

(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

EXHIBIT UKOP15 BUNDLE INDEX

No.	Document	Date	Pages
1.	Screenshot of web link https://ukop.azurewebsites.net	11 November 2024	3
2.	Email from Claimants' solicitors to xr-legal@riseup.net at 12:22pm	24 October 2024	4-15
3.	Email from Claimants' solicitors to juststopoil@protonmail.com ; info@juststopoil.org and juststopoilpress@protonmail.com at 12:22pm	24 October 2024	16-27
4.	Email delivery receipts	24 October 2024	28-29

5.	Email from xr-legal@riseup.net to Claimants' solicitors at 12:23pm	24 October 2024	30
6.	Email from Claimants' solicitors to xr-legal@riseup.net at 17:52pm	4 November 2024	31-43
7.	Email from Claimants' solicitors to juststopoil@protonmail.com ; info@juststopoil.org and juststopoilpress@protonmail.com at 17:49pm	4 November 2024	44-56
8.	Email delivery receipts	4 November 2024	57-58
9.	Email from xr-legal@riseup.net to Claimants' solicitors at 17:53pm	4 November 2024	59
10.	Email from Claimants' solicitors to xr-legal@riseup.net at 11:33am	11 November 2024	60-73
11.	Email from Claimants' solicitors to juststopoil@protonmail.com ; info@juststopoil.org and juststopoilpress@protonmail.com at 11:32am	11 November 2024	74-87
12.	Email delivery receipts	11 November 2024	88-89
13.	Email from xr-legal@riseup.net to Claimants' solicitors at 11:33am	11 November 2024	90

ukop.azurewebsites.net - /

4/13/2022	9:01 AM	270368	(2022.04.08) Final Note from Injunction Hearing dated 08 April 2022 - 103362492 1.PDF
4/25/2022	4:16 PM	304635	(2022.04.25) Claimants Solicitors Note of Return Date Injunction Hearing dated 20 April 2022 - 103566927 1.PDF
4/5/2023	3:45 PM	3468912	Application notice- dated 04.04.23- for return hearing on 20.04.23 - 110797879 1.pdf
11/4/2024	4:41 PM	153722	Application notice- dated 04.11.24- for review of final injunction Order 2024.pdf
4/19/2022	3:23 PM	84022730	Bundle 1 of 2 for Return Date Hearing on 20 April 2022 (comprising the Bundle for Interim Injunction Hearing on 8 Apr
4/19/2022	3:24 PM	90211815	Bundle 2 of 2 for Return Date Hearing on 20 April 2022 (as updated on 19 April 2022) - 103442287 1.pdf
9/29/2023	3:50 PM	4149429	Bundle of Authorities for Application for Summary Judgment.pdf
4/17/2023	11:26 AM	2325296	Bundle of Authorities for Return Date Hearing on 20 April 2023.pdf
9/29/2023	3:50 PM	68020	Claimant's skeleton argument for Application for Summary Judgment.docx
4/14/2022	3:00 PM	389745	Claimant's skeleton argument for return date hearing on 20.4.2022.pdf
4/17/2023	11:26 AM	189540	Claimants' Skeleton Argument for Return Date Hearing on 20 April 2023.pdf
4/8/2022	7:45 PM	887760	Defendant Response Pack - 103297040 1.pdf
11/4/2024	4:41 PM	19227	Draft Order - dated 04.11.24- for review of final injunction Order 2024.docx
7/10/2023	4:44 PM	1566913	Draft Order for Claimants Summary Judgment Application dated 7 July 2023 - 112689563 1.PDF
4/8/2022	7:28 PM	1061012	Draft Order for Return Date Hearing (08.04.2022) - 103296915 1.DOCX
4/5/2023	3:47 PM	1724018	Draft Order for Return Date Hearing on 20.04.23 - dated 04.04.23 - 110800165 1.pdf
7/11/2023	10:09 AM	7660669	Exhibit UKOP10 - 112418041 1.pdf
9/27/2023	11:37 AM	3163596	Exhibit UKOP11 - 112805652 1.pdf
9/27/2023	1:50 PM	64090567	Exhibit UKOP12 - 114360329 1.pdf
11/4/2024	4:47 PM	126110953	Exhibit UKOP14.pdf
4/5/2023	3:51 PM	88150000	Exhibit UKOP6 - 110755402 1.pdf
4/5/2023	3:52 PM	397591	Exhibit UKOP7 - 110744707 1.pdf
7/11/2023	10:09 AM	76198598	Exhibit UKOP9 - 112555309 1.pdf
9/27/2023	11:37 AM	287645	Fifth Witness Statement of John Michael Armstrong dated 22 September 2023 - 114373547 1.pdf
10/13/2023	11:02 AM	1014976	Final Sealed Order dated 12 October 2023 in relation to the application for summary judgment.pdf
4/21/2022	9:30 AM	1515942	Final Sealed Order for Return Date Hearing - (20.04.2022) - 103487582 1.PDF
9/27/2023	11:37 AM	259226	First Witness Statement of Antony Douglas Phillips dated 24 July 2023 - 113030926 1.pdf
4/8/2022	7:28 PM	4712819	First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022 together with Exhibit UKOP3 - 103
7/10/2023	4:44 PM	404212	Fourth Witness Statement of John Armstrong dated 6 July 2023 - 112644075 1.PDF
10/8/2024	10:29 AM	1048540	Notice of appointment to fix a date for the hearing dated 2 October 2024.pdf
10/23/2024	10:00 AM	127180	Notice of Hearing Date dated 23 October 2024.pdf
10/4/2023	11:14 AM	529121	Notice of Hearing from Claimant's Application for Summary Judgment dated 3 October 2023.pdf
9/27/2023	1:51 PM	42712595	PT-2022-000303 - EB1 Bundle 1 of 3 - Exhibit Bundle for Application for Summary Judgment - 114283607 2.pdf
9/27/2023	1:53 PM	351457212	PT-2022-000303 - EB2 Bundle 2 of 3 - Exhibit Bundle for Application for Summary Judgment - 114461165 1.pdf
9/27/2023	1:52 PM	70565567	PT-2022-000303 - EB3 Bundle 3 of 3 - Exhibit Bundle for Application for Summary Judgment - 114461173 1.pdf
4/8/2022	7:28 PM	991217	PT-2022-000303 - Application Notice for Interim Injunction Hearing dated 7 April 2022 - 103296911 1.PDF
4/17/2023	10:19 AM	178506009	PT-2022-000303 - Bundle 1 of 2 (Sections A, B, C & D) for Return Date Hearing on 20 April 2023 - 110913605 1.pdf
4/17/2023	10:19 AM	128567277	PT-2022-000303 - Bundle 2 of 2 (Sections E & F) for Return Date Hearing on 20 April 2023 - 110979467 1.pdf
9/27/2023	1:51 PM	77726087	PT-2022-000303 - Bundle for Use at Hearing of Application for Summary Judgment - 114461162 1.pdf
4/11/2022	3:10 PM	127841	PT-2022-000303 - Sealed Application Notice - Return Date - 08.04.2022 - 103313587 1.PDF
4/11/2022	3:10 PM	1141844	PT-2022-000303 - Sealed Claim Form - without rider - 11.04.2022 - 103313439 1.PDF
10/4/2023	2:00 PM	97759798	PT-2022-000303- Revised Bundle for Use at Hearing of Application for Summary Judgment.pdf
11/6/2024	10:55 AM	1476949	Sealed Application Notice dated 04.11.24- for review of final injunction Order 2024.pdf
11/11/2024	10:30 AM	206819	Sealed Application Notice dated 4 November 2024 for review of final injunction Order 2024.pdf
7/10/2023	4:44 PM	3200464	Sealed Application Notice - Claimants Summary Judgment Application dated 7 July 2023 containing details of listing ap
7/18/2023	12:04 PM	5203376	Sealed Application Notice- Claimants Summary Judgment Application dated 7 July 2023 containing Notice of hearing - 11
4/24/2023	9:19 AM	1966334	Sealed Order dated 21 April 2023 in relation to Return Date Hearing on 20 April 2023 - 111142819 1.PDF
4/12/2022	10:38 AM	3631509	Sealed Order dated 8 April 2022 in relation to interim injunction hearing - 103338343 1.PDF
4/5/2023	3:51 PM	265683	Second Witness Statement of Peter Malcolm Davis- dated 05.04.23 - 110813940 1.pdf
11/4/2024	4:41 PM	429056	Sixth Witness Statement of John Armstrong dated 4 November 2024.pdf
4/5/2023	3:49 PM	385903	Third Witness Statement of John Michael Armstrong- dated 05.04.23 - 110812946 1.pdf
7/10/2023	4:44 PM	460580	Third Witness Statement of Peter Davis dated 5 July 2023 - 112638588 1.PDF
11/11/2024	10:44 AM	152	web.config

Emily Neate

From: Marcus Farrell on behalf of Antony Phillips
Sent: 24 October 2024 12:22
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]

Tracking: **Recipient**
xr-legal@riseup.net
UKOP injunction

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 16 October 2023 and 8 October 2024. We adopt the definitions used in our email dated 8 October 2024 for ease.

Following the listing appointment on 9 October 2024, the Court has now issued a Notice of Hearing dated 23 October 2024 which states that the hearing to review the final injunction Order has been listed in a three day window from the 19 November 2024 with a time estimate of 2.5 hours. A copy of the Notice of Hearing can be found at the following weblink:

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Marcus Farrell <Marcus.Farrell@fieldfisher.com> **On Behalf Of** Antony Phillips

Sent: Tuesday, October 8, 2024 2:45 PM

To: xr-legal@riseup.net

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 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 email dated 16 October 2023.

As outlined in this email, at a hearing on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division, the Court granted a further order in favour of the Claimants, which grants final injunctive relief and orders related directions (the **"Order"**). A copy of the Order is available at the following weblink:

<https://ukop.azurewebsites.net>

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order, subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. As required by the Order, the Claimants have liaised with the Court to get a hearing listed and the Court has directed that a listing appointment to fix a date for the hearing should take place on 9 October 2024 at 11:00am. Further details can be found in the Notice of appointment to fix a date for the hearing, a copy of which is available at the above weblink.

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Amanda McLanaghan <Amanda.McLanaghan@fieldfisher.com> **On Behalf Of** Antony Phillips

Sent: Monday, October 16, 2023 4:30 PM

To: 'xr-legal@riseup.net' <xr-legal@riseup.net>

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 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 11 July 2023, 18 July 2023, 28 September 2023, 29 September 2023, 3 October 2023, 4 October 2023 and 5 October 2023. For ease we adopt the same definitions in this email.

Further to our email dated 5 October 2023, the Application was considered at the Hearing, which took place on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division.

At the Hearing, the Court granted a further order in favour of the Claimants which grants final injunctive relief and orders related directions. A copy of the Order made on 6 October 2023 may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Thursday, October 5, 2023 5:04 PM

To: xr-legal@riseup.net

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 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 emails dated 11 July 2023, 18 July 2023, 28 September 2023, 29 September 2023, 3 October 2023 and 4 October 2023. For ease we adopt the same definitions in this email.

As set out in our emails of 3 October 2023 and 4 October 2023, the Hearing of the Application will be heard tomorrow, 6 October 2023 at 10:30am with a time estimate of 2 and a half hours. The Court has now confirmed that the Hearing will be in Court 9 at the Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Mr Simon Gleeson sitting as a Judge of the Chancery Division.

As previously advised, the Claimants' further evidence for the Hearing, together with the additional court documents for use at the Hearing, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

As set out in our email of 4 October 2023, any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We again confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland
Sent: Wednesday, October 4, 2023 4:57 PM
To: xr-legal@riseup.net
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 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 emails dated 11 July 2023, 18 July 2023, 28 September 2023, 29 September 2023 and 3 October 2023. For ease we adopt the same definitions in this email.

As set out in our email of 3 October 2023, the Hearing of the Application will be heard on 6 October 2023 at 10:30am with a time estimate of 2 and a half hours and with the Court room TBC.

We confirm that the Notice of Hearing attached to our email dated 3 October 2023 has now been made available at the following weblink:

<https://ukop.azurewebsites.net>

Please note that in advance of the Hearing, and by way of service, the following additional documents have been added to the main bundle for use at the Hearing (and which contains the Court documents together with the further evidence relied upon by the Claimants):

- (a) Certificate of Service relating the Bundle and Exhibit Bundles for Hearing, First Witness Statement of Antony Douglas Phillips, Fifth Witness Statement of John Michael Armstrong and Exhibits UKOP11 and UKOP12;
- (b) Certificate of Service relating to the Skeleton Argument and Bundle of Authorities for the Hearing; and
- (c) Transcript of the Return Date Judgment on 20 April 2023.

The above documents have been added at tabs 30, 31 and 33, and the main bundle has therefore been re-uploaded to the above weblink and labelled "PT-2022-000303- Revised Bundle for Use at Hearing of Application for Summary Judgment" (the "**Main Bundle**"). The index to the Main Bundle has also been updated to reflect the addition of the above documents.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953





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

Sent: Tuesday, October 3, 2023 6:36 PM

To: xr-legal@riseup.net

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 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 emails dated 11 July 2023, 18 July 2023, 28 September 2023 and 29 September 2023. For ease we adopt the same definitions in this email.

In our email of 29 September 2023 we confirmed that the Hearing of the Application would take place tomorrow, Wednesday, 4 October 2023. However, we have now been informed by the Court that the Hearing of the Application has instead been moved to an alternative date and will now be heard on **6 October 2023 at 10:30am** with a time estimate of 2 and a half hours and with the Court room TBC.

We attach the Notice of Hearing confirming the new listing by way of service. A copy will also be made available at the following weblink:-

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Friday, September 29, 2023 5:54 PM

To: xr-legal@riseup.net

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 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 emails dated 11 July 2023, 18 July 2023 and 28 September 2023. For ease, we adopt the same definitions in this email.

We have been informed by the Court that the Hearing of the Application will take place on Wednesday, 4 October 2023, with the time TBC and the Court number TBC.

By way of service, we confirm that the Claimants' skeleton argument for the Hearing and the bundle of authorities that the Claimants will be relying upon at the Hearing (and reference to which is made in the Claimants' Skeleton argument) can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

A copy of the Claimants' skeleton argument has also been attached to this email.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D:+44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland
Sent: Thursday, September 28, 2023 10:57 AM
To: xr-legal@riseup.net
Cc: UKOP injunction <UKOPinjunction@fieldfisher.com>; Faye Hyland <Faye.Hyland@fieldfisher.com>
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 emails dated 11 July 2023 and 18 July 2023. For ease, we adopt the same definitions in this email.

As set out in our email of 18 July 2023, 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 (the "**Hearing**").

By way of service, we confirm that the bundles for use at the Hearing, and which contain the Court documents together with the further evidence relied upon by the Claimants (the "**Bundles**"), can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

The Bundles are named as follows:

- (1) PT-2022-000303- Bundle for Use at Hearing of Application for Summary Judgment;
- (2) PT-2022-000303- EB1 Bundle 1 of 3- Exhibit Bundle for Application for Summary Judgment;
- (3) PT-2022-000303- EB2 Bundle 2 of 3- Exhibit Bundle for Application for Summary Judgment; and

(4) PT-2022-000303- EB3 Bundle 3 of 3- Exhibit Bundle for Application for Summary Judgment.

Please note that the Bundles contain (at tabs 25, 26, 28 and 29 of the main bundle labelled " PT-2022-000303- Bundle for Use at Hearing of Application for Summary Judgment") a copy of the following documents by way of further evidence:

- (a) First Witness Statement of Antony Douglas Phillips;
- (b) Fifth Witness Statement of John Michael Armstrong;
- (c) Certificate of Service relating to the Application, draft order for the Application, Third Witness Statement of Peter Malcolm Davis, Fourth Witness Statement of John Michael Armstrong and Exhibits UKOP9 and UKOP10; and
- (d) Certificate of Service relating to the sealed notice of the Application with the Notice of Hearing.

The exhibits referred to in the witness statements set out at (a) and (b) above can be found in the bundles labelled "PT-2022-000303- EB2 Bundle 2 of 3- Exhibit Bundle for Application for Summary Judgment" and "PT-2022-000303- EB3 Bundle 3 of 3- Exhibit Bundle for Application for Summary Judgment". However, copies of the following documents have also been separately uploaded to the above weblink for ease of reference, and by way of service:

- (a) First Witness Statement of Antony Douglas Phillips and accompanying exhibit UKOP11; and
- (b) Fifth Witness Statement of John Michael Armstrong and accompanying exhibit UKOP12

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



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Tuesday, July 18, 2023 4:35 PM

To: xr-legal@riseup.net

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 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.

A copy of the Notice of hearing, along with the Application, can be found at the following weblink:

<https://ukop.azurewebsites.net>

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



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,

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



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Tuesday, April 25, 2023 3:25 PM

To: xr-legal@riseup.net

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

As set out in our email dated 19 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. A copy of the Order made on 20 April 2023 may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Yours faithfully,

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies
Sent: Wednesday, April 19, 2023 6:19 PM
To: xr-legal@riseup.net
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 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 and 17 April 2023. For ease, we adopt the same definitions in this email.

The Court has now confirmed that the Return Date hearing will be heard tomorrow, 20 April 2023, at 10:30am in Court 3 of the Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Mr Justice Rajah.

As we have previously advised, the Claimants' further evidence for the Return Date hearing, together with the additional court documents for use at the Return Date, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

As set out in our email of 17 April 2023, any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument, and we again confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to **UKOPinjunction@fieldfisher.com**.

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies
Sent: Monday, April 17, 2023 3:35 PM
To: xr-legal@riseup.net
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 Extinction Rebellion,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We refer to our email dated 6 April 2023, which is set out below. For ease, we adopt the same definitions in this email.

We confirm that the bundle for use at the Return Date, which contains the Court Documents together with the further evidence relied upon by the Claimants (the **"Bundle"**), can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

Please note that the Bundle contains (at tabs 31,32 and 35) a copy of: (a) the Claimants' Certificate of Service dated 14 April 2023 for filing the sealed Application Notice dated 4 April 2023, the draft Order for the Return Date hearing and the Claimants' further evidence for the Return Date hearing (as referred to in our email below dated 6 April 2023); (b) the Third Witness Statement of Daniel Owen Christopher Talfan Davies dated 14 April 2023 and (c) Exhibit UKOP8 dated 14 April 2023.

We attach to this email a copy of the Claimants' skeleton argument in relation to the Return Date, a copy of which has also been added to the weblink referred to above. A copy of the bundle of authorities upon which the Claimants will rely at the Return Date, and which are referred to in the skeleton argument, has also been uploaded to the weblink referred to above.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Thursday, April 6, 2023 2:08 PM

To: xr-legal@riseup.net

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 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



Emily Neate

From: Marcus Farrell on behalf of Antony Phillips
Sent: 24 October 2024 12:22
To: juststopoil@protonmail.com; info@juststopoil.org;
juststopoilpress@protonmail.com
Cc: UKOP injunction
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Just Stop Oil,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the "**Claimants**").

We write further to our emails dated 16 October 2023 and 8 October 2024. We adopt the definitions used in our email dated 8 October 2024 for ease.

Following the listing appointment on 9 October 2024, the Court has now issued a Notice of Hearing dated 23 October 2024 which states that the hearing to review the final injunction Order has been listed in a three day window from the 19 November 2024 with a time estimate of 2.5 hours. A copy of the Notice of Hearing can be found at the following weblink:

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Marcus Farrell <Marcus.Farrell@fieldfisher.com> **On Behalf Of** Antony Phillips
Sent: Tuesday, October 8, 2024 2:45 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,

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 email dated 16 October 2023.

As outlined in this email, at a hearing on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division, the Court granted a further order in favour of the Claimants, which grants final injunctive relief and orders related directions (the **"Order"**). A copy of the Order is available at the following weblink:

<https://ukop.azurewebsites.net>

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order, subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. As required by the Order, the Claimants have liaised with the Court to get a hearing listed and the Court has directed that a listing appointment to fix a date for the hearing should take place on 9 October 2024 at 11:00am. Further details can be found in the Notice of appointment to fix a date for the hearing, a copy of which is available at the above weblink.

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Amanda McLanaghan <Amanda.McLanaghan@fieldfisher.com> **On Behalf Of** Antony Phillips

Sent: Monday, October 16, 2023 4:32 PM

To: 'juststopoilpress@protonmail.com' <juststopoilpress@protonmail.com>; 'info@juststopoil.org' <info@juststopoil.org>; 'juststopoil@protonmail.com' <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,

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 11 July 2023, 18 July 2023, 28 September 2023, 29 September 2023 (sent to juststopoilpress@protonmail.com and juststopoil@protonmail.com), 2 October 2023 (sent to info@juststopoil.org), 3 October 2023, 4 October 2023 and 5 October 2023. For ease we adopt the same definitions in this email.

Further to our email dated 5 October 2023, the Application was considered at the Hearing, which took place on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division.

At the Hearing, the Court granted a further order in favour of the Claimants which grants final injunctive relief and orders related directions. A copy of the Order made on 6 October 2023 may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Thursday, October 5, 2023 5:04 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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023, 18 July 2023, 28 September 2023, and 29 September 2023 (sent to juststopoilpress@protonmail.com and juststopoil@protonmail.com), 2 October 2023 (sent to info@juststopoil.org), 3 October 2023 and 4 October 2023. For ease, we adopt the same definitions in this email.

As set out in our emails of 3 October 2023 and 4 October 2023, the Hearing of the Application will be heard tomorrow, 6 October 2023 at 10:30am with a time estimate of 2 and a half hours. The Court has now confirmed that the Hearing will be in Court 9 at the Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Mr Simon Gleeson sitting as a Judge of the Chancery Division.

As previously advised, the Claimants' further evidence for the Hearing, together with the additional court documents for use at the Hearing, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

As set out in our email of 4 October 2023, any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We again confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland
Sent: Wednesday, October 4, 2023 4:57 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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023, 18 July 2023, 28 September 2023, and 29 September 2023 (sent to juststopoilpress@protonmail.com and juststopoil@protonmail.com), 2 October 2023 (sent to info@juststopoil.org) and 3 October 2023. For ease, we adopt the same definitions in this email.

As set out in our email of 3 October 2023, the Hearing of the Application will be heard on 6 October 2023 at 10:30am with a time estimate of 2 and a half hours and with the Court room TBC.

We confirm that the Notice of Hearing attached to our email dated 3 October 2023 has now been made available at the following weblink:

<https://ukop.azurewebsites.net>

Please note that in advance of the Hearing, and by way of service, the following additional documents have been added to the main bundle for use at the Hearing (and which contains the Court documents together with the further evidence relied upon by the Claimants):

- (a) Certificate of Service relating the Bundle and Exhibit Bundles for Hearing, First Witness Statement of Antony Douglas Phillips, Fifth Witness Statement of John Michael Armstrong and Exhibits UKOP11 and UKOP12;
- (b) Certificate of Service relating to the Skeleton Argument and Bundle of Authorities for the Hearing; and
- (c) Transcript of the Return Date Judgment on 20 April 2023.

The above documents have been added at tabs 30, 31 and 33, and the main bundle has therefore been re-uploaded to the above weblink and labelled "PT-2022-000303- Revised Bundle for Use at Hearing of Application for Summary Judgment" (the "**Main Bundle**"). The index to the Main Bundle has also been updated to reflect the addition of the above documents.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953





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

Sent: Tuesday, October 3, 2023 6:39 PM

To: 'juststopoilpress@protonmail.com' <juststopoilpress@protonmail.com>; 'info@juststopoil.org' <info@juststopoil.org>; 'juststopoil@protonmail.com' <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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023, 18 July 2023, 28 September 2023, and 29 September 2023 (sent to juststopoilpress@protonmail.com and juststopoil@protonmail.com) and 2 October 2023 (sent to info@juststopoil.org). For ease, we adopt the same definitions in this email.

In our email of 29 September 2023 we confirmed that the Hearing of the Application would take place tomorrow, Wednesday, 4 October 2023. However, we have now been informed by the Court that the Hearing of the Application has instead been moved to an alternative date and will now be heard on **6 October 2023 at 10:30am** with a time estimate of 2 and a half hours and with the Court room TBC.

We attach the Notice of Hearing confirming the new listing by way of service. A copy will also be made available at the following weblink:-

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Friday, September 29, 2023 6:00 PM

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

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 Just Stop Oil,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023, 18 July 2023 and 28 September 2023. For ease, we adopt the same definitions in this email.

We have been informed by the Court that the Hearing of the Application will take place on Wednesday, 4 October 2023, with the time TBC and the Court number TBC.

By way of service, we confirm that the Claimants' skeleton argument for the Hearing and the bundle of authorities that the Claimants will be relying upon at the Hearing (and reference to which is made in the Claimants' Skeleton argument) can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

A copy of the Claimants' skeleton argument has also been attached to this email.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D:+44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Thursday, September 28, 2023 11:07 AM

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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023 and 18 July 2023. For ease, we adopt the same definitions in this email.

As set out in our email of 18 July 2023, 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 (the "**Hearing**").

By way of service, we confirm that the bundles for use at the Hearing, and which contain the Court documents together with the further evidence relied upon by the Claimants (the "**Bundles**"), can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

The Bundles are named as follows:

- (1) PT-2022-000303- Bundle for Use at Hearing of Application for Summary Judgment;
- (2) PT-2022-000303- EB1 Bundle 1 of 3- Exhibit Bundle for Application for Summary Judgment;
- (3) PT-2022-000303- EB2 Bundle 2 of 3- Exhibit Bundle for Application for Summary Judgment; and
- (4) PT-2022-000303- EB3 Bundle 3 of 3- Exhibit Bundle for Application for Summary Judgment.

Please note that the Bundles contain (at tabs 25, 26, 28 and 29 of the main bundle labelled " PT-2022-000303- Bundle for Use at Hearing of Application for Summary Judgment") a copy of the following documents by way of further evidence:

- (a) First Witness Statement of Antony Douglas Phillips;
- (b) Fifth Witness Statement of John Michael Armstrong;
- (c) Certificate of Service relating to the Application, draft order for the Application, Third Witness Statement of Peter Malcolm Davis, Fourth Witness Statement of John Michael Armstrong and Exhibits UKOP9 and UKOP10; and
- (d) Certificate of Service relating to the sealed notice of the Application with the Notice of Hearing.

The exhibits referred to in the witness statements set out at (a) and (b) above can be found in the bundles labelled "PT-2022-000303- EB2 Bundle 2 of 3- Exhibit Bundle for Application for Summary Judgment" and "PT-2022-000303- EB3 Bundle 3 of 3- Exhibit Bundle for Application for Summary Judgment". However, copies of the following documents have also been separately uploaded to the above weblink for ease of reference, and by way of service:

- (a) First Witness Statement of Antony Douglas Phillips and accompanying exhibit UKOP11; and
- (b) Fifth Witness Statement of John Michael Armstrong and accompanying exhibit UKOP12

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



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Tuesday, July 18, 2023 4:35 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,

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.

A copy of the Notice of hearing, along with the Application, can be found at the following weblink:

<https://ukop.azurewebsites.net>

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



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,

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



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Tuesday, April 25, 2023 3:26 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,

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

As set out in our email dated 19 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. A copy of the Order made on 20 April 2023 may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies
Sent: Wednesday, April 19, 2023 6:20 PM
To: juststopoil@protonmail.co.uk; juststopoilpress@protonmail.com; 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,

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

The Court has now confirmed that the Return Date hearing will be heard tomorrow, 20 April 2023, at 10:30am in Court 3 of the Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Mr Justice Rajah.

As we have previously advised, the Claimants' further evidence for the Return Date hearing, together with the additional court documents for use at the Return Date, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

As set out in our email of 17 April 2023, any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument, and we again confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to **UKOPinjunction@fieldfisher.com**.

Yours faithfully,

Fieldfisher

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



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies
Sent: Monday, April 17, 2023 3:37 PM
To: juststopoil@protonmail.co.uk; juststopoilpress@protonmail.com; 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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the "**Claimants**").

We refer to our email dated 6 April 2023, which is set out below. For ease, we adopt the same definitions in this email.

We confirm that the bundle for use at the Return Date, which contains the Court Documents together with the further evidence relied upon by the Claimants (the **"Bundle"**), can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

Please note that the Bundle contains (at tabs 31,32 and 35) a copy of: (a) the Claimants' Certificate of Service dated 14 April 2023 for filing the sealed Application Notice dated 4 April 2023, the draft Order for the Return Date hearing and the Claimants' further evidence for the Return Date hearing (as referred to in our email below dated 6 April 2023); (b) the Third Witness Statement of Daniel Owen Christopher Talfan Davies dated 14 April 2023 and (c) Exhibit UKOP8 dated 14 April 2023.

We attach to this email a copy of the Claimants' skeleton argument in relation to the Return Date, a copy of which has also been added to the weblink referred to above. A copy of the bundle of authorities upon which the Claimants will rely at the Return Date, and which are referred to in the skeleton argument, has also been uploaded to the weblink referred to above.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Thursday, April 6, 2023 2:09 PM

To: juststopoil@protonmail.co.uk; juststopoilpress@protonmail.com; 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,

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



Emily Neate

From: Microsoft Outlook
<MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@fieldfisher.onmicrosoft.com>
Sent: 24 October 2024 12:22
To: Marcus Farrell
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments: Untitled attachment.txt; (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

xr-legal@riseup.net (xr-legal@riseup.net)

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

Emily Neate

From: Microsoft Outlook
<MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@fieldfisher.onmicrosoft.com>
Sent: 24 October 2024 12:23
To: Marcus Farrell
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments: Untitled attachment.txt; (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

juststopoil@protonmail.com (juststopoil@protonmail.com)

info@juststopoil.org (info@juststopoil.org)

juststopoilpress@protonmail.com (juststopoilpress@protonmail.com)

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

Emily Neate

From: xr-legal@riseup.net
Sent: 24 October 2024 12:23
To: Marcus Farrell
Subject: thAutoreply 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

Emily Neate

From: Faye Hyland
Sent: 04 November 2024 17:52
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 write further to our emails dated 16 October 2023, 8 October 2024 and 24 October 2024. We adopt the definitions used in our email dated 8 October 2024 for ease.

As outlined in our email dated 24 October 2024, the hearing to review the final injunction Order has been listed in a three day window from the 19 November 2024 with a time estimate of 2.5 hours (the **"Hearing"**).

In advance of the Hearing, the Claimants have made an application to Court that:

1. any requirements on the Claimants in the interim orders made in these proceedings to continue to fix copies of documents in these proceedings in clear transparent sealed containers by way of service be dispensed with; and
2. that paragraph 6(b) of the Order be amended such that, prospectively, the Claimants be permitted to affix copies of the Order at a minimum number of 2 prominent locations on the perimeter of each of the Sites whether in clear transparent sealed containers or by any other method.

(the **"Application"**).

The Claimants have requested that the Application be dealt with at the upcoming Hearing. The Claimants have also filed further evidence for the Hearing and in support of the Application at Court in accordance with paragraph 13 of the Order.

A copy of the Application, comprising an Application Notice and Draft Order, along with the further evidence in the form of:

1. Sixth Witness Statement of John Michael Armstrong dated 4 November 2024; and
2. Exhibit UKOP14.

can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

Further, any individual who may wish to come forward to defend the Application is referred to Practice Direction 23A paragraph 7.2 of the Civil Procedure Rules in that if the defendant to an application wishes to rely on written evidence at the hearing of the application, he must file and serve the written evidence as soon as possible. Practice Direction 23A paragraph 6.4 of the Civil Procedure Rules provides that documents which are required to be filed and served in advance of a hearing must be filed and served no later than 4pm at least 2 days before that hearing unless the Court directs otherwise.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Consultant

D: +44 330 460 6953



From: Marcus Farrell <Marcus.Farrell@fieldfisher.com> **On Behalf Of** Antony Phillips

Sent: Thursday, October 24, 2024 12:22 PM

To: xr-legal@riseup.net

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 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 16 October 2023 and 8 October 2024. We adopt the definitions used in our email dated 8 October 2024 for ease.

Following the listing appointment on 9 October 2024, the Court has now issued a Notice of Hearing dated 23 October 2024 which states that the hearing to review the final injunction Order has been listed in a three day window from the 19 November 2024 with a time estimate of 2.5 hours. A copy of the Notice of Hearing can be found at the following weblink:

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Marcus Farrell <Marcus.Farrell@fieldfisher.com> **On Behalf Of** Antony Phillips

Sent: Tuesday, October 8, 2024 2:45 PM

To: xr-legal@riseup.net

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 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 email dated 16 October 2023.

As outlined in this email, at a hearing on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division, the Court granted a further order in favour of the Claimants, which grants final injunctive relief and orders related directions (the "**Order**"). A copy of the Order is available at the following weblink:

<https://ukop.azurewebsites.net>

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order, subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. As required by the Order, the Claimants have liaised with the Court to get a hearing listed and the Court has directed that a listing appointment to fix a date for the hearing should take place on 9 October 2024 at 11:00am. Further details can be found in the Notice of appointment to fix a date for the hearing, a copy of which is available at the above weblink.

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Amanda McLanaghan <Amanda.McLanaghan@fieldfisher.com> **On Behalf Of** Antony Phillips

Sent: Monday, October 16, 2023 4:30 PM

To: 'xr-legal@riseup.net' <xr-legal@riseup.net>

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 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 11 July 2023, 18 July 2023, 28 September 2023, 29 September 2023, 3 October 2023, 4 October 2023 and 5 October 2023. For ease we adopt the same definitions in this email.

Further to our email dated 5 October 2023, the Application was considered at the Hearing, which took place on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division.

At the Hearing, the Court granted a further order in favour of the Claimants which grants final injunctive relief and orders related directions. A copy of the Order made on 6 October 2023 may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Thursday, October 5, 2023 5:04 PM

To: xr-legal@riseup.net

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 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 emails dated 11 July 2023, 18 July 2023, 28 September 2023, 29 September 2023, 3 October 2023 and 4 October 2023. For ease we adopt the same definitions in this email.

As set out in our emails of 3 October 2023 and 4 October 2023, the Hearing of the Application will be heard tomorrow, 6 October 2023 at 10:30am with a time estimate of 2 and a half hours. The Court has now confirmed that the Hearing will be in Court 9 at the Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Mr Simon Gleeson sitting as a Judge of the Chancery Division.

As previously advised, the Claimants' further evidence for the Hearing, together with the additional court documents for use at the Hearing, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

As set out in our email of 4 October 2023, any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We again confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Wednesday, October 4, 2023 4:57 PM

To: xr-legal@riseup.net

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 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 emails dated 11 July 2023, 18 July 2023, 28 September 2023, 29 September 2023 and 3 October 2023. For ease we adopt the same definitions in this email.

As set out in our email of 3 October 2023, the Hearing of the Application will be heard on 6 October 2023 at 10:30am with a time estimate of 2 and a half hours and with the Court room TBC.

We confirm that the Notice of Hearing attached to our email dated 3 October 2023 has now been made available at the following weblink:

<https://ukop.azurewebsites.net>

Please note that in advance of the Hearing, and by way of service, the following additional documents have been added to the main bundle for use at the Hearing (and which contains the Court documents together with the further evidence relied upon by the Claimants):

- (a) Certificate of Service relating the Bundle and Exhibit Bundles for Hearing, First Witness Statement of Antony Douglas Phillips, Fifth Witness Statement of John Michael Armstrong and Exhibits UKOP11 and UKOP12;
- (b) Certificate of Service relating to the Skeleton Argument and Bundle of Authorities for the Hearing; and
- (c) Transcript of the Return Date Judgment on 20 April 2023.

The above documents have been added at tabs 30, 31 and 33, and the main bundle has therefore been re-uploaded to the above weblink and labelled "PT-2022-000303- Revised Bundle for Use at Hearing of Application for Summary Judgment" (the "**Main Bundle**"). The index to the Main Bundle has also been updated to reflect the addition of the above documents.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



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

Sent: Tuesday, October 3, 2023 6:36 PM

To: xr-legal@riseup.net

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 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 emails dated 11 July 2023, 18 July 2023, 28 September 2023 and 29 September 2023. For ease we adopt the same definitions in this email.

In our email of 29 September 2023 we confirmed that the Hearing of the Application would take place tomorrow, Wednesday, 4 October 2023. However, we have now been informed by the Court that the Hearing of the Application has instead been moved to an alternative date and will now be heard on **6 October 2023 at 10:30am** with a time estimate of 2 and a half hours and with the Court room TBC.

We attach the Notice of Hearing confirming the new listing by way of service. A copy will also be made available at the following weblink:-

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Friday, September 29, 2023 5:54 PM

To: xr-legal@riseup.net

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 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 emails dated 11 July 2023, 18 July 2023 and 28 September 2023. For ease, we adopt the same definitions in this email.

We have been informed by the Court that the Hearing of the Application will take place on Wednesday, 4 October 2023, with the time TBC and the Court number TBC.

By way of service, we confirm that the Claimants' skeleton argument for the Hearing and the bundle of authorities that the Claimants will be relying upon at the Hearing (and reference to which is made in the Claimants' Skeleton argument) can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

A copy of the Claimants' skeleton argument has also been attached to this email.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D:+44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Thursday, September 28, 2023 10:57 AM

To: xr-legal@riseup.net

Cc: UKOP injunction <UKOPinjunction@fieldfisher.com>; Faye Hyland <Faye.Hyland@fieldfisher.com>

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 emails dated 11 July 2023 and 18 July 2023. For ease, we adopt the same definitions in this email.

As set out in our email of 18 July 2023, 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 (the "**Hearing**").

By way of service, we confirm that the bundles for use at the Hearing, and which contain the Court documents together with the further evidence relied upon by the Claimants (the "**Bundles**"), can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

The Bundles are named as follows:

(1) PT-2022-000303- Bundle for Use at Hearing of Application for Summary Judgment;

- (2) PT-2022-000303- EB1 Bundle 1 of 3- Exhibit Bundle for Application for Summary Judgment;
- (3) PT-2022-000303- EB2 Bundle 2 of 3- Exhibit Bundle for Application for Summary Judgment; and
- (4) PT-2022-000303- EB3 Bundle 3 of 3- Exhibit Bundle for Application for Summary Judgment.

Please note that the Bundles contain (at tabs 25, 26, 28 and 29 of the main bundle labelled " PT-2022-000303- Bundle for Use at Hearing of Application for Summary Judgment") a copy of the following documents by way of further evidence:

- (a) First Witness Statement of Antony Douglas Phillips;
- (b) Fifth Witness Statement of John Michael Armstrong;
- (c) Certificate of Service relating to the Application, draft order for the Application, Third Witness Statement of Peter Malcolm Davis, Fourth Witness Statement of John Michael Armstrong and Exhibits UKOP9 and UKOP10; and
- (d) Certificate of Service relating to the sealed notice of the Application with the Notice of Hearing.

The exhibits referred to in the witness statements set out at (a) and (b) above can be found in the bundles labelled "PT-2022-000303- EB2 Bundle 2 of 3- Exhibit Bundle for Application for Summary Judgment" and "PT-2022-000303- EB3 Bundle 3 of 3- Exhibit Bundle for Application for Summary Judgment". However, copies of the following documents have also been separately uploaded to the above weblink for ease of reference, and by way of service:

- (a) First Witness Statement of Antony Douglas Phillips and accompanying exhibit UKOP11; and
- (b) Fifth Witness Statement of John Michael Armstrong and accompanying exhibit UKOP12

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



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Tuesday, July 18, 2023 4:35 PM

To: xr-legal@riseup.net

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 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.

A copy of the Notice of hearing, along with the Application, can be found at the following weblink:

<https://ukop.azurewebsites.net>

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



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,

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



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Tuesday, April 25, 2023 3:25 PM

To: xr-legal@riseup.net

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

As set out in our email dated 19 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. A copy of the Order made on 20 April 2023 may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Yours faithfully,

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057





From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies
Sent: Wednesday, April 19, 2023 6:19 PM
To: xr-legal@riseup.net
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 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 and 17 April 2023. For ease, we adopt the same definitions in this email.

The Court has now confirmed that the Return Date hearing will be heard tomorrow, 20 April 2023, at 10:30am in Court 3 of the Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Mr Justice Rajah.

As we have previously advised, the Claimants' further evidence for the Return Date hearing, together with the additional court documents for use at the Return Date, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

As set out in our email of 17 April 2023, any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument, and we again confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to **UKOPinjunction@fieldfisher.com**.

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies
Sent: Monday, April 17, 2023 3:35 PM
To: xr-legal@riseup.net
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 Extinction Rebellion,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the "**Claimants**").

We refer to our email dated 6 April 2023, which is set out below. For ease, we adopt the same definitions in this email.

We confirm that the bundle for use at the Return Date, which contains the Court Documents together with the further evidence relied upon by the Claimants (the "**Bundle**"), can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

Please note that the Bundle contains (at tabs 31,32 and 35) a copy of: (a) the Claimants' Certificate of Service dated 14 April 2023 for filing the sealed Application Notice dated 4 April 2023, the draft Order for the Return Date hearing and the Claimants' further evidence for the Return Date hearing (as referred to in our email below dated 6 April 2023); (b) the Third Witness Statement of Daniel Owen Christopher Talfan Davies dated 14 April 2023 and (c) Exhibit UKOP8 dated 14 April 2023.

We attach to this email a copy of the Claimants' skeleton argument in relation to the Return Date, a copy of which has also been added to the weblink referred to above. A copy of the bundle of authorities upon which the Claimants will rely at the Return Date, and which are referred to in the skeleton argument, has also been uploaded to the weblink referred to above.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Thursday, April 6, 2023 2:08 PM

To: xr-legal@riseup.net

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 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



The image cannot be displayed. Your computer may not have enough memory to open the image, or the image may have been deleted. Restart your computer and try again.



From: Faye Hyland
Sent: 04 November 2024 17:49
To: juststopoil@protonmail.com; info@juststopoil.org;
juststopoilpress@protonmail.com
Cc: UKOP injunction
Subject: RE: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Just Stop Oil,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We write further to our emails dated 16 October 2023, 8 October 2024 and 24 October 2024. We adopt the definitions used in our email dated 8 October 2024 for ease.

As outlined in our email dated 24 October 2024, the hearing to review the final injunction Order has been listed in a three day window from the 19 November 2024 with a time estimate of 2.5 hours (the **"Hearing"**).

In advance of the Hearing, the Claimants have made an application to Court that:

1. any requirements on the Claimants in the interim orders made in these proceedings to continue to fix copies of documents in these proceedings in clear transparent sealed containers by way of service be dispensed with; and
2. that paragraph 6(b) of the Order be amended such that, prospectively, the Claimants be permitted to affix copies of the Order at a minimum number of 2 prominent locations on the perimeter of each of the Sites whether in clear transparent sealed containers or by any other method.

(the **"Application"**)

The Claimants have requested that the Application be dealt with at the upcoming Hearing. The Claimants have also filed further evidence for the Hearing and in support of the Application at Court in accordance with paragraph 13 of the Order.

A copy of the Application, comprising an Application Notice and Draft Order, along with the further evidence in the form of:

1. Sixth Witness Statement of John Michael Armstrong dated 4 November 2024; and
2. Exhibit UKOP14.

can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

Further, any individual who may wish to come forward to defend the Application is referred to Practice Direction 23A paragraph 7.2 of the Civil Procedure Rules in that if the defendant to an application wishes to rely on written evidence at the hearing of the application, he must file and serve the written evidence as soon as possible. Practice Direction 23A paragraph 6.4 of the Civil Procedure Rules provides that documents which are required to be filed and served in advance of a hearing must be filed and served no later than 4pm at least 2 days before that hearing unless the Court directs otherwise.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Consultant

D: +44 330 460 6953



From: Marcus Farrell <Marcus.Farrell@fieldfisher.com> **On Behalf Of** Antony Phillips

Sent: Thursday, October 24, 2024 12:22 PM

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

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 16 October 2023 and 8 October 2024. We adopt the definitions used in our email dated 8 October 2024 for ease.

Following the listing appointment on 9 October 2024, the Court has now issued a Notice of Hearing dated 23 October 2024 which states that the hearing to review the final injunction Order has been listed in a three day window from the 19 November 2024 with a time estimate of 2.5 hours. A copy of the Notice of Hearing can be found at the following weblink:

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908





From: Marcus Farrell <Marcus.Farrell@fieldfisher.com> **On Behalf Of** Antony Phillips
Sent: Tuesday, October 8, 2024 2:45 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,

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 email dated 16 October 2023.

As outlined in this email, at a hearing on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division, the Court granted a further order in favour of the Claimants, which grants final injunctive relief and orders related directions (the "**Order**"). A copy of the Order is available at the following weblink:

<https://ukop.azurewebsites.net>

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order, subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. As required by the Order, the Claimants have liaised with the Court to get a hearing listed and the Court has directed that a listing appointment to fix a date for the hearing should take place on 9 October 2024 at 11:00am. Further details can be found in the Notice of appointment to fix a date for the hearing, a copy of which is available at the above weblink.

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Amanda McLanaghan <Amanda.McLanaghan@fieldfisher.com> **On Behalf Of** Antony Phillips
Sent: Monday, October 16, 2023 4:32 PM
To: 'juststopoilpress@protonmail.com' <juststopoilpress@protonmail.com>; 'info@juststopoil.org' <info@juststopoil.org>; 'juststopoil@protonmail.com' <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,

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 11 July 2023, 18 July 2023, 28 September 2023, 29 September 2023 (sent to juststopoilpress@protonmail.com and juststopoil@protonmail.com), 2 October 2023 (sent to info@juststopoil.org), 3 October 2023, 4 October 2023 and 5 October 2023. For ease we adopt the same definitions in this email.

Further to our email dated 5 October 2023, the Application was considered at the Hearing, which took place on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division.

At the Hearing, the Court granted a further order in favour of the Claimants which grants final injunctive relief and orders related directions. A copy of the Order made on 6 October 2023 may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Thursday, October 5, 2023 5:04 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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023, 18 July 2023, 28 September 2023, and 29 September 2023 (sent to juststopoilpress@protonmail.com and juststopoil@protonmail.com), 2 October 2023 (sent to info@juststopoil.org), 3 October 2023 and 4 October 2023. For ease, we adopt the same definitions in this email.

As set out in our emails of 3 October 2023 and 4 October 2023, the Hearing of the Application will be heard tomorrow, 6 October 2023 at 10:30am with a time estimate of 2 and a half hours. The Court has now confirmed that the Hearing will be in Court 9 at the Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Mr Simon Gleeson sitting as a Judge of the Chancery Division.

As previously advised, the Claimants' further evidence for the Hearing, together with the additional court documents for use at the Hearing, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

As set out in our email of 4 October 2023, any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We again confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Wednesday, October 4, 2023 4:57 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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023, 18 July 2023, 28 September 2023, and 29 September 2023 (sent to juststopoilpress@protonmail.com and juststopoil@protonmail.com), 2 October 2023 (sent to info@juststopoil.org) and 3 October 2023. For ease, we adopt the same definitions in this email.

As set out in our email of 3 October 2023, the Hearing of the Application will be heard on 6 October 2023 at 10:30am with a time estimate of 2 and a half hours and with the Court room TBC.

We confirm that the Notice of Hearing attached to our email dated 3 October 2023 has now been made available at the following weblink:

<https://ukop.azurewebsites.net>

Please note that in advance of the Hearing, and by way of service, the following additional documents have been added to the main bundle for use at the Hearing (and which contains the Court documents together with the further evidence relied upon by the Claimants):

- (a) Certificate of Service relating the Bundle and Exhibit Bundles for Hearing, First Witness Statement of Antony Douglas Phillips, Fifth Witness Statement of John Michael Armstrong and Exhibits UKOP11 and UKOP12;
- (b) Certificate of Service relating to the Skeleton Argument and Bundle of Authorities for the Hearing; and
- (c) Transcript of the Return Date Judgment on 20 April 2023.

The above documents have been added at tabs 30, 31 and 33, and the main bundle has therefore been re-uploaded to the above weblink and labelled "PT-2022-000303- Revised Bundle for Use at Hearing of Application for Summary Judgment" (the "**Main Bundle**"). The index to the Main Bundle has also been updated to reflect the addition of the above documents.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



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

Sent: Tuesday, October 3, 2023 6:39 PM

To: 'juststopoilpress@protonmail.com' <juststopoilpress@protonmail.com>; 'info@juststopoil.org' <info@juststopoil.org>; 'juststopoil@protonmail.com' <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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023, 18 July 2023, 28 September 2023, and 29 September 2023 (sent to juststopoilpress@protonmail.com and juststopoil@protonmail.com) and 2 October 2023 (sent to info@juststopoil.org). For ease, we adopt the same definitions in this email.

In our email of 29 September 2023 we confirmed that the Hearing of the Application would take place tomorrow, Wednesday, 4 October 2023. However, we have now been informed by the Court that the Hearing of the Application has instead been moved to an alternative date and will now be heard on **6 October 2023 at 10:30am** with a time estimate of 2 and a half hours and with the Court room TBC.

We attach the Notice of Hearing confirming the new listing by way of service. A copy will also be made available at the following weblink:-

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953





From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland
Sent: Friday, September 29, 2023 6:00 PM
To: juststopoilpress@protonmail.com; juststopoil@protonmail.com
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 Just Stop Oil,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023, 18 July 2023 and 28 September 2023. For ease, we adopt the same definitions in this email.

We have been informed by the Court that the Hearing of the Application will take place on Wednesday, 4 October 2023, with the time TBC and the Court number TBC.

By way of service, we confirm that the Claimants' skeleton argument for the Hearing and the bundle of authorities that the Claimants will be relying upon at the Hearing (and reference to which is made in the Claimants' Skeleton argument) can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

A copy of the Claimants' skeleton argument has also been attached to this email.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D:+44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland
Sent: Thursday, September 28, 2023 11:07 AM
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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023 and 18 July 2023. For ease, we adopt the same definitions in this email.

As set out in our email of 18 July 2023, 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 (the "**Hearing**").

By way of service, we confirm that the bundles for use at the Hearing, and which contain the Court documents together with the further evidence relied upon by the Claimants (the "**Bundles**"), can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

The Bundles are named as follows:

- (1) PT-2022-000303- Bundle for Use at Hearing of Application for Summary Judgment;
- (2) PT-2022-000303- EB1 Bundle 1 of 3- Exhibit Bundle for Application for Summary Judgment;
- (3) PT-2022-000303- EB2 Bundle 2 of 3- Exhibit Bundle for Application for Summary Judgment; and
- (4) PT-2022-000303- EB3 Bundle 3 of 3- Exhibit Bundle for Application for Summary Judgment.

Please note that the Bundles contain (at tabs 25, 26, 28 and 29 of the main bundle labelled " PT-2022-000303- Bundle for Use at Hearing of Application for Summary Judgment") a copy of the following documents by way of further evidence:

- (a) First Witness Statement of Antony Douglas Phillips;
- (b) Fifth Witness Statement of John Michael Armstrong;
- (c) Certificate of Service relating to the Application, draft order for the Application, Third Witness Statement of Peter Malcolm Davis, Fourth Witness Statement of John Michael Armstrong and Exhibits UKOP9 and UKOP10; and
- (d) Certificate of Service relating to the sealed notice of the Application with the Notice of Hearing.

The exhibits referred to in the witness statements set out at (a) and (b) above can be found in the bundles labelled "PT-2022-000303- EB2 Bundle 2 of 3- Exhibit Bundle for Application for Summary Judgment" and "PT-2022-000303- EB3 Bundle 3 of 3- Exhibit Bundle for Application for Summary Judgment". However, copies of the following documents have also been separately uploaded to the above weblink for ease of reference, and by way of service:

- (a) First Witness Statement of Antony Douglas Phillips and accompanying exhibit UKOP11; and
- (b) Fifth Witness Statement of John Michael Armstrong and accompanying exhibit UKOP12

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



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland
Sent: Tuesday, July 18, 2023 4:35 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,

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.

A copy of the Notice of hearing, along with the Application, can be found at the following weblink:

<https://ukop.azurewebsites.net>

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



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,

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



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Tuesday, April 25, 2023 3:26 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,

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

As set out in our email dated 19 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. A copy of the Order made on 20 April 2023 may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Wednesday, April 19, 2023 6:20 PM

To: juststopoil@protonmail.co.uk; juststopoilpress@protonmail.com; 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,

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

The Court has now confirmed that the Return Date hearing will be heard tomorrow, 20 April 2023, at 10:30am in Court 3 of the Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Mr Justice Rajah.

As we have previously advised, the Claimants' further evidence for the Return Date hearing, together with the additional court documents for use at the Return Date, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

As set out in our email of 17 April 2023, any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument, and we again confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to **UKOPinjunction@fieldfisher.com**.

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies
Sent: Monday, April 17, 2023 3:37 PM
To: juststopoil@protonmail.co.uk; juststopoilpress@protonmail.com; 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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We refer to our email dated 6 April 2023, which is set out below. For ease, we adopt the same definitions in this email.

We confirm that the bundle for use at the Return Date, which contains the Court Documents together with the further evidence relied upon by the Claimants (the **"Bundle"**), can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

Please note that the Bundle contains (at tabs 31,32 and 35) a copy of: (a) the Claimants' Certificate of Service dated 14 April 2023 for filing the sealed Application Notice dated 4 April 2023, the draft Order for the Return Date hearing and the Claimants' further evidence for the Return Date hearing (as referred to in our email below dated 6 April 2023); (b) the Third Witness Statement of Daniel Owen Christopher Talfan Davies dated 14 April 2023 and (c) Exhibit UKOP8 dated 14 April 2023.

We attach to this email a copy of the Claimants' skeleton argument in relation to the Return Date, a copy of which has also been added to the weblink referred to above. A copy of the bundle of authorities upon which the Claimants will rely at the Return Date, and which are referred to in the skeleton argument, has also been uploaded to the weblink referred to above.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies
Sent: Thursday, April 6, 2023 2:09 PM
To: juststopoil@protonmail.co.uk; juststopoilpress@protonmail.com; 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,

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



Emily Neate

From: Microsoft Outlook
To: xr-legal@riseup.net
Sent: 04 November 2024 17:52
Subject: Relayed: RE: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

xr-legal@riseup.net (xr-legal@riseup.net)

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

Emily Neate

From: Microsoft Outlook
To: juststopoil@protonmail.com; info@juststopoil.org;
juststopoilpress@protonmail.com
Sent: 04 November 2024 17:50
Subject: Relayed: RE: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

juststopoil@protonmail.com (juststopoil@protonmail.com)

info@juststopoil.org (info@juststopoil.org)

juststopoilpress@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]

Emily Neate

From: xr-legal@riseup.net
Sent: 04 November 2024 17:53
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

Emily Neate

From: Honey Newbury on behalf of Antony Phillips
Sent: 11 November 2024 11:33
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 emails dated 16 October 2023, 8 October 2024, 24 October 2024 and 4 November 2024. We adopt the definitions used in our email dated 4 November 2024 for ease.

We have now received a sealed copy of the Application from the Court, a copy of which can be found at the weblink below. The Court has also confirmed that the Application will be dealt with at the upcoming Hearing which is listed for a three day window from the 19 November 2024 with a time estimate of 2.5 hours.

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

Further, any individual who may wish to come forward to defend the Application is referred to Practice Direction 23A paragraph 7.2 of the Civil Procedure Rules in that if the defendant to an application wishes to rely on written evidence at the hearing of the application, he must file and serve the written evidence as soon as possible. Practice Direction 23A paragraph 6.4 of the Civil Procedure Rules provides that documents which are required to be filed and served in advance of a hearing must be filed and served no later than 4pm at least 2 days before that hearing unless the Court directs otherwise.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Faye Hyland <Faye.Hyland@fieldfisher.com>
Sent: Monday, November 4, 2024 5:52 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,

We write further to our emails dated 16 October 2023, 8 October 2024 and 24 October 2024. We adopt the definitions used in our email dated 8 October 2024 for ease.

As outlined in our email dated 24 October 2024, the hearing to review the final injunction Order has been listed in a three day window from the 19 November 2024 with a time estimate of 2.5 hours (the "**Hearing**").

In advance of the Hearing, the Claimants have made an application to Court that:

1. any requirements on the Claimants in the interim orders made in these proceedings to continue to fix copies of documents in these proceedings in clear transparent sealed containers by way of service be dispensed with; and
2. that paragraph 6(b) of the Order be amended such that, prospectively, the Claimants be permitted to affix copies of the Order at a minimum number of 2 prominent locations on the perimeter of each of the Sites whether in clear transparent sealed containers or by any other method.

(the "**Application**").

The Claimants have requested that the Application be dealt with at the upcoming Hearing. The Claimants have also filed further evidence for the Hearing and in support of the Application at Court in accordance with paragraph 13 of the Order.

A copy of the Application, comprising an Application Notice and Draft Order, along with the further evidence in the form of:

1. Sixth Witness Statement of John Michael Armstrong dated 4 November 2024; and
2. Exhibit UKOP14.

can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

Further, any individual who may wish to come forward to defend the Application is referred to Practice Direction 23A paragraph 7.2 of the Civil Procedure Rules in that if the defendant to an application wishes to rely on written evidence at the hearing of the application, he must file and serve the written evidence as soon as possible. Practice Direction 23A paragraph 6.4 of the Civil Procedure Rules provides that documents which are required to be filed and served in advance of a hearing must be filed and served no later than 4pm at least 2 days before that hearing unless the Court directs otherwise.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland
Consultant
D: +44 330 460 6953





From: Marcus Farrell <Marcus.Farrell@fieldfisher.com> **On Behalf Of** Antony Phillips
Sent: Thursday, October 24, 2024 12:22 PM
To: xr-legal@riseup.net
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 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 16 October 2023 and 8 October 2024. We adopt the definitions used in our email dated 8 October 2024 for ease.

Following the listing appointment on 9 October 2024, the Court has now issued a Notice of Hearing dated 23 October 2024 which states that the hearing to review the final injunction Order has been listed in a three day window from the 19 November 2024 with a time estimate of 2.5 hours. A copy of the Notice of Hearing can be found at the following weblink:

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Marcus Farrell <Marcus.Farrell@fieldfisher.com> **On Behalf Of** Antony Phillips
Sent: Tuesday, October 8, 2024 2:45 PM
To: xr-legal@riseup.net
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 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 email dated 16 October 2023.

As outlined in this email, at a hearing on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division, the Court granted a further order in favour of the Claimants, which grants final injunctive relief and orders related directions (the "**Order**"). A copy of the Order is available at the following weblink:

<https://ukop.azurewebsites.net>

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order, subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. As required by the Order, the Claimants have liaised with the Court to get a hearing listed and the Court has directed that a listing appointment to fix a date for the hearing should take place on 9 October 2024 at 11:00am. Further details can be found in the Notice of appointment to fix a date for the hearing, a copy of which is available at the above weblink.

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Amanda McLanaghan <Amanda.McLanaghan@fieldfisher.com> **On Behalf Of** Antony Phillips

Sent: Monday, October 16, 2023 4:30 PM

To: 'xr-legal@riseup.net' <xr-legal@riseup.net>

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 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 11 July 2023, 18 July 2023, 28 September 2023, 29 September 2023, 3 October 2023, 4 October 2023 and 5 October 2023. For ease we adopt the same definitions in this email.

Further to our email dated 5 October 2023, the Application was considered at the Hearing, which took place on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division.

At the Hearing, the Court granted a further order in favour of the Claimants which grants final injunctive relief and orders related directions. A copy of the Order made on 6 October 2023 may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Thursday, October 5, 2023 5:04 PM

To: xr-legal@riseup.net

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 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 emails dated 11 July 2023, 18 July 2023, 28 September 2023, 29 September 2023, 3 October 2023 and 4 October 2023. For ease we adopt the same definitions in this email.

As set out in our emails of 3 October 2023 and 4 October 2023, the Hearing of the Application will be heard tomorrow, 6 October 2023 at 10:30am with a time estimate of 2 and a half hours. The Court has now confirmed that the Hearing will be in Court 9 at the Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Mr Simon Gleeson sitting as a Judge of the Chancery Division.

As previously advised, the Claimants' further evidence for the Hearing, together with the additional court documents for use at the Hearing, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

As set out in our email of 4 October 2023, any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We again confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953





From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland
Sent: Wednesday, October 4, 2023 4:57 PM
To: xr-legal@riseup.net
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 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 emails dated 11 July 2023, 18 July 2023, 28 September 2023, 29 September 2023 and 3 October 2023. For ease we adopt the same definitions in this email.

As set out in our email of 3 October 2023, the Hearing of the Application will be heard on 6 October 2023 at 10:30am with a time estimate of 2 and a half hours and with the Court room TBC.

We confirm that the Notice of Hearing attached to our email dated 3 October 2023 has now been made available at the following weblink:

<https://ukop.azurewebsites.net>

Please note that in advance of the Hearing, and by way of service, the following additional documents have been added to the main bundle for use at the Hearing (and which contains the Court documents together with the further evidence relied upon by the Claimants):

- (a) Certificate of Service relating the Bundle and Exhibit Bundles for Hearing, First Witness Statement of Antony Douglas Phillips, Fifth Witness Statement of John Michael Armstrong and Exhibits UKOP11 and UKOP12;
- (b) Certificate of Service relating to the Skeleton Argument and Bundle of Authorities for the Hearing; and
- (c) Transcript of the Return Date Judgment on 20 April 2023.

The above documents have been added at tabs 30, 31 and 33, and the main bundle has therefore been re-uploaded to the above weblink and labelled "PT-2022-000303- Revised Bundle for Use at Hearing of Application for Summary Judgment" (the "**Main Bundle**"). The index to the Main Bundle has also been updated to reflect the addition of the above documents.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland
Director
D: +44 330 460 6953



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

Sent: Tuesday, October 3, 2023 6:36 PM

To: xr-legal@riseup.net

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 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 emails dated 11 July 2023, 18 July 2023, 28 September 2023 and 29 September 2023. For ease we adopt the same definitions in this email.

In our email of 29 September 2023 we confirmed that the Hearing of the Application would take place tomorrow, Wednesday, 4 October 2023. However, we have now been informed by the Court that the Hearing of the Application has instead been moved to an alternative date and will now be heard on **6 October 2023 at 10:30am** with a time estimate of 2 and a half hours and with the Court room TBC.

We attach the Notice of Hearing confirming the new listing by way of service. A copy will also be made available at the following weblink:-

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Friday, September 29, 2023 5:54 PM

To: xr-legal@riseup.net

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 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 emails dated 11 July 2023, 18 July 2023 and 28 September 2023. For ease, we adopt the same definitions in this email.

We have been informed by the Court that the Hearing of the Application will take place on Wednesday, 4 October 2023, with the time TBC and the Court number TBC.

By way of service, we confirm that the Claimants' skeleton argument for the Hearing and the bundle of authorities that the Claimants will be relying upon at the Hearing (and reference to which is made in the Claimants' Skeleton argument) can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

A copy of the Claimants' skeleton argument has also been attached to this email.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D:+44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Thursday, September 28, 2023 10:57 AM

To: xr-legal@riseup.net

Cc: UKOP injunction <UKOPinjunction@fieldfisher.com>; Faye Hyland <Faye.Hyland@fieldfisher.com>

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 emails dated 11 July 2023 and 18 July 2023. For ease, we adopt the same definitions in this email.

As set out in our email of 18 July 2023, 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 (the "**Hearing**").

By way of service, we confirm that the bundles for use at the Hearing, and which contain the Court documents together with the further evidence relied upon by the Claimants (the "**Bundles**"), can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

The Bundles are named as follows:

- (1) PT-2022-000303- Bundle for Use at Hearing of Application for Summary Judgment;
- (2) PT-2022-000303- EB1 Bundle 1 of 3- Exhibit Bundle for Application for Summary Judgment;
- (3) PT-2022-000303- EB2 Bundle 2 of 3- Exhibit Bundle for Application for Summary Judgment; and
- (4) PT-2022-000303- EB3 Bundle 3 of 3- Exhibit Bundle for Application for Summary Judgment.

Please note that the Bundles contain (at tabs 25, 26, 28 and 29 of the main bundle labelled " PT-2022-000303- Bundle for Use at Hearing of Application for Summary Judgment") a copy of the following documents by way of further evidence:

- (a) First Witness Statement of Antony Douglas Phillips;
- (b) Fifth Witness Statement of John Michael Armstrong;
- (c) Certificate of Service relating to the Application, draft order for the Application, Third Witness Statement of Peter Malcolm Davis, Fourth Witness Statement of John Michael Armstrong and Exhibits UKOP9 and UKOP10; and
- (d) Certificate of Service relating to the sealed notice of the Application with the Notice of Hearing.

The exhibits referred to in the witness statements set out at (a) and (b) above can be found in the bundles labelled "PT-2022-000303- EB2 Bundle 2 of 3- Exhibit Bundle for Application for Summary Judgment" and "PT-2022-000303- EB3 Bundle 3 of 3- Exhibit Bundle for Application for Summary Judgment". However, copies of the following documents have also been separately uploaded to the above weblink for ease of reference, and by way of service:

- (a) First Witness Statement of Antony Douglas Phillips and accompanying exhibit UKOP11; and
- (b) Fifth Witness Statement of John Michael Armstrong and accompanying exhibit UKOP12

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



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Tuesday, July 18, 2023 4:35 PM

To: xr-legal@riseup.net

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 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.

A copy of the Notice of hearing, along with the Application, can be found at the following weblink:

<https://ukop.azurewebsites.net>

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



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,

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



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Tuesday, April 25, 2023 3:25 PM

To: xr-legal@riseup.net

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

As set out in our email dated 19 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. A copy of the Order made on 20 April 2023 may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Yours faithfully,

Owen Talfan Davies

Partner

D:+44 330 460 6961

M:+44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Wednesday, April 19, 2023 6:19 PM

To: xr-legal@riseup.net

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

The Court has now confirmed that the Return Date hearing will be heard tomorrow, 20 April 2023, at 10:30am in Court 3 of the Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Mr Justice Rajah.

As we have previously advised, the Claimants' further evidence for the Return Date hearing, together with the additional court documents for use at the Return Date, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

As set out in our email of 17 April 2023, any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument, and we again confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to **UKOPinjunction@fieldfisher.com**.

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Monday, April 17, 2023 3:35 PM

To: xr-legal@riseup.net

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 Extinction Rebellion,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We refer to our email dated 6 April 2023, which is set out below. For ease, we adopt the same definitions in this email.

We confirm that the bundle for use at the Return Date, which contains the Court Documents together with the further evidence relied upon by the Claimants (the **"Bundle"**), can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

Please note that the Bundle contains (at tabs 31,32 and 35) a copy of: (a) the Claimants' Certificate of Service dated 14 April 2023 for filing the sealed Application Notice dated 4 April 2023, the draft Order for the Return Date hearing and the Claimants' further evidence for the Return Date hearing (as referred to in our email below dated 6 April 2023); (b) the Third Witness Statement of Daniel Owen Christopher Talfan Davies dated 14 April 2023 and (c) Exhibit UKOP8 dated 14 April 2023.

We attach to this email a copy of the Claimants' skeleton argument in relation to the Return Date, a copy of which has also been added to the weblink referred to above. A copy of the bundle of authorities upon which the Claimants will rely at the Return Date, and which are referred to in the skeleton argument, has also been uploaded to the weblink referred to above.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Thursday, April 6, 2023 2:08 PM

To: xr-legal@riseup.net

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 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



Emily Neate

From: Honey Newbury on behalf of Antony Phillips
Sent: 11 November 2024 11:32
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**").

We write further to our emails dated 16 October 2023, 8 October 2024, 24 October 2024 and 4 November 2024. We adopt the definitions used in our email dated 4 November 2024 for ease.

We have now received a sealed copy of the Application from the Court, a copy of which can be found at the weblink below. The Court has also confirmed that the Application will be dealt with at the upcoming Hearing which is listed for a three day window from the 19 November 2024 with a time estimate of 2.5 hours.

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

Further, any individual who may wish to come forward to defend the Application is referred to Practice Direction 23A paragraph 7.2 of the Civil Procedure Rules in that if the defendant to an application wishes to rely on written evidence at the hearing of the application, he must file and serve the written evidence as soon as possible. Practice Direction 23A paragraph 6.4 of the Civil Procedure Rules provides that documents which are required to be filed and served in advance of a hearing must be filed and served no later than 4pm at least 2 days before that hearing unless the Court directs otherwise.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Faye Hyland <Faye.Hyland@fieldfisher.com>
Sent: Monday, November 4, 2024 5:49 PM
To: juststopoil@protonmail.com; info@juststopoil.org; juststopoilpress@protonmail.com
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 Just Stop Oil,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We write further to our emails dated 16 October 2023, 8 October 2024 and 24 October 2024. We adopt the definitions used in our email dated 8 October 2024 for ease.

As outlined in our email dated 24 October 2024, the hearing to review the final injunction Order has been listed in a three day window from the 19 November 2024 with a time estimate of 2.5 hours (the **"Hearing"**).

In advance of the Hearing, the Claimants have made an application to Court that:

1. any requirements on the Claimants in the interim orders made in these proceedings to continue to fix copies of documents in these proceedings in clear transparent sealed containers by way of service be dispensed with; and
2. that paragraph 6(b) of the Order be amended such that, prospectively, the Claimants be permitted to affix copies of the Order at a minimum number of 2 prominent locations on the perimeter of each of the Sites whether in clear transparent sealed containers or by any other method.

(the **"Application"**)

The Claimants have requested that the Application be dealt with at the upcoming Hearing. The Claimants have also filed further evidence for the Hearing and in support of the Application at Court in accordance with paragraph 13 of the Order.

A copy of the Application, comprising an Application Notice and Draft Order, along with the further evidence in the form of:

1. Sixth Witness Statement of John Michael Armstrong dated 4 November 2024; and
2. Exhibit UKOP14.

can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

Further, any individual who may wish to come forward to defend the Application is referred to Practice Direction 23A paragraph 7.2 of the Civil Procedure Rules in that if the defendant to an application wishes to rely on written evidence at the hearing of the application, he must file and serve the written evidence as soon as possible. Practice Direction 23A paragraph 6.4 of the Civil Procedure Rules provides that documents which are required to be filed and served in advance of a hearing must be filed and served no later than 4pm at least 2 days before that hearing unless the Court directs otherwise.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland
Consultant
D: +44 330 460 6953



From: Marcus Farrell <Marcus.Farrell@fieldfisher.com> **On Behalf Of** Antony Phillips
Sent: Thursday, October 24, 2024 12:22 PM
To: juststopoil@protonmail.com; info@juststopoil.org; juststopoilpress@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,

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 16 October 2023 and 8 October 2024. We adopt the definitions used in our email dated 8 October 2024 for ease.

Following the listing appointment on 9 October 2024, the Court has now issued a Notice of Hearing dated 23 October 2024 which states that the hearing to review the final injunction Order has been listed in a three day window from the 19 November 2024 with a time estimate of 2.5 hours. A copy of the Notice of Hearing can be found at the following weblink:

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Marcus Farrell <Marcus.Farrell@fieldfisher.com> **On Behalf Of** Antony Phillips
Sent: Tuesday, October 8, 2024 2:45 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,

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 email dated 16 October 2023.

As outlined in this email, at a hearing on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division, the Court granted a further order in favour of the Claimants, which grants final injunctive relief and orders related directions (the **"Order"**). A copy of the Order is available at the following weblink:

<https://ukop.azurewebsites.net>

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order, subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. As required by the Order, the Claimants have liaised with the Court to get a hearing listed and the Court has directed that a listing appointment to fix a date for the hearing should take place on 9 October 2024 at 11:00am. Further details can be found in the Notice of appointment to fix a date for the hearing, a copy of which is available at the above weblink.

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

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

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Amanda McLanaghan <Amanda.McLanaghan@fieldfisher.com> **On Behalf Of** Antony Phillips

Sent: Monday, October 16, 2023 4:32 PM

To: 'juststopoilpress@protonmail.com' <juststopoilpress@protonmail.com>; 'info@juststopoil.org' <info@juststopoil.org>; 'juststopoil@protonmail.com' <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,

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 11 July 2023, 18 July 2023, 28 September 2023, 29 September 2023 (sent to juststopoilpress@protonmail.com and juststopoil@protonmail.com), 2 October 2023 (sent to info@juststopoil.org), 3 October 2023, 4 October 2023 and 5 October 2023. For ease we adopt the same definitions in this email.

Further to our email dated 5 October 2023, the Application was considered at the Hearing, which took place on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division.

At the Hearing, the Court granted a further order in favour of the Claimants which grants final injunctive relief and orders related directions. A copy of the Order made on 6 October 2023 may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Yours faithfully,

Fieldfisher

Antony Phillips

Partner

D: +44 330 460 6948

M: +44 7795 268908



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Thursday, October 5, 2023 5:04 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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023, 18 July 2023, 28 September 2023, and 29 September 2023 (sent to juststopoilpress@protonmail.com and juststopoil@protonmail.com), 2 October 2023 (sent to info@juststopoil.org), 3 October 2023 and 4 October 2023. For ease, we adopt the same definitions in this email.

As set out in our emails of 3 October 2023 and 4 October 2023, the Hearing of the Application will be heard tomorrow, 6 October 2023 at 10:30am with a time estimate of 2 and a half hours. The Court has now confirmed that the Hearing will be in Court 9 at the Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Mr Simon Gleeson sitting as a Judge of the Chancery Division.

As previously advised, the Claimants' further evidence for the Hearing, together with the additional court documents for use at the Hearing, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

As set out in our email of 4 October 2023, any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We again confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland
Sent: Wednesday, October 4, 2023 4:57 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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023, 18 July 2023, 28 September 2023, and 29 September 2023 (sent to juststopoilpress@protonmail.com and juststopoil@protonmail.com), 2 October 2023 (sent to info@juststopoil.org) and 3 October 2023. For ease, we adopt the same definitions in this email.

As set out in our email of 3 October 2023, the Hearing of the Application will be heard on 6 October 2023 at 10:30am with a time estimate of 2 and a half hours and with the Court room TBC.

We confirm that the Notice of Hearing attached to our email dated 3 October 2023 has now been made available at the following weblink:

<https://ukop.azurewebsites.net>

Please note that in advance of the Hearing, and by way of service, the following additional documents have been added to the main bundle for use at the Hearing (and which contains the Court documents together with the further evidence relied upon by the Claimants):

- (a) Certificate of Service relating the Bundle and Exhibit Bundles for Hearing, First Witness Statement of Antony Douglas Phillips, Fifth Witness Statement of John Michael Armstrong and Exhibits UKOP11 and UKOP12;
- (b) Certificate of Service relating to the Skeleton Argument and Bundle of Authorities for the Hearing; and
- (c) Transcript of the Return Date Judgment on 20 April 2023.

The above documents have been added at tabs 30, 31 and 33, and the main bundle has therefore been re-uploaded to the above weblink and labelled "PT-2022-000303- Revised Bundle for Use at Hearing of Application for Summary Judgment" (the "**Main Bundle**"). The index to the Main Bundle has also been updated to reflect the addition of the above documents.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953





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

Sent: Tuesday, October 3, 2023 6:39 PM

To: 'juststopoilpress@protonmail.com' <juststopoilpress@protonmail.com>; 'info@juststopoil.org' <info@juststopoil.org>; 'juststopoil@protonmail.com' <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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023, 18 July 2023, 28 September 2023, and 29 September 2023 (sent to juststopoilpress@protonmail.com and juststopoil@protonmail.com) and 2 October 2023 (sent to info@juststopoil.org). For ease, we adopt the same definitions in this email.

In our email of 29 September 2023 we confirmed that the Hearing of the Application would take place tomorrow, Wednesday, 4 October 2023. However, we have now been informed by the Court that the Hearing of the Application has instead been moved to an alternative date and will now be heard on **6 October 2023 at 10:30am** with a time estimate of 2 and a half hours and with the Court room TBC.

We attach the Notice of Hearing confirming the new listing by way of service. A copy will also be made available at the following weblink:-

<https://ukop.azurewebsites.net>

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Friday, September 29, 2023 6:00 PM

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

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 Just Stop Oil,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023, 18 July 2023 and 28 September 2023. For ease, we adopt the same definitions in this email.

We have been informed by the Court that the Hearing of the Application will take place on Wednesday, 4 October 2023, with the time TBC and the Court number TBC.

By way of service, we confirm that the Claimants' skeleton argument for the Hearing and the bundle of authorities that the Claimants will be relying upon at the Hearing (and reference to which is made in the Claimants' Skeleton argument) can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

A copy of the Claimants' skeleton argument has also been attached to this email.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland

Director

D:+44 330 460 6953



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Thursday, September 28, 2023 11:07 AM

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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our emails dated 11 July 2023 and 18 July 2023. For ease, we adopt the same definitions in this email.

As set out in our email of 18 July 2023, 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 (the "**Hearing**").

By way of service, we confirm that the bundles for use at the Hearing, and which contain the Court documents together with the further evidence relied upon by the Claimants (the "**Bundles**"), can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

The Bundles are named as follows:

- (1) PT-2022-000303- Bundle for Use at Hearing of Application for Summary Judgment;
- (2) PT-2022-000303- EB1 Bundle 1 of 3- Exhibit Bundle for Application for Summary Judgment;
- (3) PT-2022-000303- EB2 Bundle 2 of 3- Exhibit Bundle for Application for Summary Judgment; and
- (4) PT-2022-000303- EB3 Bundle 3 of 3- Exhibit Bundle for Application for Summary Judgment.

Please note that the Bundles contain (at tabs 25, 26, 28 and 29 of the main bundle labelled " PT-2022-000303- Bundle for Use at Hearing of Application for Summary Judgment") a copy of the following documents by way of further evidence:

- (a) First Witness Statement of Antony Douglas Phillips;
- (b) Fifth Witness Statement of John Michael Armstrong;
- (c) Certificate of Service relating to the Application, draft order for the Application, Third Witness Statement of Peter Malcolm Davis, Fourth Witness Statement of John Michael Armstrong and Exhibits UKOP9 and UKOP10; and
- (d) Certificate of Service relating to the sealed notice of the Application with the Notice of Hearing.

The exhibits referred to in the witness statements set out at (a) and (b) above can be found in the bundles labelled "PT-2022-000303- EB2 Bundle 2 of 3- Exhibit Bundle for Application for Summary Judgment" and "PT-2022-000303- EB3 Bundle 3 of 3- Exhibit Bundle for Application for Summary Judgment". However, copies of the following documents have also been separately uploaded to the above weblink for ease of reference, and by way of service:

- (a) First Witness Statement of Antony Douglas Phillips and accompanying exhibit UKOP11; and
- (b) Fifth Witness Statement of John Michael Armstrong and accompanying exhibit UKOP12

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



From: Honey Newbury <Honey.Newbury@fieldfisher.com> **On Behalf Of** Faye Hyland

Sent: Tuesday, July 18, 2023 4:35 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,

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.

A copy of the Notice of hearing, along with the Application, can be found at the following weblink:

<https://ukop.azurewebsites.net>

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



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,

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



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Tuesday, April 25, 2023 3:26 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,

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

As set out in our email dated 19 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. A copy of the Order made on 20 April 2023 may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies
Sent: Wednesday, April 19, 2023 6:20 PM
To: juststopoil@protonmail.co.uk; juststopoilpress@protonmail.com; 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,

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

The Court has now confirmed that the Return Date hearing will be heard tomorrow, 20 April 2023, at 10:30am in Court 3 of the Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Mr Justice Rajah.

As we have previously advised, the Claimants' further evidence for the Return Date hearing, together with the additional court documents for use at the Return Date, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

As set out in our email of 17 April 2023, any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument, and we again confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to **UKOPinjunction@fieldfisher.com**.

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies
Sent: Monday, April 17, 2023 3:37 PM
To: juststopoil@protonmail.co.uk; juststopoilpress@protonmail.com; 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,

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the "**Claimants**").

We refer to our email dated 6 April 2023, which is set out below. For ease, we adopt the same definitions in this email.

We confirm that the bundle for use at the Return Date, which contains the Court Documents together with the further evidence relied upon by the Claimants (the **"Bundle"**), can now be viewed at the following weblink:-

<https://ukop.azurewebsites.net>

Please note that the Bundle contains (at tabs 31,32 and 35) a copy of: (a) the Claimants' Certificate of Service dated 14 April 2023 for filing the sealed Application Notice dated 4 April 2023, the draft Order for the Return Date hearing and the Claimants' further evidence for the Return Date hearing (as referred to in our email below dated 6 April 2023); (b) the Third Witness Statement of Daniel Owen Christopher Talfan Davies dated 14 April 2023 and (c) Exhibit UKOP8 dated 14 April 2023.

We attach to this email a copy of the Claimants' skeleton argument in relation to the Return Date, a copy of which has also been added to the weblink referred to above. A copy of the bundle of authorities upon which the Claimants will rely at the Return Date, and which are referred to in the skeleton argument, has also been uploaded to the weblink referred to above.

Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified below:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057



From: Rachel Bedford <Rachel.Bedford@fieldfisher.com> **On Behalf Of** Owen Talfan Davies

Sent: Thursday, April 6, 2023 2:09 PM

To: juststopoil@protonmail.co.uk; juststopoilpress@protonmail.com; 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,

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



Emily Neate

From: Microsoft Outlook
To: xr-legal@riseup.net
Sent: 11 November 2024 11:33
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

xr-legal@riseup.net (xr-legal@riseup.net)

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

Emily Neate

From: Microsoft Outlook
To: juststopoilpress@protonmail.com; info@juststopoil.org;
juststopoil@protonmail.com
Sent: 11 November 2024 11:32
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

juststopoilpress@protonmail.com (juststopoilpress@protonmail.com)

info@juststopoil.org (info@juststopoil.org)

juststopoil@protonmail.com (juststopoil@protonmail.com)

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

Emily Neate

From: xr-legal@riseup.net
Sent: 11 November 2024 11:33
To: Honey Newbury
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