

*"I thank the members of the Jury deeply for their 'common sense' verdict — they were actually permitted to hear the several climate related agreed facts, which were read out to them, about the severe threats the present emergency poses to our world and they listened!*

*I thank the prosecution for agreeing to those facts following earlier trials I attended in which the 'whole truth' was repeatedly denied to the Jury. I thank the Judge for allowing them to decide that we "more likely than not" had a reasonable excuse for what we did.*

*In my statement to the police, I urgently expressed my fears for my family and world and my hopes for an 'eco-U- turn'. With this acquittal, I feel this may be closer to being made possible. The tide may well be turning if the agreed facts on climate, allowed in this trial, can become widely known and acted upon internationally."*

In 2024 Just Stop Oil successfully won its original demand of 'no new oil and gas' and on March 27th 2025 announced an end to the campaign of action. However, our supporters will continue to tell the truth in court, to speak out for our political prisoners and to help build what comes next.

## **ENDS**

Press contact: 07762 987334

Press email: [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)

High quality images & video here: <https://juststopoil.org/press-media>

Heathrow 10 images here:

[https://drive.google.com/drive/folders/1mByhU4LBPB6t5pMAP\\_-5dJOkhvsxwTNX?usp=sharing](https://drive.google.com/drive/folders/1mByhU4LBPB6t5pMAP_-5dJOkhvsxwTNX?usp=sharing)

Website: <https://juststopoil.org/>

Facebook: <https://www.facebook.com/JustStopOil/>

Instagram: <https://www.instagram.com/just.stopoil/>

Twitter: [https://twitter.com/JustStop\\_Oil](https://twitter.com/JustStop_Oil)

Youtube: <https://juststopoil.org/youtube>

TikTok: <https://www.tiktok.com/@juststopoil>

We use cookies on our website to give you the most relevant experience by remembering your preferences and repeat visits. By clicking "Accept All", you consent to the use of ALL the cookies. However, you may visit "Cookie Settings" to provide a controlled consent.

[Cookie Settings](#)

[Accept All](#)

Britain / 29 August 2025

# Eight JSO supporters acquitted of public nuisance after petrol station action



**M** JSO activists blocking a service station on the M25 in August 2022. Photo: Just Stop Oil



**E**IGHT Just Stop Oil activists have been cleared of causing a public nuisance after disrupting Britain’s largest petrol station.

Michael Davies, Charles Laurie, Phoebe Frewer, Sophie Sharples, Tez Burns, Peter Lay, Gareth Harper and Emma Ireland took action at Cobham motorway services in Surrey in August 2022.

As part of a wider campaign targeting petrol stations along the M25, the activists were among a group of 35 who also took action at Clacket Lane services in Kent and Thurrock services in Essex.

At Guildford Crown Court on Wednesday, all eight defendants were found not guilty of intentionally or recklessly causing a public nuisance by blocking the entrance to Cobham services.

However, Mx Burns and Mr Lay were found guilty of causing criminal damage, while Mr Laurie was found guilty of possession of a hammer with intent to damage property after two petrol pumps were damaged.

Following the verdict, Ms Ireland said: “I am grateful to the judge and the prosecution for allowing the agreed facts on the climate crisis to have played a part in this trial and for allowing us to speak to our motivations without fear of being found in contempt of court.

“The prosecution spoke about common sense and I was reminded that, in 2022, I felt that common sense would have been for the Conservative government to stop issuing new oil and gas licences, to show a commitment to reducing carbon emissions and, in turn, to offer some protection to humanity from the gravest predictions of climate collapse.”



**Donate to the 95th  
Anniversary Appeal**

---

**Elizabeth Short**

---

### Owned by Our Readers

We're a reader-owned co-operative, which means you can become part of the paper too by buying shares in the People's Press Printing Society.

[Subscribe](#)

[Support us](#)

#### Sections

[Britain](#)  
[World](#)  
[Editorial](#)  
[Features](#)  
[Culture](#)  
[Sport](#)

#### Topics

[Climate Crisis](#)  
[Workers' Rights](#)  
[Middle East](#)  
[Labour Party](#)  
[Red Star Talks](#)  
[Scotland](#)  
[Iran](#)  
[Latin America](#)

#### Services

[Advertise](#)  
[Contact us](#)  
[Shop](#)  
[Subscribe](#)  
[Support us](#)  
[Daily Alert](#)





## Hung jury in latest Just Stop Oil gantry case

Court & Prison, Press / July 21, 2025

A Just Stop Oil supporter faces retrial after a jury was unable to reach a verdict in relation to her participation in the M25 gantry climbing actions in November 2022 demanding an end to new oil and gas licencing. [1]

A 12-member jury at Southwark Crown Court was unable to reach a verdict in the case of a Just Stop Oil supporter charged with the new statutory offence of 'causing a public nuisance' under the Police, Crime, Sentencing and Courts Act 2022, following more than 9 hours of deliberations over three days.

Theresa Norton, 66, a former councillor and carer, took part in a Just Stop Oil action on the M25 in November 2022, during which she climbed a gantry near junction 1b on 7 November, to demand an end to all new oil and gas projects – a demand that has since been adopted as official government policy. She did

The CPS has now been allowed 7 days by Judge Tomlinson to determine whether it will pursue a retrial.

In her evidence to the Jury, Norton said:

*"I acted on my conscience. My despair turned into action into hope. Sadly, conscience is not a legal defence. Therefore, you'll be directed to ignore this evidence, all that I've said, and come to your verdict only on the evidence as presented by the prosecution. This leaves you with no choice, no agency, you have become part of the machinery of state. Accepting of the cognitive dissonance that can happily see a government declare such statements as seen in the Agreed Facts, whilst simultaneously issuing 130 new oil and gas licences, planning for extra runways at airports, building more roads, refusing to implement plans to insulate our badly designed cold and draughty homes, continuing with subsidies to fossil fuel companies to the tune of millions of pounds a week and delaying investment for sustainable green energy, because the fossil fuel lobby is powerful and generous with donations to influential think tanks.*

*The climate crisis was only getting worse in 2021. Talks by eminent climate scientists were telling us to act, do something. In 2022, a third of Pakistan was under flood water- 1700 dead, 13,000 injured, 8 million displaced. Portugal, Germany and France had rampant wildfires. In July there were wildfires in UK and 40 degrees in London for the first time. London Fire Brigade had its busiest day since WW2.*

*Civil resistance is a communicative act. It communicates that something is very wrong and needs to change. It is not trying to seize power in a violent armed revolution. It is nonviolent and peaceful. Facts, information and science do not motivate people to change. Tell a smoker that smoking kills and they'll carry on. Facts are not what powers the human heart. That's why just talking about science will not save us and quoting all the statistics in the world will not move us to change. You have to bring emotions into it. Nonviolent direct action has a history of effecting change. We've been vindicated. That oil and gas will stay in the sea. But I stand here because I maintain the courage of my convictions. I believe that when we see clearly through that state machinery, it is only our collective conscience that can truly be relied upon."*

During the trial, the Crown prosecution acknowledged the findings of the 2020 Net Zero Interim report, which stated:

*"Climate change is an existential threat to humanity. Without global action to limit greenhouse gas emissions, the climate will change catastrophically with almost unimaginable consequences for societies across the world."* [3]

Additionally, the prosecution agreed upon the established scientific consensus that warming exceeding 1.5 degrees Celsius above pre-industrial levels poses 'catastrophic' and 'irreversible' risks to humanity. It was further accepted that the average global temperature rise for the year ending 2024 was 1.65 degrees Celsius, with projections indicating that warming would permanently surpass 1.5 degrees Celsius before 2030.

Just Stop Oil continues to stand by those prosecuted for peaceful resistance against fossil fuel expansion in the face of rapidly accelerating climate collapse.

Press contact: 07762 987334

Press email: [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)

High quality images & video here: <https://juststopoil.org/press-media>

Website: <https://juststopoil.org/>

Facebook: <https://www.facebook.com/JustStopOil/>

Instagram: <https://www.instagram.com/just.stopoil/>

Twitter: [https://twitter.com/JustStop\\_Oil](https://twitter.com/JustStop_Oil)

Youtube: <https://juststopoil.org/youtube>

TikTok: <https://www.tiktok.com/@juststopoil>

### Notes to Editors

[1] Just Stop Oil is a member of the A22 Network of civil resistance projects.

April 26th 2025 was the last Just Stop Oil action, but our supporters will continue to tell the truth in the courts, speak out for our political prisoners, and call out the UK's oppressive anti-protest laws.

Just Stop Oil continues to rely on small donations from the public to make this happen.

[2] <https://juststopoil.org/2023/10/30/no-prison-for-m25-injunction-breakers/>

[3]  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004025/210615\\_NZR\\_interim\\_report\\_Master\\_v4.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004025/210615_NZR_interim_report_Master_v4.pdf)

---

← Previous Post

Next Post →

Support  
Just Stop Oil



## Palestine Action


● This article is more than **4 months** old

# Palestine Action activists cleared of aggravated burglary at Israeli defence firm site

None of the six activists were convicted of any offence over break-in at Elbit Systems factory near Bristol in 2024

**Haroon Siddique** *Legal affairs correspondent*

Wed 4 Feb 2026 13.54 GMT

 Prefer the Guardian on Google

Six [Palestine Action](#) activists have been cleared of committing aggravated burglary over a break-in at an Israeli defence firm's UK site.

Charlotte Head, Samuel Corner, Leona Kamio, Fatema Rajwani, Zoe Rogers and Jordan Devlin were accused of threatening unlawful violence and [using sledgehammers](#) as weapons after a prison van was driven into Elbit Systems' factory in Filton, near Bristol, on 6 August 2024.

But after a trial at Woolwich crown court, south London, none were convicted of any offence.

All six were acquitted of aggravated burglary, which carries a maximum sentence of life imprisonment, and jurors found Rajwani, Rogers and Devlin not guilty of violent disorder.

The jury deliberated for 36 hours and 34 minutes but could not reach verdicts for charges of criminal damage against any of the six defendants. This was in spite of all of the defendants, except Devlin, telling jurors they had entered the factory without permission and damaged Elbit's equipment including computers and drones.

Additionally, no verdict was reached in the allegation that Corner, 23, inflicted grievous bodily harm on police sergeant Kate Evans, or on the charges of violent disorder against Head, Corner and Kamio.

Before the verdicts on Wednesday, Mr Justice Johnson told the jurors he was not going to ask them to deliberate further, because “you believe that you can go no further than you have got to already”.

The activists hugged one another in the dock as a dozen of their supporters cheered from the public gallery above.

Deanna Heer KC, prosecuting, had told the jury that the defendants were all armed with sledgehammers, which she said were not only intended to be used to damage property but also as weapons “to be used if necessary to threaten and damage people”.


Heer alleged security guards were sworn at, had sledgehammers swung at them and were whipped, while one was sprayed with a foam fire extinguisher.

Rajiv Menon KC, representing Head, said any violence by the defendants was clearly unplanned, that the defendants had not expected security guards to enter the factory and were “completely out of their depth”.

**He compared Head to the suffragettes**, while describing Elbit Systems, of which Elbit Systems UK is a subsidiary, as a “dreadful company [that] has played a critical role in the killing of tens of thousands of Palestinians”.

The defence also argued that the security team had used excessive force and pointed to missing CCTV footage.

### Sign up to **First Edition**

 **Free daily newsletter**

Our morning email breaks down the key stories of the day, telling you what's happening and why it matters

**Enter your email address**

**Sign up**

Get updates about our journalism and ways to support and enjoy our work.

**Privacy Notice:** Newsletters may contain information about charities, online ads, and content funded by outside parties. If you do not have an account, we will create a guest account for you on [theguardian.com](https://www.theguardian.com) to send you this newsletter. You can complete full registration at any time. For more information about how we use your data see our [Privacy Policy](#).

During the trial one juror asked the judge whether it would count as a lawful excuse if a defendant believed they were performing a life-saving action by destroying weapons used to kill civilians in an illegal genocide. Johnson said it would not, but Menon reminded the jurors of their absolute right to acquit.

Heer and Johnson both told the jurors, before they began deliberating, that they should disregard their views on the conflict in the Middle East.

After the verdicts, Rogers’ mother, Clare, said: “Our loved one’s action against Elbit Systems and the state’s brutal response have exposed the true values of the government. The government is determined to do business with Israel and protect its weapons industry at any cost.

“Our loved ones dared to poke this beast - and no expense has been spared in policing, prosecuting and imprisoning them without trial. Imagine if the government had put the same amount of money, resources and political will into preventing a genocide.”

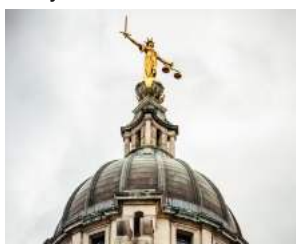
A spokesperson for Defend Our Juries, which has organised rallies opposing the ban on Palestine Action, **which took effect on 5 July last year**, said the verdicts were “a huge blow to government ministers” who had “tried to portray Palestine Action as a violent group to justify banning it under badly drafted terrorism legislation”.

Amnesty International also said it showed how disproportionate the proscription decision was.

## More on this story

**Palestine Action trial lawyer wins appeal against contempt of court charge**

12 May 2026



**Palestine Action ban created 'culture of fear', UK appeal court hears**

28 Apr 2026



**Greta Thunberg, Sally Rooney and Brian Eno defy Palestine Action ban in letter to judges**

24 Apr 2026



**Palestine Action activist who hit officer with sledgehammer 'panicked', court told**

22 Apr 2026



**Palestine Action wanted to sue Elbit Systems' pro told**

15 Apr 2026



---

## Most viewed

---

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) BIRMINGHAM AIRPORT LIMITED  
(2) LIVERPOOL AIRPORT LIMITED  
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED  
(4) BRISTOL AIRPORT LIMITED  
(5) SOUTH WEST AIRPORTS LIMITED  
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

Claimants

- v -

PERSONS UNKNOWN  
AS MORE PARTICULARLY DESCRIBED  
IN THE AMENDED CLAIM FORM

Defendants

---

AJW23

---

This is the exhibit marked "AJW23" in the witness statement of Alexander James Wright.

## **Briefing Note Incident London Southend Airport 08/06/2026**

Around 05.00 hrs on 08/06/2026 a group of 48 students arrived at London Southend Airport. They went straight to security. Only 1 had a hold bag. During the security screening process, one of the group was found to have a Just Stop Oil (JSO) orange hat in her bag. This had Just Stop Oil and their skull logo on it. The same student had a tin of 'Super Glue' hairspray. When asked why she had the items, she stated that someone had given it to her as a dare to carry for fresher week and gave very vague answers to questions asked. Another student was found to have a cabin bag with 3 handheld 'walkie talkie' radios in it. These were covered in coloured glass beads to look like child's toys, but were of a good quality Motorola Brand. When asked, her explanation was her friends preferred to use them rather than mobile phones on a night out. The girl was very argumentative and challenging towards security staff. All were well spoken students who appeared to be associated with Kings College and UCL, given the logos on their clothing. Two further large tins of the same style hair spray were found in other students bags.

Once through security, a number of students appeared from the rest rooms with bright orange t shirts on (the same colour orange as JSO). The T shirts had writing on which read 'Malta Hockey tour 2026'. At the same time, small groups started to position themselves all around the terminal, at or near to exit doors to the apron. The booking was confirmed as being made by 1 person, who had booked 24 flights a month ago, and the other 24 a week before departure . In the 24 hrs prior to departure, there were also another 50 people booked on the Malta flight, which easyJet stated was unusual activity for this route. Police were called and they positioned around the terminal. Other flights were boarded with Police at the gates to clear the terminal down, leaving only the Malta flight passengers.

When Police arrived, the students behaviour was observed. It appeared several older people were briefly communicating with the student group, but were not sitting with them. The older people were in smaller groups of 2 and were constantly walking around the terminal. Lots of texting was taking place, with many of the students appearing to pick up phones at exactly the same time to read texts. There appeared to be more movement around the terminal than would be usual for a delayed flight.

When the Police had enough resources, airport staff spoke to the organisers. The student group did not say they had any association with the older people. The main group of 48 students were taken back to CSA and conversations had with them. This did not ascertain much information, as all appeared to say exactly the same, however stories varied a lot as to where they were staying in Malta. All students had their bags searched (with their own consent) and nothing further was found. This was done in the presence of Police. Once cleared they were allowed to fly. It was noticed by airport security staff that a lot of the clothing in the bags appeared old and the toiletries were mainly half used items and cheap non branded perfumes

Once concluded, on the face of it, the incident did 'appear' to be a large group of students going on a hockey tour. We were unable to link anything to the adults who were seen talking with them. At this time, we do not know if the group had any other intentions, however we dealt with the incident as a potential protest related incident until it was clarified otherwise. The details of the LSA injunction were given to the organisers. The final outcome was a 2 hour delay, which disrupted operations in the terminal and required Police attendance.



9. Who should be served with this application?

Defendants (Persons Unknown)

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

The Claimants will arrange for service on the Defendants (Persons Unknown)

N244 Application notice (06.22)

© Crown copyright 2022  
Reproduced by Thomson Reuters

10. What information will you be relying on, in support of your application?

- the attached witness statement
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

We refer to the witness statement of Alexander James Wright dated 11 June 2026 which has previously been filed with the Court in these proceedings.

The Claimants apply for permission to amend the Amended Claim Form and Amended Particulars of Claim in the form enclosed with this application so as to amend the definition of the Defendants (Persons Unknown) in the light of the evidence contained within such witness statement - which the Claimants respectfully submit should be reflected in the statements of case and the definition of the Defendants (Persons Unknown).

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

No

## Statement of Truth

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

- I believe that the facts stated in section 10 (and any continuation sheets) are true.
- The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature



- Applicant
- Litigation friend (where applicant is a child or a Protected Party)
- Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

18

Month

June

Year

2026

Full name

Alexander James Wright

Name of applicant's legal representative's firm

Eversheds Sutherland (International) LLP

If signing on behalf of firm or company give position or office held

Legal Director

Applicant's address to which documents should be sent.

Building and street

Two New Bailey

Second line of address

6 Stanley Street

Town or city

Salford

County (optional)

Postcode

M	3	5	G	X		
---	---	---	---	---	--	--

If applicable

Phone number

+44 750 057 8620

Fax phone number

DX number

Your Ref.

292659.000057/WRIGHTAX

Email

alexwright@eversheds-sutherland.com



Draft Re-Amended Claim Form

# Claim Form

**You may be able to issue your claim online which may save time and money. Go to [www.moneyclaim.gov.uk](http://www.moneyclaim.gov.uk) to find out more.**

<b>In the</b>	High Court of Justice King's Bench Division
<b>Fee Account no.</b>	PBA 0087211
<b>Help with Fees - Ref no.</b> (if applicable)	<b>H W F</b> - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/>

For court use only	
<b>Claim no.</b>	KB-2024-002473
<b>Issue date</b>	31 July 2024

Claimant(s) name(s) and address(es) including postcode

**(1) BIRMINGHAM AIRPORT LIMITED** of Diamond House, Birmingham Airport, Birmingham, West Midlands, B26 3QJ

**(2) LIVERPOOL AIRPORT LIMITED** of Venus Building 1 Old Park Lane, Traffordcity, Manchester M41 7HA

**(3) PEEL L&P INVESTMENTS (NORTH) LIMITED** of Venus Building 1 Old Park Lane, Traffordcity, Manchester M41 7HA

**(4) BRISTOL AIRPORT LIMITED** of Lulsgate House, Bristol Airport, Bristol BS48 3DW

**(5) SOUTH WEST AIRPORTS LIMITED** of Lulsgate House, Bristol Airport, Bristol BS48 3DW

**(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED** of Lulsgate House, Bristol Airport, Bristol BS48 3DW



KB-2024-002473

Defendant(s) name and Address(es) including postcode

**Please refer to Schedule 1 attached to the Claim Form**

Brief details of claim

The Claimants seek an injunction to restrain the Defendants from acts of trespass and/or private and/or public nuisance on the land edged red on Plan 1, Plan 2 and Plan 3.

Value

This is a non monetary claim

Defendant's name and address for service including postcode

	£
Amount claimed	
Court fee	£626
Legal representative's costs	TBC
<b>Total amount</b>	

For further details of the courts [www.gov.uk/find-court-tribunal](http://www.gov.uk/find-court-tribunal).

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.

You must indicate your preferred County Court Hearing Centre for hearings here  
(see notes for guidance)

King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL

Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

- No

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

- Yes  
 No

Claim no.

Particulars of Claim

attached

to follow

## Statement of truth

**Note:** you are reminded that a copy of this claim form must be served on all other parties.

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

- I **believe** that the facts stated in this claim form and any attached sheets are true.
- The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

### Signature



- Claimant
- Litigation friend (where claimant is a child or protected party)
- Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day                  Month                  Year

31                  0 7                  2 0 2 4

Full name

Stuart Sherbrooke Wortley

Name of claimant's legal representative's firm

Eversheds Sutherland (International) LLP

If signing on behalf of firm or company give position or office held

Partner

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Postcode

E | C | 2 | V | 7 | W | S

If applicable

Phone number

DX number

Your Ref.

AllyboM/362291.1

Email

## Re-Amended Schedule 1 to Claim Form

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~
- (2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~
- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

Amended pursuant to CPR 17.1(1)

Re-amended pursuant to the order of [ ] dated [ ]

**CLAIM NO: KB – 2024 -002473**

**IN THE HIGH COURT OF JUSTICE**

**KING'S BENCH DIVISION**

**B E T W E E N**

- (1) BIRMINGHAM AIRPORT LIMITED
- (2) LIVERPOOL AIRPORT LIMITED
- (3) PEEL L&P INVESTMENTS (NORTH) LIMITED
- (4) BRISTOL AIRPORT LIMITED
- (5) SOUTH WEST AIRPORTS LIMITED
- (6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

**Claimants**

**- v -**

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~
- (2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~
- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) ~~AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUEL OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)~~

**Defendants**

## **Birmingham Airport**

1. The First Claimant is the operator of Birmingham Airport, located in Airport Way, Birmingham B26 3QJ, shown edged in red on Plan 1 ("**BHX**"). BHX serves around 11.8 million travelling passengers each year with an annual revenue of approximately £152 million.
2. With the exception of the parcels of land referred to in paragraph 9, the First Claimant is the registered proprietor of all of the land on which BHX is situated as shown in red on Plan 1, through the interests shown in the Title Schedule and on Plan 1A attached hereto - but subject to the interests referred to in paragraph 4.
3. Subject to the aforesaid interests, the First Claimant is entitled to an immediate right of possession occupation and control of BHX by virtue of its titles as shown in the Title Schedule and on Plan 1A.
4. Plan 1B identifies the areas within BHX over which the First Claimant lacks (or does not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests ("**the BHX Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First Claimant does not assert that it is the person with an immediate right of occupation or possession.
5. The BHX Third Party Areas are coloured blue and green on Plan 1B. The blue colouring indicates areas within BHX which are the subject of leases. The green colouring indicates parts of BHX which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.
6. There are five areas coloured blue on Plan 1B (numbered 1-5) each of which directly abuts the red line boundary of BHX. In each of those locations, the boundary of BHX is not in the possession or control of the First Claimant.
7. With those exceptions, access to or from the BHX Third Party Areas by the public from outside the airport, necessarily involves the use of areas of BHX which remain unencumbered by any such arrangement and in relation to which, accordingly, the First Claimant remains entitled to possession occupation and control by virtue of their interests shown in the Title Schedule and on Plan 1A.

8. Within the BHX red line boundary, there are 3 parcels in respect of which the First Claimant is not the registered proprietor:-
- a. although the land on which the northern landing lights (coloured orange on Plan 1B) are situated is registered in the name of a third party company, the First Claimant asserts that it is entitled to the immediate right of occupation or possession of those lights and the structure which supports them. Some of the lights and some parts of the structure have been in place since around 1967 and others since 2008. All of the lights and structures have been maintained by the First Claimant or its predecessors throughout that period;
  - b. on the south western boundary is an unregistered strip of land (coloured bright green on Plan 1A but omitted from the key on that plan) in respect of which the First Claimant asserts that it is entitled to the immediate right of occupation or possession; and
  - c. on the eastern boundary is an Air Rail Link and an associated platform and station. By an agreement for lease dated 1 April 2013, Network Rail Infrastructure Limited agreed to grant and the First Claimant (then known as Birmingham International Airport Limited) agreed to take a lease of the land coloured purple on Plan 1B for a term of 199 years. The lease has not been completed but the First Claimant asserts that it is entitled to the immediate right of occupation or possession of the land coloured purple.
9. By virtue of s 63 of the Airports Act 1986, the First Claimant has power to make byelaws with respect to BHX. Pursuant to the Birmingham Airport Limited Byelaws 2021, byelaw 3.32, no person has a right to use any part of BHX as defined therein for demonstrations or public assemble which is likely to obstruct or interfere with the proper use of the airport or the safety or security of passengers or persons using the airport. The plan which defines BHX for the purposes of the byelaws does not extend to the landing lights. Apart from that, it includes all the land edged in red on Plan 1.

### **Liverpool Airport**

10. The Second Claimant is the operator of Liverpool Airport, located in Speke Hall Avenue, Speke, Liverpool L24 1YD, shown edged in red on Plan 2 ("LJLA"). LJLA serves around 5 million travelling passengers each year with an annual revenue of approximately £35 million.

11. The Second Claimant is the proprietor of the land on which LJLA is situated as shown in red on Plan 2, through the interests shown in the Title Schedule and Plan 2A attached hereto - but subject to the interests referred to in paragraph 14.
12. The Third Claimant has been joined to the proceedings as it is the registered proprietor of the land on which the western landing lights (coloured brown on Plan 2B) are situated, which is registered under Title Number MS575438.
13. Subject to the aforesaid interests, the Second Claimant (and the Third Claimant in respect of the western landing lights) is entitled to an immediate right of possession occupation and control of LJLA, by virtue of its titles as shown in the Title Schedule and Plan 2A.
14. Plan 2B identifies the areas within LJLA over which the Second Claimant lacks (or does not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the LJLA Third Party Areas**") or public rights of way ("**the LJLA Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Second Claimant does not assert that it is the person with an immediate right of occupation or possession.
15. The LJLA Third Party Areas are coloured blue and green on Plan 2B. The blue colouring indicates areas within LJLA which are the subject of leases. The green colouring indicates parts of LJLA which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.
16. The LJLA Highways are indicated in pink on Plan 2B. These provide access to LJLA to the Second Claimant and its licensees (including members of the public).
17. Access to or from the LJLA Third Party Areas by the public from outside the airport, necessarily involves the use of areas of LJLA which remain unencumbered by any such arrangement and in relation to which, accordingly, the Second Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule and on Plan 2A.
18. All except 2 of the eastern landing lights (coloured orange on Plan 2B) are situated on title numbers CH596568 and CH384543 in respect of which the Second Claimant is the registered proprietor. The Second Claimant asserts that it is entitled to the immediate right of occupation or possession of the other 2 landing lights and the

structure which supports them which are situated on unregistered land. The lights and the structure which supports them have been in this location since around 1960 and they have been maintained by the Second Claimant or its predecessors throughout that period.

19. By virtue of s 63 of the Airports Act 1986, the Second Claimant has power to make byelaws with respect to LJLA. Pursuant to the Liverpool John Lennon Airport Byelaws 2022, byelaw 2.18, no person has a right to use any part of LJLA for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the landing lights, the plan which defines LJLA for the purposes of the byelaws includes all of the land edged in red on Plan 2.

### **Bristol Airport**

20. The Fourth Claimant is the operator of Bristol Airport, located in Bristol BS48 3DY, shown edged in red on Plan 3 ("**BRS**"). BRS serves around 10 million travelling passengers each year with an annual revenue of approximately £179 million.
21. The Fourth, Fifth and Sixth Claimants are the proprietors of the land on which BRS is situated as shown in red on Plan 3, through the interests shown in the Title Schedule and Plan 3A hereto - but subject to the interests referred to in paragraph 23.
22. Subject to the aforesaid interests, the Fourth, Fifth and Sixth Claimants are entitled to an immediate right of possession occupation and control of BRS, by virtue of its titles as shown in the Title Schedule and Plan 3A.
23. Plan 3B identifies the areas within BRS over which the Fourth, Fifth and Sixth Claimants lack (or do not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests ("**the BRS Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fourth, Fifth and Sixth Claimants do not assert that they are the person with an immediate right of occupation or possession.
24. The BRS Third Party Areas are coloured blue and green on Plan 3B. The blue colouring indicates areas within BRS which are the subject of leases. The green colouring indicates parts of BRS which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

25. Access to or from the BRS Third Party Areas by the public from outside the airport, necessarily involves the use of areas of BRS which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fourth, Fifth and Sixth Claimants remain entitled to possession occupation and control by virtue of its interests shown in the Title Schedule and on Plan 3A.
26. Although the land on which the western landing lights (coloured brown on Plan 3B) are situated is registered in the name of a third party individual, the Fourth Claimant asserts that it is entitled to the immediate right of occupation or possession of those lights and the structure which supports them. The lights and structure have been in place since around 2004 and have been maintained by the Fourth Claimant or its predecessors throughout that period.
27. By virtue of s63 of the Airports Act 1986, the Fourth Claimant has power to make byelaws with respect to BRS. Pursuant to the Bristol Airport Byelaws 2012, byelaw 4.17, no person has a right to organise or take part in any protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the landing lights, the plan which defines BRS for the purposes of the byelaws includes all the land outlined in red on Plan 3.

### **The Claimants' claims**

28. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management / airline facilities and (in the case of BHX) the Air Rail Link railway.
29. In relation to each airport:
  - a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).
  - b. No wider consent subsists; and (subject to the highways described above) no public right of access, or way, subsists over the airports.

- c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.
- d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

30. In relation to the Third Party Areas at each airport:

- a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the Court to make an order which does not distinguish between the airports generally (as shown outlined in red on the various plans) and the Third Party Areas within them; and
- b. Further or alternatively, protest which occurs on the Third Party Areas interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.
  - a. The like considerations apply in relation to those of the landing lights not in the outright possession of the Claimants.

31. Further, in respect of the LJLA Highways described above: protest which occurs on these highways interferes and/or threatens to interfere:

- b. Unreasonably and substantially, with the Second and Third Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;
- c. Unreasonably and substantially, with (and/or to obstruct or hinder) the free passage along the highway, occasioning particular damage to the Second and Third Claimants; and

- d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the byelaws.

### **The threats**

32. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:
33. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations..."
34. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").
35. At this meeting, a co-founder of Just Stop Oil was reported to have advocated:
- Cutting through fences and gluing themselves to runway tarmac;
  - Cycling in circles on runways;
  - Climbing on to planes to prevent them from taking off;
  - Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.
36. Since that meeting, Just Stop Oil has announced the following on its website:

#### **"SO WHAT'S THE PLAN?"**

*Our Government doesn't give a f\*\*\* about its responsibilities. The country is in ruins. You know it, I know, they know it. That means it's up to us to come together and be the change we need.*

*We need bold, un-ignorable action that confronts the fossil fuel elites. We refuse to comply with a system which is killing millions around the world, and that's why we have declared airports a site of nonviolent civil resistance."*

*We can't do this alone, we have a plan for this Summer, are you willing help make this happen?"*

37. It says, further:

***"This summer, Just Stop Oil will be taking action at airports.***

*As the grass becomes scorched, hosepipe bans kick in and the heat of the climate crisis enters peoples' minds, our resistance will put the spotlight on the heaviest users of fossil fuels and call everyone into action with us.*

*We'll work in teams of between 10-14 people willing to risk arrest from all over the UK. We need to be a minimum of 200 people to make this happen, but we'll be prepared to scale in size as our numbers increase. Exact dates and more details are coming.*

*Our plan can send shockwaves around the world and finish oil and gas. But we need each other to make it happen. Are you ready to join the team?"*

38. Just Stop Oil has also organised a fundraising page on the website <https://chuffed.org/project/just-stop-oil-resisting-against-new-oil-and-gas>, which says the following:<sup>1</sup>

***"Cat's out the bag. Just Stop Oil will take action at airports***

***The secret is out - and our new actions are going to be big.***

*We're going so big that we can't even tell you the full plan, but know this - Just Stop Oil will be taking our most radical action yet this summer. We'll be taking action at sites of key importance to the fossil fuel industry; **super-polluting airports.***

*..."*

39. On 6 June 2024, an email was sent from [info@juststopoil.org](mailto:info@juststopoil.org) to a subscriber list stating:

*"This is the most exciting email I've ever sent.*

*As many of you already know, this summer Just Stop Oil is taking action at airports.*

*That's exciting right? Well, there's more.*

*We won't be taking action alone.*

*Resistance groups across several countries in Europe have agreed to work together. That means this summer's actions will be internationally coordinated.*

---

<sup>1</sup> As of 29 July 2024, £24,519 had been raised on this website.



45. On 29 June 2024, JSO sent an email to subscribers in the following terms:-

***"Since Tuesday, 31 supporters of Just Stop Oil have now been arrested for possessing the strong convictions that governments and corporations do not have the right to prioritise oil profits over the safety and wellbeing of our loved-ones, communities and the many millions already suffering the effects of runaway climate breakdown.***

*In a sane society, it would be those who are setting the stage for an end to ordered society that would be having their doors barged down and dragged into the back of a police van to be interrogated about the catastrophic criminal damages they are imposing on every living thing and on every future generation. Instead, it is ordinary people- mothers, grandparents and young people who are having their futures stolen from them, that the police come for.*

***The incoherent pattern of arrests we have seen over the last 24 hours suggests a rattled system. They know that as climate breakdown intensifies, civil unrest will increase and one day there will not be enough police to cope with the millions stepping into action, as the full betrayal of the political establishment becomes clearer.***

***We will not be intimidated by the death throes of a broken system. Nothing the state can throw at us is worse than the realities that will be imposed on all of us if the breakdown of our climate carries on unabated. We WILL be stepping into action in the summer because when the lives of your family are at risk, there is no other choice than to protect them..."***

46. On 24 July 2024, a further ten JSO activists were arrested at Heathrow Airport following an intelligence led operation. According to media reports, some of those arrested were found to be carrying cutting gear and glue.

47. On 28 July 2024, a further eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with national infrastructure.

48. On 29 July 2024, a further two JSO activists were arrested at Heathrow Airport after spraying orange paint around the entrance hall to Terminal 5.

49. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for BHX, LJLA and/or BRS:

- c. trespass on the airports and/or
- d. by protest conducted on or from the Third Party Areas and/or on or from the land on which the landing lights (which are not within the Byelaw plans) are situate, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or

- e. by protest conducted on or from the highways, obstruct those occasioning particular damage to the Claimants and/or interfere with the Claimants' right of access to the airports via those highways, so as to cause a nuisance actionable by the Claimants.
50. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.
  51. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:
  52. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.
  53. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive - by which point harm may already have occurred.
  54. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.
  55. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.
  56. The airports in the present case are all the subject of byelaws. These include prohibitions which would have the effect of prohibiting the protest of which the

Claimants are fearful. The general criminal law (offences of aggravated trespass under s68 of the Criminal Justice and Public Order Act 1994 and/or interference with use or operation of key national infrastructure under s7 of the Public Order Act 2023) would also embrace some of what is intimated by the protest campaigns summarised above. But breach of the Byelaws attracts a modest penalty (a fine) and neither the byelaws nor the general law were sufficient to deter the activities which have already taken place at Stansted Airport. The explicit threats mentioned above indicate that breaching the general criminal law is regarded more as a goal, than as a deterrent, by at least some campaigners. By comparison, bespoke relief in the form of an injunction responding to the particular threats which have emerged, appears to be viewed differently by potential protesters in comparable matters and has shown itself to be an effective way of vindicating the private law rights of those whose lawful interests are threatened by unlawful acts.

57. Airports operate under heightened security for a mixture of reasons including counter-terrorism. They are also environments in which stress levels tend to be high. This combination makes protest activity, and any activity which is out of the normal, especially dangerous. It might have an ambiguous appearance and carries the risk of being mis-interpreted as an outright security threat, potentially provoking a response from the police or security forces which would be disproportionate if the purposes of the protesters were to be taken at face value.
58. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

**AND THE FIRST CLAIMANT CLAIMS AGAINST THE FIRST DEFENDANT:**

- (1) Subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months or such other period as the Court may determine, an order that the First Defendants must not, without the consent of the First Claimant enter, occupy or remain upon the land outlined in red on Plan 1.

**AND THE SECOND AND THIRD CLAIMANTS CLAIM AS AGAINST THE SECOND DEFENDANT:**

- (2) Subject to periodic review by the Court on application by the Second and Third Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent

of the Second and Third Claimant, enter, occupy or remain upon the land outlined in red on Plan 2.

**AND THE FOURTH, FIFTH AND SIXTH CLAIMANTS CLAIM AGAINST THE THIRD DEFENDANT:**

- (3) Subject to periodic review by the Court on application by the Fourth, Fifth and Sixth Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Third Defendants must not, without the consent of the Fourth, Fifth and Sixth Claimants (or either of them), enter, occupy or remain upon the land outlined in red on Plan 3.

**STATEMENT OF TRUTH**

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

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

---

Stuart Sherbrooke Wortley

Partner

**Eversheds Sutherland (International) LLP**

Dated: 31 July 2024

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR/S JUSTICE [     ] ]

ON: 30 June 2026

B E T W E E N : -

(1) LONDON CITY AIRPORT LIMITED  
(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

-and-

PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHER WEATH INEQUALITY CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER DEFINED IN THE CLAIM FORM

Defendants

---

ORDER

---

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the injunction made by Order dated 20 June 2024 by Mr Justice Julian Knowles (“the Knowles J Order”)

**AND UPON** the review of the Knowles J Order on 24 June 2025 by Mr Justice Bourne and the order of 24 June 2025 (“**the Bourne J Order**”)

**AND UPON** the Claimants’ application dated 2 June 2026

**AND UPON** the Claimants’ application dated 18 June 2026 to re-amend the claim form and amend the particulars of claim

**AND UPON** the review hearings in each of the following claims having been listed on 30 June 2026 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (“**the Claims**”)

**AND UPON** reading the application and the witness evidence in support

**AND UPON** hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

**AND UPON** the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Knowles J Order

**IT IS ORDERED that:**

1. The Knowles J Order shall remain in full force and effect, subject to the variations thereto by the Bourne J Order (and subject to review, as provided for in paragraph 3 of the Knowles J Order).
2. The Knowles J Order, as varied by the Bourne J Order, shall be varied in the form set out in the schedule to this Order.
3. The Claimants have permission to re-amend the claim form and amend the particulars of claim to amend the description of the Defendants and otherwise in the form annexed to the application notice dated 18 June 2026.
4. The court will provide sealed copies of this order to the Claimants’ solicitors for service or notification in accordance with paragraph 9 of the Knowles J Order.

SCHEDULE

Varied pursuant to the order of Bourne J dated 24 June 2025

Further varied pursuant to the order [ ] dated 30 June 2026

**IN THE HIGH COURT OF JUSTICE**  
**KING BENCH DIVISION**

**CLAIM NO: KB-2024-001765**

**Before Mr Justice Julian Knowles**  
**On 20 June 2024**

**BETWEEN:-**

- (1) LONDON CITY AIRPORT LIMITED  
(2) DOCKLANDS AVIATION GROUP LIMITED

**Claimants**

- v -

**PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHER WEALTH INEQUALITY CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER DEFINED IN THE CLAIM FORM**

**Defendant**

---

**ORDER**

---

**PENAL NOTICE**

**IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

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

**IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN**

**This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.**

**UPON** the Claimants' claim by Claim Form, dated 12 June 2024

**AND UPON** hearing the Claimants' application for an interim injunction, dated 12 June 2024, and supporting evidence, without Persons Unknown being notified

**AND UPON** hearing Counsel for the Claimants

**AND UPON** the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

**AND UPON** the "Land" being defined as that land known as London City Airport, as shown for identification edged red on the attached Plan 1 in Schedule 1, but excluding:

- a. Those buildings shaded blue on Plan 1;
- b. In those buildings shaded green on Plan 1, the areas edged blue on Plans 2-8;
- c. In those areas shaded purple, the land suspended over the ground and forming part of the Docklands Light Railway.
- d. In the areas shaded pink, the underground rail tunnel, the subway and that part of Docklands Light Railway located below ground level.

**IT IS ORDERED THAT:**

**INJUNCTION**

1. Until 20 June 2029 or final determination of the claim or further order in the meantime, whichever shall be the earlier, Persons Unknown must not, without the consent of the Claimants, enter, occupy or remain upon the Land.
2. In respect of paragraph 1, Persons Unknown must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
3. The injunction contained at paragraph 1 of this Order shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list) ~~with a time estimate of 1.5 hours.~~ Such hearing shall be listed to be heard with the review of any injunctions made in all or any of the claims with case numbers KB-2024-002132, KB-2024-002317, and KB-2024-002473, with a time estimate of 1 day. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the review hearing.

**VARIATION**

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application. If any evidence

is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimants have liberty to apply to vary this Order.

### **SERVICE AND NOTIFICATION**

7. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and Note of the Hearing on 20 June 2024 will be notified to Persons Unknown by the Claimants carrying out each of the following steps:
  - a. Uploading a copy onto the following website:  
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
  - c. Either affixing a notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9(d) below.
9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to Persons Unknown by the Claimants carrying out each of the following steps:
  - a. Uploading a copy of the Order onto the following website:  
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
  - c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those

locations marked with an "X" on Plan 1.

- d. Affixing warning notices of A2 size at those locations marked with an "X" on Plan 1.
10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to Persons Unknown of any further applications shall be effected by the Claimants carrying out each of the following steps:
    - a. Uploading a copy of the application onto the following website:  
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>.
    - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
    - c. Affixing a notice at those locations marked with an "X" on Plan 1 stating that the application has been made and where it can be accessed in hard copy and online.
  11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(a)-(b) only.
  12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.
  13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8(c), 9(c)-(d) and 10(c), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

#### **FURTHER DIRECTIONS**

14. Liberty to apply.
15. Costs are reserved.

#### **COMMUNICATIONS WITH THE CLAIMANT**

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

~~(1)–Stuart Wortley~~  
~~Eversheds Sutherland (International) LLP–~~  
~~[StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@eversheds-sutherland.com)~~

~~07712 881 393~~

~~(2) Nawaaz Allybokus~~

~~Eversheds Sutherland (International) LLP~~

~~[NawaazAllybokus@eversheds-sutherland.com](mailto:NawaazAllybokus@eversheds-sutherland.com)~~

~~07920 590 944~~

~~Alexander Wright~~

~~Eversheds Sutherland (International) LLP~~

~~[alex.wright@eversheds-sutherland.com](mailto:alex.wright@eversheds-sutherland.com)~~

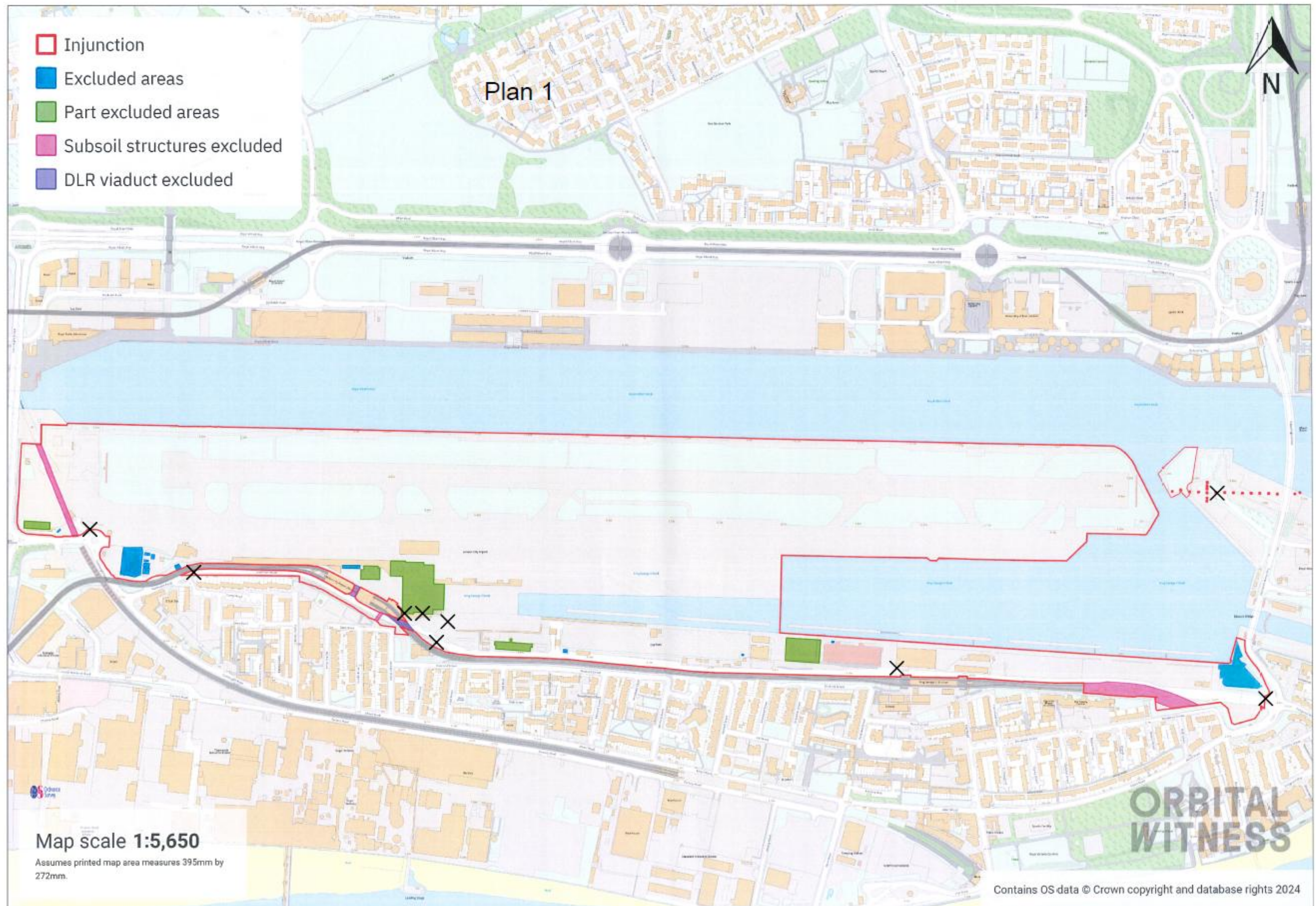
~~07500 578620~~

**Dated: 20 June 2024**

## **SCHEDULE 1 - PLANS**

- Injunction
- Excluded areas
- Part excluded areas
- Subsoil structures excluded
- DLR viaduct excluded

Plan 1



Map scale 1:5,650

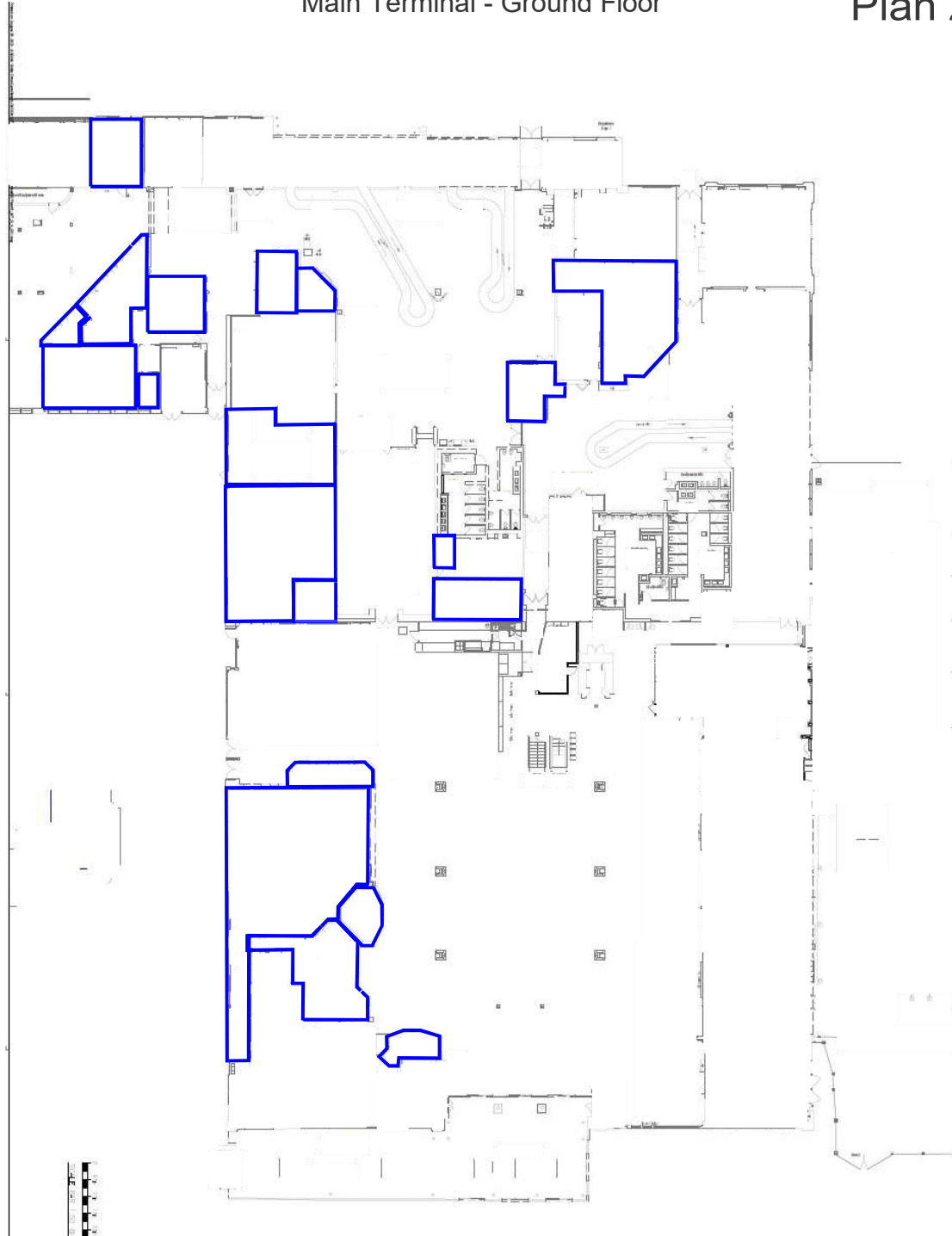
Assumes printed map area measures 395mm by 272mm.

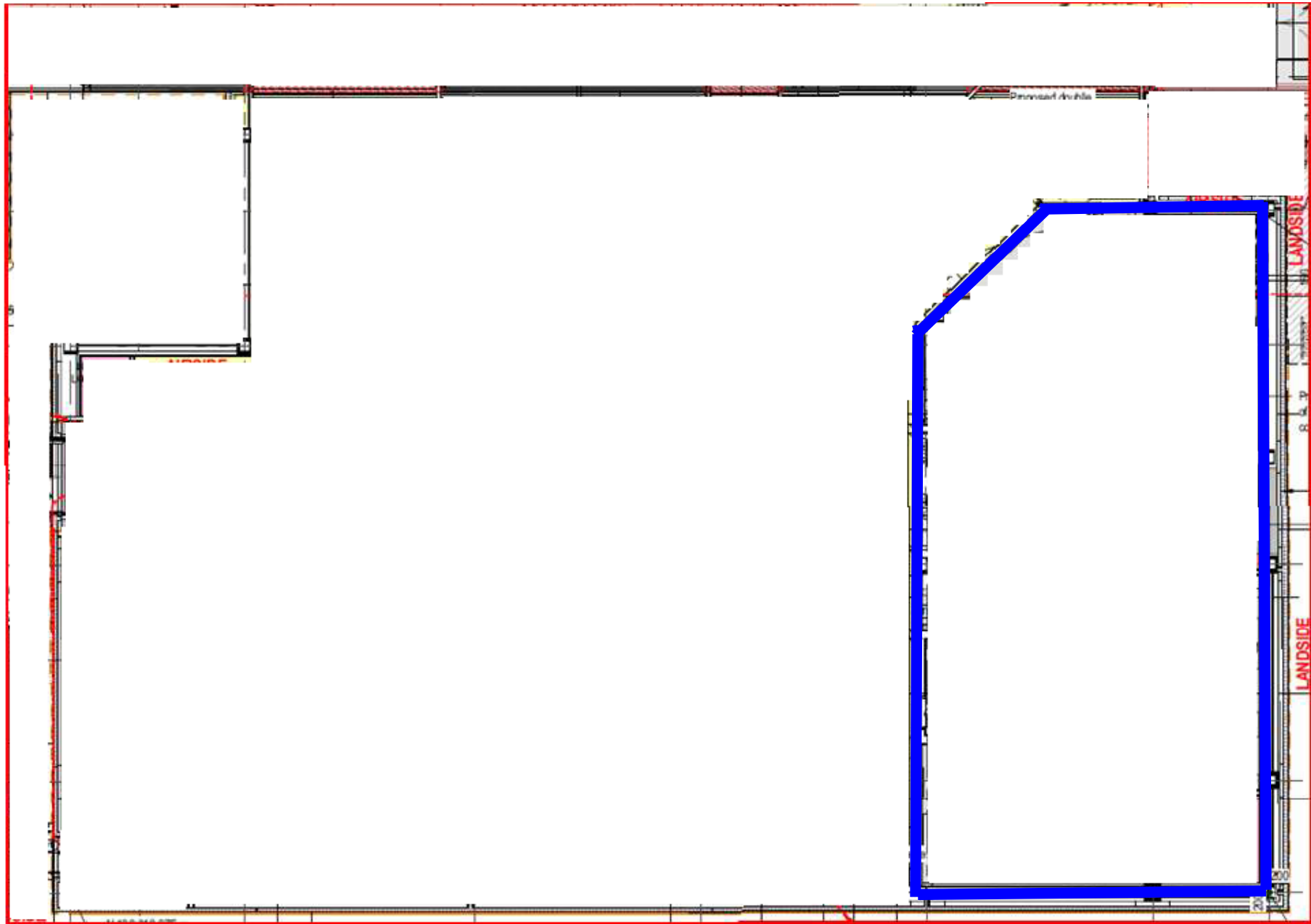
**ORBITAL  
WITNESS**

Contains OS data © Crown copyright and database rights 2024

Main Terminal - Ground Floor

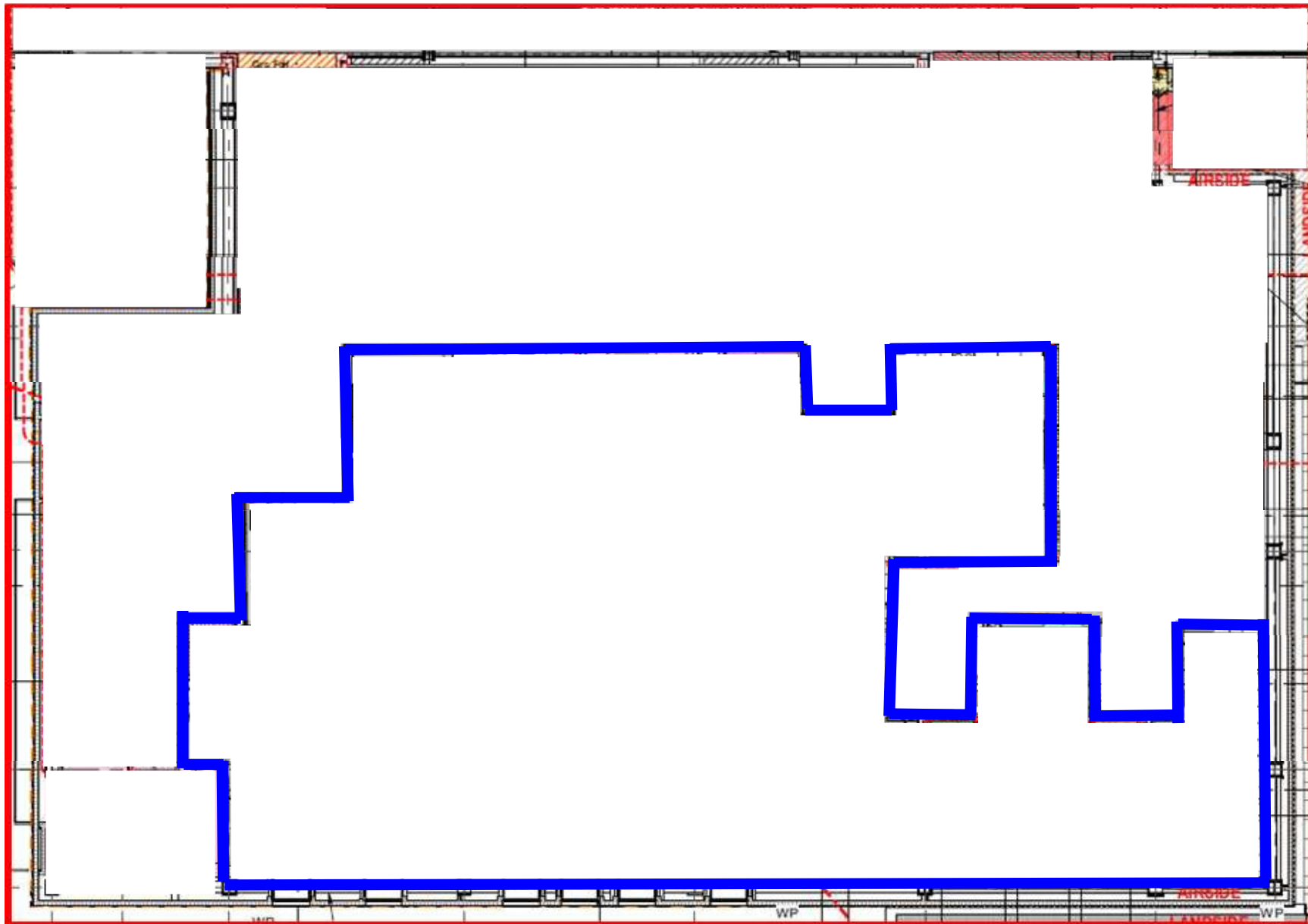
Plan 2





Terminal Immigration Facilities - First Floor

Plan 4

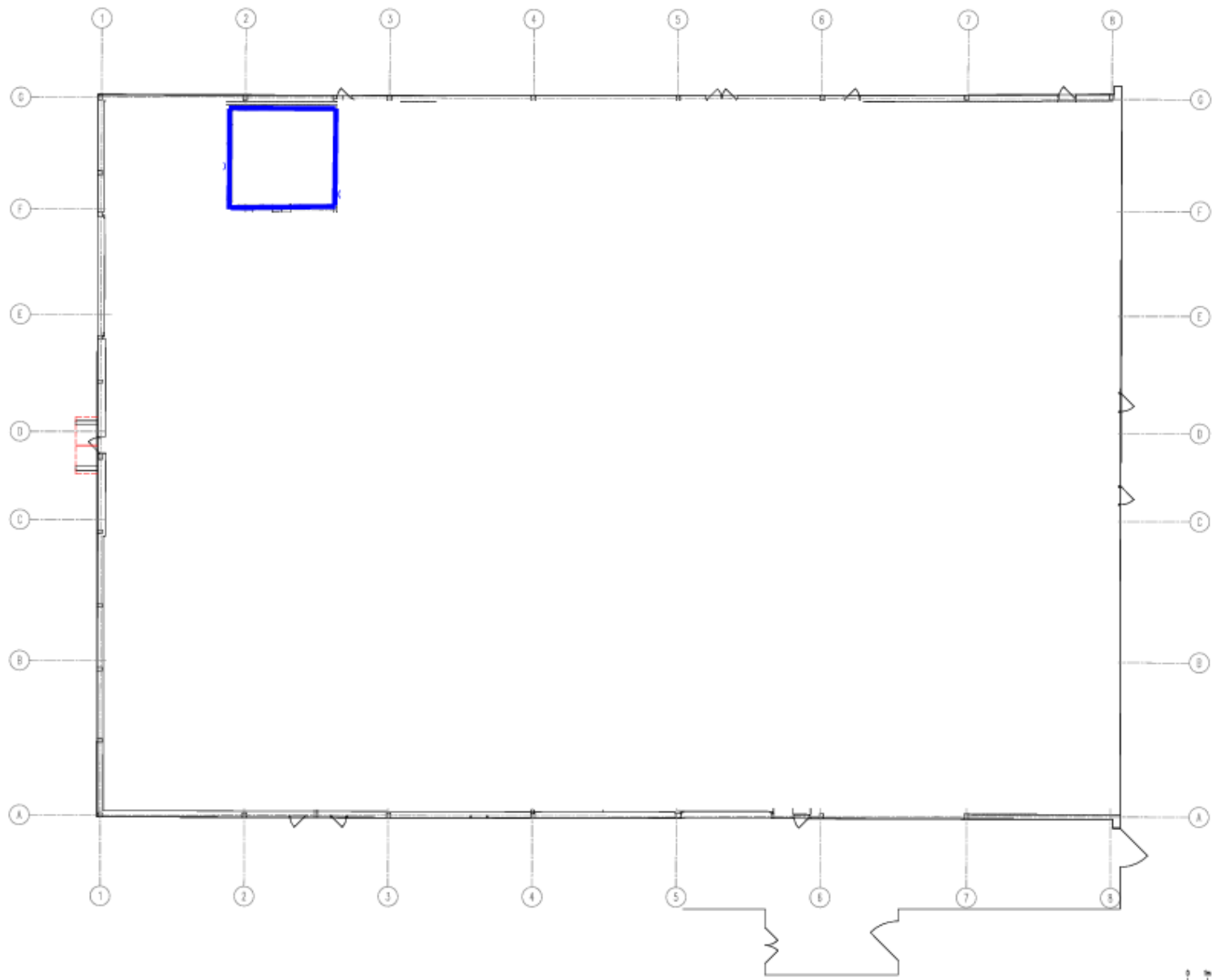


# Blue Shed - Ground Floor

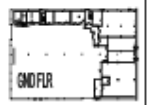
# Plan 5

DO NOT SCALE - IF IN DOUBT ASK  
Associated Drawings

General Notes



1. Name	02/1/20
2. Date	02/01/20



RECORD DRAWING

BLUE SHED  
Ground Floor  
General Arrangement



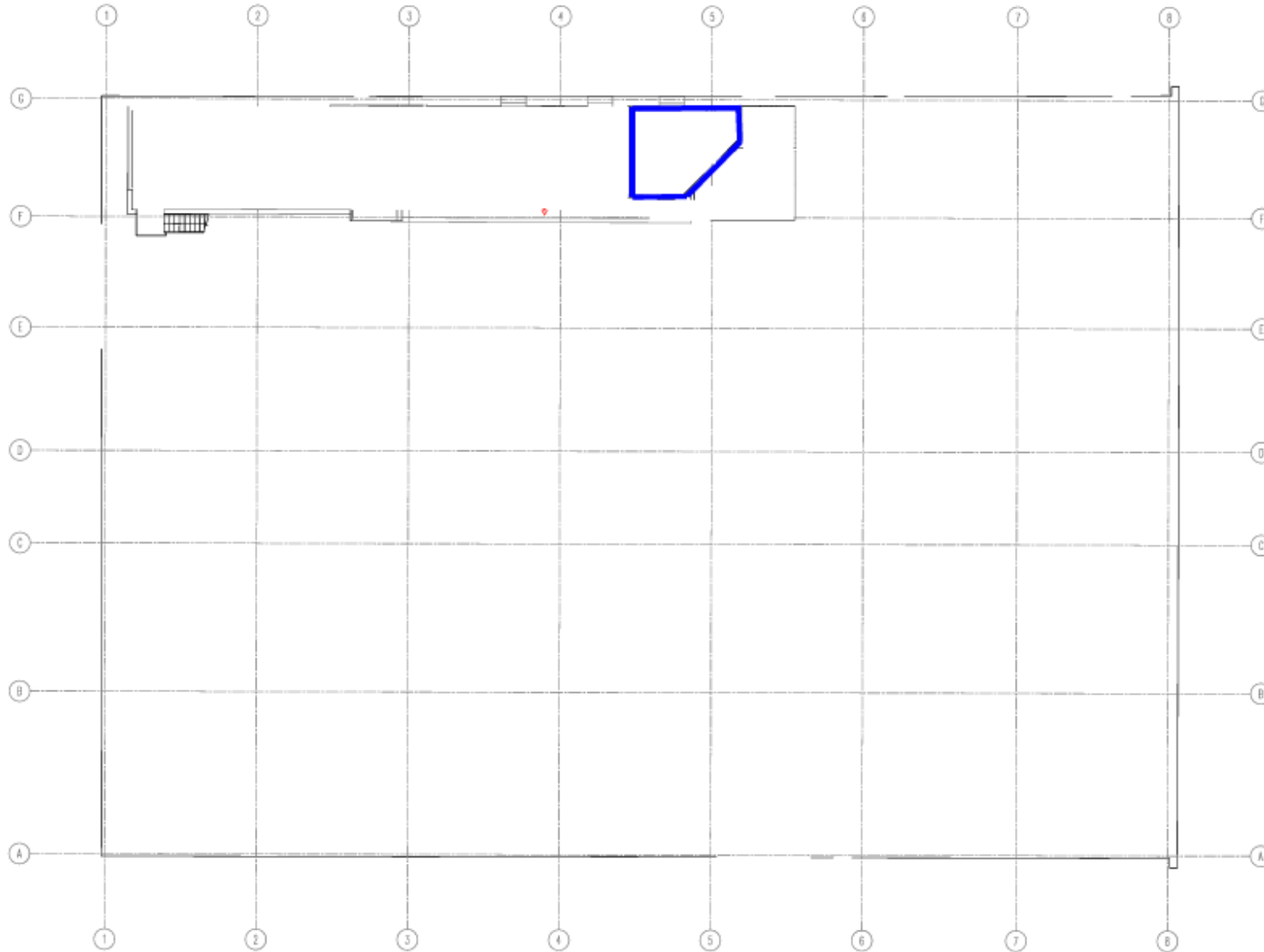
SCALE BAR 1:100 @ A1

02/01/20  
RBS/G/A/001

2020

# Blue Shed - First Floor

# Plan 6



DO NOT SCALE - FINISH TASK

Accumulated Dimensions

General Notes:

**LEGEND**  
XXXX FIRE DOOR  
XXXX STANDARD DOOR

1	Rev	Notes	Date

**WILKINS**

1ST FLR

**London City Airport**  
Get closer.  
London City Airport, City Airport House  
Hag Road, London, E16 2PB

**RECORD DRAWING**


**BLUE SHED**  
1st Floor  
General Arrangement

Number: 100  
Revision: R/BS/1/A/001



General Notes

LEGEND

-  Fire Door
-  Standard Door

E - Room Numbers Added	16/09/18
D - Layout amended	18/09/18
C - Layout amended	05/09/18
B - Room numbers added	04/02/18
A - Redraft as indicated	15/06/15

G+ F/RCS

London City Airport  
Get closer.  
London City Airport, City Aviation House  
Royal Dock, London, UK 200

RECORD DRAWING

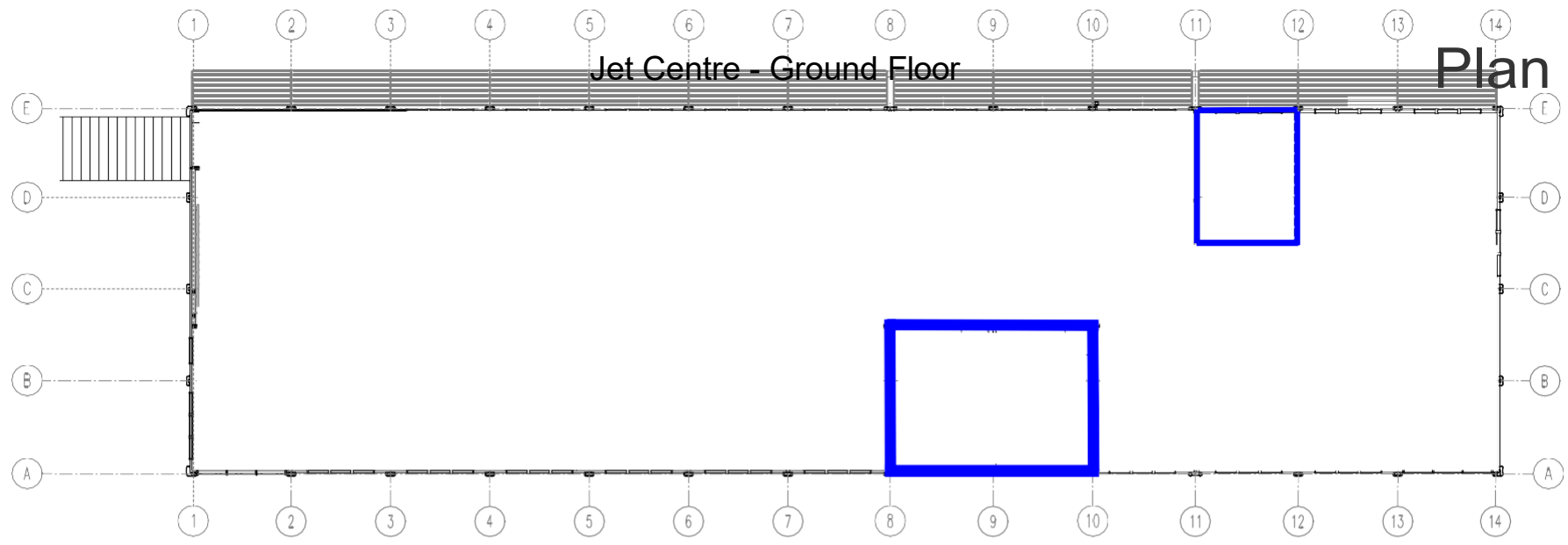
JET CENTRE

Ground to first floor  
General Arrangement Plan

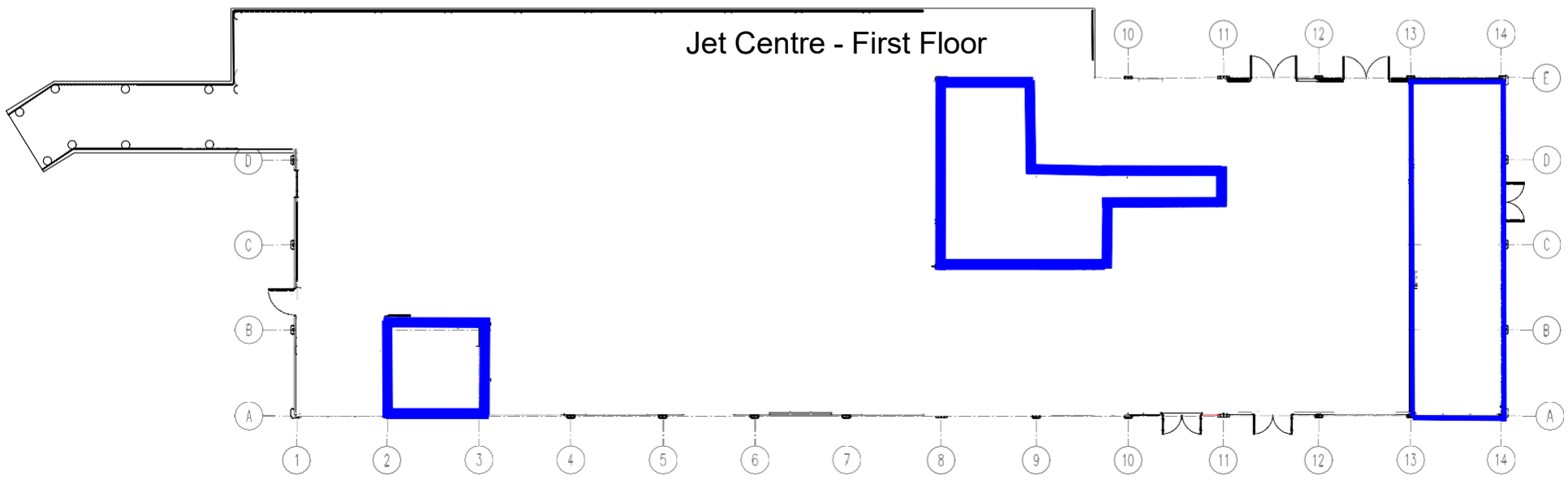
2022  
R/JC/A/A/001

# Jet Centre - Ground Floor

# Plan 7

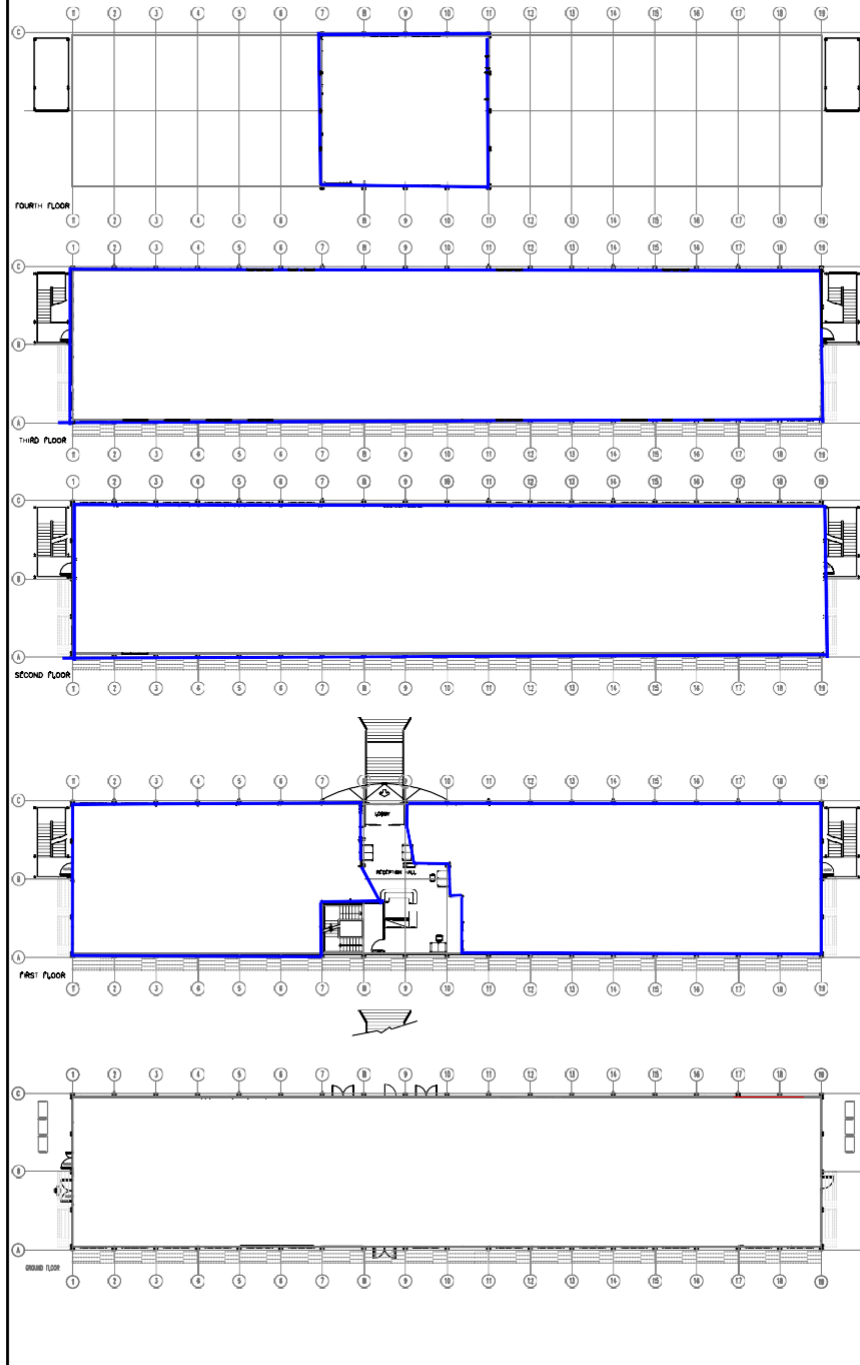


# Jet Centre - First Floor



# City Aviation House

# Plan 8



1" = 32'-0"  
SCALE: ARCH. DRAWING

RECEIVED DRAWING  
CITY OF AVANTON HSE

SL:03

PROJECT NO. 2023-001  
DATE: 01/10/2023  
DRAWN BY: J. B. BROWN  
CHECKED BY: J. B. BROWN

## **SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS**

- (1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.
  
- (2) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

### SCHEDULE 3 – EMAIL ADDRESSES

- [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
- [info@juststopoil.org](mailto:info@juststopoil.org)
- [info@takebackpower.net](mailto:info@takebackpower.net)
- [press@takebackpower.net](mailto:press@takebackpower.net)
- [shut the system info@proton.me](mailto:shut_the_system_info@proton.me)
- [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org)
- [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org)
- [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com)
- [youthdemand@proton.me](mailto:youthdemand@proton.me)
- [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

IN THE HIGH COURT OF JUSTICE  
KING’S BENCH DIVISION

BEFORE: THE HONOURABLE MR/S JUSTICE [     ]

ON: 30 June 2026

B E T W E E N : -

- (1) MANCHESTER AIRPORT PLC
- (2) AIRPORT CITY (MANCHESTER) PLC
- (3) MANCHESTER AIRPORT CAR PARK (1) LIMITED
- (4) STANSTED AIRPORT LTD
- (5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)

Defendants

---

ORDER

---

**PENAL NOTICE**

**IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

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

**IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**UPON** the injunction made by Order dated 5 July 2024 by HHJ Coe KC (“**the HHJ Coe KC Orders**”)

**AND UPON** the review of the HHJ Coe KC Order on 24 June 2025 by Mr Justice Bourne and the order of 24 June 2025 (“**the Bourne J Order**”)

**AND UPON** the Claimants’ application dated 2 June 2026

**AND UPON** the Claimants’ application dated 18 June 2026 to re-amend the particulars of claim

**AND UPON** the review hearings in each of the following claims having been listed on 30 June 2026 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (“**the Claims**”)

**AND UPON** reading the application and the witness evidence in support

**AND UPON** hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

**AND UPON** the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the HHJ Coe KC Order

**IT IS ORDERED that:**

1. The HHJ Coe KC Orders, as varied by the Bourne J Order, shall remain in full force and effect and subject to review, as provided for in paragraph 4 of the HHJ Coe KC Orders, subject to paragraph 3 of this Order.
2. The Claimants have permission to re-amend the particulars of claim in the form annexed to the application notice dated 18 June 2026.
3. The HHJ Coe KC Orders shall be varied by:
  - a. the removal of paragraphs 16(1) and (2); and
  - b. the replacement of the email addresses at Schedule 3 with the following list of email addresses:
    - [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
    - [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
    - [info@juststopoil.org](mailto:info@juststopoil.org)
    - [info@takebackpower.net](mailto:info@takebackpower.net)
    - [press@takebackpower.net](mailto:press@takebackpower.net)
    - [shut\\_the\\_system\\_info@proton.me](mailto:shut_the_system_info@proton.me)
    - [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org)
    - [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org)
    - [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com)
    - [youthdemand@proton.me](mailto:youthdemand@proton.me)
    - [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)
4. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification.

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR/S JUSTICE [     ] ]  
ON: 30 June 2026

B E T W E E N : -

- (1) LEEDS BRADFORD AIRPORT LIMITED
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMIED
- (4) NIAL SERVICES LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT NEWCASTLE AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

Defendants

---

ORDER

---

**PENAL NOTICE**

**IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

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

**IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**UPON** the injunctions made by Order dated 19 July 2024 by Ritchie J (“**the Ritchie J Orders**”)

**AND UPON** the review of the Ritchie J Order on 24 June 2025 by Mr Justice Bourne and the order of 24 June 2025 (“**the Bourne J Order**”)

**AND UPON** the Claimants’ application dated 2 June 2026

**AND UPON** the Claimants’ application dated 18 June 2026 to re-amend the claim form and re-amend the particulars of claim

**AND UPON** the review hearings in each of the following claims having been listed on 30 June 2026 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (“**the Claims**”)

**AND UPON** reading the application and the witness evidence in support

**AND UPON** hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

**AND UPON** the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Ritchie J Order

**IT IS ORDERED that:**

1. The Ritchie J Orders shall remain in full force and effect subject to review, as provided for in paragraph 2 of the Ritchie J Orders, subject to the amendments shown in Annexes 1 to 3 to this Order (which includes the variation as ordered by paragraph 2 of the Bourne J Order).
  
2. The Claimants have permission to re-amend the claim form and particulars of claim to:
  - a. Re-amend the description of the Defendants.
  - b. Substitute Plan 2, Plan 2A and Plan 2B with the plans annexed to the application dated 18 June 2026 marked Plan 2, Plan 2A and Plan 2b.
  - c. Re-amend paragraph 14 of the amended particulars of claim to refer to the London Luton Airport Byelaws 2025 and the correct byelaws therein and otherwise in the form annexed to the application notice dated 18 June 2026.
  
3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification in accordance with paragraph 9 of the Ritchie J Orders and by affixing this order at the locations marked "X" on the applicable Ritchie J Order (Plan 1, Plan 2 and Plan 3).

Annex 1

Amended by the order of The Hon. Dated [ ]

Schedule 1 3 Plan Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE

KINGS BENCH DIVISION

ROYAL COURTS OF JUSTICE

BETWEEN:-

(1) LEEDS BRADFORD AIRPORT LIMITED

AND THREE OTHERS

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

---

ORDER

---

**PENAL NOTICE**

**IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

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

**IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**BEFORE** The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 18 July 2024

**UPON** the Claimants' claim by the Claim Form issued on 16 July 2024

**AND UPON** the Claimants' ex-parte application for an injunction issued on 16 July 2024 ("**the Application**")

**AND UPON READING** the Application and the first witness statements: of Alexander James Wright dated 16 July 2024, 17 July 2024, (another) 17 July 2024; and 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

**AND UPON** hearing Mr Morshead K.C. and Miss Barden, Counsel for the Claimants and no one attending for the Defendants.

**AND UPON** the First Claimant giving and the Court accepting the undertakings set out in Schedule 2 to this Order.

**AND UPON** the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to [protestrequest@lba.co.uk](mailto:protestrequest@lba.co.uk).

## **DEFINITIONS**

“**Leeds Bradford Airport**” means the land shown in red outlined in red on Plan 1 to the Claim Form, appended to this Order in Schedule 1 (“**Plan 1**”).

“**Amended Warning Notice**” means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address <https://www.leedsbradfordairport.co.uk/injunction>. at which copies of this Order may be viewed and downloaded).

## **NOW IT IS ORDERED THAT:**

### **INJUNCTION**

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.
2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

### **SERVICE**

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the First Defendant:
  - a. Uploading a copy onto the following website:  
<https://www.leedsbradfordairport.co.uk/injunction>.
  - b. Sending an email to each of the email addresses listed in Schedule 3 to this Order (1) stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and (2) attaching this Order.
  - c. Affixing a notice at those locations marked with an “X” on Plan 1 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form of Schedule 4 and, in the case of any further applications or documents served pursuant to paragraph 9 of this Order, affixing a notice at

the locations marked with an “X” on Plan 1 setting out where the relevant application(s) or document(s) can be found and obtained in hard copy.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraph 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.
6. The Court will provide sealed copies of this Order to the First Claimant’s solicitors for service (whose details are set out below).
7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.
8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3 and 4. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

#### **FURTHER DIRECTIONS**

9. Service on the First Defendant of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the First Claimant’s solicitors 72 hours’ notice of such application by email to [StuartWortleyalexwright@eversheds-sutherland.com](mailto:StuartWortleyalexwright@eversheds-sutherland.com). If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant’s solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant’s solicitors.
13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.

15. Costs are reserved.

**Ritchie J**

**Made 19 July 2024**

**NOTES**

**COMMUNICATIONS WITH THE FIRST CLAIMANT**

The First Claimant's solicitors and their contact details are:

~~(1) Stuart Wortley  
Eversheds Sutherland (International) LLP  
[StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@eversheds-sutherland.com)  
07712 881 393~~

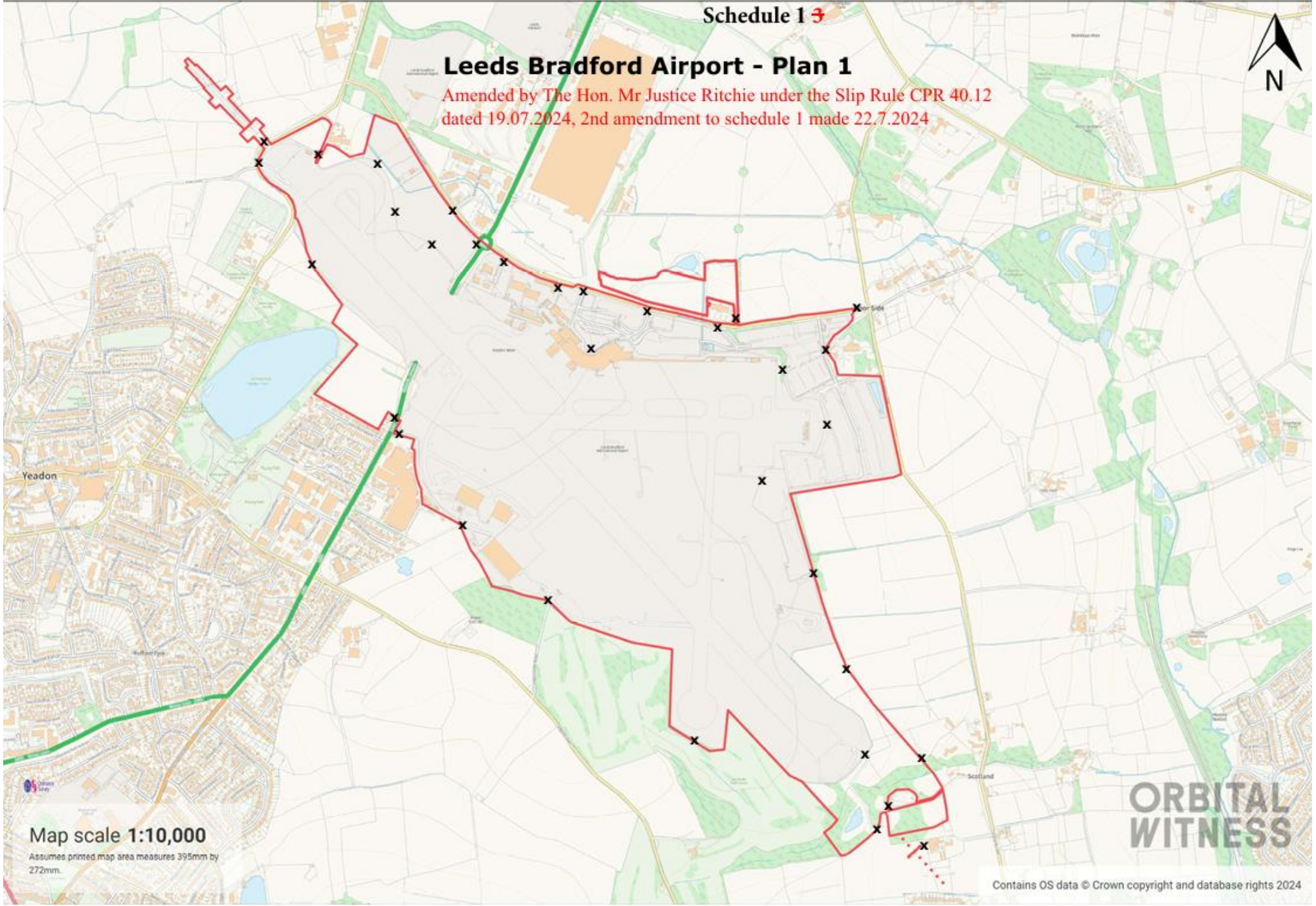
~~(2) Nawaaz Allybokus  
Eversheds Sutherland (International) LLP  
[NawaazAllybokus@eversheds-sutherland.com](mailto:NawaazAllybokus@eversheds-sutherland.com)  
07920 590 944~~

(3) Alexander Wright  
Eversheds Sutherland (International) LLP  
[alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)  
07500 578620

Schedule 1 ↻

# Leeds Bradford Airport - Plan 1

Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024



Map scale 1:10,000  
Assumes printed map area measures 395mm by 272mm.

**ORBITAL  
WITNESS**

Contains OS data © Crown copyright and database rights 2024

## **SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT**

- (1) The First Claimant will take steps to serve the First Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
- (2) The First Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

### SCHEDULE 3 – EMAIL ADDRESSES

- [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
- [info@juststopoil.org](mailto:info@juststopoil.org)
- ~~[enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk)~~
- [info@takebackpower.net](mailto:info@takebackpower.net)
- [press@takebackpower.net](mailto:press@takebackpower.net)
- [shut the system info@proton.me](mailto:shut_the_system_info@proton.me)
- [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org)
- [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org)
- [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com)
- [youthdemand@proton.me](mailto:youthdemand@proton.me)
- [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

## SCHEDULE 4 – AMENDED WARNING NOTICE

### High Court Injunction in Force

#### NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 (“the Order”)

**TO:** PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

**FROM:** Leeds Bradford Airport Limited (the “**First Claimant**”)

This notice relates to the land known as Leeds Bradford Airport which is shown edged red on the Plan below (the “**Airport**”)

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the First Claimant.

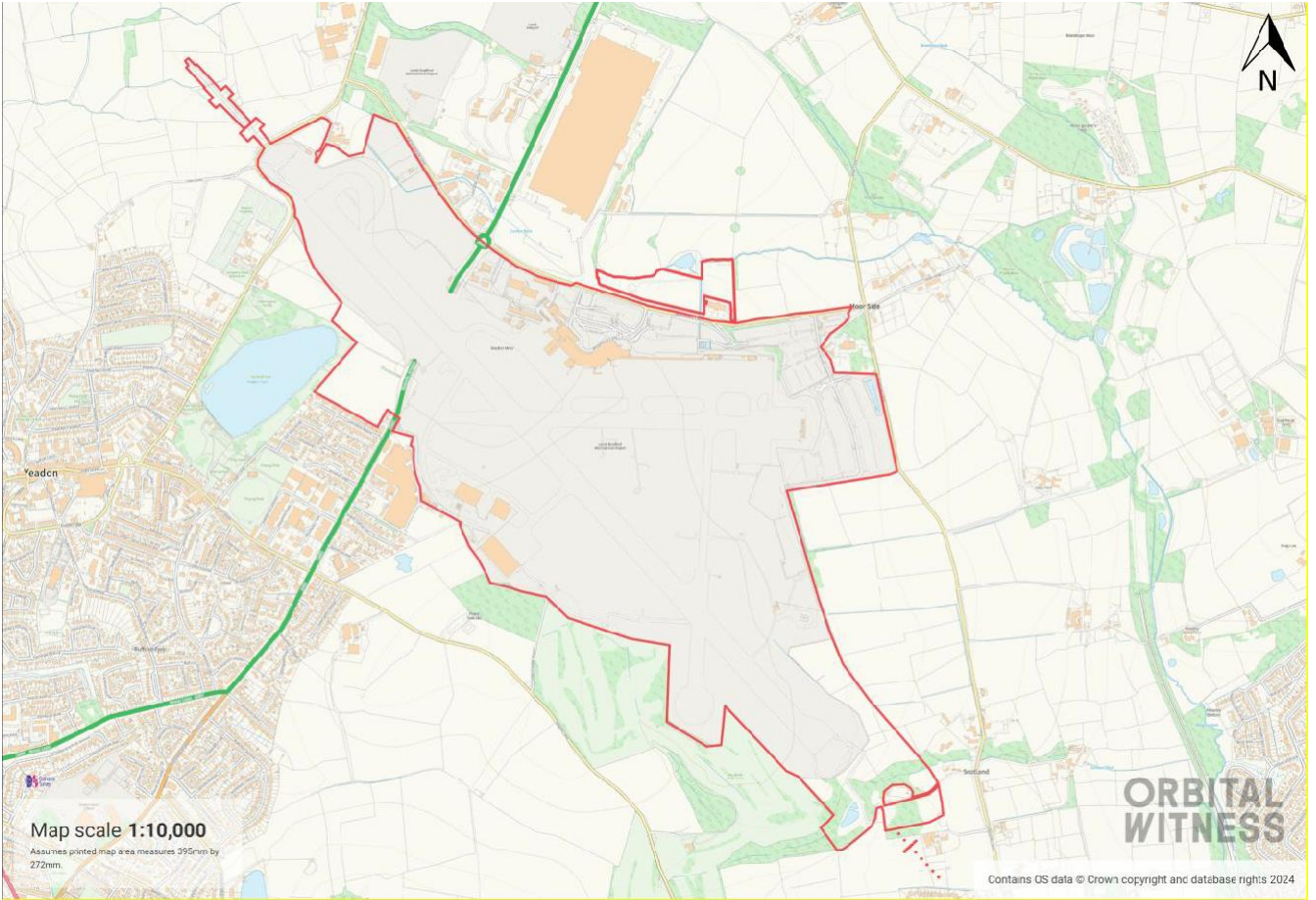
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant’s solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: <https://www.leedsbradfordairport.co.uk/injunction>

Copies may also be obtained from the Information Desk or by contacting Alexander Wright Stuart Wortley of Eversheds Sutherland on 0771 288 1393 07500578620 or by email [alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com) [stuartwortley@eversheds-sutherland.com](mailto:stuartwortley@eversheds-sutherland.com).



Annex 2

Amended by the order of The Hon.

Dated [ ]

**CLAIM NO: KB-2024-002317**

**IN THE HIGH COURT OF JUSTICE**  
**KINGS BENCH DIVISION**  
**ROYAL COURTS OF JUSTICE**

**BETWEEN:-**

**(2) LONDON LUTON AIRPORT OPERATIONS LIMITED**

**AND THREE OTHERS**

**Claimants**

- v -

**(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)**

**AND TWO OTHERS**

**Defendants**

---

**ORDER**

---

## **PENAL NOTICE**

**IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

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

## **IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**BEFORE** The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 19 July 2024.

**UPON** the Claimants' claim by the Claim Form issued on 16 July 2024.

**AND UPON** the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

**AND UPON READING** the Application and the witness statements of: Alexander James Wright dated 16 July 2024, dated 17 July 2024, (and another) 17 July 2024 and dated 18 July 2024; Vincent Hodder dated 15 July 2024; Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

**AND UPON** hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants.

**AND UPON** the Second Claimant giving and the Court accepting the undertakings set out in Schedule 2 to this Order.

**AND UPON** the Second Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London Luton Airport, as defined by this Order, should be made by email to [protestrequest@ltn.aero](mailto:protestrequest@ltn.aero).

## **DEFINITIONS**

**"London Luton Airport"** means the land shown in red outlined in red on Plan 2 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

“**Amended Warning Notice**” means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address <https://www.london-luton.co.uk/corporate/lla-publications/injunction> at which copies of this Order may be viewed and downloaded.

## **NOW IT IS ORDERED THAT:**

### **INJUNCTION**

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of London Luton Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.
2. This Order is subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

### **SERVICE**

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Second Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the Second Defendant:
  - a. Uploading a copy onto the following website: <https://www.london-luton.co.uk/corporate/lla-publications/injunction>.
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and attaching this Order.
  - c. Affixing a notice at those locations marked with an “X” on Plan 2 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form in Schedule 4 and, in the case of any further applications or documents served pursuant to paragraph 9 of this Order, affixing a notice at the locations marked with an “X” on Plan 2 setting out where the relevant application(s) or document(s) can be found and obtained in hard copy.
4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the Second Defendant and each of them.
6. The Court will provide sealed copies of this Order to the Second Claimant's solicitors for service (whose details are set out below).
7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.
8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

### **FURTHER DIRECTIONS**

9. Service on the Second Defendant of any further applications or documents in the proceedings by the Second Claimant shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Second Claimant's solicitors 72 hours' notice of such application by email to [StuartWortleyalexwright@eversheds-sutherland.com](mailto:StuartWortleyalexwright@eversheds-sutherland.com). If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Second Claimant's solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second Claimant's solicitors.
13. The Second Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

**Ritchie J**

**Made 19 July 2024**

## NOTES

### COMMUNICATIONS WITH THE SECOND CLAIMANT

The Second Claimant's solicitors and their contact details are:

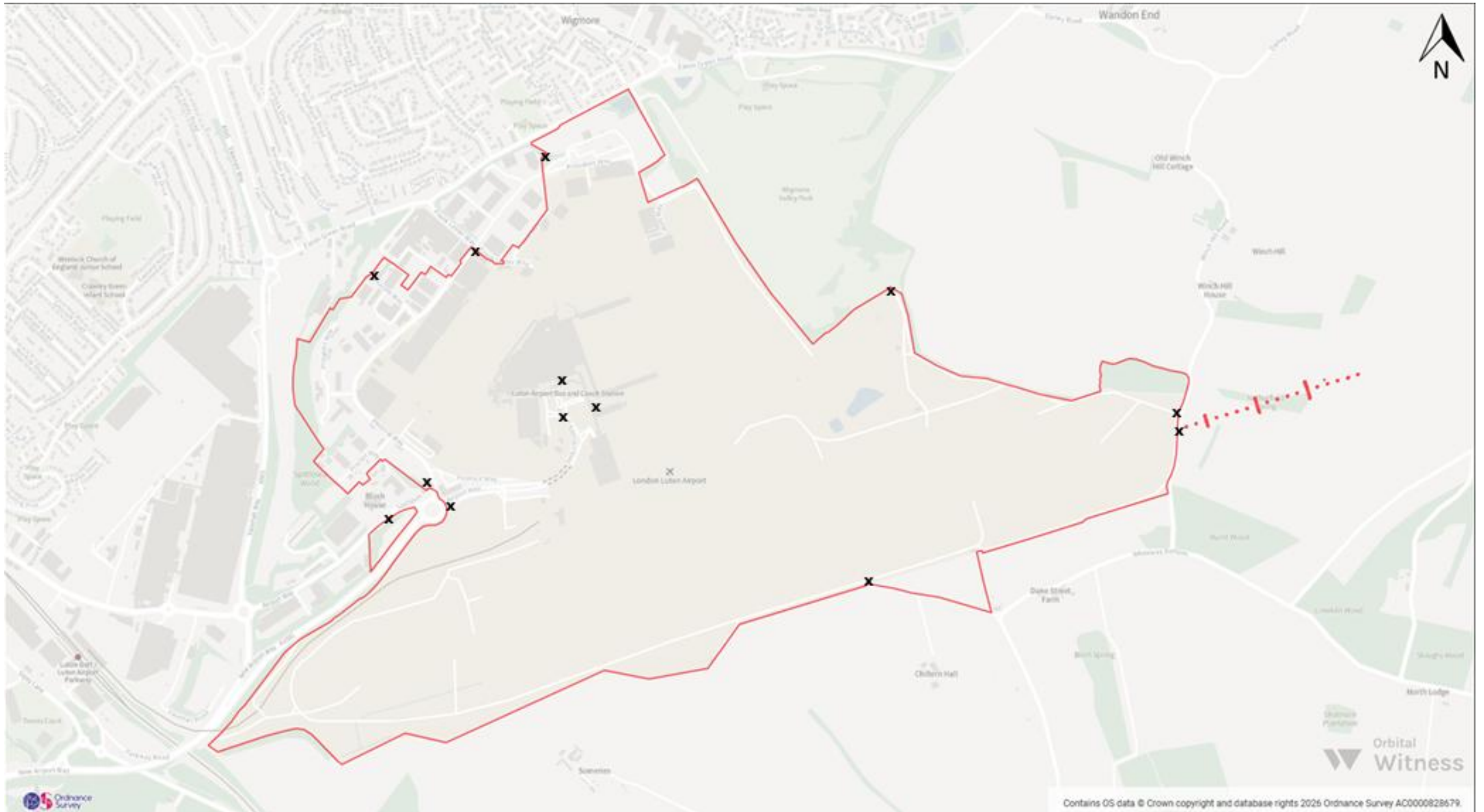
~~(1) Stuart Wortley  
Eversheds Sutherland (International) LLP  
[StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@eversheds-sutherland.com)  
07712 881 393~~

~~(2) Nawaaz Allybokus  
Eversheds Sutherland (International) LLP  
[NawaazAllybokus@eversheds-sutherland.com](mailto:NawaazAllybokus@eversheds-sutherland.com)  
07920 590 944~~

(3) Alexander Wright  
Eversheds Sutherland (International) LLP  
[alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)  
07500 578620

## SCHEDULE 1

# LONDON LUTON AIRPORT PLAN 2



## **SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND CLAIMANT**

- (1) The Second Claimant will take steps to serve the Second Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
  
- (2) The Second Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

### SCHEDULE 3 – EMAIL ADDRESSES

- [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
- [info@juststopoil.org](mailto:info@juststopoil.org)
- ~~[enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk)~~
- [info@takebackpower.net](mailto:info@takebackpower.net)
- [press@takebackpower.net](mailto:press@takebackpower.net)
- [shut\\_the\\_system\\_info@proton.me](mailto:shut_the_system_info@proton.me)
- [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org)
- [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org)
- [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com)
- [youthdemand@proton.me](mailto:youthdemand@proton.me)
- [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

## SCHEDULE 4 – AMENDED WARNING NOTICE

### High Court Injunction in Force

#### NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 (“the Order”)

**TO:** PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

**FROM:** London Luton Airport Operations Limited (the “**Second Claimant**”)

This notice relates to the land known as London Luton Airport which is shown edged red on the Plan below (the “**Airport**”)

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the Second Claimant.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Second Claimant’s solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: <https://www.london-luton.co.uk/corporate/lla-publications/injunction>

Copies may also be obtained from the Information Desk or by contacting Alexander Wright Stuart Wortley of Eversheds Sutherland ~~on 0771 288 1393~~ on 07500578620 or by email [alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com) [stuartwortley@eversheds-sutherland.com](mailto:stuartwortley@eversheds-sutherland.com).



Amended by the order of The Hon. Dated [ ]

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE  
KINGS BENCH DIVISION  
ROYAL COURTS OF JUSTICE

BETWEEN:-

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED  
(4) NIAL SERVICES LIMITED

AND TWO OTHERS

Claimants

- v -

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

---

ORDER

---

PENAL NOTICE

**IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

**ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO**

**BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.**

### **IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**BEFORE The Honourable Mr Justice Ritchie on 18 July 2024**

**UPON** the Claimants' claim by the Claim Form issued on 16 July 2024

**AND UPON** the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

**AND UPON READING** the Application and the witness statements of: Alexander James Wright dated 16 July 2024, 17 July 2024, (and another) 17 July 2024, dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**")

**AND UPON** hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants

**AND UPON** the Third and Fourth Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

**AND UPON** the Third and Fourth Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Newcastle International Airport, as defined by this Order, should be made by email to [protestrequest@newcastleinternational.co.uk](mailto:protestrequest@newcastleinternational.co.uk)

### **DEFINITIONS**

**"Newcastle International Airport"** means the land shown in red outlined in red on Plan 3 to

the Claim Form, appended to this Order in Schedule 1 (“**Plan 3**”).

“**Amended Warning Notice**” means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address <https://www.newcastleairport.com/about-your-airport/airport-company/injunction/> at which copies of this Order may be viewed and downloaded).

## **IT IS ORDERED THAT:**

### **INJUNCTION**

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Newcastle International Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants (or either of them).
2. This Order is subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

### **SERVICE**

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Third and Fourth Claimants shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the Third Defendant:
  - a. Uploading a copy onto the following website:  
<https://www.newcastleairport.com/about-your-airport/airport-company/injunction/>
  - b. Sending an email with this Order attached to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
  - c. Affixing a notice at those locations marked with an “X” on Plan 3 setting out where these documents can be found and obtained in hard copy in the form of Schedule 4 and, in the case of any further applications or documents served pursuant to paragraph 9 of this Order, affixing a notice at the locations

marked with an “X” on Plan 1 setting out where the relevant application(s) or document(s) can be found and obtained in hard copy.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraph 3 shall be good and sufficient service of this Order and of the Claim Documents upon the Third Defendant and each of them.
6. The Court will provide sealed copies of this Order to the Third and Fourth Claimants’ solicitors for service (whose details are set out below).
7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.
8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraphs 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

#### **FURTHER DIRECTIONS**

9. Service on the Third Defendant of any further applications or documents in the proceedings by the Third and Fourth Claimants shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Third and Fourth Claimants’ solicitors 72 hours’ notice of such application by email to [StuartWortley-alexwright@eversheds-sutherland.com](mailto:StuartWortley-alexwright@eversheds-sutherland.com). If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Third and Fourth Claimants’ solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Third and Fourth Claimants’ solicitors.
13. The Third and Fourth Claimants (or either of them) have liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.

15. Costs are reserved.

**Ritchie J**

**Made 19.7.2024**

**COMMUNICATIONS WITH THE THIRD AND FOURTH CLAIMANTS**

The Third and Fourth Claimants' solicitors and their contact details are:

~~(1) Stuart Wortley  
Eversheds Sutherland (International) LLP  
StuartWortley@eversheds-sutherland.com  
07712 881 393~~

~~(2) Nawaaz Allybokus  
Eversheds Sutherland (International) LLP  
NawaazAllybokus@eversheds-sutherland.com  
07920 590 944~~

(3) Alexander Wright  
Eversheds Sutherland (International) LLP  
[alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)  
07500 578620

## SCHEDULE 1

# Newcastle International Airport - Plan 3



**SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE THIRD AND FOURTH CLAIMANTS**

- (1) The Third and Fourth Claimants will take steps to serve the Third Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
- (2) The Third and Fourth Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

### SCHEDULE 3 – EMAIL ADDRESSES

- [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
- [info@juststopoil.org](mailto:info@juststopoil.org)
- ~~[enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk)~~
- [info@takebackpower.net](mailto:info@takebackpower.net)
- [press@takebackpower.net](mailto:press@takebackpower.net)
- [shut\\_the\\_system\\_info@proton.me](mailto:shut_the_system_info@proton.me)
- [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org)
- [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org)
- [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com)
- [youthdemand@proton.me](mailto:youthdemand@proton.me)
- [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

SCHEDULE 4 – **AMENDED** WARNING NOTICE

HIGH COURT CLAIM NO: KB-2024-002317

**High Court Injunction in Force**

**NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 (“the Order”)**

**TO:** PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

**FROM:** Newcastle International Airport Limited and NIAL Services Limited (the “**Third and Fourth Claimants**”)

This notice relates to the land known as Newcastle International Airport which is shown edged red on the Plan below (the “**Airport**”)

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the Third and Fourth Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

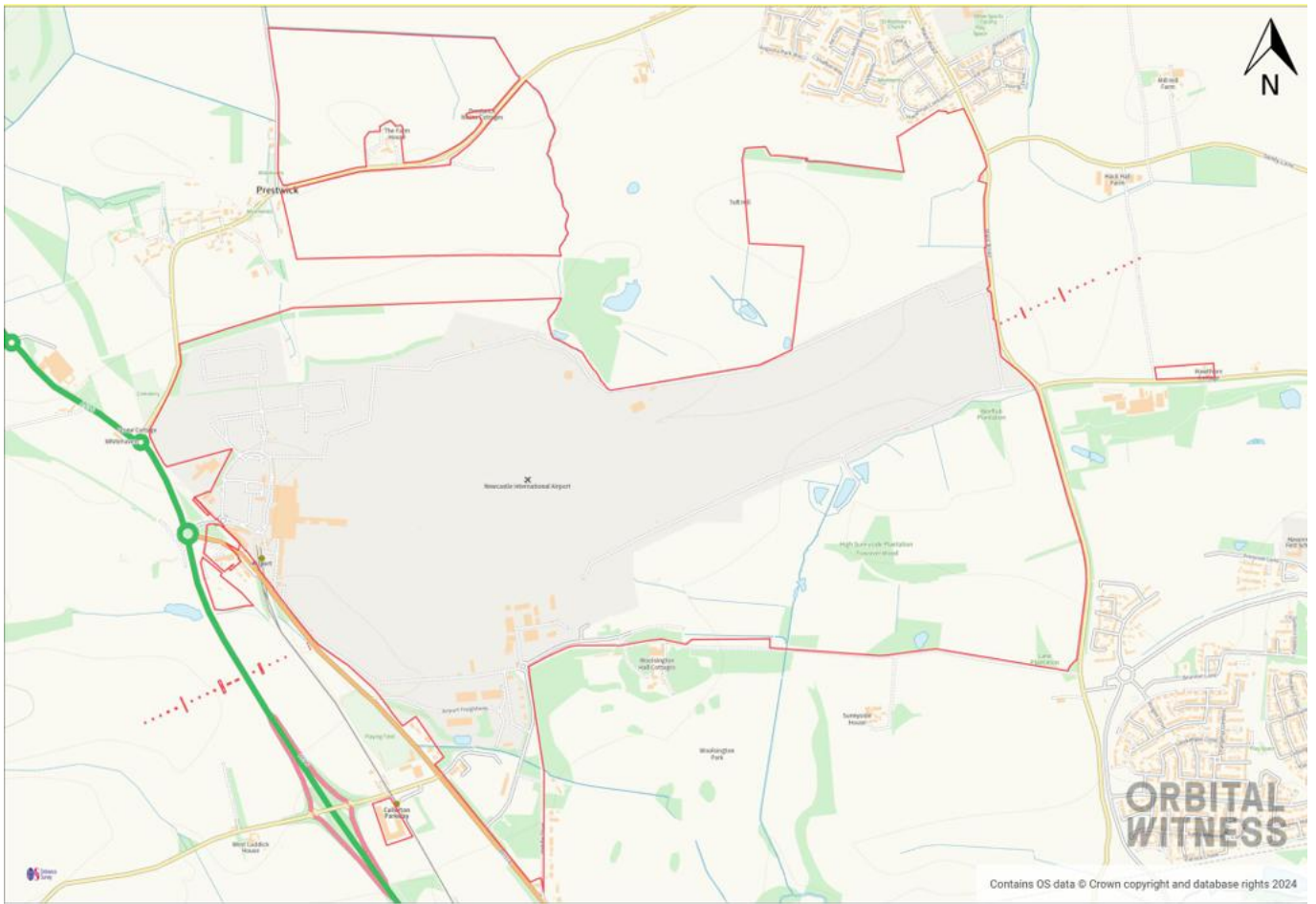
**You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized**

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Third and Fourth Claimants’ solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at:

<https://www.newcastleairport.com/about-your-airport/airport-company/injunction/>

Copies may also be obtained from the Information Desk or by contacting Alexander Wright ~~Stuart Wortley~~ of Eversheds Sutherland on ~~0771 288 1393~~ 07500578620 or by email [alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com) ~~stuartwortley@eversheds-sutherland.com~~



**IN THE HIGH COURT OF JUSTICE**  
**KING'S BENCH DIVISION**

**BEFORE: THE HONOURABLE MR/S JUSTICE [     ]**

**ON: 30 June 2026**

**B E T W E E N : -**

- (1) BIRMINGHAM AIRPORT LIMITED**
- (2) LIVERPOOL AIRPORT LIMITED**
- (3) PEEL L&P INVESTMENTS (NORTH) LIMITED**
- (4) BRISTOL AIRPORT LIMITED**
- (5) SOUTH WEST AIRPORT LIMITED**
- (6) BRISTOL AIRPORT DEVELOPMENT LIMITED**

**Claimants**

**-and-**

**(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)**

**(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)**

**(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)**

**Defendants**

---

**ORDER**

---

**PENAL NOTICE**

**IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

**ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR**

**PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.**

**IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**UPON** the injunction made by Order dated 6 August 2024 by Jacobs J (“**the Jacobs J Orders**”)

**AND UPON** the review of the Jacobs J Orders on 24 June 2025 by Mr Justice Bourne and the order of 24 June 2025 (“**the Bourne J Order**”)

**AND UPON** the Claimants’ application dated 2 June 2026

**AND UPON** the Claimants’ application dated 18 June 2026 to re-amend the claim form and re-amend the particulars of claim

**AND UPON** the review hearings in each of the following claims having been listed on 30 June 2026 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (“**the Claims**”)

**AND UPON** reading the application and the witness evidence in support

**AND UPON** hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

**AND UPON** the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Jacobs J Order

**IT IS ORDERED that:**

1. The Jacobs J Orders shall remain in full force and effect subject to review, as provided for in paragraph 2 of the Jacobs Order, and subject to the amendments shown in Annexes 1 to 3 of this Order.
2. The Claimants have permission to re-amend the claim form and particulars of claim to amend the description of the Defendants and otherwise in the form annexed to the application notice dated 18 June 2026.
3. The court will provide sealed copies of this order to the Claimants’ solicitors for service or notification.

Annex 1

Amended by order of [ ] dated [ ]

**CLAIM NO: KB-2024-002473**

**IN THE HIGH COURT OF JUSTICE  
KINGS BENCH DIVISION**

**BEFORE MR JUSTICE JACOBS  
DATED 6<sup>TH</sup> AUGUST 2024**

**BETWEEN:-**

(1) BIRMINGHAM AIRPORT LIMITED

AND FIVE OTHERS

**Claimants**

- v -

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

**Defendants**

---

**ORDER**

---

**PENAL NOTICE**

**IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

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

**ASSETS SEIZED.**

**IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**BEFORE THE HONOURABLE MR JUSTICE**

**JACOBS ON 6 AUGUST 2024**

**UPON** the Claimants' claim by the Claim Form dated 31 July 2024

**AND UPON** the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

**AND UPON READING** the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

**AND UPON** hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

**AND UPON** the First Claimant giving and the Court accepting the undertakings set out in Schedule 2 to this Order

**AND UPON** the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Birmingham Airport, as defined by this Order, should be made by email to [protestrequest@birminghamairport.co.uk](mailto:protestrequest@birminghamairport.co.uk)

**AND UPON** the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

**DEFINITIONS**

**"Birmingham Airport"** means the land outlined in red on Plan 1 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

“**Amended Warning Notice**” means a notice in the form as set out in Schedule 4 to this Order.

**IT IS ORDERED THAT:**

**INJUNCTION**

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Birmingham Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

**REVIEW**

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court’s list). Such hearing shall be listed to be heard with the review of any injunctions made in all or any of the claims with the Claims, with a time estimate of 1 day with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

**SERVICE/NOTIFICATION**

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).
4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:
  - a. Uploading a copy onto the following website:  
<https://www.Birminghamairport.co.uk/injunction>.
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.

- c. Affixing a Warning Notice approximately at those locations marked with an “X” on Plan 1 setting out where these documents can be found and obtained in hard copy.
5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.
6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.
7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.
8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: <https://www.Birminghamairport.co.uk/injunction>.
9. The Court will provide sealed copies of this Order to the First Claimant’s solicitors for service or notification (whose details are set out below).

**FURTHER DIRECTIONS**

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the First Claimant’s solicitors 72 hours’ notice of such application by email to [StuartWortleyalexwright@eversheds-sutherland.com](mailto:StuartWortleyalexwright@eversheds-sutherland.com). If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant’s solicitors at least 48 hours in advance of any hearing.
11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant’s solicitors.
13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for

further directions.

14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

#### **COMMUNICATIONS WITH THE FIRST CLAIMANT**

16. The First Claimant's solicitors and their contact details are:

~~(1) Stuart Wortley~~

~~Eversheds Sutherland (International) LLP~~

~~[StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@eversheds-sutherland.com)~~

~~07712 881 393~~

~~(2) Nawaaz Allybokus~~

~~Eversheds Sutherland (International) LLP~~

~~[NawaazAllybokus@eversheds-sutherland.com](mailto:NawaazAllybokus@eversheds-sutherland.com)~~

~~07920 590 944~~

Alexander Wright

Eversheds Sutherland (International) LLP

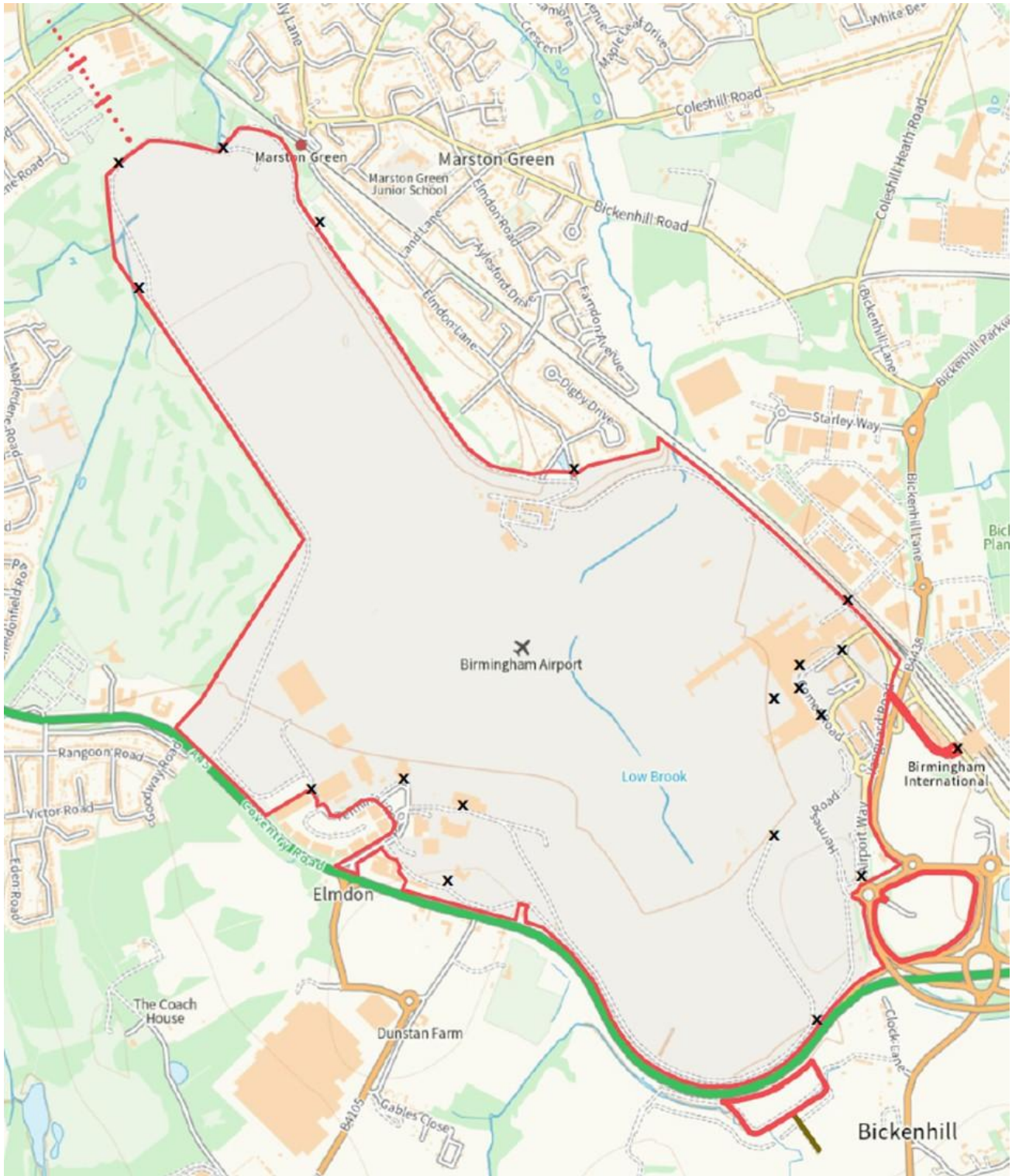
[alex.wright@eversheds-sutherland.com](mailto:alex.wright@eversheds-sutherland.com)

07500 578620

#### **COMMUNICATIONS WITH THE COURT**

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at <https://efile.cfile-app.com>

**SCHEDULE 1**



## **SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT**

- (1) The First Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

### SCHEDULE 3 – EMAIL ADDRESSES

- [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
- [info@juststopoil.org](mailto:info@juststopoil.org)
- ~~[enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk)~~
- [info@takebackpower.net](mailto:info@takebackpower.net)
- [press@takebackpower.net](mailto:press@takebackpower.net)
- [shut the system info@proton.me](mailto:shut_the_system_info@proton.me)
- [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org)
- [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org)
- [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com)
- [youthdemand@proton.me](mailto:youthdemand@proton.me)
- [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

SCHEDULE 4 – AMENDED WARNING NOTICE

**KB-2024-002473 High Court Injunction in Force**

**NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 (“the Order”)**

**TO:** PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BIRMINGHAM AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

**FROM:** Birmingham Airport Limited (the “**First Claimant**”)

This notice relates to the land known as Birmingham Airport which is shown edged red on the Plan below (the “**Airport**”).

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the First Claimant.

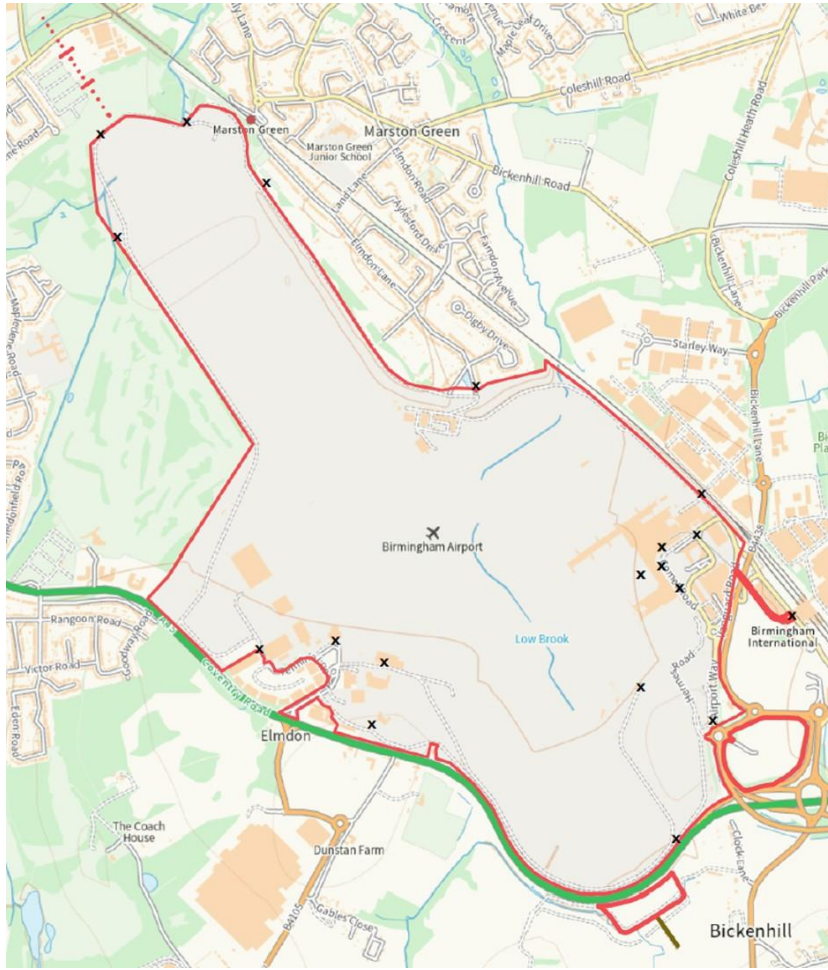
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant’s solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at:  
<https://www.Birminghamairport.co.uk/injunction>

Copies may also be obtained from the Information Desk or by contacting Alexander Wright Stuart Wortley of Eversheds Sutherland on 0771 288 1393 07500578620 or by email alexwright@eversheds-sutherland.com stuartwortley@eversheds-sutherland.com.



ANNEX 2

Amended by order of [ ] dated [ ]

**CLAIM NO: KB-2024-002473**

**IN THE HIGH COURT OF  
JUSTICE KINGS BENCH  
DIVISION**

**BEFORE MR JUSTICE JACOBS  
DATED 6<sup>TH</sup> AUGUST 2024**

**BETWEEN:-**

- (2) LIVERPOOL AIRPORT LIMITED  
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED

AND FOUR OTHERS

- v -

**Claimants**

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

**Defendants**

---

**ORDER**

---

**PENAL NOTICE**

**IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

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

## IMPORTANT NOTICE TO THE DEFENDANTS

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**BEFORE THE HONOURABLE MR JUSTICE**

**JACOBS ON 6 AUGUST 2024**

**UPON** the Claimants' claim by the Claim Form dated 31 July 2024

**AND UPON** the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

**AND UPON READING** the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

**AND UPON** hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

**AND UPON** the Second and Third Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

**AND UPON** the Second and Third Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Liverpool Airport, as defined by this Order, should be made by email to [protestrequest@liverpoolairport.com](mailto:protestrequest@liverpoolairport.com)

**AND UPON** the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

### **DEFINITIONS**

**"Liverpool Airport"** means the land outlined in red on Plan 2 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

“**Amended Warning Notice**” means a notice in the form as set out in Schedule 4 to this Order.

**IT IS ORDERED THAT:**

**INJUNCTION**

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of Liverpool Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second and Third Claimants.

**REVIEW**

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court’s list). Such hearing shall be listed to be heard with the review of any injunctions made in all or any of the claims with the Claims, with a time estimate of 1 day with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

**SERVICE/NOTIFICATION**

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).
4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:
  - a. Uploading a copy onto the following website:  
<https://www.liverpoolairport.com/injunction>
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that

the documents can be found at the website referred to above.

- c. Affixing an Amended Warning Notice approximately at those locations marked with an “X” on Plan 2 setting out where these documents can be found and obtained in hard copy.
5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.
6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.
7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.
8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto:  
<https://www.liverpoolairport.com/injunction>.
9. The Court will provide sealed copies of this Order to the Second and Third Claimants’ solicitors for service or notification (whose details are set out below).

### **FURTHER DIRECTIONS**

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Second and Third Claimants’ solicitors 72 hours’ notice of such application by email to [StuartWortleyalexwright@eversheds-sutherland.com](mailto:StuartWortleyalexwright@eversheds-sutherland.com). If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Second and Third Claimants’ solicitors at least 48 hours in advance of any hearing.
11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second and Third Claimants’ solicitors.

13. The Second and Third Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

#### **COMMUNICATIONS WITH THE SECOND AND THIRD CLAIMANTS**

16. The Second and Third Claimants' solicitors and their contact details are:

~~(1) Stuart Wortley  
Eversheds Sutherland (International) LLP  
StuartWortley@eversheds-sutherland.com  
07712 881 393~~

~~(2) Nawaaz Allybokus  
Eversheds Sutherland (International) LLP  
NawaazAllybokus@eversheds-sutherland.com  
07920 590 944~~

Alexander Wright  
Eversheds Sutherland (International) LLP  
[alex.wright@eversheds-sutherland.com](mailto:alex.wright@eversheds-sutherland.com)  
07500 578620

**COMMUNICATIONS WITH THE COURT**

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at <https://efile.cfile-app.com>

**SCHEDULE 1**



**SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND AND THIRD CLAIMANTS**

- (1) The Second and Third Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

### SCHEDULE 3 – EMAIL ADDRESSES

- [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
- [info@juststopoil.org](mailto:info@juststopoil.org)
- ~~[enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk)~~
- [info@takebackpower.net](mailto:info@takebackpower.net)
- [press@takebackpower.net](mailto:press@takebackpower.net)
- [shut the system info@proton.me](mailto:shut_the_system_info@proton.me)
- [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org)
- [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org)
- [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com)
- [youthdemand@proton.me](mailto:youthdemand@proton.me)
- [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

**SCHEDULE 4 – AMENDED WARNING NOTICE**  
**KB-2024-002473 High Court Injunction in Force**

**NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 (“the Order”)**

**TO:** PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

**FROM:** Liverpool Airport Limited and Peel L&P Investments (North) Limited (the “**Second and Third Claimants**”)

This notice relates to the land known as Liverpool Airport which is shown edged red on the Plan below (the “**Airport**”).

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the Second and Third Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Second and Third Claimants’ solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at: <https://www.liverpoolairport.com/injunction>

Copies may also be obtained from the Information Desk or by contacting **Alexander Wright Stuart Wortley** of Eversheds Sutherland on ~~0771 288 1393~~ [07500578620](tel:07500578620) or by email [alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com) ~~stuartwortley@eversheds-sutherland.com~~.



ANNEX 3

Amended by order of [ ] dated [ ]

**CLAIM NO: KB-2024-002473**

**IN THE HIGH COURT OF  
JUSTICE KINGS BENCH  
DIVISION**

**BEFORE MR JUSTICE JACOBS  
DATED 6<sup>TH</sup> AUGUST 2024**

**BETWEEN:-**

- (4) BRISTOL AIRPORT LIMITED
- (5) SOUTH WEST AIRPORTS LIMITED
- (6) BRISTOL AIRPORT DEVELOPMENTS LIMITED

AND THREE OTHERS

**Claimants**

- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

**Defendants**

---

ORDER

---

**PENAL NOTICE**

**IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

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

## IMPORTANT NOTICE TO THE DEFENDANTS

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**BEFORE THE HONOURABLE MR JUSTICE**

**JACOBS ON 6 AUGUST 2024**

**UPON** the Claimants' claim by the Claim Form dated 31 July 2024

**AND UPON** the Claimants' application for an injunction dated 31 July 2024 ("**the Application**")

**AND UPON READING** the Application and the witness statements of Stuart Sherbrooke Wortley dated 1 August 2024 and dated 6 August 2024, Nick Barton dated 31 July 2024, John Irving dated 31 July 2024 and Graeme Gamble dated 31 July 2024 ("**the Witness Statements**")

**AND UPON** hearing Mr Morshead K.C. and Mr Sibley, Counsel for the Claimants and no one attending for the Defendants

**AND UPON** the Fourth, Fifth and Sixth Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

**AND UPON** the Fourth, Fifth and Sixth Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Bristol Airport, as defined by this Order, should be made by email to [protestrequest@Bristolairport.com](mailto:protestrequest@Bristolairport.com)

**AND UPON** the Claimants amending the sealed Claim Form and Particulars of Claim prior to service, pursuant to CPR 17.1(1), to substitute a new plan 1 for Birmingham Airport and to amend the definitions of the Defendants

### DEFINITIONS

**"Bristol Airport"** means the land shown outlined in red on Plan 3 to the Amended Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

“**Amended Warning Notice**” means a notice in the form as set out in Schedule 4 to this Order.

IT IS ORDERED THAT:

### **INJUNCTION**

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Bristol Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Fourth, Fifth and Sixth Claimants.

### **REVIEW**

2. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court’s list). Such hearing shall be listed to be heard with the review of any injunctions made in all or any of the claims with the Claims, with a time estimate of 1 day with a time estimate of 2 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraph 1 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimant has applied for the review to take place.

### **SERVICE/NOTIFICATION**

3. Service of the Amended Claim Form and the Application for injunction is dispensed with, pursuant to CPR 16, 6.28 and 81.4(2)(c).
4. This Order, the Amended Claim Form, Application Notice and evidence in support will be served on or notified to the Defendants by the Claimants carrying out each of the following steps:
  - a. Uploading a copy onto the following website:  
<https://www.Bristolairport.com/injunction>
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that

the documents can be found at the website referred to above.

- c. Affixing an Amended Warning Notice approximately at those locations marked with an “X” on Plan 3 setting out where these documents can be found and obtained in hard copy.
5. Service on or notification to the Defendants of any further applications or documents shall be effected by carrying out the steps in paragraphs 4a and 4b above.
6. In respect of paragraphs 4 and 5 above, effective service or notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.
7. For the avoidance of doubt, in respect of the steps referred to at paragraphs 4 and 5, effective service or notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.
8. A Note of the Hearing shall as soon as reasonably practicable be uploaded onto: <https://www.Bristolairport.com/injunction>.
9. The Court will provide sealed copies of this Order to the Fourth, Fifth and Sixth Claimants’ solicitors for service or notification (whose details are set out below).

#### FURTHER DIRECTIONS

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Fourth, Fifth and Sixth Claimants’ solicitors 72 hours’ notice of such application by email to [StuartWortleyalexwright@eversheds-sutherland.com](mailto:StuartWortleyalexwright@eversheds-sutherland.com). If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Fourth, Fifth and Sixth Claimants’ solicitors at least 48 hours in advance of any hearing.
11. Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Fourth, Fifth and Sixth Claimants' solicitors.
13. The Fourth, Fifth and Sixth Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

#### COMMUNICATIONS WITH THE FOURTH, FIFTH AND SIXTH CLAIMANTS

16. The Fourth, Fifth and Sixth Claimants' solicitors and their contact details are:

~~(1) Stuart Wortley  
Eversheds Sutherland (International) LLP  
[StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@eversheds-sutherland.com)  
07712 881 393~~

~~(2) Nawaaz Allybokus  
Eversheds Sutherland (International) LLP  
[NawaazAllybokus@eversheds-sutherland.com](mailto:NawaazAllybokus@eversheds-sutherland.com)  
07920 590 944~~

Alexander Wright  
Eversheds Sutherland (International) LLP  
[alex.wright@eversheds-sutherland.com](mailto:alex.wright@eversheds-sutherland.com)  
07500 578620

#### COMMUNICATIONS WITH THE COURT

Kings Bench Division, The Royal Courts of Justice, The Strand, London, WC2A 2LL by the Court's E-Filing service at <https://efile.cefile-app.com>

**SCHEDULE 1**





**SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FOURTH, FIFTH  
AND SIXTH CLAIMANTS**

- (1) The Fourth, Fifth and Sixth Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

### SCHEDULE 3 – EMAIL ADDRESSES

- [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
- [info@juststopoil.org](mailto:info@juststopoil.org)
- ~~[enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk)~~
- [info@takebackpower.net](mailto:info@takebackpower.net)
- [press@takebackpower.net](mailto:press@takebackpower.net)
- [shut the system info@proton.me](mailto:shut_the_system_info@proton.me)
- [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org)
- [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org)
- [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com)
- [youthdemand@proton.me](mailto:youthdemand@proton.me)
- [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

SCHEDULE 4 – AMENDED WARNING NOTICE

**KB-2024-002473 High Court Injunction in Force**

**NOTICE OF HIGH COURT ORDER DATED 6 AUGUST 2024 (“the Order”)**

**TO:** PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY WHO ENTER OR REMAIN ON THE PREMISES AT BRISTOL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE AMENDED CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the “Defendants”)

**FROM:** Bristol Airport Limited, South West Airports Limited and Bristol Developments Limited (the “Fourth, Fifth and Sixth Claimants”)

This notice relates to the land known as Bristol Airport which is shown edged red on the Plan below (the “Airport”).

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the Fourth, Fifth and Sixth Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fourth, Fifth and Sixth Claimants’ solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 6 August 2024 may be viewed at:  
<https://www.Bristolairport.com/injunction>.

Copies may also be obtained from the Information Desk or by contacting Alexander Wright Stuart Wortley of Eversheds Sutherland on ~~0771-288-1393~~ 07500578620 or by email [alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)  
[stuartwortley@evershedssutherland.com](mailto:stuartwortley@evershedssutherland.com).

