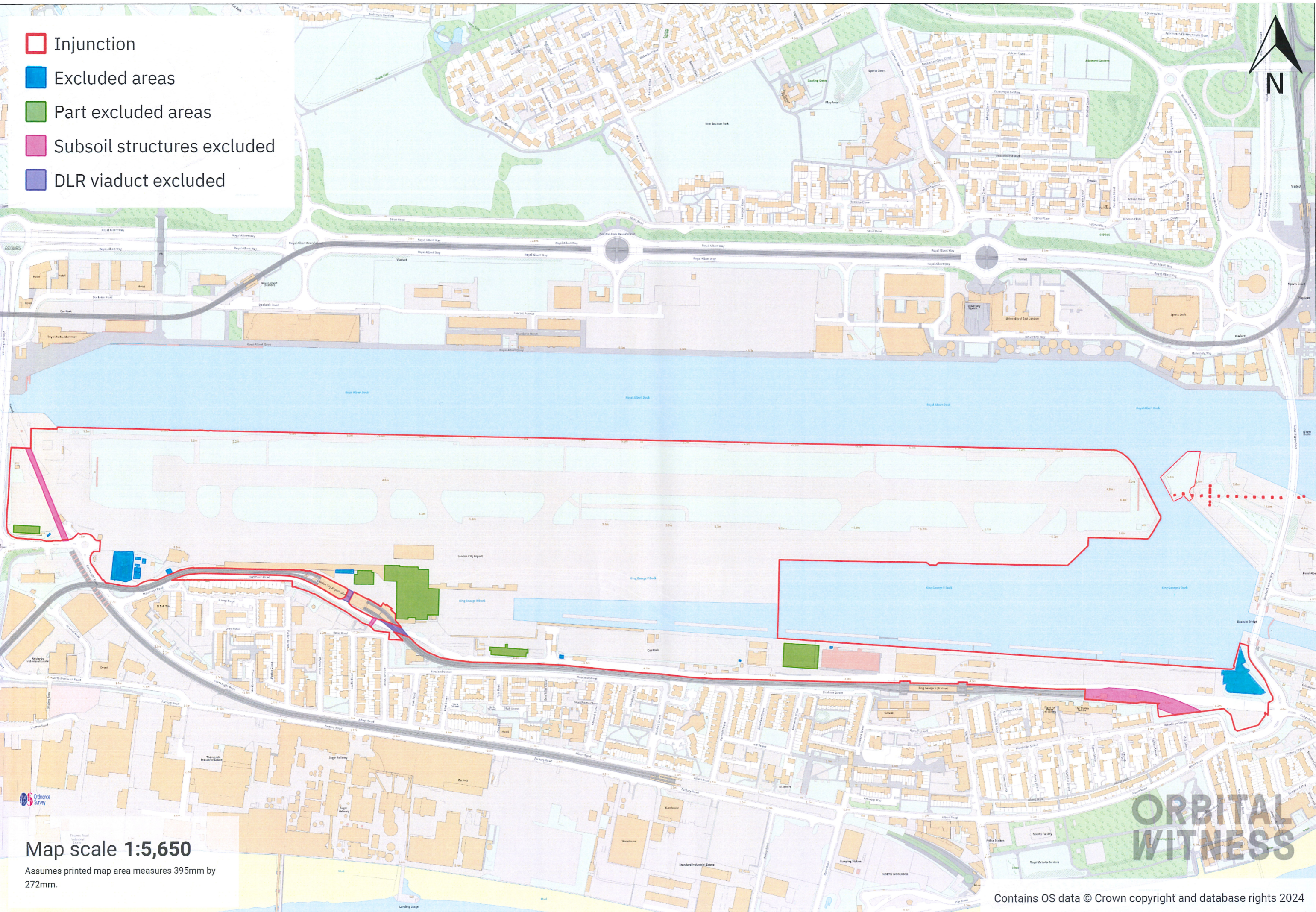


- Injunction
- Excluded areas
- Part excluded areas
- Subsoil structures excluded
- DLR viaduct excluded



Map scale 1:5,650

Assumes printed map area measures 395mm by 272mm.

**ORBITAL  
WITNESS**



CLAIM NO: KB-2024-1765  
CLAIM NO: KB-2024-2132  
CLAIM NO: KB-2024-2317  
CLAIM NO: KB-2024-2473

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
B E T W E E N

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

Claimants (KB-2024-1765)

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

Claimants (KB-2024-2132)

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

Claimants (KB-2024-2317)

(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 (KB-2024-2473)

and

PERSONS UNKNOWN  
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS

Defendants

(KB-2024-1765/KB-2024-2132/  
KB-2024-2317/KB-2024-2473)

---

AJW13

---

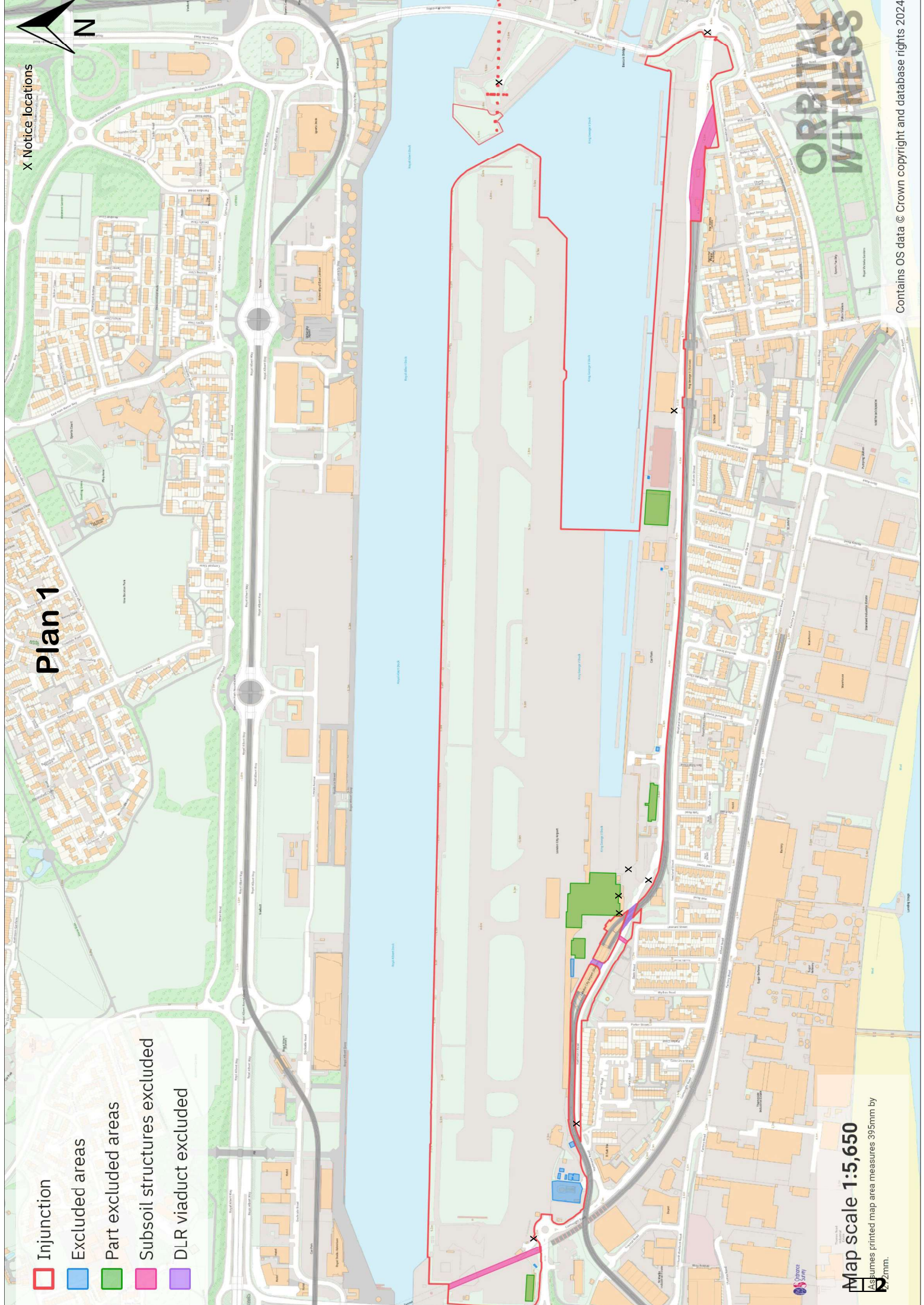
This is the exhibit marked "AJW13" in the witness statement of Alexander James Wright.

X Notice locations



# Plan 1

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



# ORBITAL WITNESS

**Map scale 1:5,650**  
 Assumes printed map area measures 395mm by 272mm.



CLAIM NO: KB-2024-1765  
CLAIM NO: KB-2024-2132  
CLAIM NO: KB-2024-2317  
CLAIM NO: KB-2024-2473

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
B E T W E E N

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

Claimants (KB-2024-1765)

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

Claimants (KB-2024-2132)

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

Claimants (KB-2024-2317)

(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 (KB-2024-2473)

and

PERSONS UNKNOWN  
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS

Defendants

(KB-2024-1765/KB-2024-2132/  
KB-2024-2317/KB-2024-2473)

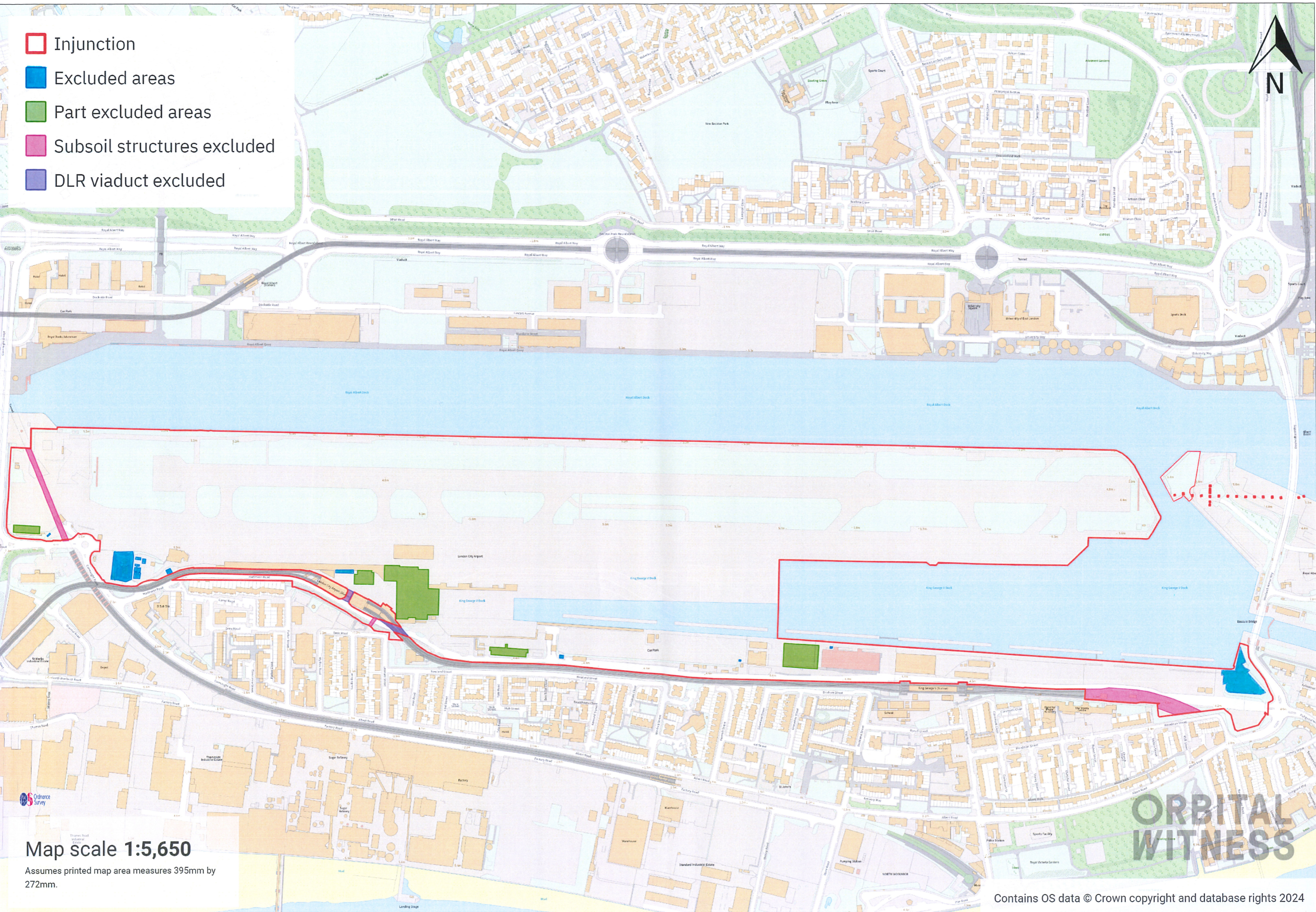
---

AJW14

---

This is the exhibit marked "AJW14" in the witness statement of Alexander James Wright.

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



Map scale 1:5,650

Assumes printed map area measures 395mm by 272mm.

**ORBITAL  
WITNESS**



CLAIM NO: KB-2024-1765  
CLAIM NO: KB-2024-2132  
CLAIM NO: KB-2024-2317  
CLAIM NO: KB-2024-2473

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
B E T W E E N

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

Claimants (KB-2024-1765)

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

Claimants (KB-2024-2132)

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

Claimants (KB-2024-2317)

(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 (KB-2024-2473)

and

PERSONS UNKNOWN  
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS

Defendants

(KB-2024-1765/KB-2024-2132/  
KB-2024-2317/KB-2024-2473)

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AJW15

---

This is the exhibit marked "AJW15" in the witness statement of Alexander James Wright.

## Clifford, Meghan

---

**From:** Evie Barden <EBarden@landmarkchambers.co.uk>  
**Sent:** 27 June 2025 13:29  
**To:** Waite, Samantha | She/Hers  
**Subject:** Re: London City Airport Limited and ors -v- Persons Unknown  
**Attachments:** London City Airport Limited v PU. Draft minute of order. KB-2024-001765.docx

Dear Samantha

I've also managed to reduce the file size in the Word document – please now find that attached.

Evie

---

**From:** Evie Barden <EBarden@landmarkchambers.co.uk>  
**Date:** Friday, 27 June 2025 at 13:18  
**To:** Waite, Samantha | She/Hers <Samantha.Waite@justice.gov.uk>  
**Subject:** Re: London City Airport Limited and ors -v- Persons Unknown

Hi Samantha

I've saved the draft as a PDF and then compressed the file. Does that help?

Kind regards,

Evie

---

**From:** Waite, Samantha | She/Hers <Samantha.Waite@justice.gov.uk>  
**Date:** Friday, 27 June 2025 at 13:08  
**To:** Evie Barden <EBarden@landmarkchambers.co.uk>  
**Subject:** Re: London City Airport Limited and ors -v- Persons Unknown

Dear Evie,

I hope you are well,

The Judge has approved the orders now, however the LCA order is too big to be sent as an attachment, has to be a link. I am going to try and make it work with the court associates, however in the event they can not seal and serve the order, do you have any recommendations? Is it possible to make the pictures smaller? Can it be served in two separate documents? Happy to help where needed.

Kind Regards,

*Samantha Waite*

**Clerk to The Hon. Mr Justice Bourne**

**Phone:** 07860340370 |

**Email:** [samantha.waite@justice.gov.uk](mailto:samantha.waite@justice.gov.uk)

Clerks to HM Judges | HMCTS | Room W315 | Royal Courts of Justice | London | WC2A 2LL



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**From:** Evie Barden <EBarden@landmarkchambers.co.uk>  
**Sent:** Thursday, June 26, 2025 11:25 AM  
**To:** Waite, Samantha | She/Hers <Samantha.Waite@justice.gov.uk>  
**Subject:** Re: London City Airport Limited and ors -v- Persons Unknown

Thank you very much Samantha.

Best  
Evie

---

**From:** Waite, Samantha | She/Hers <Samantha.Waite@justice.gov.uk>  
**Date:** Thursday, 26 June 2025 at 11:07  
**To:** Evie Barden <EBarden@landmarkchambers.co.uk>  
**Subject:** RE: London City Airport Limited and ors -v- Persons Unknown

Dear Evie,

Thank you, these are safely received now and I can see your previous email, all of which I will pass on to the Judge.

Kind Regards,

*Samantha Waite*

**Clerk to The Hon. Mr Justice Bourne**

**Phone:** 07860340370 |

**Email:** [samantha.waite@justice.gov.uk](mailto:samantha.waite@justice.gov.uk)

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**From:** Evie Barden <EBarden@landmarkchambers.co.uk>  
**Sent:** 26 June 2025 10:44  
**To:** Waite, Samantha | She/Hers <Samantha.Waite@justice.gov.uk>  
**Subject:** Re: London City Airport Limited and ors -v- Persons Unknown

Dear Samantha

Can I check whether you received my email below? I had a mail delivery failure notification from your email. In the event that it hasn't come through, please see below. I've now provided the links to the orders, rather than attachments in the hope that works.

Best  
Evie

**From:** Evie Barden <[EBarden@landmarkchambers.co.uk](mailto:EBarden@landmarkchambers.co.uk)>  
**Date:** Thursday, 26 June 2025 at 10:30  
**To:** Waite, Samantha | She/Hers <[Samantha.Waite@justice.gov.uk](mailto:Samantha.Waite@justice.gov.uk)>  
**Cc:** Alexander <[alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)>, Stuart <[stuartwortley@eversheds-sutherland.com](mailto:stuartwortley@eversheds-sutherland.com)>, Timothy Morshead KC <[TMorshead@landmarkchambers.co.uk](mailto:TMorshead@landmarkchambers.co.uk)>  
**Subject:** Re: London City Airport Limited and ors -v- Persons Unknown

Dear Samantha

I attach four revised orders which hopefully address the judge's concerns below. In respect of the judge's second query, I have altered the wording in para 3 below in the London City Airport draft order so that paragraph 1 reads: "The Knowles J Order shall remain in full force and effect, subject to the variations thereto set out in the schedule to this order (and subject to review, as provided for in paragraph 3 of the Knowles J Order)." The schedule to the order then contains the Knowles J order as varied with a new plan and paragraph 3 of the body of the order then requires the order to be served in accordance with paragraph 9 of the Knowles J Order, which dealt with service of the order.

Should I be able to assist further, please let me know.

Best,  
Evie

---

**From:** Waite, Samantha | She/Hers <[Samantha.Waite@justice.gov.uk](mailto:Samantha.Waite@justice.gov.uk)>  
**Date:** Wednesday, 25 June 2025 at 16:19  
**To:** Evie Barden <[EBarden@landmarkchambers.co.uk](mailto:EBarden@landmarkchambers.co.uk)>  
**Cc:** Alexander <[alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)>, Stuart <[stuartwortley@eversheds-sutherland.com](mailto:stuartwortley@eversheds-sutherland.com)>, Timothy Morshead KC <[TMorshead@landmarkchambers.co.uk](mailto:TMorshead@landmarkchambers.co.uk)>  
**Subject:** Re: London City Airport Limited and ors -v- Persons Unknown

Dear Evie,

Thank you for sending these draft orders. The Judge has some queries I hope you can assist with,

1. Is it a good idea to have 10 orders, rather than 1 order in each of the 4 claims?
2. The London City Airport draft order para 2 refers to amending the claim form. Is it not necessary to refer to amending the plan attached to the Injunction? Does that give rise to a question of re-service?
3. The wording of para 1 of each order doesn't quite work. It needs to be made clear that the previous injunctions continue, which again may suggest a need for service. Compare the wording used in the order following the review in Valero Energy: "The Ritchie Order shall remain in full force and effect (subject to review, as provided for in paragraph 18 of the Ritchie Order)."

Thank you,

Kind Regards,  
*Samantha Waite*

**Clerk to The Hon. Mr Justice Bourne**

**Phone:** 07860340370 |

**Email:** [samantha.waite@justice.gov.uk](mailto:samantha.waite@justice.gov.uk)

Clerks to HM Judges | HMCTS | Room W315 | Royal Courts of Justice | London | WC2A 2LL



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**From:** Evie Barden <[EBarden@landmarkchambers.co.uk](mailto:EBarden@landmarkchambers.co.uk)>

**Sent:** Tuesday, June 24, 2025 4:03 PM

**To:** Ferreira, Valnei | He/His <[Valnei.Ferreira1@justice.gov.uk](mailto:Valnei.Ferreira1@justice.gov.uk)>

**Cc:** Wright, Alexander <[alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)>; Wortley, Stuart <[stuartwortley@eversheds-sutherland.com](mailto:stuartwortley@eversheds-sutherland.com)>; Timothy Morshead KC <[TMorshead@landmarkchambers.co.uk](mailto:TMorshead@landmarkchambers.co.uk)>

**Subject:** London City Airport Limited and ors -v- Persons Unknown

Dear Mr Ferreira

Further to the hearing of these claims before Mr Justice Bourne earlier today, please find attached the draft minutes of order for the court's approval and sealing.

Do let me know if I can assist further.

Kind regards,

Evie Barden

(Junior counsel for the Claimants)

**Evie Barden**

Pronouns: she/her

dd. +44 (0) 20 7421 1375 | t. +44 (0) 20 7430 1221

[www.landmarkchambers.co.uk](http://www.landmarkchambers.co.uk)

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

**BEFORE: THE HONOURABLE MR JUSTICE BOURNE**

**ON: 24 June 2025**

**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, 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 Claimants’ application dated 2 June 2025

**AND UPON** the Claimants’ application dated 17 June 2025 to amend the claim form

**AND UPON** the review hearings in each of the following claims having been listed on 24 June 2025 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 set out in the schedule to this order (and subject to review, as provided for in paragraph 3 of the Knowles J Order).
2. The Claimants have permission to amend the claim form to substitute the plan annexed to the Claimants’ application dated 17 June 2025 for Plan 1 to the claim form.
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 Knowles J Order.

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

**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, 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

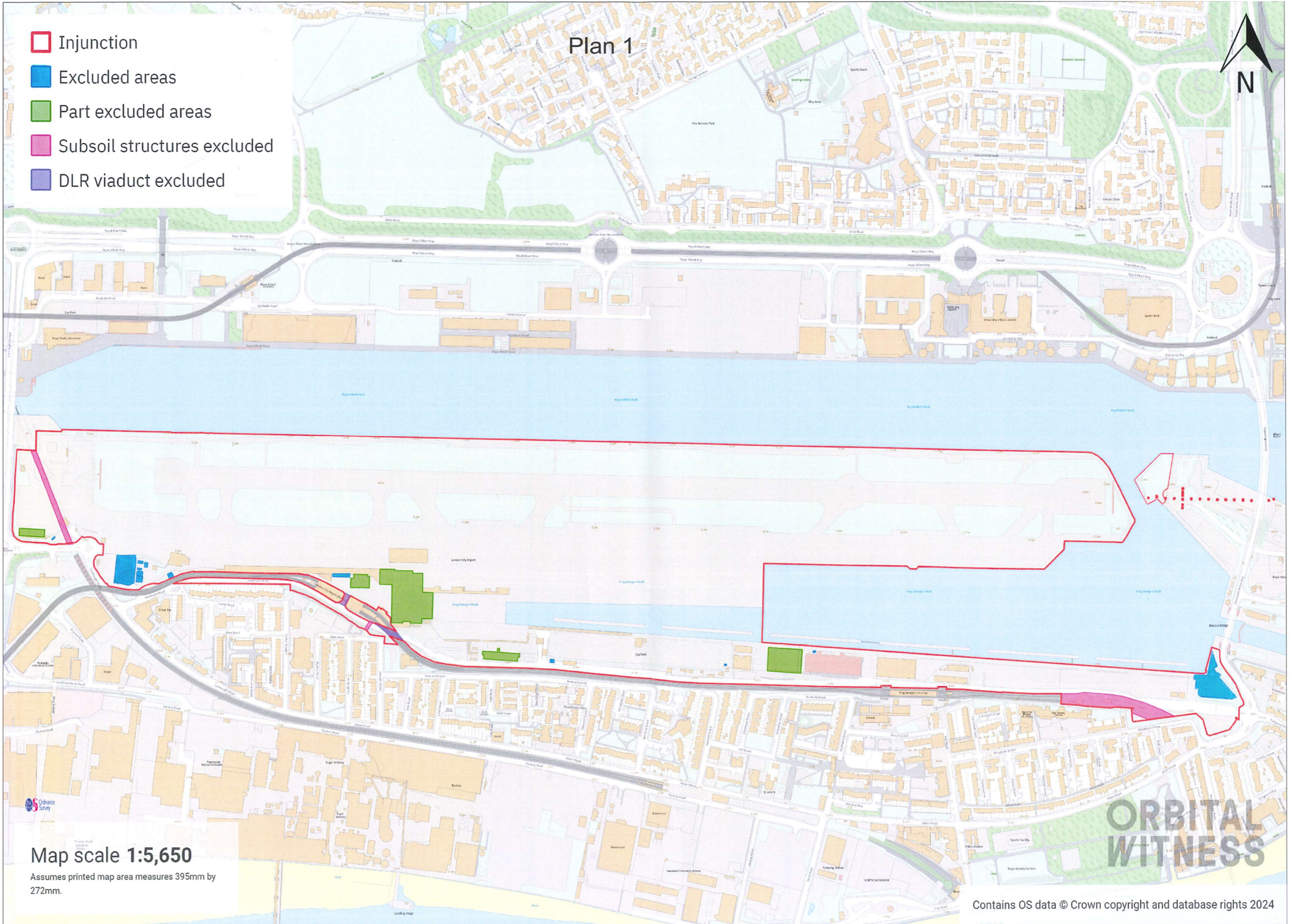
(2) Nawaaz Allybokus  
Eversheds Sutherland (International) LLP  
[NawaazAllybokus@eversheds-sutherland.com](mailto:NawaazAllybokus@eversheds-sutherland.com)  
07920 590 944

**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

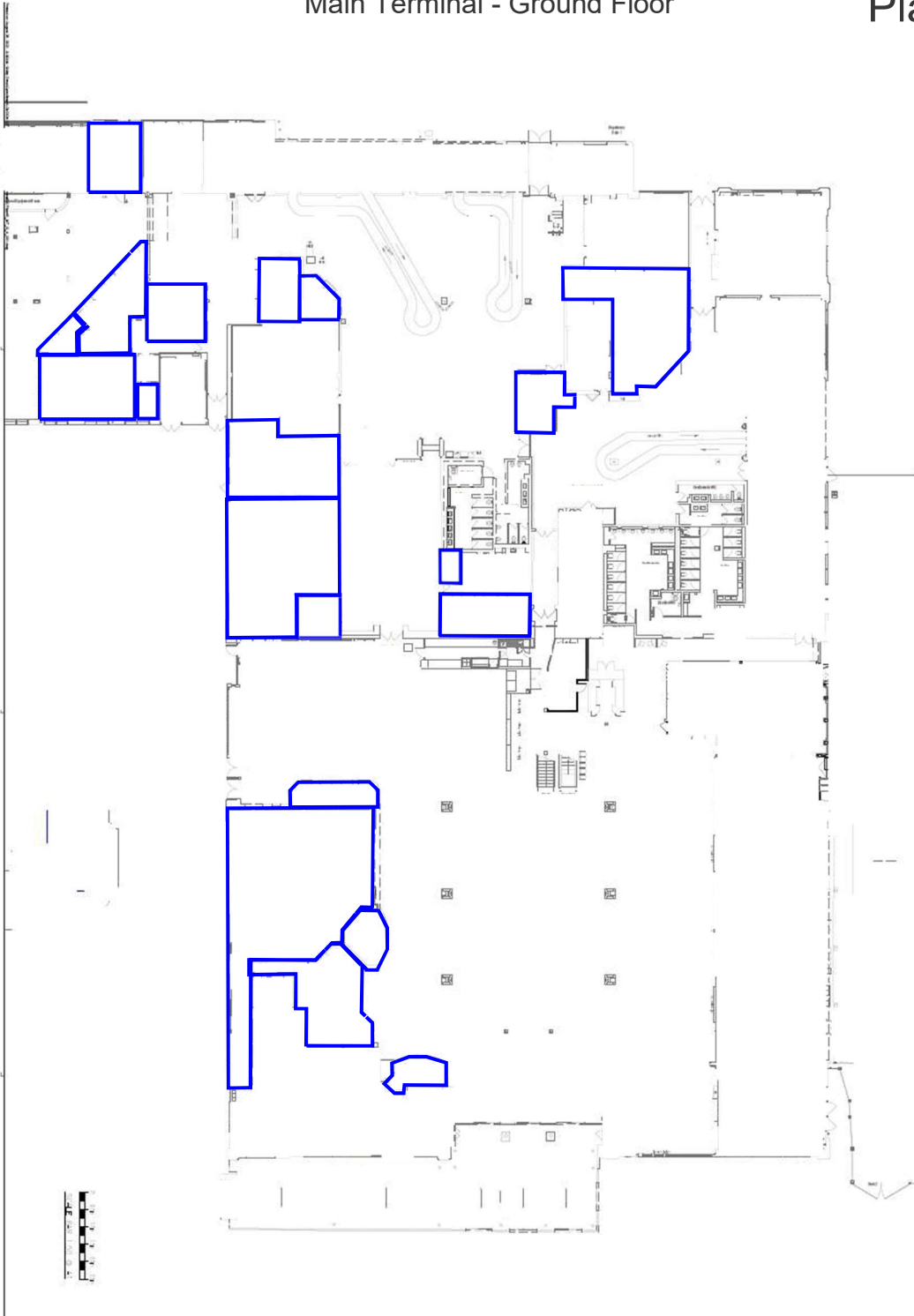
Assumes printed map area measures 395mm by 272mm.

**ORBITAL  
WITNESS**



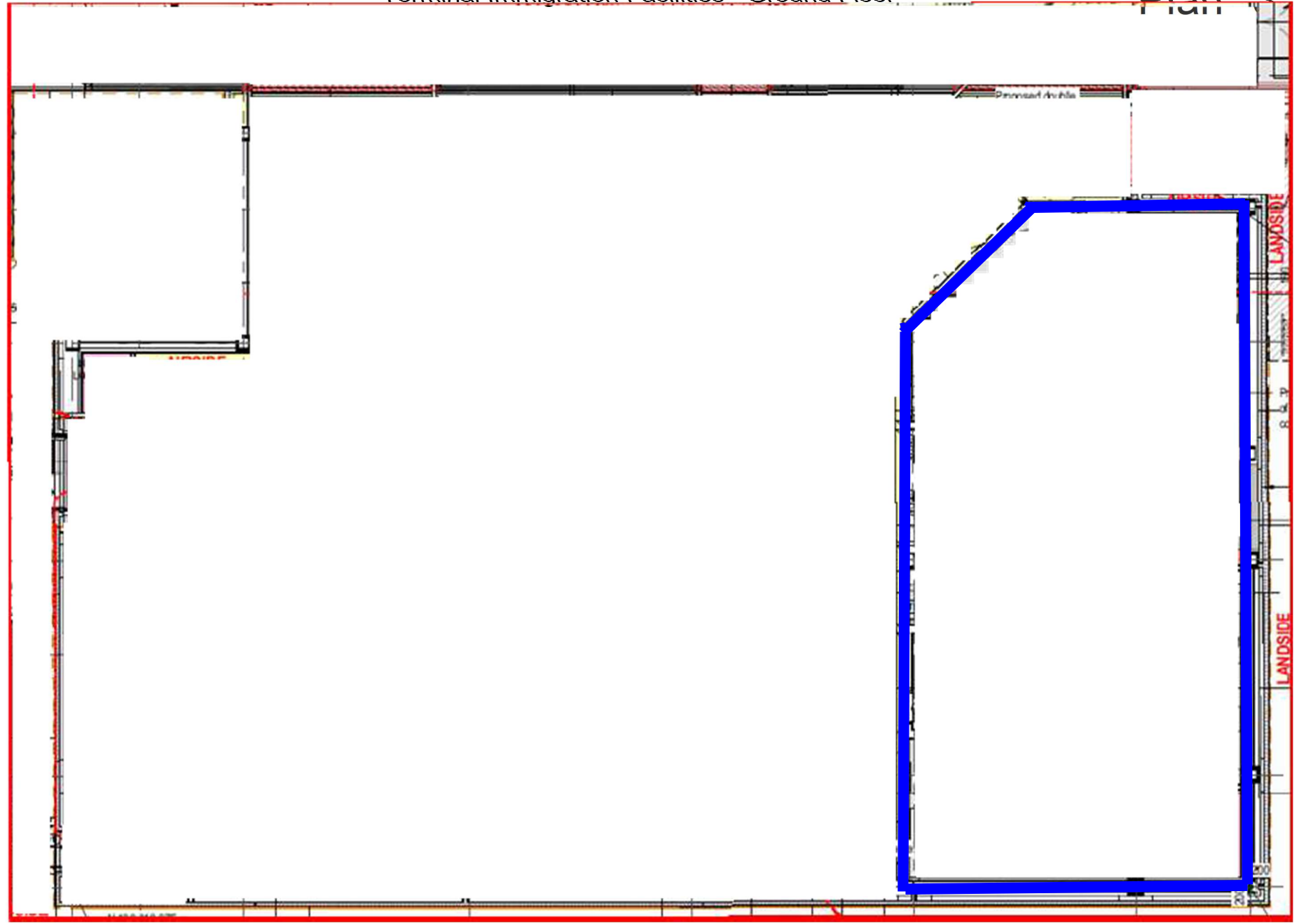
Main Terminal - Ground Floor

Pla



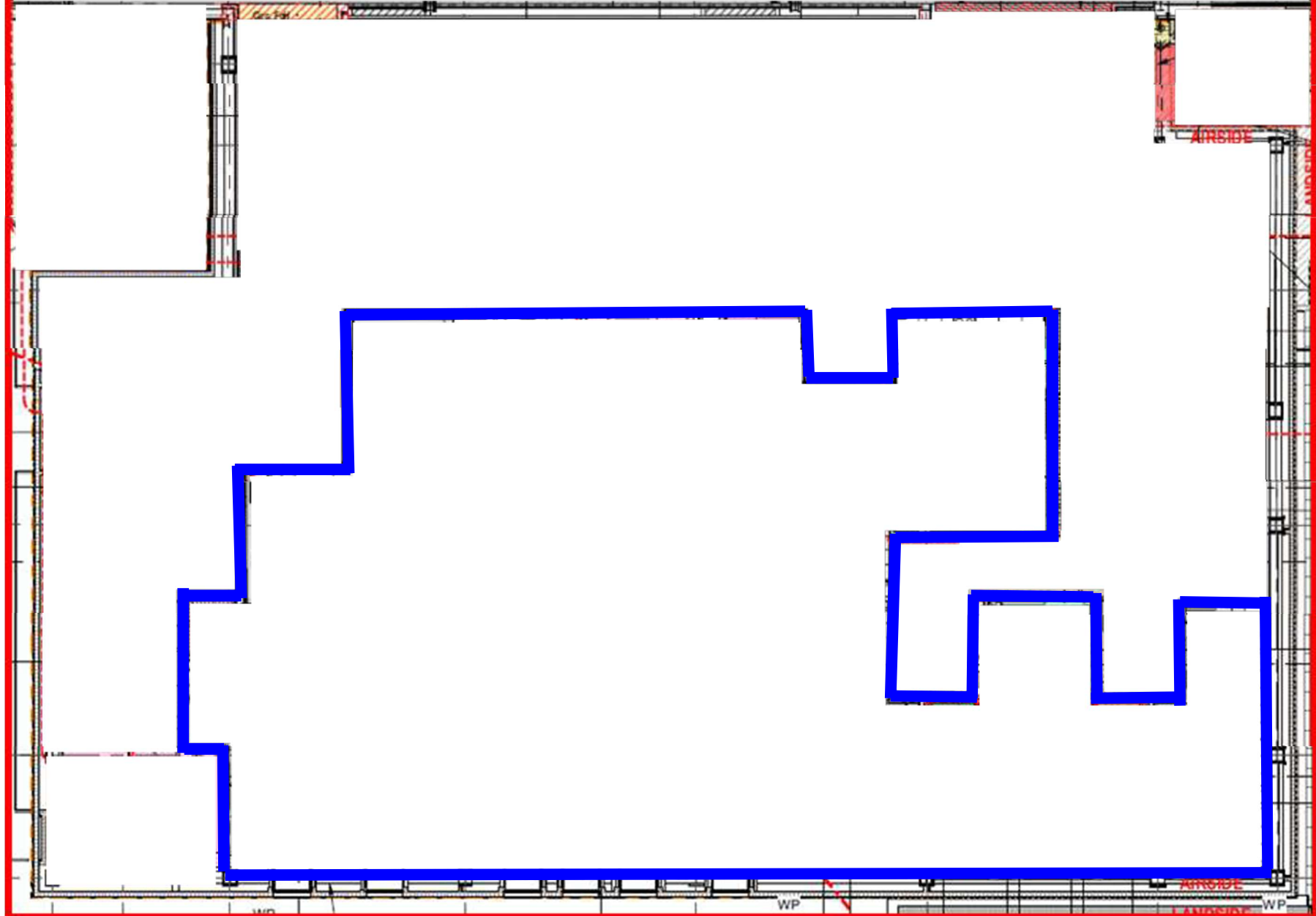
Terminal Immigration Facilities - Ground Floor

Plan 2



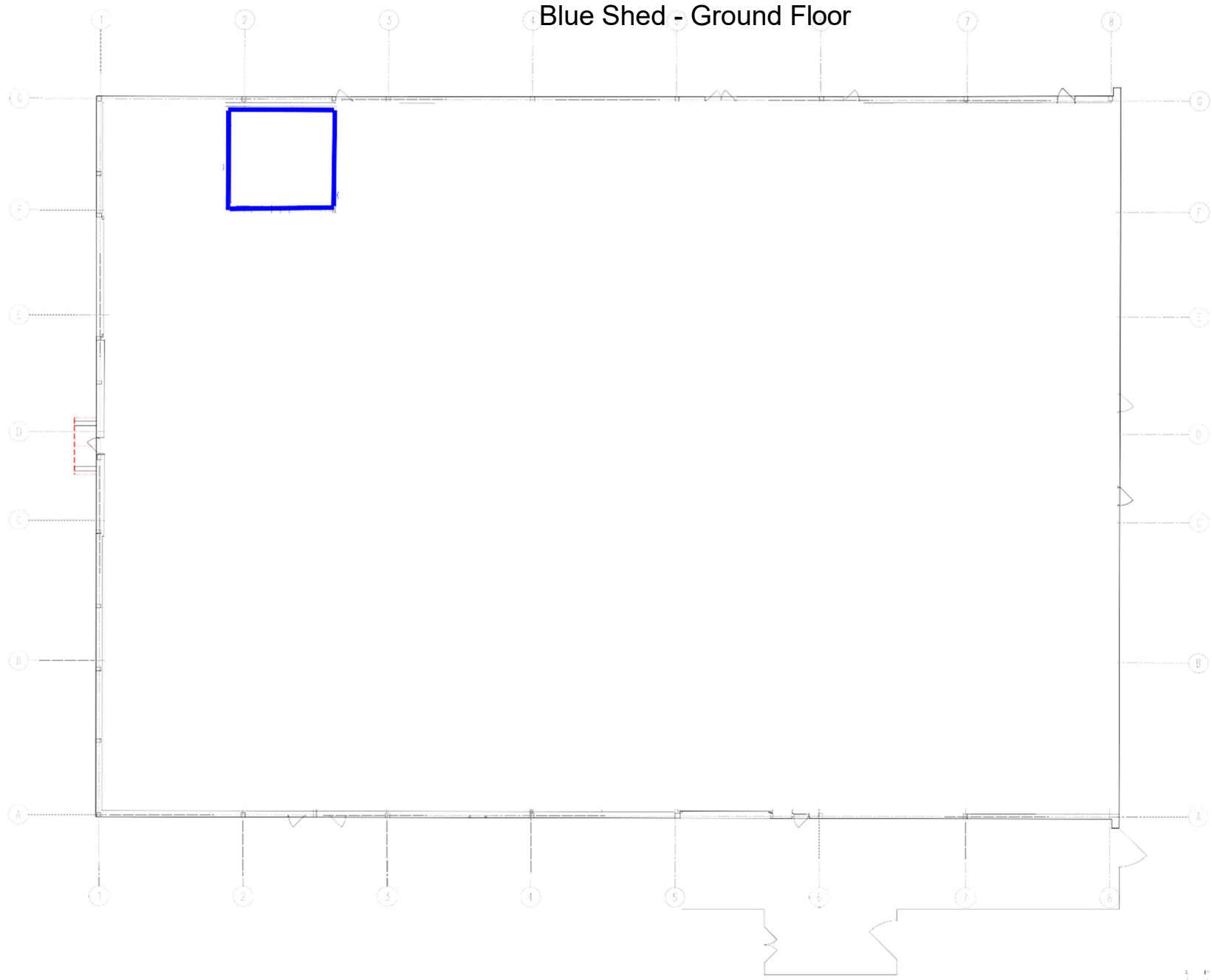
Terminal Immigration Facilities - First Floor

Plan 4

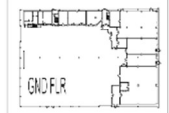


# Blue Shed - Ground Floor

# Plan 5



B Room Number Added	01/11/19
A Door Number Added	01/02/19



London City Airport, City Aviation House  
Ridge Works, London, E16 3PB

**RECORD DRAWING**

**BLUE SHED**  
Ground Floor  
General Arrangement Plan

05/02/19  
RBS/JG/AVD1

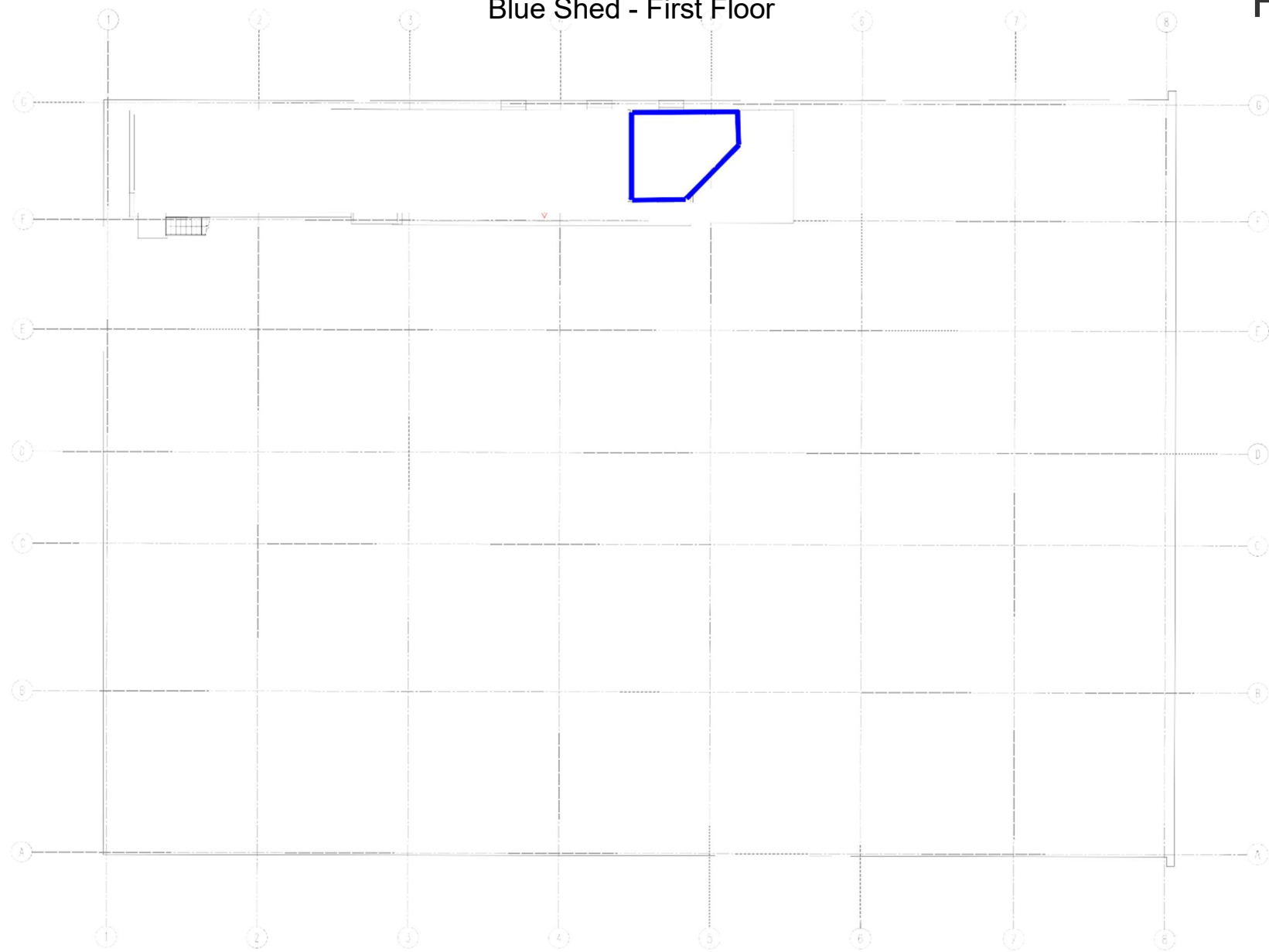


General Notes

LEGEND  
XXXX FIRE DOOR  
XXXX STANDARD DOOR

# Blue Shed - First Floor

# Plan 6



#	Room Number	Area
1	Room Number	Area



London City Airport  
Get closer.  
London City Airport, City Aviation House  
Royal Docks, London, E16 2PB

RECORD DRAWING

**BLUE SHED**  
1st Floor  
General Arrangement

Author	12/11/18
Check	13/11/18
Issue	13/11/18
Scale	1:100

PROJECT: BLUE SHED  
DRAWING: 1ST FLR  
DATE: 13/11/18



General Notes

LEGEND

-  Fire Door
-  Standard Door

C. Plan Number Added	14/04/18
D. Layout created	18/04/18
E. Issued	04/05/18
B. Plan Number Added	04/02/18
A. Issued as Initial	15/06/15

G-FLRS

London City Airport  
Get closer.  
London City Airport, City Airport House  
Royal Dock, London, E16 2PB

RECORD DRAWING

JET CENTRE

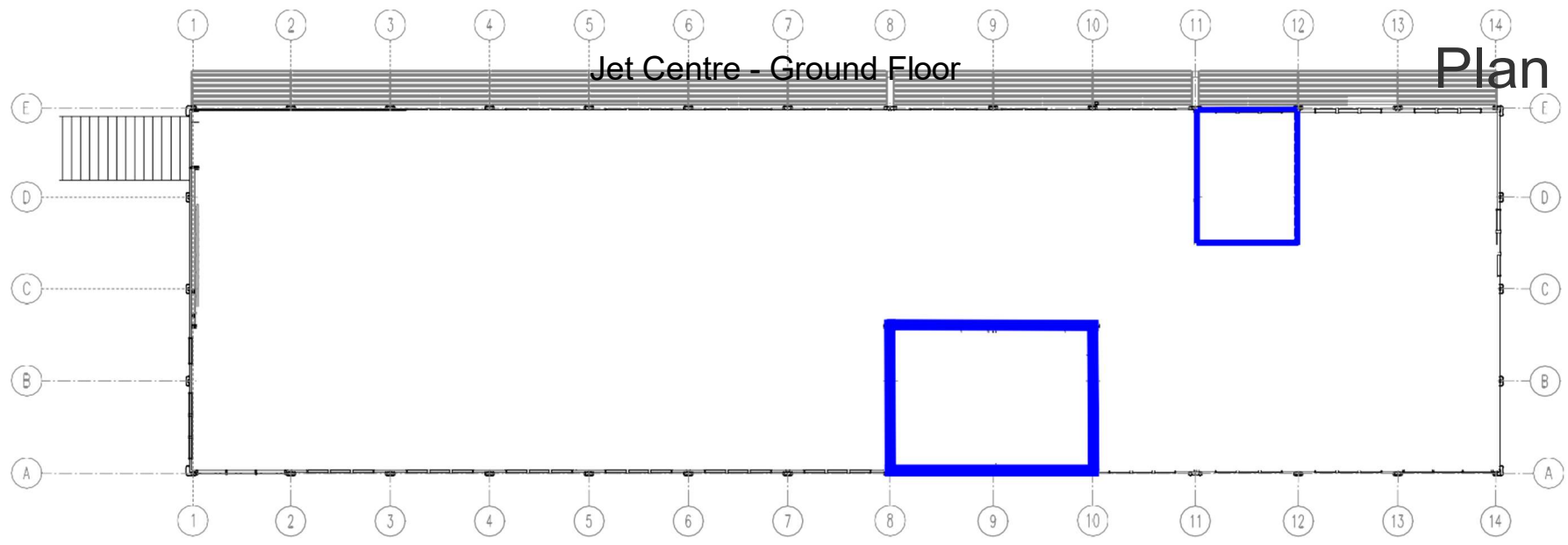
Ground to first floor  
General Arrangement Plan

R/JC/A/A/001

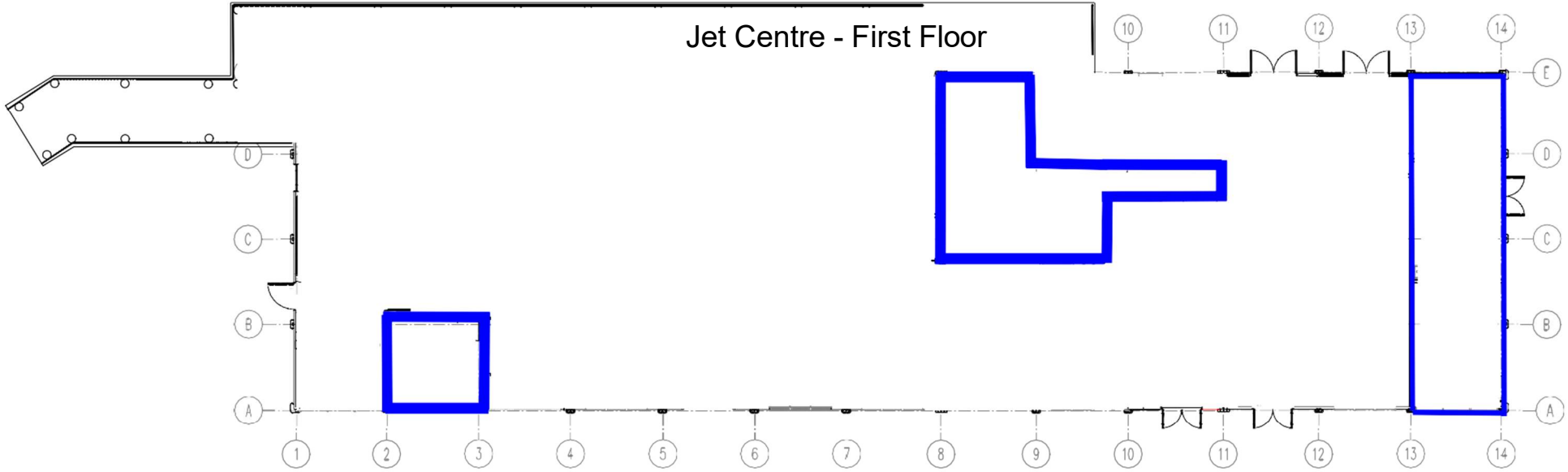


# Jet Centre - Ground Floor

# Plan 7

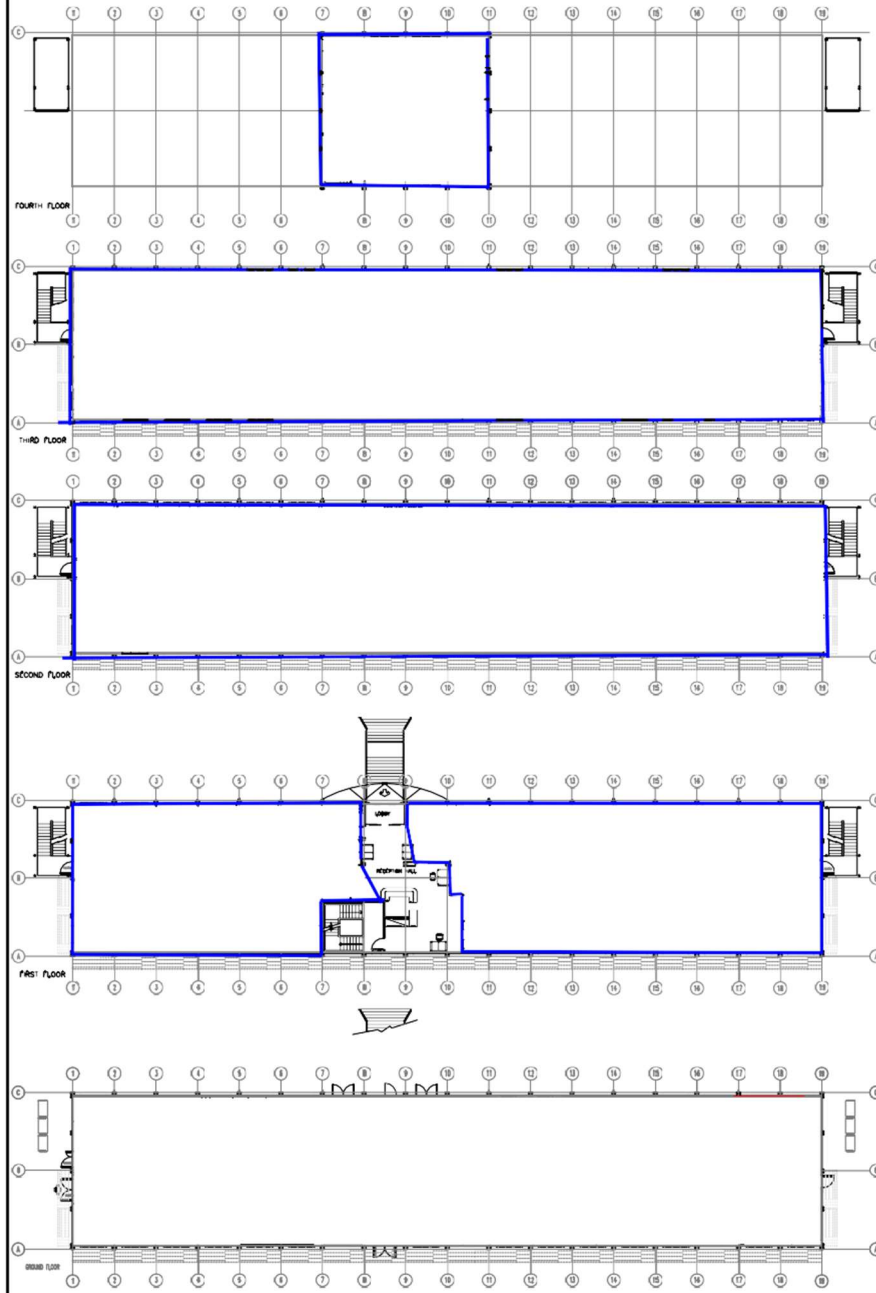


# Jet Centre - First Floor



# City Aviation House

# Plan 8



1" = 10'-0"  
SCALE: ARCH. DRAW. 1/8" = 1'-0"

ARCHITECT: **LANOON CPT. ARCHITECT**  
PROJECT: CITY AVIATION HOUSE  
DATE: 11/17/11  
DRAWN BY: [Name]  
CHECKED BY: [Name]  
SCALE: ARCH. DRAW. 1/8" = 1'-0"



## **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)

CLAIM NO: KB-2024-1765  
CLAIM NO: KB-2024-2132  
CLAIM NO: KB-2024-2317  
CLAIM NO: KB-2024-2473

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
B E T W E E N

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

Claimants (KB-2024-1765)

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

Claimants (KB-2024-2132)

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

Claimants (KB-2024-2317)

(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 (KB-2024-2473)

and

PERSONS UNKNOWN  
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS

Defendants

(KB-2024-1765/KB-2024-2132/  
KB-2024-2317/KB-2024-2473)

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AJW16

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This is the exhibit marked "AJW16" in the witness statement of Alexander James Wright.

HIGH COURT CLAIM NO: KB-2024-001765

## High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 20 June 2024

**TO:** Persons Unknown who, in connection with the Just Stop Oil or other environmental 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 plan) but excluding those areas of land as further defined below (the "Defendants")

**FROM:** (1) London City Airport Ltd and (2) Docklands Aviation Group Ltd

This notice relates to the land known as London City Airport, Royal Docks, London E16 2PB which is shown for illustration purposes edged red on the adjacent Plan but excluding: (a) the buildings coloured blue; (b) certain parts of the buildings coloured green; (c) the sections of the Docklands Light Railway coloured purple; and (d) the subsoil structures coloured pink (the "Land")

**It is ordered that, until 20 June 2029 or further order in the meantime, the Defendants must not without the consent of the Claimants, enter, occupy or remain upon the Land.**

**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**

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 June 2024 may be viewed at: [www.londoncityairport.co.uk/corporate/corporate-info/reports-and-publications/injunction](http://www.londoncityairport.co.uk/corporate/corporate-info/reports-and-publications/injunction).

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



IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v -

PERSONS UNKNOWN  
AS MORE PARTICULARLY DESCRIBED  
IN THE AMENDED CLAIM FORM

Defendants

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Draft Order

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This exhibit appears at pages 2026 to 2028.

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# Claim Form

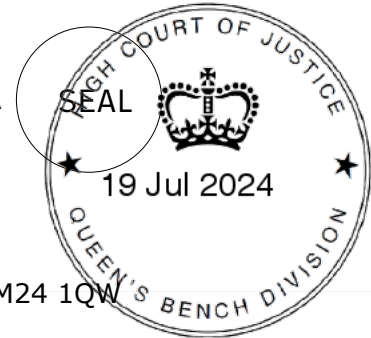
<b>In the</b>	High Court of Justice King's Bench Division
<b>Fee Account no.</b>	PBA 0087211
<b>Help with Fees - Ref no.</b> (if applicable)	<b>H W F</b> - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/>

**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.**

	For court use only
Claim no.	
Issue date	

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

- (1) **Manchester Airport P**  
of Level 5 Town Hall Extension, Albert Square, Manchester M60 2LA
- (2) **Airport it Manchester ited**  
of 6th Olympic House, Manchester Airport, Manchester M90 1QX
- (3) **Manchester Airport Par Par ited**  
of 6th Olympic House, Manchester Airport, Manchester M90 1QX
- (4) **Stansted Airport ited**  
of Enterprise House, Bassingbourn Road, Stansted Airport, Essex CM24 1QW
- (5) **East Midlands International Airport ited**  
of Pathfinder House, Castle Donington, Derby DE74 2SA



KB-2024-002132  
DATE OF ISSUE  
03/07/2024

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 Plans 1 - 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>	

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

Full name

Stuart 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/077654.000167

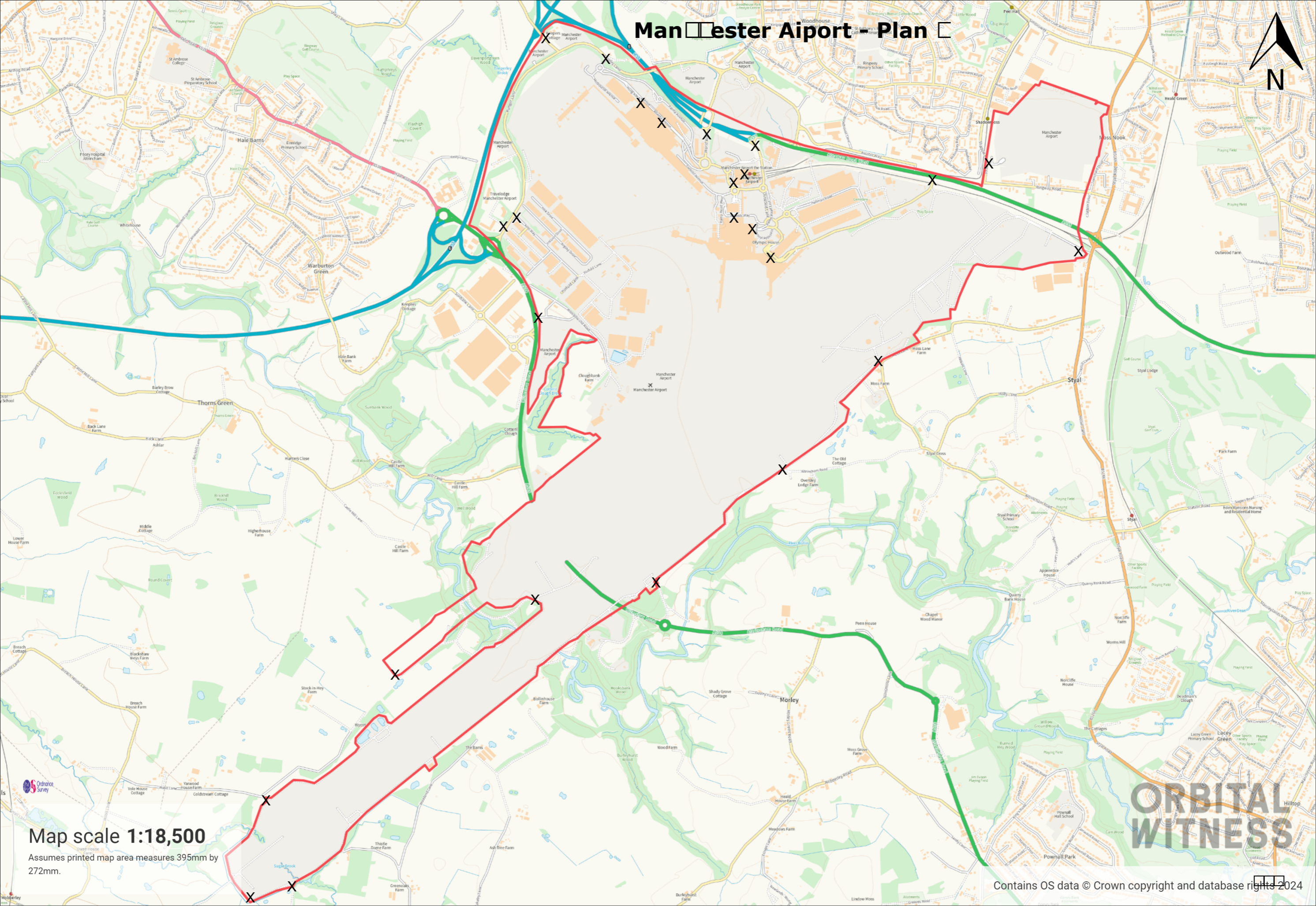
Email

## SCHEDULE 1 TO THE CLAIM FORM

- (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)



# Manchester Airport - Plan



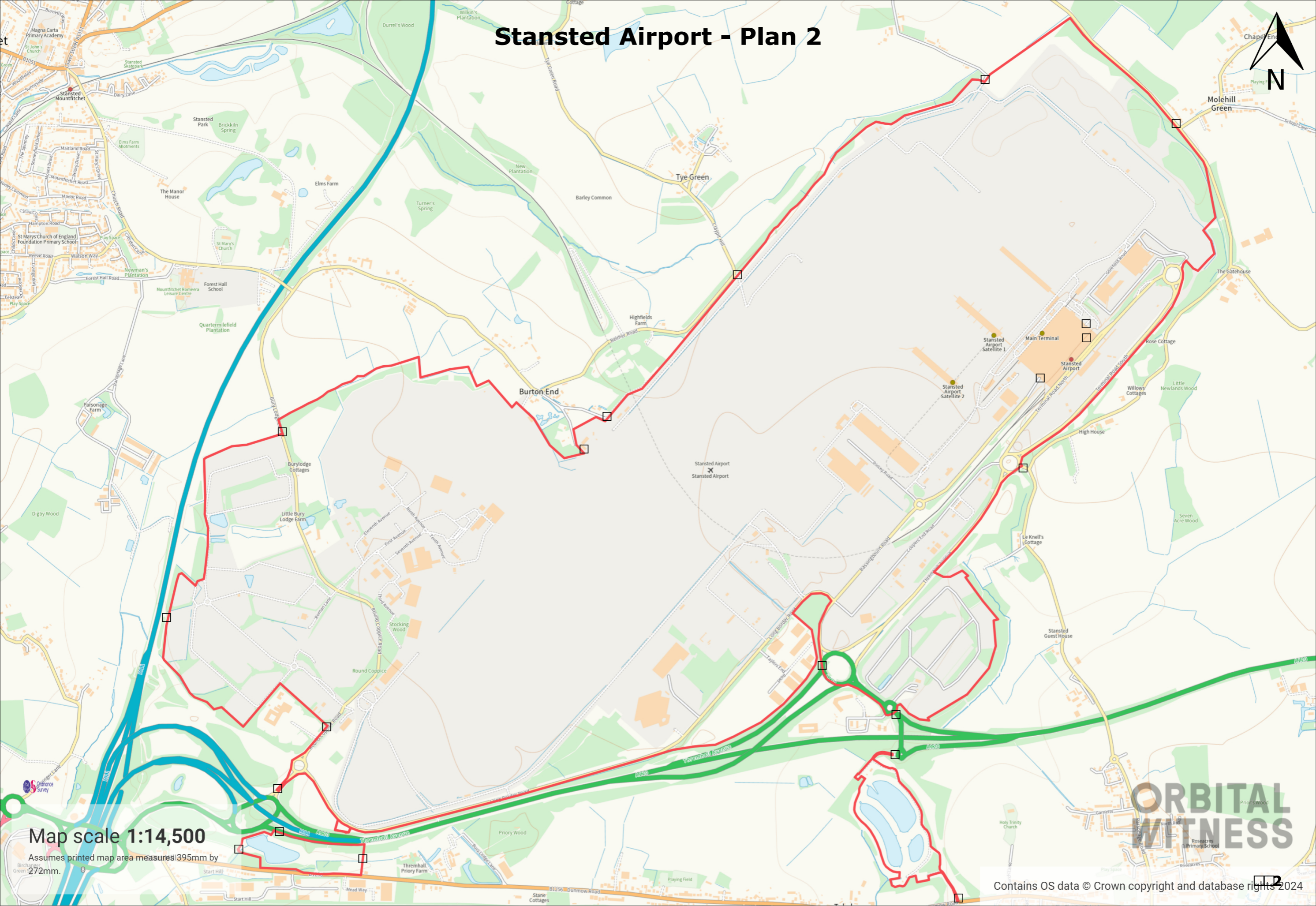
Map scale 1:18,500

Assumes printed map area measures 395mm by 272mm.



# ORBITAL WITNESS

# Stansted Airport - Plan 2

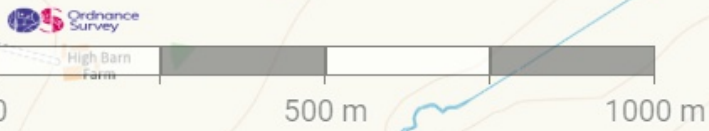
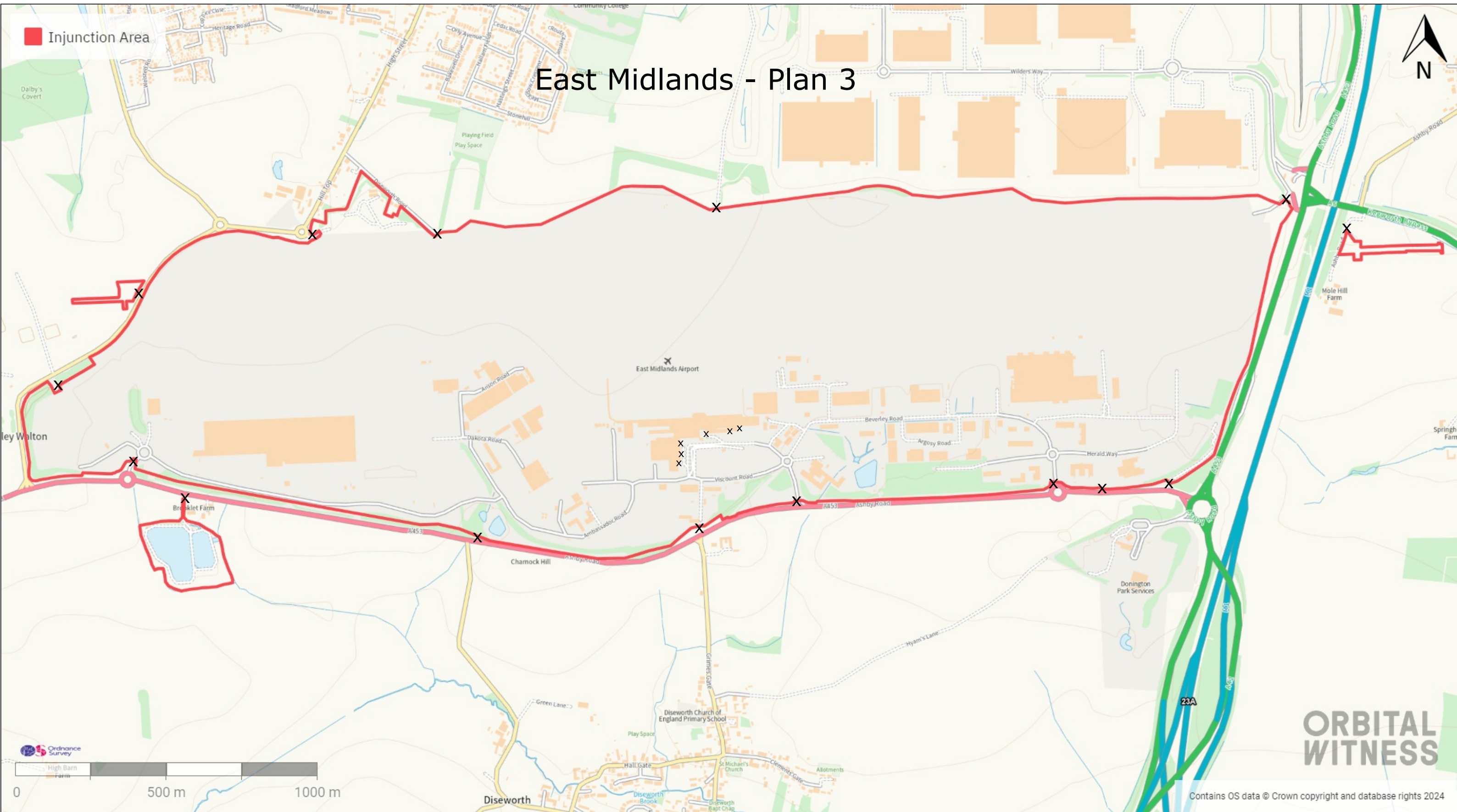


Map scale 1:14,500  
Assumes printed map area measures 1395mm by 272mm.

**ORBITAL FITNESS**

Injunction Area

# East Midlands - Plan 3



**ORBITAL  
WITNESS**

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

CLAIM NO: **KB-2024-002132**

**BETWEEN:-**

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

**Claimants**

- v -

- (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 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**

---

**PARTICULARS OF CLAIM**

---

**Manchester Airport**

1. The First Claimant is the operator of Manchester Airport, located in Manchester M90 1QX, shown outlined in red on Plan 1 ("**Manchester Airport**"). Manchester Airport serves around 25 million travelling passengers each year with an annual revenue of approximately £425 million.

2. The First, Second and Third Claimants are the registered proprietors of the land on which Manchester Airport is situated as shown in red on Plan 1, through a mixture of freehold and leasehold interests as shown in the Title Schedule hereto — but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas and subject also to certain highways.
3. Subject to those interests, the First, Second and Third Claimants are entitled to an immediate right of possession occupation and control of Manchester Airport, by virtue of their respective titles as shown in the Title Schedule.
4. Plan 1A depicts the areas within Manchester Airport which are the subject of third party interests, shown thereon shaded in blue, green and brown ("**the Manchester Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First, Second and Third Claimants are displaced as the persons with an immediate right of occupation or possession. The brown land is a railway/ railway station. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes certain the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.
5. Nevertheless, access to or from the Manchester Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Manchester Aiport which remain unencumbered by any such arrangement and in relation to which, accordingly, the First to Third Claimants remain entitled to possession occupation and control by virtue of their interests shown in the Title Schedule.
6. Also shown on Plan 1A are the highways shown shaded in pink on Plan 1A, which run beneath the taxiway within the Airport and/or provide access to Manchester Airport to the First to Third Claimants and their licensees (including members of the public).
7. By virtue of s63 of the Airports Act 1996, the First Claimant has power to make byelaws with respect to Manchester Airport. Pursuant to the Manchester Airport Byelaws 2024, byelaw 3.36, 3.10 and 3.34, no person has a right to use any part of Manchester Airport as defined therein for protest. The plan which defines Manchester Airport for the purposes of the Byelaws is not in all respects identical to Plan 1. However, the area covered by the Byelaws includes (a) the Manchester Third Party Areas and (b) the highways therein.

## **Stansted Airport**

8. The Fourth Claimant is the operator of Stansted Airport, located in Stansted CM24 1QW, shown outlined in red on Plan 2 ("**Stansted Airport**"). Stansted Airport serves around 25 million travelling passengers each year with an annual revenue of approximately £373 million.
9. The Fourth Claimant is the proprietor of the land on which Stansted Airport is situated as shown in red on Plan 2, through the interests shown in the Title Schedule hereto—  
— but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.
10. Subject to those interests of third parties, the Fourth Claimant is entitled to an immediate right of possession occupation and control of Stansted Airport, by virtue of its titles as shown in the Title Schedule.
11. Plan 2A depicts the areas within Stansted Airport which are the subject of third party interests, shown thereon shaded in blue, green, purple and pink ("**the Stansted Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fourth Claimant is displaced as the person with an immediate right of occupation or possession. The purple land is a railway station. The pink land is a railway tunnel. The blue land consists of (and the green land includes) other areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes certain the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.
12. Nevertheless, access to or from the Stansted Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Stansted Airport which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fourth Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.
13. By virtue of s63 of the Airports Act 1996, the Fourth Claimant has power to make byelaws with respect to Stansted Airport. Pursuant to the Stansted Airport Byelaws 1996, byelaws 3.17 and 3.19, no person has a right to use any part of Stansted Airport for protest.

## East Midlands Airport

14. The Fifth Claimant is the operator of East Midlands International Airport, located in Castle Donnington, Derby DE74 2SA, shown outlined in red on Plan 3 ("**EMA**"). EMA served around 3.3 million travelling passengers each year with an annual revenue of approximately £81 million.
15. The Fifth Claimant is the proprietor of the land on which EMA is situated as shown in red on Plan 3, through the interests shown in the Title Schedule hereto—but subject to the interests of various third parties arising by sub-demises (and/or other occupational arrangements) over certain areas.
16. Subject to those interests of third parties, the Fifth Claimant is entitled to an immediate right of possession occupation and control of EMA, by virtue of its titles as shown in the Title Schedule.
17. Plan 3A depicts the areas within EMA which are the subject of third party interests, shown thereon shaded in blue and green ("**the EMA Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fifth Claimant is displaced as the person with an immediate right of occupation or possession. The blue land consists of (and the green land includes) areas which are the subject of sub-leases or other occupational arrangements. By way of example, the blue and green land includes certain the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.
18. One of those areas, namely, the East Midlands Aeropark, takes direct access from the public highway. Subject to that exception: access to or from the EMA Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of the EMA which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fifth Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.
19. By virtue of s63 of the Airports Act 1996, the Fifth Claimant has power to make byelaws with respect to EMA. Pursuant to the East Midlands Airport Byelaws 2001, byelaw 3.5, no person has a right to use any part of Stansted Airport for protest.

### **The Claimants' claims**

20. 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 a railway station.
21. 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 at Manchester Airport 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.
22. 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;

- b. Further or alternatively, protest which occurs on the Third Party Areas threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.
23. Further, in respect of the highways at Manchester Airport described above: protest which occurs on these highways threatens:
- a. Unreasonably and substantially to interfere with the First, Second and Third Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;
  - b. Unreasonably and substantially to obstruct or hinder the free passage along the highway, occasioning particular damage to the First, Second and Third Claimants; and
  - c. In respect of the tunnelled highway in pink on Plan 1A, unreasonably and substantially to interfere with the First, Second and Third Claimants' ordinary use and enjoyment of the airport, insofar as a need might arise to close off the runaway for safety reasons; and
  - d. In any event, protest (at least, any protest causing disruption) is unlawful by reason of the Manchester Airport Byelaws 2024.

### **The threats**

24. 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:

25. 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..."

26. 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**").

27. 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.

28. 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?"*

29. 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?"*

30. 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.***

..."

31. 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.*

*PICTURE OF AIRPORT ACTIONS SYMBOLISING INTERNATIONAL COMMUNITY (<https://us02web.zoom.us/meeting/register/tZloduqqqTMtE9dgMMhlaymvEZgO45jgJ19A>)*

*People across Europe will be taking the fight to airports, the heart of the fossil economy.*

*This summer's actions across multiple countries will go down in history.*

*Want to meet the people making this happen?*

*Every Thursday for the next four weeks starting on the 13th of JUNE, 6.30pm*

*You don't want to miss this.*

*See you there,*

*Just Stop Oil"*

32. On 2 June 2024, Extinction Rebellion environmental activists blocked access to Farnborough Airport.

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<sup>1</sup> As of 27 June 2024, £24,099 had been raised on this website.

33. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at Stansted Airport, in one of the Third Party Areas (an area which is subject to an occupational arrangement with a third party), as part of a series of protests on climate change. This included:
- a. an individual using an angle grinder to cut a hole in the perimeter fence of the airport;
  - b. two individuals trespassing the perimeter fence; and
  - c. spray painting two aircrafts orange using a fire extinguisher.
34. As a result of this direct action:
- a. Notwithstanding that the protest took place on a Third Party Area, it was necessary to suspend operations on the runway on the Fourth Claimant's retained land in Stansted Airport for approximately 50 minutes: three aircraft departures were affected.
  - b. the two individuals (known as Jenifer Kowalski and Cole Macdonald) were arrested and charged with causing criminal damage, aggravated trespass and interference with the use or operation of national infrastructure.
35. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for Manchester Airport, Stansted Airport and/or East Midlands Airport:
- a. trespass on the Airport and/or
  - b. by protest conducted on or from the Third Party Areas, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or
  - c. by protest conducted on or from the highways on Plan 1A, obstruct those occasioning particular damage to the First, Second and Third Claimants and/or interfere with the First, Second and Third Claimants' right of access to Manchester Airport via those highways, so as to cause a nuisance actionable by the First, Second and Third Claimants.

36. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.
37. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:
  - a. 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.
  - b. 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.
  - c. 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.
  - d. 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 tens or hundreds of 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.

- e. 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.
- f. 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.
- g. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

**AND THE FIRST, SECOND AND THIRD CLAIMANTS CLAIM AGAINST THE FIRST DEFENDANT:**

- (1) Subject to periodic review by the Court on application by the Claimants at intervals not exceeding 24 months or such other period as the Court may determine, an order that the First Defendants must not, without the consent of the First, Second and Third Claimants (or either of them), enter, occupy or remain upon the land outlined in red on Plan 1.

**AND THE FOURTH CLAIMANT CLAIMS AS AGAINST THE SECOND DEFENDANT:**

- (2) Subject to periodic review by the Court on application by the Claimants at intervals not exceeding 24 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent of the Claimants, enter, occupy or remain upon the land outlined in red on Plan 2.

**AND THE FIFTH CLAIMANT CLAIMS AGAINST THE THIRD DEFENDANT:**

- (3) Subject to periodic review by the Court on application by the Claimants at intervals not exceeding 24 months or such other period as the Court may determine, an order that the Third Defendants must not, without the consent of the Claimants, 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 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

Claimants' solicitor

### **Title Schedule to the Particulars of Claim**

1. The First Claimant is the registered proprietor of the following titles:-

<b>Registered Title</b>	<b>Freehold / Leasehold</b>
GM408669	Leasehold
GM724915	Leasehold
GM839013	Leasehold
MAN315638	Leasehold
CH373359	Leasehold
CH408609	Leasehold
CH408610	Leasehold
CH414019	Leasehold
CH469834	Leasehold
CH469835	Leasehold
CH593537	Leasehold
GM827720	Leasehold
GM869598	Leasehold
GM874357	Leasehold
GM874715	Leasehold
GM923439	Leasehold
MAN157825	Leasehold
MAN404429	Leasehold
MAN8976	Leasehold
MAN348640	Leasehold
MAN359310	Leasehold

2. The Second Claimant is the registered proprietor of the following titles:-

<b>Registered Title</b>	<b>Freehold / Leasehold</b>
GM513511	Freehold
MAN371404	Leasehold
MAN269014	Leasehold
MAN270740	Leasehold

3. The Third Claimant is the registered proprietor of the following title:-

<b>Registered Title</b>	<b>Freehold / Leasehold</b>
MAN371404	Leasehold

4. The Fourth Claimant is the registered proprietor of the following titles:

<b>Registered Title</b>	<b>Freehold / Leasehold</b>
EX438482	Freehold
EX574488	Freehold
EX574502	Freehold
EX574498	Freehold
EX574495	Freehold
EX574482	Freehold
EX574485	Freehold
EX574491	Freehold
EX574504	Freehold
EX574508	Freehold
EX574523	Freehold
EX948708	Freehold
EX574513	Freehold
EX640482	Freehold
EX574507	Freehold
EX574477	Freehold
EX574473	Freehold
EX438486	Freehold
AA7858	Leasehold
EX900137	Leasehold
EX976114	Leasehold






5. The Fourth Claimant also has a lease of the buildings known as 6002 and 6003 at Stansted Airport granted on 20 September 2022 and made between Airport Industrial GP Limited and Airport Industrial Nominees Limited which is unregistered and is shown coloured brown on Plan 2.

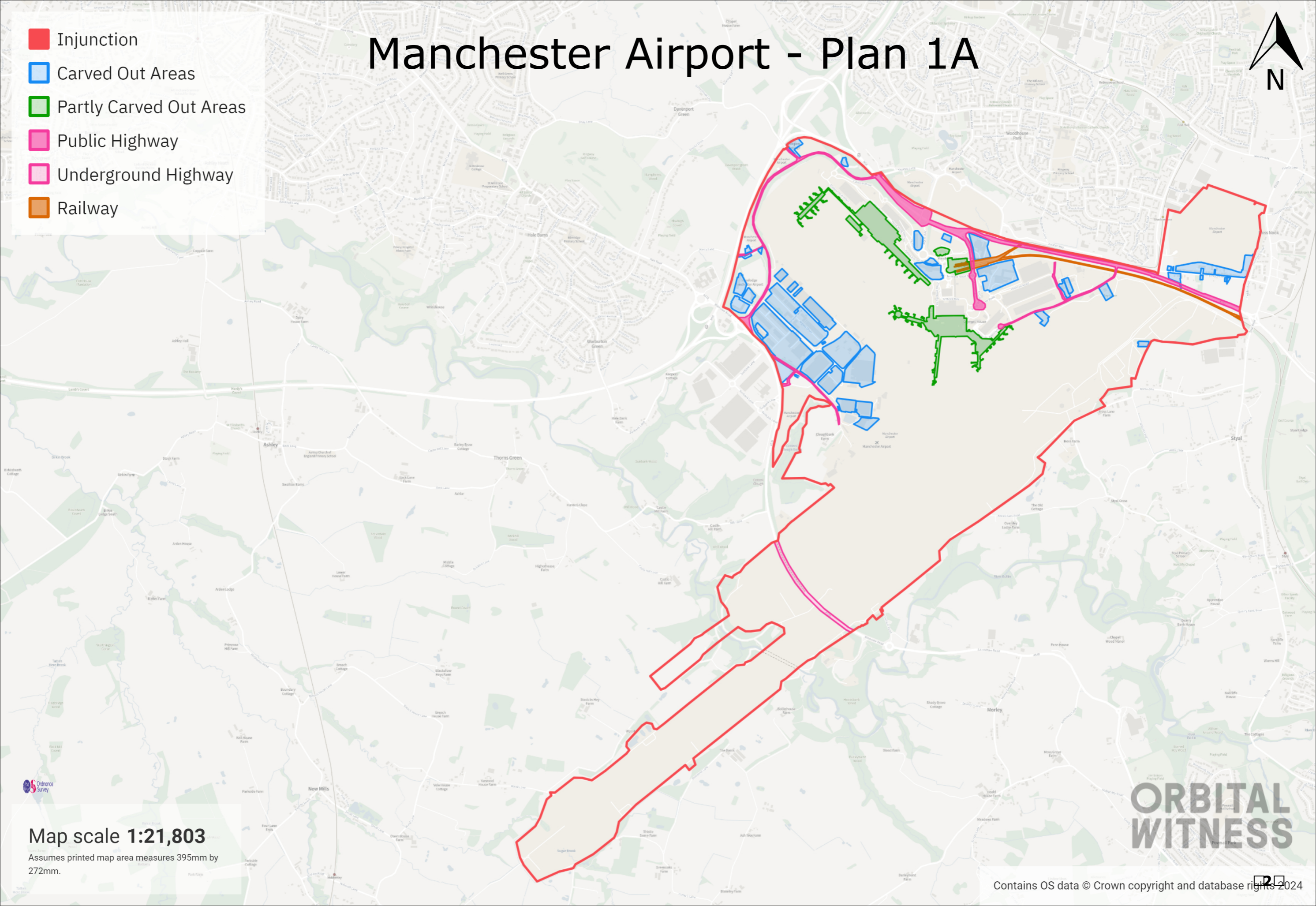
6. The Fifth Claimant is the registered owner of the following titles:-

<b>Registered Title</b>	<b>Freehold / Leasehold</b>
LT113826	Freehold
LT300968	Freehold
LT305941	Freehold
LT325861	Freehold
LT289774	Freehold

# Manchester Airport - Plan 1A



-  Injunction
-  Carved Out Areas
-  Partly Carved Out Areas
-  Public Highway
-  Underground Highway
-  Railway








Map scale **1:21,803**

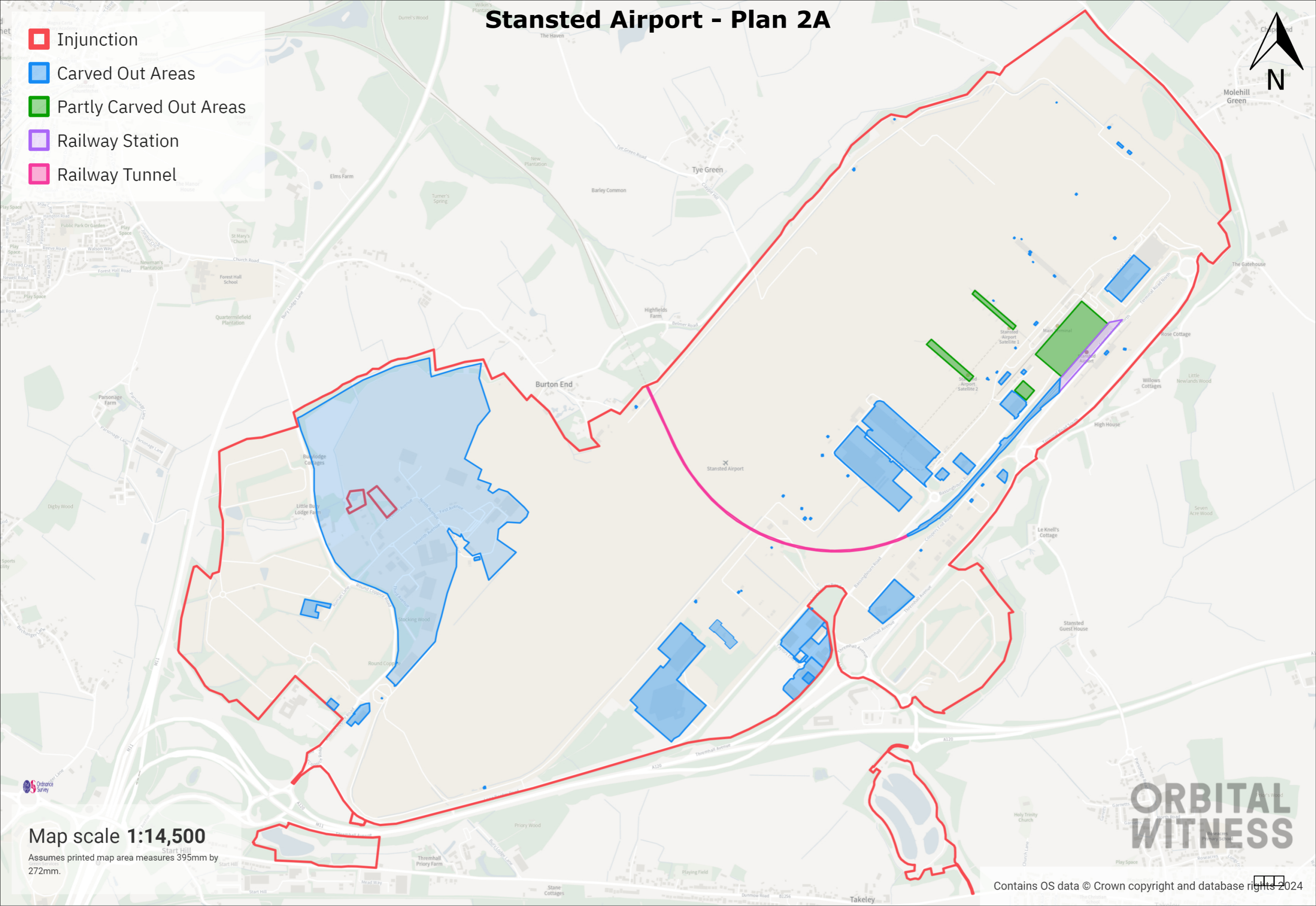
Assumes printed map area measures 395mm by 272mm.

# ORBITAL WITNESS



# Stansted Airport - Plan 2A

-  Injunction
-  Carved Out Areas
-  Partly Carved Out Areas
-  Railway Station
-  Railway Tunnel



 Map scale **1:14,500**  
Assumes printed map area measures 395mm by 272mm.

**ORBITAL  
WITNESS**



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

**BEFORE: HER HONOUR JUDGE COE K.C.**

**DATED: 5 July 2024**

**BETWEEN:-**

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



**- v -**

**KB-2024-002132**

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

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

**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 the Claim Form dated 3 July 2024

**AND UPON** the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

**AND UPON READING** the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

**AND UPON HEARING** Leading and Junior Counsel for the Claimants

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

**IT IS ORDERED THAT:**

### DEFINITIONS

1. **“Manchester Airport”** means the land shown outlined in red on Plan 1 to the Claim Form (including the highways therein), appended to this Order in Schedule 1 (**“Plan 1”**).
2. **“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.manchesterairport.co.uk/injunction/>) at which copies of this Order may be viewed and downloaded).

### **INJUNCTION**

3. With immediate effect, unless varied, discharged or extended by further order, the First Defendants and each of them are forbidden from doing the following:
  - a. Entering, occupying or remaining on any part of Manchester Airport without the consent of the First, Second and Third Claimants (or any of them);
  - b. Affixing themselves to any other person or object on Manchester Airport;
  - c. Impeding access to or enjoyment of Manchester Airport by the First, Second and Third Claimants (or any of them) and those authorised by the First, Second and Third Claimants (or any of them), whether by blocking any entrance or otherwise;
  - d. Blocking or obstructing the free and safe passage of traffic onto or along or across the highways within Manchester Airport;
  - e. Refusing to leave the aforesaid parts of the highways when asked to do so by a police constable, when contravening any of paragraphs 3(b) and/or (d);
  - f. Continuing to do any act prohibited by paragraphs 3(a) to (e) above.
4. This Order is subject to periodic review by the Court on application by the First, Second and Third Claimants at intervals not exceeding 12 months.

### **SERVICE**

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First, Second and Third Claimants shall take the following steps by way of service of copies of the amended

Claim Form, amended Particulars of Claim, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) upon the First Defendants:

- a. Uploading a copy onto the following website:  
<https://www.manchesterairport.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 notice at those locations marked with an “X” on Plan 1 setting out where these documents can be found and obtained in hard copy.
6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the First Defendants by the First, Second and Third Claimants carrying out each of the following steps:
- a. Uploading a copy of the Order onto the following website:  
<https://www.manchesterairport.co.uk/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.
7. The taking of such steps set out at paragraph 5 and 6 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendants and each of them.
8. The Court will provide sealed copies of this Order to the First, Second and Third Claimants’ solicitors for service (whose details are set out below).
9. 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 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

**FURTHER DIRECTIONS**

10. Service on the First Defendants of any further applications or documents in the proceedings by the First, Second and Third Claimants (or any of them) shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).
11. 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, Second and Third Claimants' solicitors 72 hours' notice of such application by email to [StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@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 to the First, Second and Third Claimants' solicitors at least 48 hours in advance of any hearing.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
13. The First, Second and Third Claimants (or any 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.

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

16. The First, Second and Third 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

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

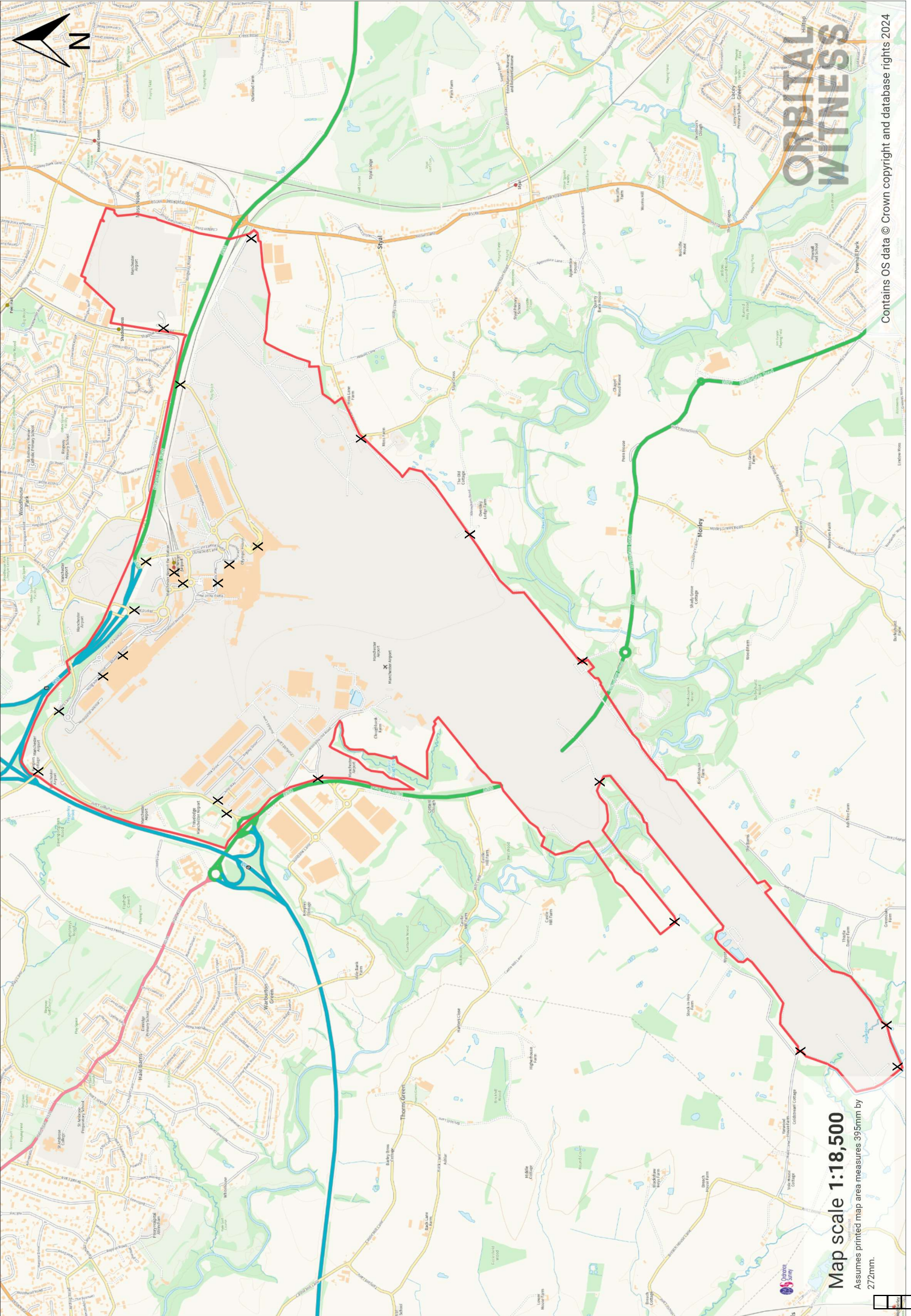


## SCHEDULE 1



# ORBITAL WITNESS

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**Map scale 1:18,500**  
Assumes printed map area measures 395mm by 272mm.



## **SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST, SECOND AND THIRD**

- (1) The First, Second and Third Claimants will take steps to serve the First Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.
  
- (2) The First, 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 3 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
- juststopoilpress@protonmail.com
- [info@juststopoil.org](mailto:info@juststopoil.org)
- enquiries@extinctionrebellion.uk

**SCHEDULE 4 - WARNING NOTICE**

# High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

**TO:** Persons Unknown whose purpose is or includes protest on the premises at Manchester Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the **"Defendants"**)

**FROM:** Manchester Airport Plc, Airport City (Manchester) Ltd, and Manchester Airport Car Park (1) Limited ("the **First, Second and Third Claimants"**)

This notice relates to the land known as Manchester Airport, Manchester, M90 1QX which is shown edged red on the Plan below (the **"Airport"**)

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the First, Second, and Third Claimants
2. Affixing themselves to any other person or object on the Airport.
3. Impeding access to or enjoyment of the Airport by the First, Second and Third Claimants or those authorised by the First, Second, and Third Claimants, whether by blocking access to any entrance or otherwise.
4. Blocking or obstructing the free and safe passage of traffic onto or along or across those parts of the highway show the red line outlined on the Plan;
5. Refusing to leave the parts of the highways on the Plan when asked to do so by a police constable, when contravening any paragraph 1 and/or 4.

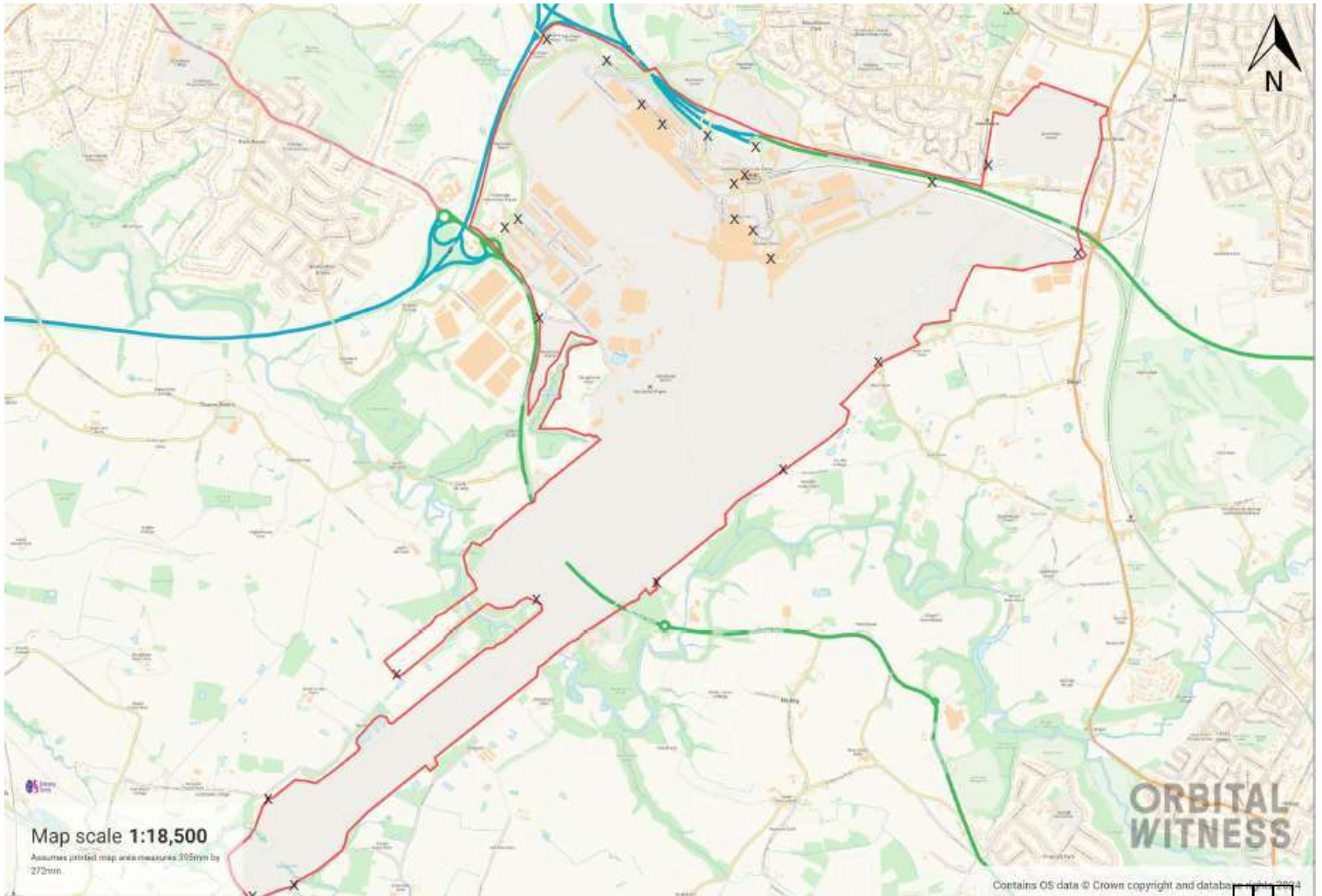
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

## 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 this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First, 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 5 July 2024 may be viewed at: <https://www.manchesterairport.co.uk/injunction/>

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



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

**BEFORE: HER HONOUR JUDGE COE K.C.**

**DATED: 5 July 2024**

**BETWEEN:-**

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



**- v -**

**KB-2024-002132**

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

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

**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 the Claim Form dated 3 July 2024

**AND UPON** the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

**AND UPON** hearing Leading and Junior Counsel for the Claimants

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

**IT IS ORDERED THAT:**

### DEFINITIONS

1. "**Stansted 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**").

2. **“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.stanstedairport.com/injunction/>) at which copies of this Order may be viewed and downloaded).

### **INJUNCTION**

3. With immediate effect, unless varied, discharged or extended by further order, the Second Defendants and each of them are forbidden from doing the following:
  - a. Entering, occupying or remaining on any part of Stansted Airport without the consent of the Fourth Claimant;
  - b. Affixing themselves to any other person or object on Stansted Airport;
  - c. Impeding access to or enjoyment of Stansted Airport by the Fourth Claimant and those authorised by the Fourth Claimant, whether by blocking any entrance or otherwise;
  - d. Continuing to do any act prohibited by paragraphs 3(a) to (c) above.
4. This Order is subject to periodic review by the Court on application by the Fourth Claimant at intervals not exceeding 12 months.

### **SERVICE**

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Fourth 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”**) upon the Second Defendants:
  - a. Uploading a copy onto the following website:  
<https://www.stanstedairport.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 a notice at those locations marked with an "X" on Plan 2 setting out where these documents can be found and obtained in hard copy.
6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the Defendants by the Claimant carrying out each of the following steps:
  - a. Uploading a copy of the Order onto the following website: <https://www.stanstedairport.com/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 2.
  - d. Affixing Warning Notices of A2 size at those locations marked with an "X" on Plan 2.
7. The taking of such steps set out at paragraph 5 and 6 shall be good and sufficient service of this Order and of the Claim Documents upon the Second Defendants and each of them.
8. The Court will provide sealed copies of this Order to the Fourth Claimant's solicitors for service (whose details are set out below).
9. 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 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

#### **FURTHER DIRECTIONS**

10. Service on the Second Defendants of any further applications or documents in the proceedings by the Fourth Claimant shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).
11. 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 Claimant's solicitors 72 hours' notice of such application by email to [StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@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 to the Fourth Claimant's solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
13. The Fourth 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 FOURTH CLAIMANT**

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

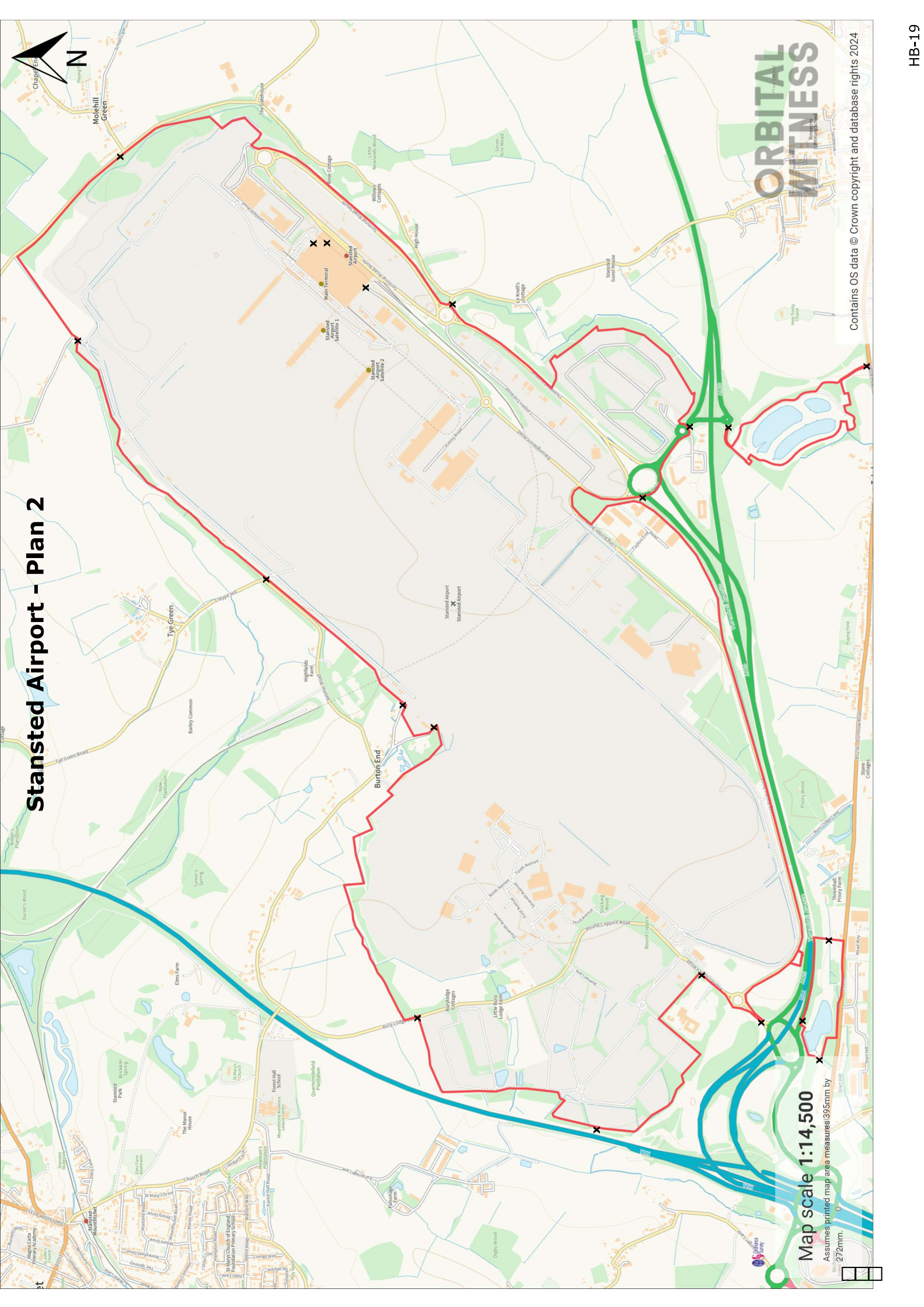
(1) Stuart Wortley  
Eversheds Sutherland (International) LLP  
[StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@eversheds-sutherland.com)  
07712 881 393

(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**

# Stansted Airport - Plan 2



Map scale 1:14,500

Assumes printed map area measures 395mm by

272mm.

**ORBITAL WITNESS**  
PROVIDED BY  
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## **SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FOURTH CLAIMANT**

- (1) The Fourth Claimant will take steps to serve the Second Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.
  
- (2) The Fourth 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 3 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
- juststopoilpress@protonmail.com
- [info@juststopoil.org](mailto:info@juststopoil.org)
- enquiries@extinctionrebellion.co.uk

**SCHEDULE 4 - WARNING NOTICE**

# High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

**TO:** Persons Unknown whose purpose is or includes protest on the premises at Stansted Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the “**Defendants**”)

**FROM:** Stansted Airport Ltd (“the **Fourth Claimant**”)

This notice relates to the land known as Stansted Airport, Stansted, CM24 1QW which is shown edged red on the Plan below (the “**Airport**”)

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the Fourth Claimant
2. Affixing themselves to any other person or object on the Airport.
3. Impeding access to or enjoyment of the Airport by the Fourth Claimant or those authorised by the Fourth Claimant, whether by blocking access to any entrance or otherwise.

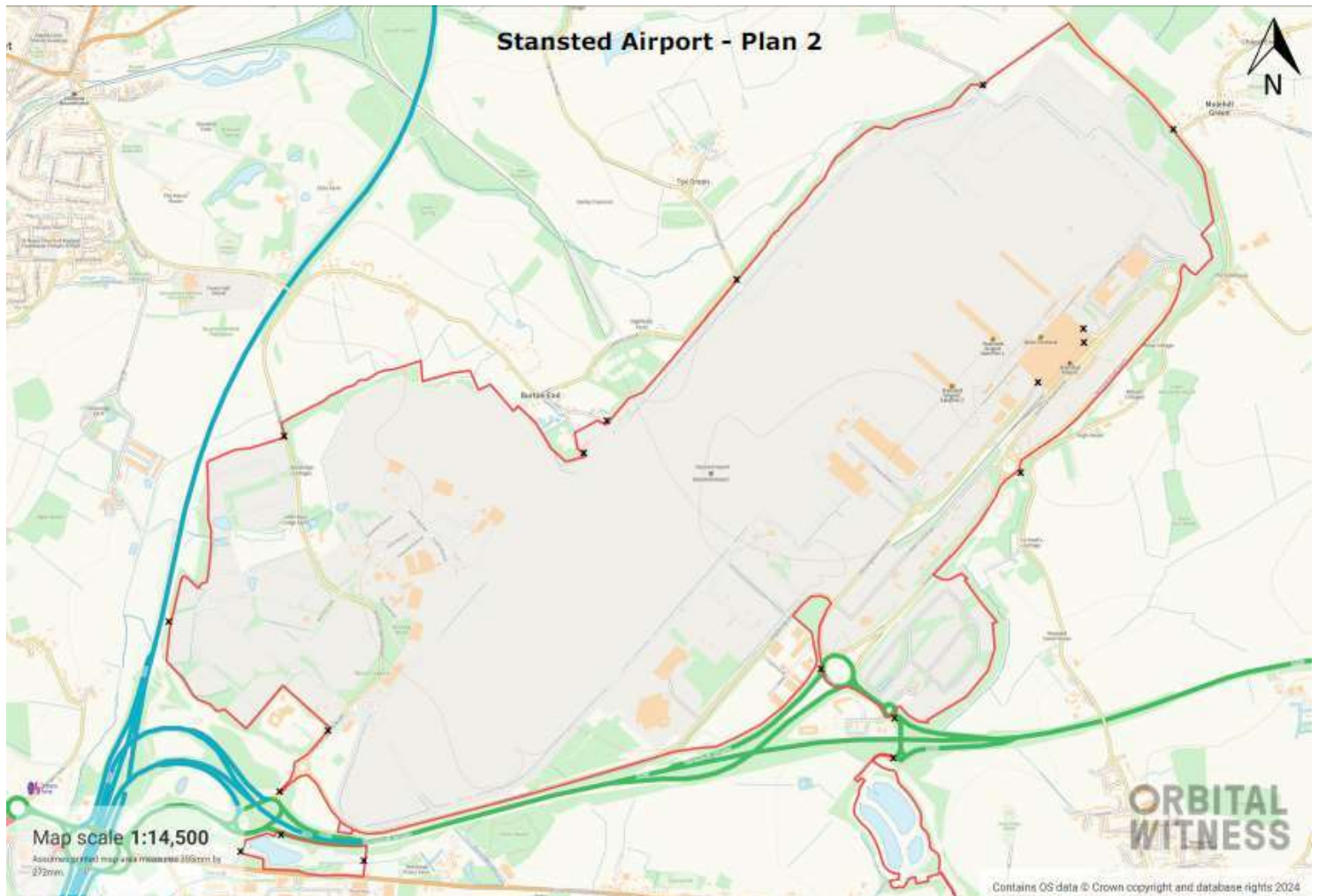
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

## 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 this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fourth 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 5 July 2024 may be viewed at: <https://www.stanstedairport.com/injunction/>

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



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

**BEFORE: HER HONOUR JUDGE COE K.C.**

**DATED: 5 July 2024**

**BETWEEN:-**

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



**Claimants**

**- v -**

**KB-2024-002132**

- (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**

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## ORDER

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### PENAL NOTICE

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

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

**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 the Claim Form dated 3 July 2024

**AND UPON** the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

**AND UPON READING** the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

**AND UPON** hearing Leading and Junior Counsel for the Claimants

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

**IT IS ORDERED THAT:**

### DEFINITIONS

1. "**East Midlands 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**").

2. **“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.eastmidlandsairport.com/injunction/>) at which copies of this Order may be viewed and downloaded).

## **INJUNCTION**

3. With immediate effect, unless varied, discharged or extended by further order, the Third Defendants and each of them are forbidden from doing the following:
  - a. Entering, occupying or remaining on any part of East Midlands Airport without the consent of the Fifth Claimant;
  - b. Affixing themselves to any other person or object on East Midlands Airport;
  - c. Impeding access to or enjoyment of East Midlands Airport by the Fifth Claimant and those authorised by the Fifth Claimant, whether by blocking any entrance or otherwise;
  - d. Continuing to do any act prohibited by paragraphs 3(a) to (c) above.
4. This Order is subject to periodic review by the Court on application by the Fifth Claimant at intervals not exceeding 12 months.

## **SERVICE**

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Fifth 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”**) upon the Third Defendants:
  - a. Uploading a copy onto the following website:  
<https://www.eastmidlandsairport.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 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.
6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the Third Defendants by the Fifth Claimant carrying out each of the following steps:
  - a. Uploading a copy of the Order onto the following website: <https://www.eastmidlandsairport.com/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 3.
  - d. Affixing Warning Notices of A2 size at those locations marked with an "X" on Plan 3.
7. The taking of such steps set out at paragraph 5 and 6 shall be good and sufficient service of this Order and of the Claim Documents upon the Third Defendants and each of them.
8. The Court will provide sealed copies of this Order to the Fifth Claimant's solicitors for service (whose details are set out below).
9. 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 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

#### **FURTHER DIRECTIONS**

10. Service on the Third Defendants of any further applications or documents in the proceedings by the Fifth Claimant shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).
11. 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 Fifth Claimant's solicitors 72 hours' notice of such application by email to [StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@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 to the Fifth Claimant's solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
13. The Fifth 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 FIFTH CLAIMANT**

16. The Fifth 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

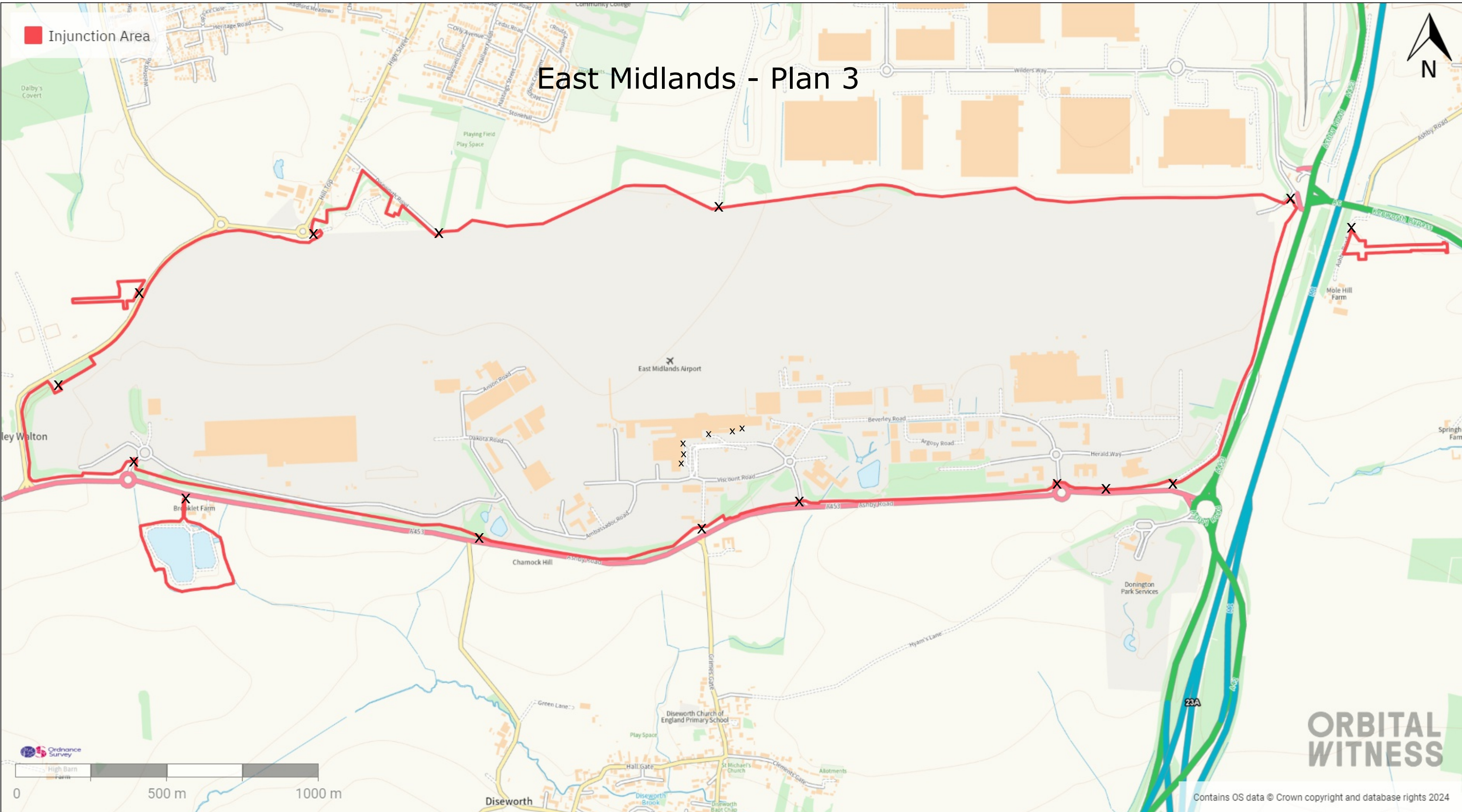
(2) Nawaaz Allybokus  
Eversheds Sutherland (International) LLP  
[NawaazAllybokus@eversheds-sutherland.com](mailto:NawaazAllybokus@eversheds-sutherland.com)  
07920 590 944

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

**SCHEDULE 1**

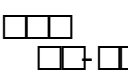
Injunction Area

# East Midlands - Plan 3



**ORBITAL  
WITNESS**

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

- (1) The Fifth Claimant will take steps to serve the Third Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.
  
- (2) The Fifth 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 3 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
- juststopoilpress@protonmail.com
- [info@juststopoil.org](mailto:info@juststopoil.org)
- enquiries@extinctionrebellion.co.uk

**SCHEDULE 4 - WARNING NOTICE**

# High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

**TO:** Persons Unknown whose purpose is or includes protest on the premises at East Midlands International Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the **"Defendants"**)

**FROM:** East Midlands International Airport Ltd ("the **Fifth Claimant**")

This notice relates to the land known as East Midlands International Airport, Castle Donnington, Derby, DE74 2SA which is shown edged red on the Plan below (the **"Airport"**)

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the Fifth Claimant
2. Affixing themselves to any other person or object on the Airport.
3. Impeding access to or enjoyment of the Airport by the Fifth Claimant or those authorised by the Fifth Claimant, whether by blocking access to any entrance or otherwise.

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 this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Fifth 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 5 July 2024 may be viewed at: <https://www.eastmidlandsairport.com/injunction/>

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



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

**BEFORE: HER HONOUR JUDGE COE K.C.**

**DATED: 5 July 2024**

**BETWEEN:-**

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



**Claimants**

**- v -**

**KB-2024-002132**

- (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**

---

**UPON** the Claimants' claim by the Claim Form dated 3 July 2024

**AND UPON** the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

**AND UPON READING** the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

**AND UPON** hearing Leading and Junior Counsel for the Claimants

**AND UPON** the Court granting the First to Third Claimant an injunction on 5 July 2024 ("**the Manchester Order**") in respect of the land shown outlined in red on Plan 1 to the Claim Form ("**Manchester Airport**")

**AND UPON** the Court granting the Fourth Claimant an injunction on 5 July 2024 ("**the Stansted Order**") in respect of the land shown outlined in red on Plan 2 to the Claim Form ("**Stansted Airport**")

**AND UPON** the Court granting the Fifth Claimant an injunction on 5 July 2024 ("**the EMA Order**") in respect of the land shown outlined in red on Plan 3 to the Claim Form ("**East Midlands Airport**")

**IT IS ORDERED THAT:**

**PERMISSION TO AMEND**

1. The Claimants have permission to amend the claim form and particulars of claim so as to refer to "Extinction Rebellion" in the name of the Defendants and shall file an amended Claim Form and amended Particulars of Claim.

**THIRD PARTIES**

2. By 19 July 2024, the First, Second and Third Claimants shall notify any persons who have a right or interest in Manchester Airport of the Manchester Order and provide a copy of the same to them by carrying out the following steps:
  - a. Uploading a copy of this Order onto the following website:  
<https://www.manchesterairport.co.uk/injunction/>

- b. Affixing a copy of this Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 1.
3. By 19 July 2024, the Fourth Claimant shall notify any persons who have a right or interest in Stansted Airport of the Stansted Order and provide a copy of the same to them by carrying out the following steps:
  - a. Uploading a copy of this Order onto the following website:  
<https://www.stanstedairport.com/injunction>
  - b. Affixing a copy of this Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 2.
4. By 19 July 2024, the Fifth Claimant shall notify any persons who have a right or interest in East Midlands Airport of the EMA Order and provide a copy of the same to them by carrying out the following steps:
  - a. Uploading a copy of this Order onto the following website:  
<https://www.eastmidlandsairport.com/injunction/>
  - b. Affixing a copy of this Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 3.

#### **COMMUNICATIONS WITH THE CLAIMANTS**

5. The 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



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

**BETWEEN:-**

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

**Claimants**

**- v -**

- (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**

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**NOTE OF "WITHOUT NOTICE" HEARING BEFORE  
HER HONOUR JUDGE COE K.C.  
5 JULY 2024**

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Hearing commenced at 14:00.

The Judge had read the hearing bundle, the Claimant's skeleton argument, and he had received the authorities bundle.

TMKC introduced the case as one under the newly described jurisdiction which has been in the Supreme Court in Wolverhampton – sui generis relief against Persons Unknown.

TMKC addressed a misstatement in the skeleton argument in which it says that the third parties were asked about whether they would like to take part as joint Claimants. In fact, they were not

asked due to time pressure but there were miscommunications between TMKC and those instructing him.

Judge explained that if an Order is made as requested, it will presumably need to include provisions for the third parties to be notified.

### **Manchester Airport**

Manchester Airport is a difficult area, but the "X" marked locations are where it is proposed to put notices.

TMKC referred to the Byelaws plan and how it cannot be used for the Injunction as it was not accurately drawn, as a result, C has attempted to duplicate the Byelaw map as if it had been done properly in producing the plans for the injunction (refers to witness statement of Mr Wortley).

TMKC described the title ownership of C at Manchester Airport and how the red line on Plan 1 falls within the land on Plan A, either as freeholders or leaseholders.

The effect of that in point of law is C's right to maintain trespass subject to certain exceptions (to be addressed later); such that no one has a right to be on that land except by C's consent.

TMKC, referring to witness statement of Mr Wortley (para 17) explained the carved out areas shown coloured blue, green and pink on Plan A etc.

TMKC explained that the carved out plans can create confusion, but it shows that in some instances C cannot claim trespass.

In order to make our claim good in trespass. Jurisdiction to give us relief on that basis.

TMKC explained the use of nuisance / threatened nuisance arising from the carved out areas, and an unreasonable use of land and the need for those areas to make the injunction in respect of the remaining land effective. TMKC uses example of protest at Stansted over a carved out area, which resulted in the runway being shut as a result of the risk of over-spill.

There were no trespass in that instance but the relief afforded by the injunction is still required.

### **Stansted Airport**

TMKC explained that Plan 2 would be attached to the Order.

TMKC described the title ownership of C at Stansted Airport, and how the red line on Plan 2 falls within the land on Plan A, as either freeholder or leaseholder; third party areas are depicted in plan 2A.

TMKC explains there is no complication due to highways but there remains some complexity because floor plans in pockets of third party interests in different buildings at Stansted. Further, it would be inappropriate and misleading to treat the blue areas differently to the generality.

### **East Midlands Airport**

TMKC explained Plan C, Plan 3 and the carved out plans.

TMKC explains why it is appropriate and necessary for us to be in receipt of the injunction in relation to trespass regarding the generality effective.

TMKC explained the effectiveness of injunctions in relation to other organisations (e.g. National Highways) but that campaigners have shifted their focus to airports. That has been manifested by pronouncements made expressly which Mr Wortley's statement sets out and the recent protest at Stansted.

TMKC disclosed the byelaws, relief of aggravated trespass and interference with national infrastructure. Those are available to the Airport, but the witness statement of Mr Wortley (para

42) includes evidence from which can be inferred that the protestors are willing to take risk in front of jury / magistrates but not a High Court judge.

TMKC explained how ineffective byelaws are for the type of action intended for the injunction to prevent – including the threshold of the punishment.

### **Legal tests / full and frank disclosure**

TMKC referred to the cause of action.

TMKC addressed the duty of full and frank disclosure, including sufficient evidence to prove the claim, no realistic defence, *DPP v Zeigler*, damages not being an adequate remedy, and that if the injunction prohibits any conduct that is lawful, then it must be in a way that is no more than is proportionate.

The balancing exercise for the Judge in deciding whether to grant the injunction only needed to be done in public land (i.e. where there were highways) and clearly favoured the grant of an injunction.

TMKC referred to Leggatt LJ in *Cuadrilla* (endorsed in Court of Appeal in *Canada Goose* and Supreme Court in *Wolverhampton*) in relation to the third party area, makes the point that although the court must be careful not to impose an injunction in wider terms than are necessary to do justice, the court is entitled to restrain conduct that is not in itself tortious or otherwise unlawful if it is satisfied that such a restriction is necessary in order to afford effective protection to the rights of the claimant in the particular case. Leggatt LJ makes the point that there is nothing objectionable in principle in using intention to define the defendants. There will be need for C to prove the purpose is to protest (otherwise the claim to commit would fail)

The proposed title of the Defendants do not fall foul of *Hampshire Waste*. "Persons intending to trespass or trespass" – this did not capture people whether or not on the land (too wide). This claim only seeks people whose purpose is to protest.

### **Draft Order**

TMKC guided the Judge through the draft Orders sought.

- Description of D:-
  - bespoke wording "or on any flight therefrom"
  - the only plausible explanation is the purpose of protest at airport or aeroplane at airport or aeroplane.
  - "whether in connection with JSO or otherwise" – if persons disavowed the campaign.
- Judge explored why other groups were not included in the definition of Ds, and suggested that other groups of which Cs are aware be added to that definition. TMKC agreed with the Judge and obtained permission to amend the Claim Form and POC.
- Para 3, with immediate effect – sometimes says until [date] in the future. One way of giving effect of temporal certainty. Your ladyship's decision.
- Judge concluded that reviews after 24 months is too long, but will reduce to 12 months.
- Judge confirms that the claim is best to be served rather than notification.

### **Judgment at 15:34**

Pursuant to Supreme Court's decision in *Wolverhampton* and the decision in *Valero*, principles are quite clearly set out now.

Cs are those who own 3 airports in the UK. Manchester, Stansted and East Midlands Airport. Ds who are persons unknown are those who, as described in POC, and which permission has been given to amend.

Ds are people who feel strongly that fossil fuel use should cease and are engaged in a campaign of protest at various locations. Already well reported protests have caused significant disruption. Those involved are active on the internet and have indicated that this particular summer they have an intention to continue this protest at airports (as seen in the evidence of Mr McBride and Wortley).

They intend to cause disruption in the summer and they consider this consider that this could be scope for some publicity for the campaign. In light of that Cs have brought applications such as these. Newcomer application, in the sense that the PU are those who cannot be identified but are identifiable by purpose. The sui generis were specifically addressed in *Wolverhampton* in the Supreme Court. The principles are much clearer and further clarified by Mr Justice Ritchie. In short form, Court must be satisfied that there is a compelling need for the injunction of this kind. I am satisfied that I have been taken very carefully through the areas of protection of injunctions has been sought. Referred to plans 1 and 2 in Manchester and Stansted, and 3 in East Midland. The land in question is owned by various Cs.

There are complications with claims for trespass, as there are various leases and licences which give right to others to occupy. Cs do not have an immediate right to possession and therefore the claim in trespass cannot be supported for all of the land.

Considerable work has been done by Cs. Land is in ownership of Cs. Premise is that if an injunction is granted only on basis of land which is owned, that would not provide a practical solution but by reference to authorities that Cs are entitled to these applications where it is necessary to make that which they seek effective. The risk is that any protestor will nonetheless threaten nuisance spilling out onto land they do own. There are examples of that already occurring for protestors within this category.

It is appropriate to do so in respect of all of this land shown on Plans 1, 2 and 3. And authorities make that quite straightforward. I have to be satisfied that there is a compelling need here. Satisfied here of compelling need.

Injunctions are necessary and proportionate and there is clear evidence of threat and intention to target airports, in a way that has already been targeted. Examples were given of Gatwick airport. Experience at Stansted with wire cutters. The threat is real and imminent and already manifested itself.

Consequences are of particular significance: Airports are sensitive places where security is paramount. This sort of disruption. Delay or disruption but also increased sensitivity from evidence of Mr McBride because targets for terrorists. Airports have to respond because this could be a mask for a terrorist activity. Damage to aircraft and other security issues and significant financial repercussions.

Also, I should take into account what arguments Ds might have raised. This is a without notice application and they are not here– it does not mean should not take that into account. Ds have been arrested for various criminal offences – Criminal Justice and Public Order Act and Public Order Act. Similarly, there are byelaws. The disadvantage is that they are enforceable after the action has taken place. The criminal system does not prevent action in the way that an injunction does. Scope for prosecution is not a remedy for Cs.

Should have said before that I have been referred to the point about tipping off and satisfied that appropriate to make the application without notice. The Claimants have not only given full and frank but have gone to some length to set out what might have been said. Included byelaws.

I am satisfied that necessary to make the injunctions and there is a compelling need.

Legal approach – I would cite the section of Mr Justice Ritchie in *Valero* – the matters I need to be satisfied about. Hard to see what particular harm to the PU in preventing them from carrying out the sort of protest over land which is privately owned.

In the interests of putting everything before the Court, Cs in Manchester Airport have referred to the fact that there are highways. There is a right to public generally and so therefore have to take into the rights of the protestors under the ECHR, particular Arts 10 and 11.

There is a need to consider when the balancing exercise that any interference is something which would cause me not to make this order. Right to peaceful protestation are to be protected do not include the deliberate and criminal behaviour which is the threat here.

The need remains compelling and any interference does not outweigh the need for the injunction.

Cs have agreed to provide a standard undertaking in damages. As part of the injunction, and if there is anyone they would be able to seek a remedy to damages.

In those circumstances, it is appropriate to make the orders sought. I should say that: appropriate for the definition of Ds to include any other organisation of which Cs are aware and have a website or email address.

This is not a case where it is appropriate to have an interim order with return in 2 weeks. As was set out in *Wolverhampton*, this is sui generis. As far as interim or final orders are concerned, anyone has a right to come and have the order discharged or varied. Indicated that this will be reviewed, rather than to last for, in 12 months, which is sufficient to cover off the threat. Reflect the sequential nature of the campaigns organised at various location.

Third parties with interests at the airports should be notified.

Hearing concluded at 16:00.

Case No: KB-2024-002132

Neutral Citation No.: [2024] EWHC 2247 (KB)

**IN THE HIGH COURT OF JUSTICE**  
**BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES**  
**(KBD)**

Royal Courts of Justice  
Strand  
London WC2A 2LL

Wednesday, 24 July 2024

BEFORE:

**HHJ COE KC (Sitting as a Judge of the High Court)**

BETWEEN:

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**MANCHESTER AIRPORT PLC AND OTHERS**

Claimants

- and -

**PERSONS UNKNOWN**

Defendant

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**MR T MORSHEAD KC and MS E BARDEN** appeared on behalf of the Claimants  
The Defendant did not appear and was not represented

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**JUDGMENT**  
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1. HHJ Coe KC: This is an extempore judgment; it is not comprehensive, and it is not going to be as detailed as some of the judgments in the authorities to which I have been referred. The reason I am able to deal with it in an extempore and short form is twofold. Firstly, because pursuant to the decision of the Supreme Court in *Wolverhampton City Council v London Gypsies and Travellers* [2023] UKSC 47 (“*Wolverhampton*”) and the subsequent decision of Ritchie J in *Valero Energy Limited v Persons Unknown* [2024] EWHC 134 (KB) (“*Valero*”), the principles are now quite clearly set out, despite the fact that these sorts of injunction applications are relatively new in jurisdictional terms. The second reason, is that I have the benefit of a very detailed and helpful skeleton argument on behalf of the claimants, which has gone, point by point, through the matters for and against the applications which I need to consider in deciding whether or not to make the orders sought.
2. In very short terms, the claimants own three airports in the UK: Manchester Airport; Stansted Airport; and East Midlands Airport. The defendants who are persons unknown - as described in the particulars of claim and in the draft order which I have given permission to amend - are people who feel strongly that the obtaining and use of fossil fuels should cease, and therefore they have engaged in a series of protests and campaigns of protest at various different locations.
3. In some instances, those already well reported incidents have produced significant disruption and in consequence injunctions have been granted to prevent further disruption. Those involved in these campaigns are active on the internet and their websites and so on, and have indicated that this particular summer of 2024, it is their intention to carry on these protests in similar fashion at UK airports.
4. I have seen the witness evidence from Mr McBride and Mr Wortley in particular setting out the details and the wording that has been used by those who have made these posts. It could not be clearer that they intend to bring home their message by causing disruption in the summer, in particular when there is a lot more air traffic with people going on holiday, and so on. They consider that this would give scope for some increased publicity to bring the public's attention to their campaign.

5. It is in light of this published intention that the claimants bring these applications. They are of the sort described in *Wolverhampton* as “newcomer” applications, in the sense that the persons unknown are those who cannot be identified by name, but who form an identifiable group of people by reason of their purpose and intention, as well as their past behaviour and their future plans.
6. These **sui generis** claims were specifically addressed in the *Wolverhampton* case in the Supreme Court and the principles identified there are now much clearer and as I say, have been further clarified by Ritchie J, and therefore in very short form rather than simply the balance of convenience, *American Cyanamid* sort of test. The court has to be satisfied that there is a compelling need for an injunction in a case of this kind, which has effectively become the key question.
7. I am satisfied first of all that I have been taken very carefully through the geographical areas in respect of which the protection of injunctions are sought, and so I have seen in particular, Plan 1 in relation to Manchester Airport, Plan 2 in relation to Stansted, and Plan 3 in relation to East Midlands which identify the land which is owned by the various, relevant claimants.
8. It is right to say that there are some complicating features in terms of simply bringing these claims in trespass as one would ordinarily do, because within those areas of land owned by the claimants there are various leases, licences and perhaps other arrangements which give rise to a right to occupy to others and therefore, the claimants properly acknowledge that they do not have an immediate right to possession and therefore, in trespass to protect against the threat of trespass. Considerable work has been done to set those details out and I have been referred to the title plans, and to the breakdown of the specific parts of each airport.
9. However, I am satisfied that the land itself as identified is in the ownership of the claimants. This application is made on the premise that if the injunctions were granted only on the basis of the land that is owned and to which there is a right of possession, it will not provide an effective solution. Again, by reference to the authorities it seems to me first of all that the claimants are entitled to make these applications where they are necessary in order to make the protection which they seek against trespass effective.

10. Secondly, the risk is that (albeit not on land to which the named claimants have a right of possession) any protest of the kind in respect of which injunctions are sought could spill out effectively onto the land to which the claimants do have the right to possession, and against which they are entitled to protection from nuisance. I have been given examples of how that has in fact already occurred in respect of the protestors who fall within this category of defendant.
11. I am satisfied that if it is appropriate to grant the injunctions sought, it is appropriate to grant them in respect of all of the land identified, that is, the areas identified in Plans 1, 2 and 3 to which I have been referred. The authorities make it quite straightforwardly clear that I have to be satisfied that there is a compelling need here, and I am satisfied on the basis of the evidence, in particular of Mr Wortley, who has identified the risks here that these injunctions are necessary and proportionate and that there is a compelling need for them.
12. In saying that, first of all as I have already referred to, there is clear evidence that there is a threat, indeed an intention to target airports, in the way that other airports and other enterprises and oil terminals, infrastructure and highways, have already been targeted in a disruptive way. The example that I have been given in respect of Gatwick Airport, is that people arrived with bandages apparently intending to block [access] and that there have been experiences at Stansted of people going through the perimeter fence with wire cutters and spraying aeroplanes orange. The threat is real, and it is imminent, and in some respects, it is already manifest.
13. Secondly, that the consequences of such protests (as far as airports are concerned) is of particular significance and importance. Airports are sensitive places where security is paramount, and we are all perfectly well aware of that, and if there is this sort of disruption or protest, not only does it have a significant knock-on effect or ripple effect in terms of busy airports, so that delay or disruption to even one flight is likely to affect many others, and therefore many other passengers.
14. Also, there is an increased sensitivity which is identified for me in this case from the evidence of Mr McBride in that even peaceful protests on an airport is a problem because airports are targets for terrorist organisations, and therefore airports have to

respond as if this could be a much more serious security threat and of course as has been pointed out to me, such a protest could in fact be a mask for a terrorist incident.

15. There is, of course, the danger of damage to aircraft, and not only security issues, but other significant financial repercussions which have a long-term effect.
16. Therefore, I am satisfied that there is a compelling need for the relief sought.
17. It is also right that I should take into account what arguments the defendants here might have raised, if they had been present. This is a without notice application, but it does not mean there is not an obligation to take those arguments into account, particularly where these protests have involved individuals being arrested for criminal offences. There are various criminal offences to which I have been referred including those in the Criminal Justice and Public Order Act 1994, the Public Order Act 2023 which now makes it an offence to affix oneself to an object on the land and the offence of aggravated trespass.
18. Similarly, there are byelaws at Stansted, Manchester and East Midlands which are intended to prevent: the obstruction of emergency exits; demonstrations; people loitering on the land; people refusing to leave when they are asked to do; and so on. The disadvantage from the claimants' point of view of the byelaws and the criminal law generally, is that they only are enforceable after the action has taken place. In other words, they do not prevent the threat or the action in the way that an injunction would, and that is in my view a significant and particularly importance difference in this situation.
19. There is a world of difference between waiting for somebody to breach the criminal law, or the byelaws and then prosecuting them, preventing this sort of action in the first place. The scope that there is for prosecution and sentence is not a remedy which would prevent the threat which is what this injunction application is all about.
20. I should have said before that since this is a without notice application, I have been referred already to the point about tipping off, and I am satisfied that it is appropriate to make this application without notice and for me to consider it without notice. I am also

satisfied that as is apparent from the claimant's skeleton argument and from the submissions that have been made to me in a really very comprehensive way, the claimants have not only dealt with full and frank disclosure, but have gone to some lengths to set out what might have been said on behalf of the defendants. For example, the inclusion in the bundle of the various byelaws from the airports and reference to them deals with one such issue.

21. In those circumstances, I am satisfied that it is necessary to grant the injunctions and that there is a compelling need for them. The correct legal approach is already covered in terms of the authorities that I have been referred to. I would cite the section of Ritchie J's judgment in *Valero*, which seems to me to set out as the claimants' skeleton argument has done, the matters I need to be satisfied about. In particular, it is hard to see at the moment what particular harm there could be to the persons unknown in preventing them from carrying out the sort of disruptive protests that are threatened, and which have been committed before. That is certainly the case in respect of the land, which is privately owned, or in private possession. However again, in the interests of putting everything before the court that they need to, the claimants in respect of Manchester Airport have also referred me to the fact that there are two highways within the land which has been identified, and clearly therefore there is a right to the public without permission to go onto those two highways.
22. I therefore have also to take into account the rights of the potential protestors and have regard to the European Convention on Human Rights, in particular articles 10 and 11. I need to consider whether or not in performing the overall balancing exercise, and in deciding whether or not the compelling need remains, or whether any interference with those rights is something which should cause me to not to make these orders.
23. There is a right to go onto a highway, and there is a right to protest on a highway, but that is a right to peaceful protest. The rights which are to be protected do not include the sort of deliberate and potentially unlawful, criminal behaviour which is the real basis of the threat here. In the circumstances, it seems to me that having considered that as far as Manchester is concerned, the need is compelling and any question of any interference with those rights does not outweigh the need for the injunction.

24. I am also of course aware of the fact - and it has been referred to most recently in submissions - that the claimants give a standard undertaking in damages as part of the injunction application, and if there is anybody who considers that their rights have been interfered with, to such an extent that they would be able to bring a claim and seek a remedy and damages then they are still entitled to. The claimants have given the appropriate undertaking in respect of any such right which is found to have been breached and in respect of which loss is found to have been caused.
25. In those circumstances, it seems to me that it is appropriate to make the orders sought. Having gone through the orders with counsel, first of all it seems to me that it is appropriate to amend the definition of those unknown persons, to include any other organisation of which the claimants are aware, and in respect of which they have any website or email address. I say that because the definition of identification is important, even though it is apparent in this case that it is not simply certain identified organisations, it is nonetheless important that those who otherwise might be similarly minded are included.
26. Secondly, whilst this is not the sort of application where in my view it is appropriate for example to make an interim order with a return date in two weeks' time or so as far as interim or final injunction orders are concerned, there is no distinction in the sense that anybody affected has the right to come to court and seek to have the order discharged, set aside or varied. That is the position here.
27. In those circumstances, what I have indicated is that this is an injunction which is to be reviewed after, rather than to last for, a period of 12 months. That seems to me to be a sufficient period of time to cover off the nature of the threat which has been identified, namely when there are most flights out of airports, but also to reflect the somewhat sequential nature of the kind of campaigns that have been organised at various different locations.
28. I also made it clear that those third parties who are not claimants here but do have a right to possession of various parts of the airports, should also be notified in case they have any reason to ask for any part of these orders to be discharged or varied.

**Epiq Europe Ltd** hereby certify that the above is an accurate and complete record of the proceedings or part thereof.

Lower Ground, 46 Chancery Lane, London WC2A 1JE

Email: [civil@epiqglobal.co.uk](mailto:civil@epiqglobal.co.uk)

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR JUSTICE BOURNE

ON: 24 June 2025

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-

KB-2024-002132

(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 Order**”)

**AND UPON** the Claimants’ application dated 2 June 2025

**AND UPON** the review hearings in each of the following claims having been listed on 24 June 2025 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 Order shall remain in full force and effect subject to the amendment referred to in paragraph 2 below (and subject to review, as provided for in paragraph 4 of the HHJ Coe KC Order).

2. Paragraph 4 of the HHJ Coe KC Order is amended so as to read:

*“This Order is subject to periodic review by the Court on application by the 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.”*

3. The court will provide sealed copies of this order to the Claimants’ solicitors for service or notification.

**Hearing Note – First Annual Review Hearing of Airport Injunctions**

**24 June 2025 (Court: Court 14)**

**Before:** Bourne J (Bourne J)

**For the Claimants:** Timothy Morshead KC (“**TMKC**”) with Evie Barden

**ATTENDANCE**

No person appeared to oppose the applications, noted that the hearing had been listed for a day due to the possibility that individuals may have wished to attend and to make representations. TMKC advised Bourne J that the hearing had been notified as required by the various Orders and that, if any member of the public wished to attend or make representations, this hearing provided the opportunity to do so.

**PURPOSE OF THE HEARING**

The hearing was the first annual review of airport-related newcomer injunctions granted last year. TMKC explained that the various Claimants sought continuation of the existing injunctions, with draft forms of order to continue the injunctions and to address case-management matters.

Consideration given to the approach to be adopted, proceeded on the basis that the review was not a merits rehearing. The question to be considered was whether there had been a material change in the background circumstances diminishing the need for the injunctions, having assimilated sufficient background for that review.

**NOTIFICATION AND SERVICE**

TMKC submitted that notification had been given as required by the Orders. Bourne J was also taken to evidence from Mr Wortley explaining how the Orders had been served last year, with a typographical correction to paragraph 11.2: the date should read 21 June 2024, not 21 August 2024.

**CLAIMANTS’ SUBMISSIONS**

TMKC submitted that a concise, de minimis approach should be adopted, consistent with the approach in the Valero review hearing, because there had been no material change that undermined the basis on which the injunctions had been granted.

The Claimants’ position was that the injunctions should be reviewed together, rather than formally consolidated, because that was good case management. The Bourne J agreed.

TMKC submitted that there remained a compelling need for the injunctions. Although Just Stop Oil had made a March 2025 announcement suggesting that direct action would stop, subsequent communications and reports, including the GB News report and the 14/15 June 2025 Seeds of Rebellion event, made it unsafe to treat that announcement as a complete renunciation of direct action.

TMKC explained that the Claimants also relied on evidence that other groups, including Youth Demand, Extinction Rebellion and Fossil Fuel London, had not renounced direct action, and that a lone campaigner could act without affiliation to any group.

TMKC submitted that airports were particularly sensitive environments: the public cannot be kept out, protestors may intermingle with passengers, disruption can have cascading effects, and security concerns mean that a high premium is placed on orderly conduct.

TMKC referred to the police correspondence. The National Police Coordination Centre email taking account of the existence and effectiveness of injunctions; local police advice to London City Airport was that an injunction remained useful.

Discussion on Gatwick Airport and potential breach of their injunctions in July 2025, no knowledge as to whether committal applications were made and why not, if not.

TMKC submitted that, subject to the above, the absence of airport direct action since the injunctions were made was consistent with the injunctions working as a deterrent, rather than demonstrating that they were no longer necessary.

On proportionality and Convention rights, TMKC submitted that there had been no relevant change in the law, that the balancing exercise undertaken last year could be relied on subject to updated evidence, and that Article 10 and Article 11 rights could be exercised away from the airport areas.

### **FORM OF ORDER SOUGHT**

TMKC invited Bourne J to retain the existing descriptive approach to “persons unknown”, rather than reducing the description to “persons unknown” only, noting Soole J’s approach in the Cambridge case, MBA Acres and the need for defendants to be defined as precisely as possible.

TMKC also invited the Court not to require permission before any application for committal. TMKC submitted that any issues arising from trivial or overzealous enforcement could be dealt with at the committal hearing, that no such applications had yet been made, and that there was no pattern of overzealous enforcement by the Claimants.

TMKC explained that the Claimants sought to homogenise the orders where appropriate. In relation to London City Airport, the relevant Claimants sought an amended plan to reflect a current ownership position, including an additional area let to a third party.

Hearing adjourned for Bourne J to consider matters ahead of issuing judgment.

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

Royal Courts of Justice  
Strand  
London, WC2A 2LL

Wednesday, 26<sup>th</sup> August 2025

BEFORE:

**MR JUSTICE BOURNE**

BETWEEN:

-----  
**LONDON CITY AIRPORT LTD & ORS**

Claimants

- and -

**PERSONS UNKNOWN**

Defendants

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**MR T MORSHEAD KC, MS E BARDEN** (instructed by Eversheds Sutherland International LLP) appeared on behalf of the Claimant  
**THE DEFENDANTS** were not present and not represented

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**JUDGMENT**

(Approved)

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1. MR JUSTICE BOURNE: At this hearing I conducted the first annual review of injunctions granted at the separate hearings of four claims last year, concerning activities by environmental protestors at a total of ten airports at different locations in England. The relevant airports are identified in each order.
2. The claimants were represented by Mr Morshead, King’s Counsel and Ms Baden of counsel. There was no appearance by any defendant or by anyone expressing opposition to the continuation of the injunctions.
3. The injunctions were sought because in 2024, airports in England and elsewhere became targets in campaigns of disruptive environmental protest, notably by the campaigning group, “Just Stop Oil” (“JSO”). Individual airports and groups of airports sought injunctive relief against “Persons Unknown”, invoking the “newcomer” jurisdiction as explained by the Supreme Court in *Wolverhampton City Council v London Gypsies and Travellers* [2023] UKSC 47, [2024] 1 AC 983 (“Wolverhampton”).
4. I have read the judgments given when the original injunctions were granted of Julian Knowles J (20 June 2024, KB-2024-176) HHJ Coe KC (5 July, KB-2024-002132) and Ritchie J (19 July 2024, KB-2024-002317). I have also seen a note of what was said by Jacob J in KB-2024-002473 on 6 August 2024.
5. By way of context, I note that orders were also made at hearings in other claims concerning Heathrow (Julian Knowles J, 24 July 2024), Gatwick (Ritchie J, 19 July 2024) and Southend Airports (Farbey J, 14 August 2024). This review does not encompass those three cases.
6. Each judge was satisfied that an injunction was necessary to restrain the threat of tortious conduct and that it was just and convenient to make an order. In particular, because of threats of unlawful action by protest groups, viewed in the light of some previous incidents, and the potential for such action to cause health and safety risks (to the public, airport staff, emergency services and/or the protestors themselves) and delay and disruption to the public. In addition, each judge was satisfied that it was appropriate to grant injunction against “Persons Unknown.”

7. I shall note increase the length of this judgment or extend the corpus of judicial discussions of this broad subject by repeating the statements of legal principle and factual considerations, which were set out by the judges when granting the injunctions last year.
8. It is, in particular, unnecessary for me to explore some distinctive characteristics of these cases which were considered by the judges, notably the fact that the claims concern a combination of (1) land owned by the claimants, (2) land not owned by the claimants but on which there is airport infrastructure and (3) public highways in and around the airports. The injunction granted to London City Airport covers land in category (1) only, whereas the injunctions in the other three cases cover all three categories. The claimants are not seeking any geographical expansion of the injunctions granted last year. London City Airport seeks, and I will grant, permission to amend to reflect a change of ownership of one specific area.
9. The nature of a review hearing of this kind was considered in *Wolverhampton* at paragraph 225, where the Supreme Court observed that the hearing:

“...will give all parties an opportunity to make full and complete disclosure to the court, supported by appropriate evidence as to how effective the order has been, whether any reasons or grounds for its discharge has emerged, whether there is any proper justification for continuance; and whether and on what basis, a further order ought to be made.”

10. In *High Speed Two (HS2) Ltd & Anor v Persons Unknown* [2024] EWHC 1277 (KB), Richie J described the court’s task at a review hearing:

“Drawing these authorities together, on a review of an interim injunction against PUs [Persons Unknown] and named Defendants, this Court is not starting de novo. The Judges who have previously made the interim injunctions have made findings justifying the interim injunctions. It is not the task of the Court on review to query or undermine those. However, it is vital to understand why they were made, to read and assimilate the findings, to understand the sub-strata of the **quia timet**, the reasons for the fear of unlawful direct action. Then it is necessary to determine, on the evidence, whether anything material has changed. If nothing material has changed, if the risk still exists as before and the claimant remains rightly and justifiably fearful of

unlawful attacks, the extension may be granted so long as procedural and legal rigour has been observed and fulfilled.

33. On the other hand, if material matters have changed, the Court is required to analyse the changes, based on the evidence before it, and in the full light of the past decisions, to determine anew, whether the scope, details and need for the full interim injunction should be altered. To do so, the original thresholds for granting the interim injunction still apply.”

11. I have therefore considered whether, since last year’s injunction orders were made, there has been any material change affecting, diminishing or removing the need for them to be in place.
12. Each application for review is supported by a witness statement by Stuart Wortley, a partner in Eversheds Sutherland (International) LLP, who represent the claimants. He sets out a chronology of incidents and events, occurring both before and since last year’s injunctions.
13. Of the events postdating any or all of the injunctions, Mr Moreshead emphasises several, including the following:-
  - (a) On 19 July 2024, one of the JSO founders, Roger Hallam, was found guilty with others of conspiring to organised protests to block the N25 motorway in November 2022. He was sentenced to five years in prison, later reduced on appeal to four years.
  - (b) On 24 July 2024, ten JSO activists were arrested at Heathrow Airport, seemingly equipped to be able to cut through fences and/or affix themselves to parts of the land or aircraft. Of those individuals, nine were later found guilty by a jury of conspiracy to cause a public nuisance. Five were sentenced to terms in prison of up to 15 months, and four were given suspended sentences.
  - (c) On 27 July 2024 a protest which was due to occur at London City Airport, was relocated to the Department of Transport.
  - (d) On 29 July 2024, eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure.

(e) On 30 July 2024, two JSO activists were arrested at Heathrow Airport after spraying orange paint around the Terminal 5 entrance hall and on destination boards in the departure lounge. Following a criminal trial, the jury was unable to return a verdict.

(f) On 31 July 2024, a protest by JSO and Fossil Free London, was held at the Docklands Light Railway Station, at London City Airport. That being an area excluded from the red line of the injunction.

(g) On 1 August 2024, six JSO activists were blocked access to the departure gates at Heathrow Terminal 5.

(h) On 5 August 2024, five JSO activists were arrested on their way to Manchester Airport and were in possession of bolt cutters, angle grinders, glue, sand and banners reading “oil kills”. Four of these individuals were subsequently found guilty of conspiracy to commit a public nuisance and then sentenced to terms of imprisonment, ranging between 18 and 30 months.

(i) On 21 February 2025, XR held a demonstration at Inverness Airport against climate change.

(j) On 27 May 2025, JSO made an announcement which at least gave the impression that it had now decided to withdraw from mounting disruptive protests of a direct action nature.

(k) However, on 18 May 2025, GB News reported that JSO was considering a “dramatic U-turn” and on 21 May 2025, JSO sent a link to its subscribers with the comment, “GB News was right for once. We are ‘plotting a comeback’.”

(l) On 21 May 2025, London City Airport received intelligence information from the Metropolitan Police of a protest by environmental protest groups, which had been planned at Heathrow Airport, to be held at the Sofitel Hotel on 20 May 2025, where an annual general meeting for Shell was being held and which was within the redline boundary of the injunction obtained by that airport. The protest was relocated to the

Shell head office, “in order to avoid the risk of associated penalties for breaching the injunction.”

(m) Over the weekend of 14 and 15 June 2025, JSO arranged an event described as “Seeds of Rebellion”, which seemingly was part of a training programme – a “summer of resistance training” – where attenders would be taught how “to plan actions that cut through” and to “plant the seeds of the coming non-violent revolution.”

(n) JSO’s fundraising page currently invites donations for – “[A] New campaign [that] is in the works”

14. Mr Wortley’s evidence also mentions activities of other protest groups opposed to the use of fossil fuels including Youth Demand, Extinction Rebellion and Fossil Free London. He refers to disruptive protest activity in 2024 and 2025 by Extinction Rebellion, though not at airports. He also exhibited an email sent by the Metropolitan Police to London City Airport’s security team on 21 May 2025, which referred to the incident relating to the Shell AGM and said:

“...The injunction at [Heathrow Airport] had a real impact on the Shell protest yesterday and builds on your experiences. To remove an injunction now, would open up to further protest. And whilst JSO have stepped down, there appear to be a cycle of new groups emerging and this cannot be ruled out, so maintaining it would be very much recommended.”

15. I accept Mr Moreshead’s submission that that advice from the police is a relevant consideration. Although the announcement by JSO on 21 March 2025 could signal a reduction from the risk of unlawful activity at the airports, there is also clear evidence of a possible U-turn from that announcement. And, as Mr Morshead submits, even if JSO left the scene, it is too early to tell what the effect of that would be, having regard to the possibility of some JSO members continuing to support direct action, and to the continued existence of other protest groups. Nor is it possible to conclude that the risk has been materially reduced or removed by the imprisonment of some JSO activists referred to above.

16. Meanwhile, the substantial, though not total lack of direct action at the airports since the grant of the injunctions is consistent with the injunctions having proved to be an effective deterrent. I accept that removing the injunctions at present would create a real risk of a resumption of activity at airports.
17. When granting the injunctions, the judges last year concluded that enforcement of bylaws and criminal proceedings did not provide an adequate alternative remedy. That, in my view, has not changed.
18. In the circumstances considered as a whole, I conclude that there has been no material change which removes or seriously diminishes the justification or the rationale for the injunctions, and that they should continue in force.
19. Turning to the form of the order, Mr Morshead showed me the decision of Nicklin J in *MBR Acres Limited and Others v John Curtin & Persons Unknown* [2025] EWHC 331 (KB), which took a different approach of directing an injunction in a protest case, “**contra mundum**”, rather than by describing categories of defendants by reference to the conduct to be prohibited, which would also make service of the claim unnecessary. Nicklin J noted that the court must consider what other or better solutions may be available, having regard to enhanced police and local authority powers. He also indicated that orders should include a requirement that the court’s permission be obtained before any application is made to commit for contempt of court.
20. Mr Morshead submitted that it would be better in this case to retain a description of the intended defendants, by reference to the conduct being enjoined, and that that course was followed in a later decision of Soole J in *Chancellor, Masters and Scholars of the University of Cambridge v Persons Unknown* [2025] EWHC 724 (KB). He also submitted that a requirement for consent for committal proceedings should not be necessary, having regard to the safeguards built into the injunction and to the impact which applications for consent could have on costs and court resources.
21. In the present cases, the judges last year found it appropriate to describe or define the defendants by specific reference to the type of conduct to be enjoined. Although Nicklin J has identified a possible different approach, it seems to me that on a review

hearing, I should not change the approach taken by the previous judges, where the underlying circumstances have not materially changed. I am also mindful of the need, emphasised by the Supreme Court in *Wolverhampton* at paragraph 221, for defendants in injunctions to be defined as precisely as possible. It seems to me that that also favours a continuation of the approach taken last year.

22. Nor am I persuaded to depart from what was ordered last year by adopting a standard wording to define or describe the prohibited acts in the four cases before me. The differences in wording have not created any difficulty for me in conducting this review, and any potential defendant who has already become aware of the injunction in respect of any specific airport may already be aware of the existing wording, and that factor militates against a change.
23. I also accept the submission that it is not necessary to insert a provision requiring consent or permission to be obtained for any contempt application in the event of a breach of the injunction. Although such a provision could provide a helpful safeguard in some “**contra mundum**” cases, as described by Nicklin J in *MVR Acres*, in the present cases, no enforcement issue has arisen so far. That is by contrast with *MBR Acres*, where Nicklin J vigorously criticised the conduct of claimants who pursued a committal application, which he described as frivolous and bordering on vexatious. As Mr Morshead said, claimants who choose to commence committal proceedings for trivial breaches do so at their own risk. The courts have repeatedly said that, in cases which do not appear to have been cited to the court in *MBR Acres*, such as *Sectorguard Plc v Diene Plc* [2009] EWHC 2693 (Ch), per Briggs J at paragraph 46. Meanwhile, in the circumstances of the present case, I have no reason to expect that such an issue will arise.
24. It seems to me, by way of confirmation, that the steps taken to publicise the orders last year, remain appropriate and sufficient.
25. I will provide for the next review to take place in one year from now. It will remain open for anyone to apply to vary or discharge the orders before then. The cases will again be listed together upon that occasion, but I see no need to consolidate them.

26. I shall ask counsel to finalise the terms of an order whose effect is that the injunctions granted last year will remain in force. For practical reasons, and in principle, that seems to me preferable to the alternative of granting entirely new injunctions.

**Epiq Europe Ltd** hereby certify that the above is an accurate and complete record of the proceedings or part thereof.

Lower Ground, 46 Chancery Lane, London WC2A 1JE

Email: [civil@epiqglobal.co.uk](mailto:civil@epiqglobal.co.uk)

**This transcript has been approved by the Judge**



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

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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.

1. The orders of Coe HHJ Orders are attached, together with the Bourne J Orders.
2. The Bourne J Orders and the Coe HHJ Orders together provide that:
  - a) the injunctions granted pursuant to the Coe HHJ Orders are to be reviewed at 12 month intervals; and
  - b) the hearing at which such review is to be considered is to be listed to “*be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.*”
3. The Claims are defined in the Bourne J Orders as the claims in actions KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (“**the Claims**”).
4. The Claimants in the remaining Claims also seek review of the injunctions and have, by Eversheds Sutherland (International) LLP, also made applications of even date to the same effect as this application.
5. The Court is invited to make an order on the papers in the form of the draft order. The Claimants will notify the Defendants of any order made by the Court and the application following the making of the order.

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

2

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	
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If applicable

Phone number

+44 161 831 8582

Fax phone number

DX number

Your Ref.

292659.000057/WRIGHTAX

Email

alexwright@eversheds-sutherland.com

**IN THE HIGH COURT OF JUSTICE**

**KING'S BENCH DIVISION**

**BEFORE: MRS JUSTICE STACEY DBE**

**DATED: 15 June 2026**

**BETWEEN:-**

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



**KB-2024-002132**  
**Claimants**

**- v -**

**PERSONS UNKNOWN AS DESCRIBED IN THE CLAIM FORM**

**Defendants**

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**ORDER**

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**UPON** the Claimants' claim by the Claim Form dated 3 July 2024

**AND UPON** the Claimants' application for an injunction dated 4 July 2024

**AND UPON** the making of an injunction by order dated 5 July 2024 by Her Honour Judge Coe K.C. ("**the Orders**")

**AND UPON** the review hearings in each of the claims KB-2024-001765, KB-2024-002132, KB-2024-002317 and KB-2024-2473 ("**the Claims**") having been listed to be heard together on 24 June 2025 ("**the 2025 Review Hearing**")

**AND UPON** the Orders dated 24 June 2025 of Bourne J following the hearing of the 2025 Review Hearing in respect of the Claims

**AND UPON** the Claimants' application dated 2 June 2026 ("**the Application**")

**AND UPON** the Court making the order without a hearing on the basis a hearing would not be appropriate

**IT IS ORDERED THAT:**

1. The Orders shall be reviewed at a hearing on 24 June 2026 or a date thereafter as soon as is convenient for the Court, with a time estimate of 1 day.
2. The Claimants shall serve the Application and this order on the Defendants by carrying out the steps set out in paragraph 10 of the Orders.
3. A person affected by this order may make an application have to it set aside, varied or stayed within 7 days after the order is served on them.