

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

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

**ON: 30 June 2026**

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

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

**Claimants**

**-and-**

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

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

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

**Defendants**

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**ORDER**

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**PENAL NOTICE**

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

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

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

**IMPORTANT NOTICE TO THE DEFENDANTS**

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

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

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

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

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

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

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

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

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

**IT IS ORDERED that:**

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

Annex 1

Amended by order of [ ] dated [ ]

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

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

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

**BETWEEN:-**

(1) BIRMINGHAM AIRPORT LIMITED

AND FIVE OTHERS

**Claimants**

- v -

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

AND TWO OTHERS

**Defendants**

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**ORDER**

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**PENAL NOTICE**

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

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

**ASSETS SEIZED.**

**IMPORTANT NOTICE TO THE DEFENDANTS**

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

**BEFORE THE HONOURABLE MR JUSTICE**

**JACOBS ON 6 AUGUST 2024**

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

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

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

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

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

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

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

**DEFINITIONS**

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

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

**IT IS ORDERED THAT:**

**INJUNCTION**

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

**REVIEW**

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

**SERVICE/NOTIFICATION**

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

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

**FURTHER DIRECTIONS**

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

further directions.

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

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

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

~~(1) Stuart Wortley~~

~~Eversheds Sutherland (International) LLP~~

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

~~07712 881 393~~

~~(2) Nawaaz Allybokus~~

~~Eversheds Sutherland (International) LLP~~

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

~~07920 590 944~~

Alexander Wright

Eversheds Sutherland (International) LLP

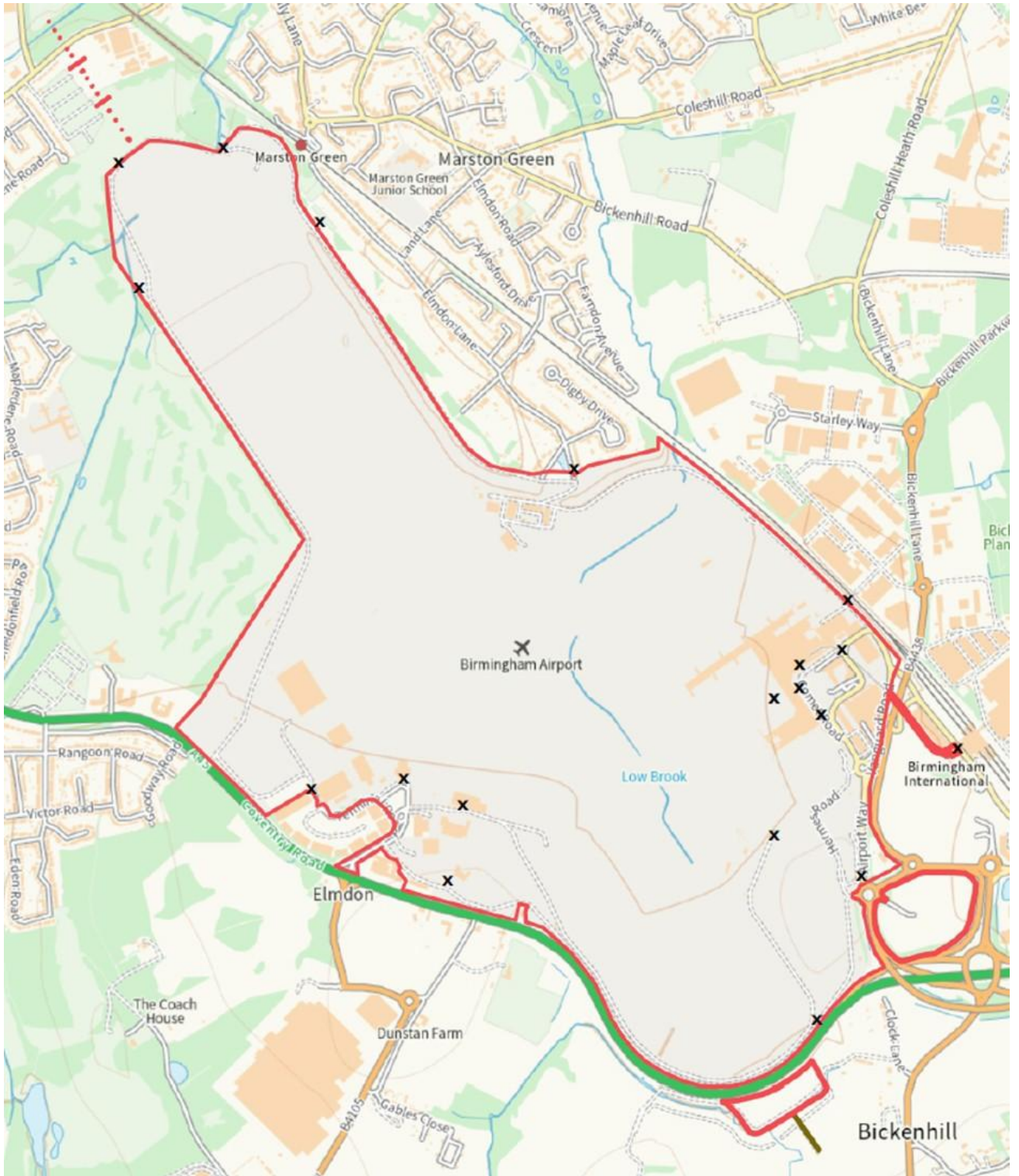
[alex.wright@eversheds-sutherland.com](mailto:alex.wright@eversheds-sutherland.com)

07500 578620

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

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

**SCHEDULE 1**



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

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

### SCHEDULE 3 – EMAIL ADDRESSES

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

SCHEDULE 4 – AMENDED WARNING NOTICE

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

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

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

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

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

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

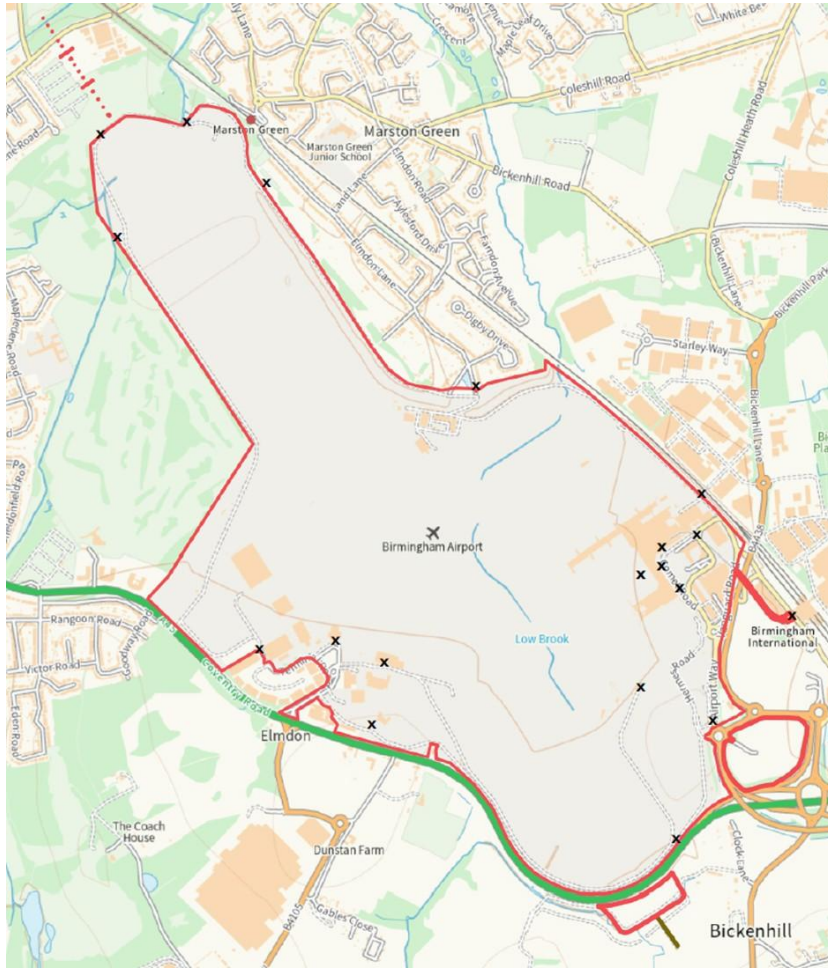
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

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

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

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



ANNEX 2

Amended by order of [ ] dated [ ]

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

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

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

**BETWEEN:-**

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

AND FOUR OTHERS

- v -

**Claimants**

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

AND TWO OTHERS

**Defendants**

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**ORDER**

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**PENAL NOTICE**

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

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

## IMPORTANT NOTICE TO THE DEFENDANTS

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

**BEFORE THE HONOURABLE MR JUSTICE**

**JACOBS ON 6 AUGUST 2024**

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

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

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

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

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

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

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

### **DEFINITIONS**

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

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

**IT IS ORDERED THAT:**

**INJUNCTION**

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

**REVIEW**

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

**SERVICE/NOTIFICATION**

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

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

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

### **FURTHER DIRECTIONS**

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

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

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

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

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

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

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

**COMMUNICATIONS WITH THE COURT**

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

**SCHEDULE 1**



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

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

### SCHEDULE 3 – EMAIL ADDRESSES

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

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

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

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

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

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

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

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

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

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

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

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



ANNEX 3

Amended by order of [ ] dated [ ]

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

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

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

**BETWEEN:-**

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

AND THREE OTHERS

**Claimants**

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

AND TWO OTHERS

**Defendants**

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ORDER

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**PENAL NOTICE**

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

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

## IMPORTANT NOTICE TO THE DEFENDANTS

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

**BEFORE THE HONOURABLE MR JUSTICE**

**JACOBS ON 6 AUGUST 2024**

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

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

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

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

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

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

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

### DEFINITIONS

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

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

IT IS ORDERED THAT:

### **INJUNCTION**

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

### **REVIEW**

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

### **SERVICE/NOTIFICATION**

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

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

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

#### FURTHER DIRECTIONS

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

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

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

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

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

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

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

#### COMMUNICATIONS WITH THE COURT

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

**SCHEDULE 1**

# Bristol Airport - Plan 3



**ORBITAL  
WITNESS**



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

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

### SCHEDULE 3 – EMAIL ADDRESSES

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

SCHEDULE 4 – AMENDED WARNING NOTICE

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

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

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

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

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

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

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

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

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

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

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

