Claim no: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) PLC
(3) MANCHESTER AIRPORT CAR PARK (1) LIMIED

AND TWO OTHERS

Claimants

-and-

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

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

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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 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 ("**the Application**")

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 statement of Stuart Sherbrooke Wortley dated 6 June 2025

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

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

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Manchester Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the HHJ Coe KC Order

DEFINITIONS

"**Manchester Airport**" means the land shown in red outlined in red on Plan 1 to the Claim Form (including the highways therein), appended to this Order in Schedule 1 ("**Plan 1**")

"**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.

IT IS ORDERED THAT:

INJUNCTION

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

2. 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 and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the First Defendants by:

    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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the First Defendants and each of them.

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

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the First Defendants of any further applications or documents in the proceedings by the First, Second and Third Claimants shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

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 Claimants' solicitors 72 hours' notice of such application by email to 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 or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The First, Second and Third Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 1 will be the same as Plan 1 attached to the HHJ Coe KC Order

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

(1) The Claimants will take steps to serve the First Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

(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 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
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Claim no: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(4) STANSTED AIRPORT LTD

AND FOUR OTHERS

Claimants

-and-

(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)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

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. No order be made to the continuing effect 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 First, Second and Third 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.

Claim no: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(4) STANSTED AIRPORT LTD

AND FOUR OTHERS

Claimants

-and-

(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)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

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 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 (**"the Application"**)

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 statement of Stuart Sherbrooke Wortley dated 6 June 2025

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

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

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Stansted Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the HHJ Coe KC Order

DEFINITIONS

"**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**")

"**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/about-us/injunction/ at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

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

2. This Order is subject to periodic review by the Court on application by the Fourth Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the Second Defendants by:

    a. Uploading a copy onto the following website: https://www.stanstedairport.com/about-us/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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Second Defendants and each of them.

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

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification 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 paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

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 Claimants' solicitors 72 hours' notice of such application by email to 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 or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. Fourth Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 2 will be the same as Plan 2 attached to the HHJ Coe KC Order

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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 which took place on 24 June 2025 by 4pm on 27 June 2025.

(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 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
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED INSERT ("the Order")

TO: Persons Unknown whose purpose is or includes protest on the premises at Stansted Airport shown edged red on Plan 2 or 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 or Extinction Rebellion or otherwise) (the "**Defendants**")

FROM: Stansted Airport (the "**Fourth Claimant**")

This notice relates to the land known as Stansted 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 without the consent of the Fourth 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 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 24 July 2025 may be viewed at: https://www.stanstedairport.com/about-us/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.

Claim no: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

AND FOUR OTHERS

Claimants

-and-

(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)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

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. No order be made to the continuing effect 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 First, Second and Third 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.

Claim no: KB-2024-002132

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD

AND FOUR OTHERS

Claimants

-and-

(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)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

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 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 statement of Stuart Sherbrooke Wortley dated 6 June 2025

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

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

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at East Midlands Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the HHJ Coe KC Order

DEFINITIONS

"**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**")

"**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/about-us/injunction at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

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

2. This Order is subject to periodic review by the Court on application by the Fifth Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the Third Defendants by:

    a. Uploading a copy onto the following website: https://www.eastmidlandsairport.com/about-us/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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Third Defendants and each of them.

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

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification 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 paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

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 Claimants' solicitors 72 hours' notice of such application by email to 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 or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. Fifth Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 3 will be the same as Plan 3 attached to the HHJ Coe KC Order

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIFTH CLAIMANT

(1) The Claimants will take steps to serve the Third Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

(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 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
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Amended pursuant to the order of HHJ Coe KC dated 5 July 2024

Claim Form

In the High Court of Justice King's Bench Division	
Fee Account no.	PBA 0087211
Help with Fees - Ref no. (if applicable)	**H W F** – –

You may be able to issue your claim online which may save time and money. Go to 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) **M[illegible] A[illegible] PL[illegible]**
of Level 5 Town Hall Extension, Albert Square, Manchester M60 2LA
(2) **A[illegible] (M[illegible]) L[illegible]**
of 6th Olympic House, Manchester Airport, Manchester M90 1QX
(3) **M[illegible] A[illegible] P[illegible] (C) L[illegible]**
of 6th Olympic House, Manchester Airport, Manchester M90 1QX
(4) **S[illegible] A[illegible] L[illegible]**
of Enterprise House, Bassingbourn Road, Stansted Airport, Essex CM24 1QW
(5) **E[illegible] M[illegible] I[illegible] A[illegible] L[illegible]**
of Pathfinder House, Castle Donington, Derby DE74 2SA

HIGH COURT OF JUSTICE SEAL 19 Jul 2024 QUEEN'S BENCH DIVISION

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

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

P[illegible] S[illegible]

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
Total amount	

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

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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
03	0 7	2 0 2 4

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

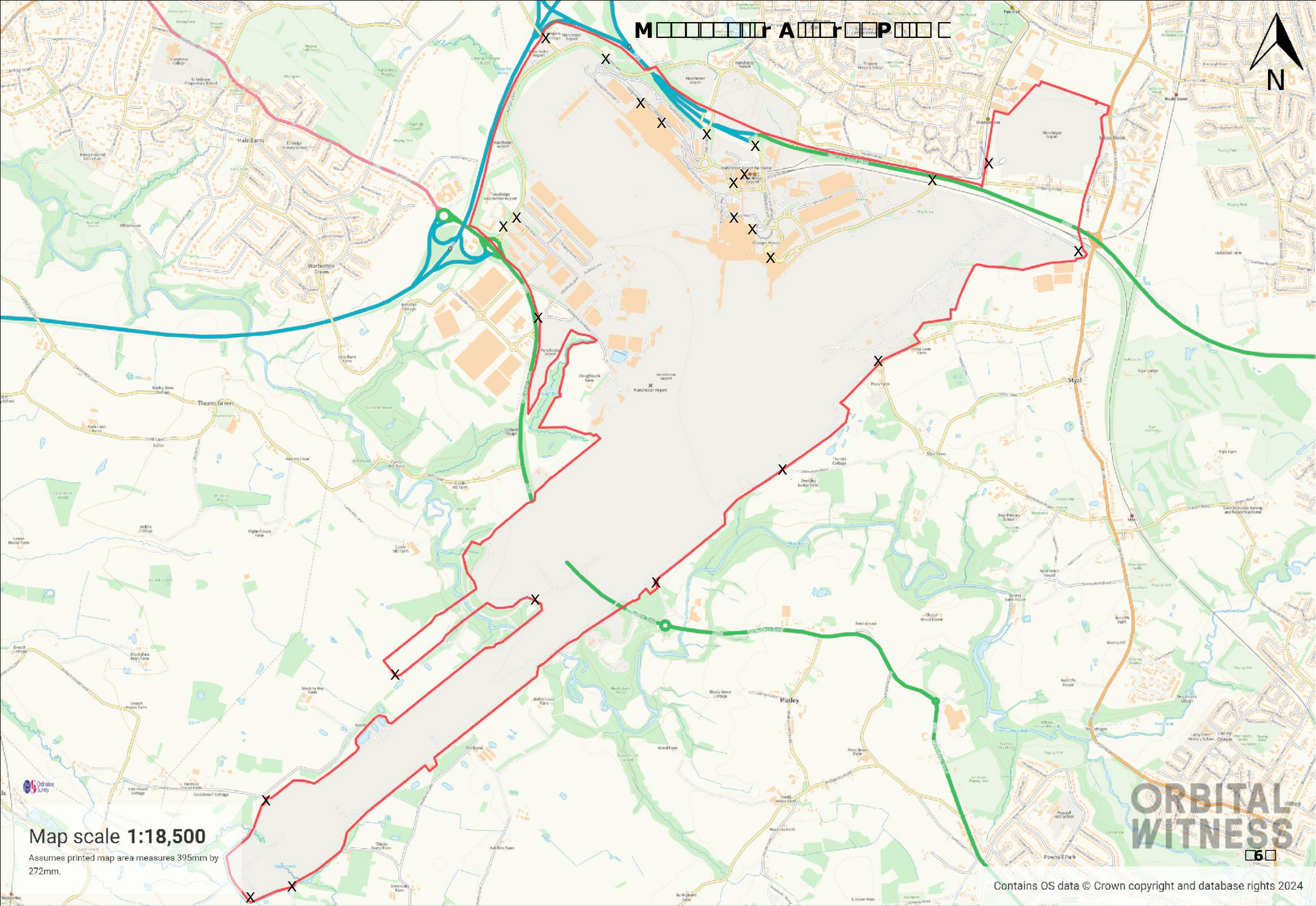
Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form:
https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter

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)


N
Hale Barns
Warburton Green
Thorns Green
Manchester Airport
Styal
Morley
Moss Nook
Heald Green
Shadow Moss
Map scale 1:18,500
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
6
Contains OS data © Crown copyright and database rights 2024

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Map scale 1:14,500

Assumes printed map area measures 395mm by 272mm.

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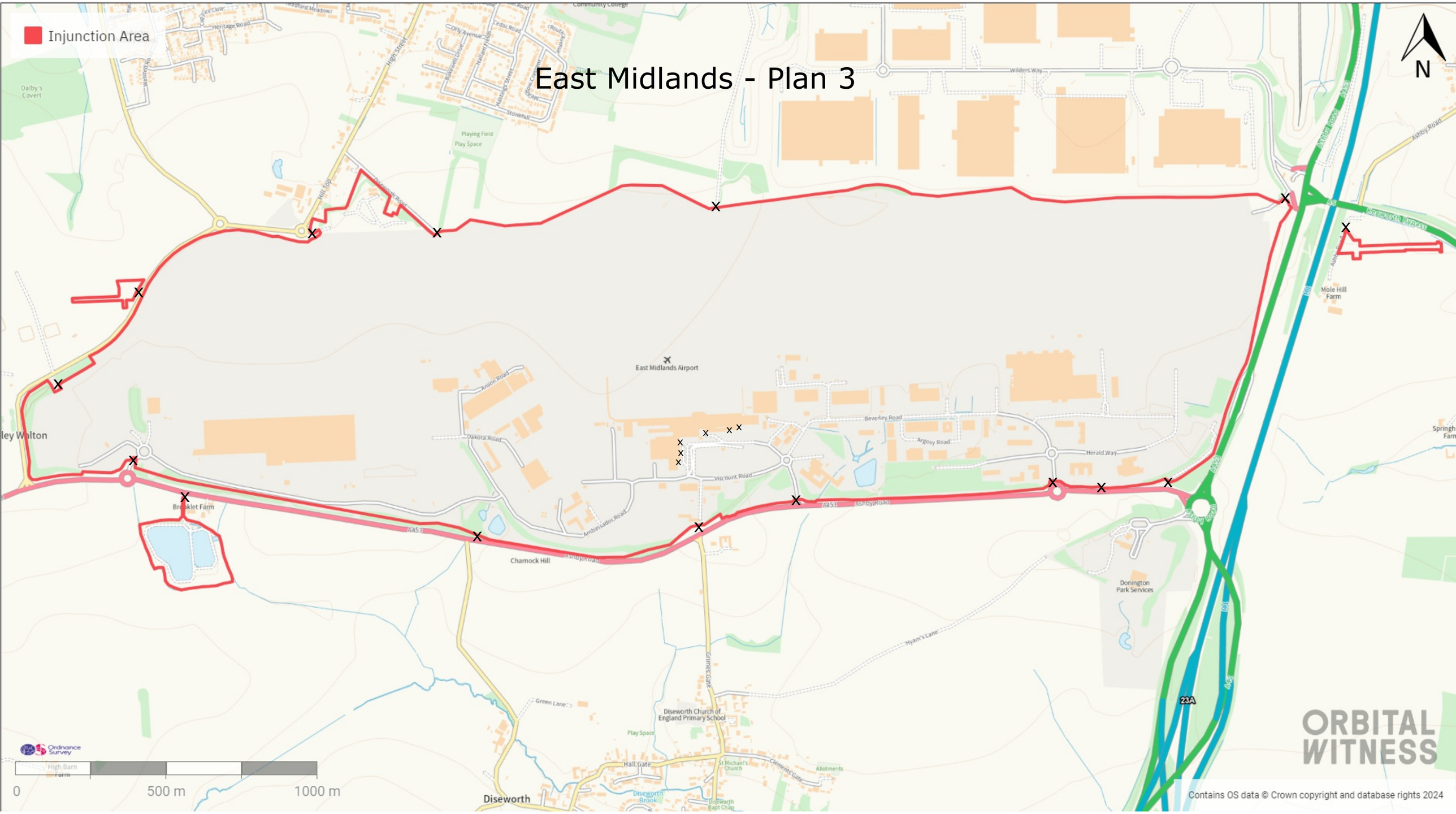
Injunction Area
East Midlands - Plan 3
N
East Midlands Airport
Charnock Hill
Diseworth
Donington Park Services
Mole Hill Farm
Brooklet Farm
A453
M1
M42
23A
0
500 m
1000 m
ORBITAL WITNESS
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Amended pursuant to the order of HHJ Coe K.C. dated 5 July 2024

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 Aiport 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:[1]

> *"**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 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/tZIodugpqTMtE9dgMMhlaymvEZgO45jgJ19A)*
>
> *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.

[1] 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:-

Registered Title	Freehold / Leasehold
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:-

Registered Title	Freehold / Leasehold
GM513511	Freehold
MAN371404	Leasehold
MAN269014	Leasehold
MAN270740	Leasehold

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

Registered Title	**Freehold / Leasehold**
MAN371404	Leasehold

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

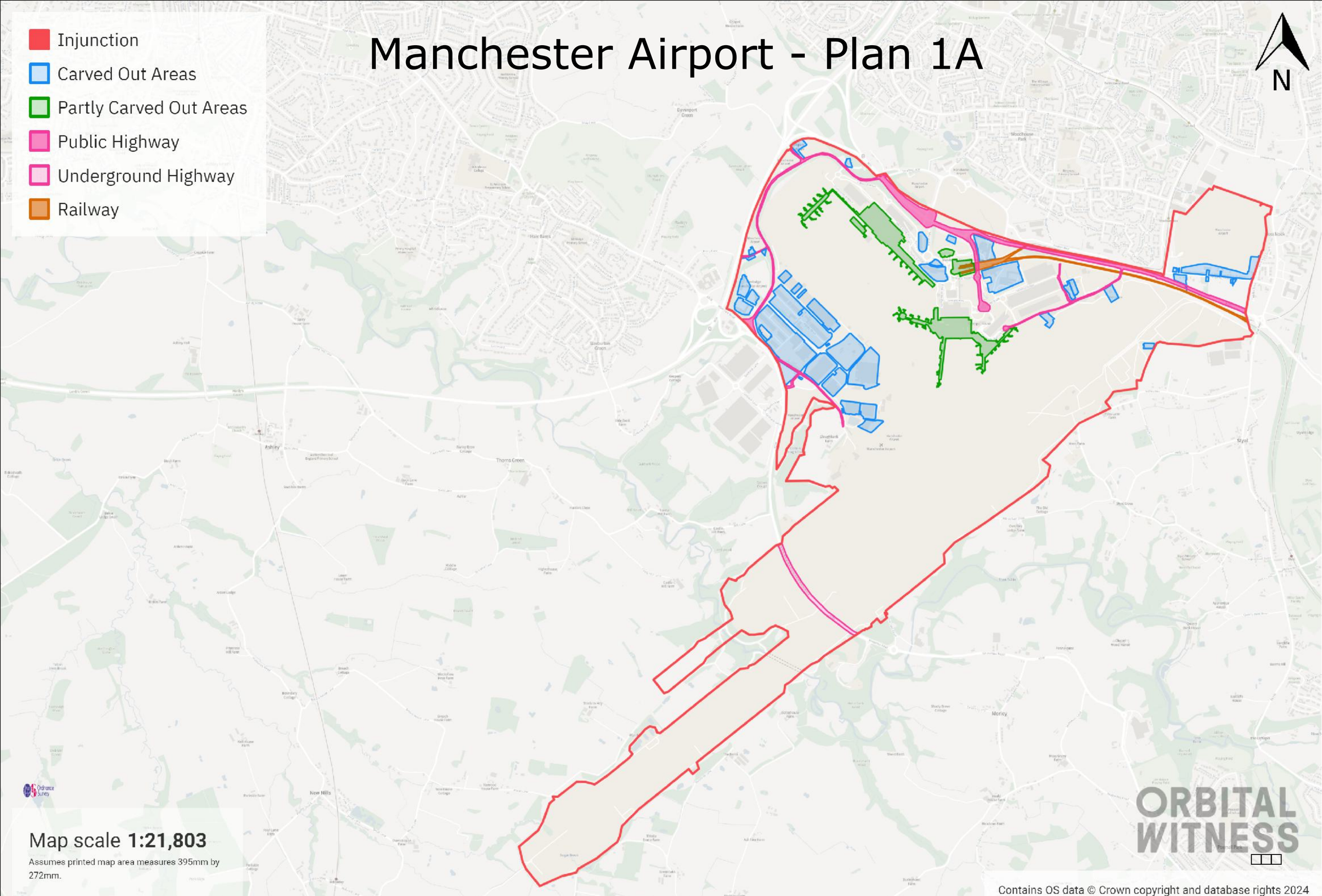
Registered Title	**Freehold / Leasehold**
EX438482	Freehold
EX574488	Freehold
EX574502	Freehold
EX574498	Freehold
EX574495	Freehold
EX574482	Freehold
EX574485	Freehold
EX574491	Freehold
EX574504	Freehold
EX574508	Freehold
EX574523	Freehold
EX948708	Freehold
EX574513	Freehold
EX640482	Freehold
EX574507	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:-

Registered Title	**Freehold / Leasehold**
LT113826	Freehold
LT300968	Freehold
LT305941	Freehold
LT325861	Freehold
LT289774	Freehold

Manchester Airport - Plan 1A



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

N

Map scale **1:14,500**

Assumes printed map area measures 395mm by 272mm.

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ORBITAL WITNESS □□□

East Midlands Airport - Plan 3A

CLAIM NO: KB-2024-002132

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 -

(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 been 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 . 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

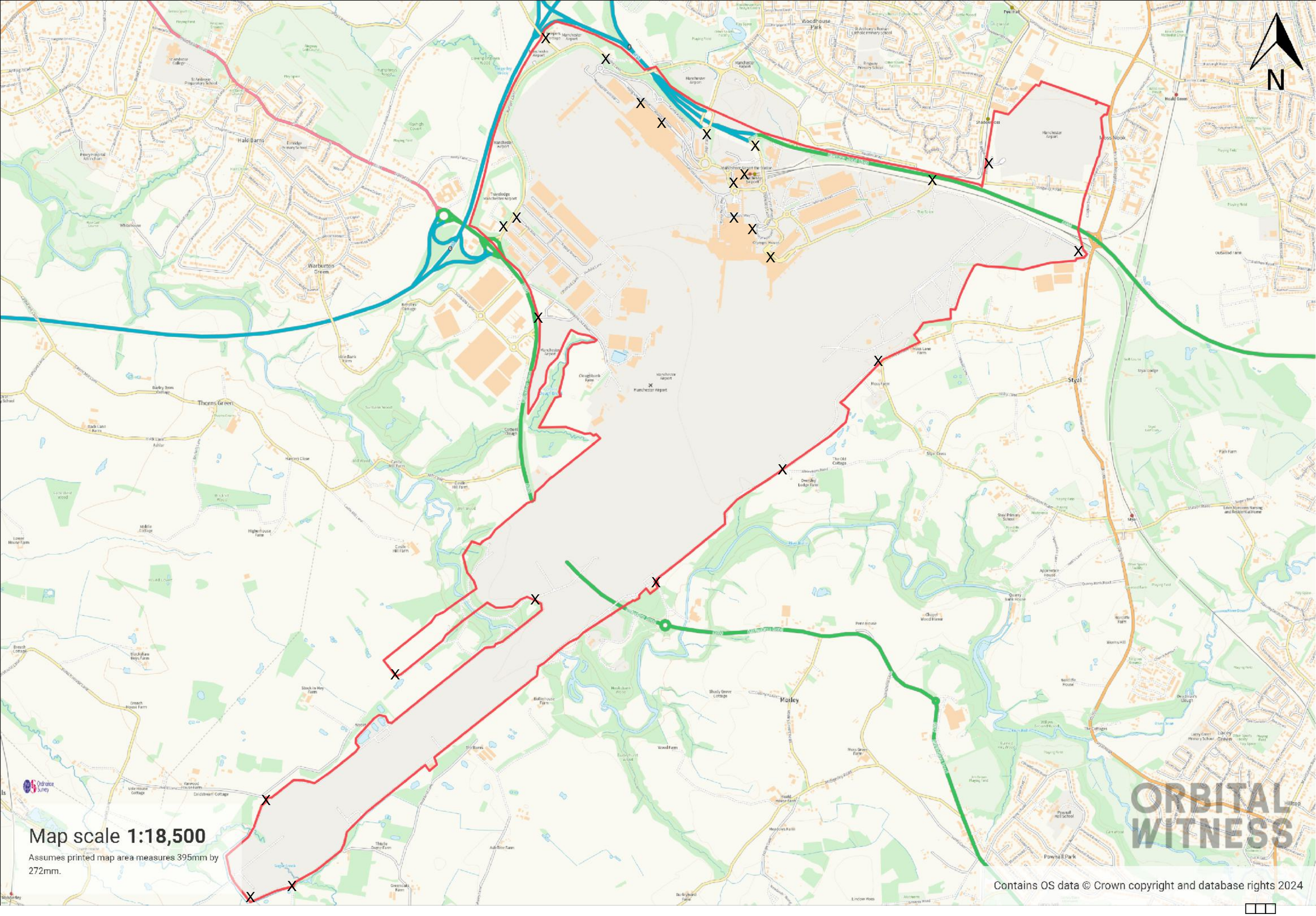
16. The First, Second and Third Claimants' solicitors and their contact details are:

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

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

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

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

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
- enquiries@extinctionrebellion.uk

SCHEDULE 4 – WARNING NOTICE

HIGH COURT CLAIM NO: KB-2024-002132

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.

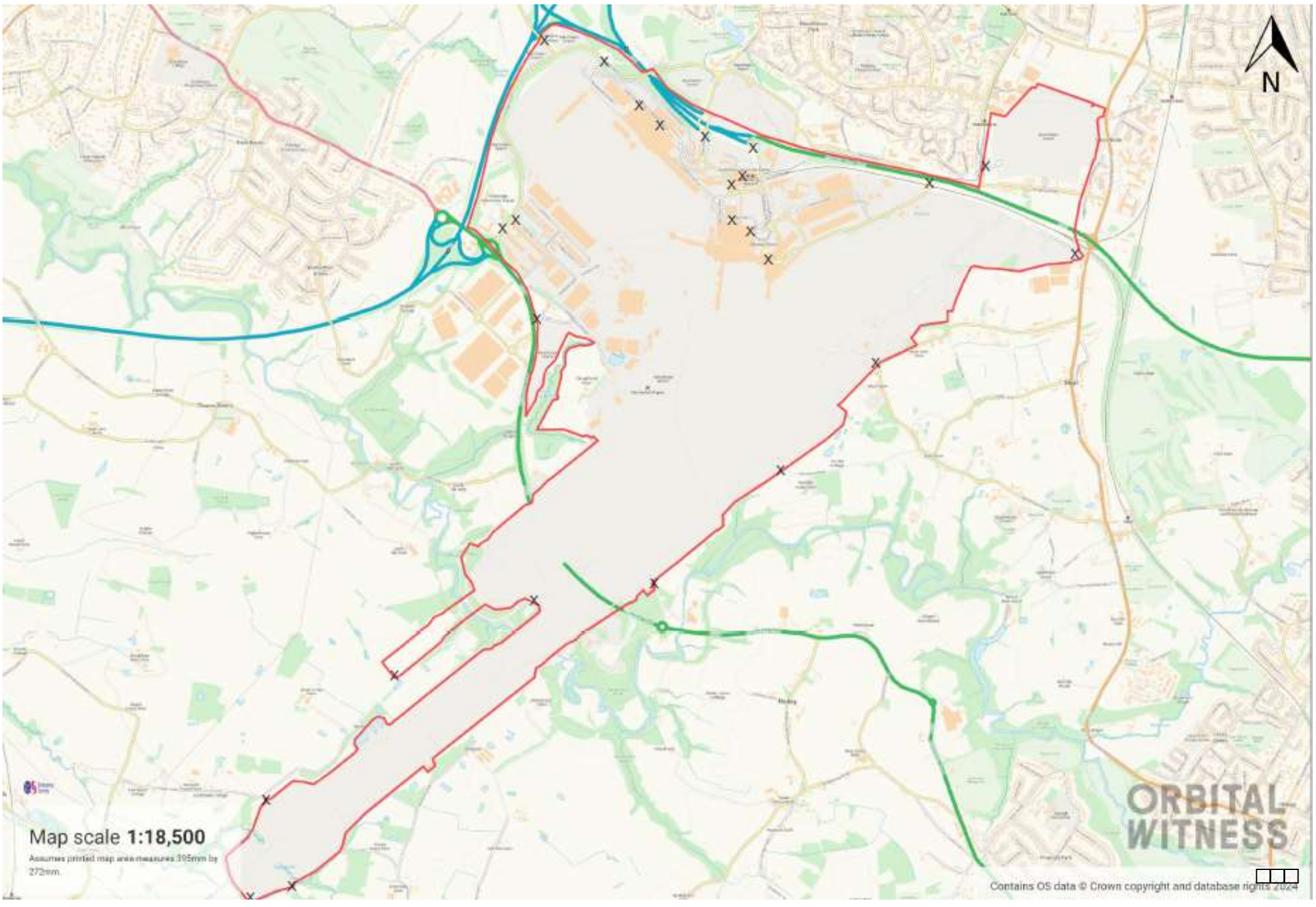
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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



CLAIM NO: KB-2024-002132

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 -

(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
07712 881 393

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

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

CLAIM NO: KB-2024-002132

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

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

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 task 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.

Certificate of service

Name of court	Claim No.
IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION	KB-2024-002132
Name of Claimant Manchester Airport PLC and others	
Name of Defendant Persons Unknown (as more particularly described in the Claim Form)	

On what day did you serve? 23/07/2024

The date of service is 23/07/2024

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Amended Claim Form dated 05.07.24 (sealed by the Court on 22.07.24) and Amended Particulars of Claim

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Persons Unknown

How did you serve the documents?
(please tick the appropriate box)

- ☐ by first class post or other service which provides for delivery on the next business day
- ☐ by delivering to or leaving at a permitted place
- ☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*
- ☑ by other means permitted by the court *(please specify)*

  at paragraphs 5 - 6 of the Order dated 5.7.24, the last step for service was completed on 23.07.24
- ☐ by Document Exchange
- ☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*
- ☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

(1) Web:https://www.manchesterairport.co.uk/about-us/injunction
(2) Emails:juststopoil@protonmail.com; juststopoilpress@protonmail.com; info@juststopoil.org; and enquiries@extinctionrebellion.uk
(3) Site: Manchester Airport, Manchester M90 1QX

Being the
- ☐ claimant's
- ☐ defendant's
- ☐ solicitor's
- ☐ litigation friend

- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
- ☐ last known place of business
- ☐ last known principal place of business
- ☐ principal office of the partnership
- ☐ principal office of the corporation
- ☐ principal office of the company
- ☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- ☑ other *(please specify)*

  (1) C1-3's webpage; (2) D's email addresses; and (3) C1-3's Premises

I believe that the facts stated in this certificate are true.

Full name: Muhammad Nusrullah Nawaaz Allybokus

Signed:

(Claimant) ~~(Defendant)~~ ('s solicitor) ~~('s litigation friend)~~

Position or office held: Associate Solicitor

(If signing on behalf of firm or company)

Date: 23/07/2024

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Calculation of deemed day of service of a claim
A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	**Deemed day of service**
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
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Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court	Claim No.
IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION	KB-2024-002132
Name of Claimant Stansted Airport Ltd and others	
Name of Defendant Persons Unknown (as more particularly described in the Claim Form)	

On what day did you serve? 23/07/2024

The date of service is 23/07/2024

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Amended Claim Form dated 05.07.24 (sealed by the Court on 22.07.24) and Amended Particulars of Claim

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Persons Unknown

How did you serve the documents?
(please tick the appropriate box)

- ☐ by first class post or other service which provides for delivery on the next business day
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- ☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

(1) Web: https://www.stanstedairport.com/about-us/injunction/
(2) Emails: juststopoil@protonmail.com; juststopoilpress@protonmail.com; info@juststopoil.org; and enquiries@extinctionrebellion.uk
(3) Site: Bassingbourn Rd, Stansted CM24 1QW

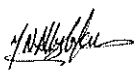
Being the ☐ claimant's ☐ defendant's ☐ solicitor's ☐ litigation friend

- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
- ☐ last known place of business
- ☐ last known principal place of business
- ☐ principal office of the partnership
- ☐ principal office of the corporation
- ☐ principal office of the company
- ☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- ☑ other *(please specify)*

  (1) C4's webpage; (2) D's email addresses; and (3) C4's Premises

I believe that the facts stated in this certificate are true.

Full name: Muhammad Nusrullah Nawaaz Allybokus

Signed: 

(Claimant) ~~(Defendant)~~ ('s solicitor) ~~(litigation friend)~~

Position or office held: Associate Solicitor

(If signing on behalf of firm or company)

Date: 23/07/2024

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Certificate of service

Name of court	Claim No.
IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION	KB-2024-002132
Name of Claimant East Midlands International Airport and others	
Name of Defendant Persons Unknown (as more particularly described in the Claim Form)	

On what day did you serve? 23/07/2024

The date of service is 23/07/2024

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Amended Claim Form dated 05.07.24 (sealed by the Court on 22.07.24) and Amended Particulars of Claim

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Persons Unknown

How did you serve the documents?
(please tick the appropriate box)

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(1) Web:https://www.eastmidlandsairport.com/about-us/injunction/
(2) Emails:juststopoil@protonmail.com; juststopoilpress@protonmail.com; info@juststopoil.org; and enquiries@extinctionrebellion.uk
(3) Site: East Midlands Airport, Castle Donington, Derby DE74 2SA

Being the
- ☐ claimant's
- ☐ defendant's
- ☐ solicitor's
- ☐ litigation friend

- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
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- ☐ principal office of the partnership
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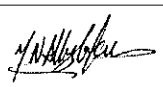
- ☐ principal office of the company
- ☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- ☑ other *(please specify)*

  (1) C5's webpage; (2) D's email addresses; and (3) C5's Premises

I believe that the facts stated in this certificate are true.

Full name: Muhammad Nusrullah Nawaaz Allybokus

Signed: 

(Claimant) ~~(Defendant)~~ ('s solicitor) ~~(Litigation friend)~~

Position or office held: Associate Solicitor

(If signing on behalf of firm or company)

Date: 23/07/2024

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N244

Application notice

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

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter

Name of court **The High Court of Justice** **King's Bench Division**	**Claim no.** **KB-2024-2132**
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
	H W F - - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Manchester Airport Plc and others	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	2 June 2025 02 Jun 2025

HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

KB-2024-002132

1. What is your name or, if you are a legal representative, the name of your firm?
   Eversheds Sutherland (International) LLP

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

   If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?
   1. To list a hearing (time estimate 1 day) to review the injunction made by order of Her Honour Judge Coe KC dated 5 July 2024, on 20 June 2025 or as close to that date as is convenient for the Court.

   2. To consolidate the claim under CPR rule 3.1(2)(h), alternatively case manage and hear it under rule 3.2(i) and/or (p) with the following claims:
   (a) London City Airport Ltd and ors v PU - claim no KB-2024-001765;
   (b) Leeds Bradford Airport Ltd and ors v PU - claim no KB-2024-002317; and
   (c) Birmingham Airport Ltd and ors v PU - claim no KB-2024-002473 ("**the Other Airports Claims**").

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

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

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

7. Give details of any fixed trial date or period: N/A

8. What level of Judge does your hearing need? High Court Judge

9. Who should be served with this application?

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 order of Her Honour Judge Coe KC is attached, together with the orders made by:-

   (a) Julian Knowles J dated 20 June 2024 made in claim no KB-2024-001765

   (b) Ritchie J dated 18 July 2024 (and amended pursuant to the slip rule on 19 and 22 July 2024) made in claim no KB-2024-00217; and

   (c) Jacobs J dated 6 August 2024 made in claim no KB-2024-002473.

The review hearing

2. Paragraph 4 of the Order of Her Honour Judge Coe KC in the instant case provides for the Order to be reviewed "… at intervals not exceeding 12 months".

3. The Claimants invite the Court to list the review hearing pursuant to paragraph 3 of that order on 20 June 2025 or as soon as is convenient thereafter.

4. No time estimate was provided for in the order of Her Honour Judge Coe KC.

Consolidation / case management with the Other Airports Claims

5. All of the injunctions granted in the Other Airports Claims are subject to review at 12 month intervals and the Claimants in those cases also seek review of the injunctions and have, by Eversheds Sutherland (International) LLP also made applications of even date to this application (and also for consolidation or case management with this case and the Other Airports Claims.

6. In those cases:-

   (a) Paragraph 3 of the Order of Julian Knowles J made in claim number KB-2024-001765 provides for a time estimate of 1.5 hours for the hearing of the review application made in that claim.

   (b) Paragraph 2 of the order of Jacobs J dated 6 August 2024 made in claim number KB-2024-002473 provides a time estimate of 2.5 hours for the hearing of the review of the injunction made in that claim.

   (c) No time estimate is provided in Ritchie J's order. However, it is anticipated that a similar time estimate would be required.

7. In view of the similarity of factual and legal issues in this claim and the Other Airports Claims, it would be beneficial for the claims to be consolidated, alternatively case managed and heard together, in order to determine the cases in accordance with the overriding objective and in specific to (a) minimise the demands placed on the court resources by a multiplicity of hearings which would require more than a day of court time; and (b) avoid the risk of inconsistent decisions.

8. 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

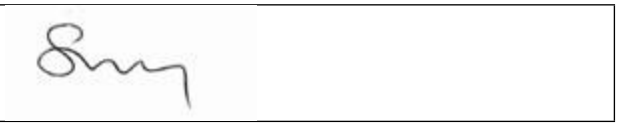
Statement of Truth

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	Month	Year
2	June	2025

Full name

Stuart Sherbrooke Wortley

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

Partner

Applicant's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Greater London

Postcode

E	C	2	V	7	W	S

If applicable

Phone number

0771 288 1393

Fax phone number

DX number

Your Ref.

SSW/AW/EP/077654.0001167

Email

stuartwortley@eversheds-sutherland.com

Party: *Claimants*
Name: *S S Wortley*
Number: *Second*
Date: *06.06.25*
Exhibits: *"SSW17" – "SSW22"*

CLAIM NO: KB-2024-0002132

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

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

I STUART SHERBROOKE WORTLEY of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a partner in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants.

2. On 05.07.24, Her Honour Judge Coe KC granted injunctions to restrain the Defendants from entering, occupying or remaining on Manchester Airport, Stansted Airport and East Midlands Airport (as defined in those Orders) until varied, discharged or extended by further order. Each of the Orders also prohibited further acts adopted by activists engaged in direct action namely:-

   (a) affixing themselves to any other person or object;

(b) impeding access to or enjoyment of the Airport;

(c) blocking or obstructing traffic; and

(d) refusing to leave when asked to do so by a police constable.

3. Paragraph 4 of the Orders provided for each of those injunctions to be reviewed by the Court periodically at intervals not exceeding 12 months.

4. I make this witness statement for the purposes of the review hearing which has been listed on 24.06.25.

2024 Airport Injunctions

5. Between 20.06.24 and 14.08.24, the following injunctions were granted to protect airports against environmental protestors opposed to the use of fossil fuels.

	Airport	**Action Number**	**Judge / Date of Order**
1	London City Airport	KB-2024-001765	Mr Justice Julian Knowles 20 June 2024
2	Manchester Airport Stansted Airport East Midlands Airport	KB-2024-002132	HHJ Rosalind Coe 5 July 2024
3	Heathrow Airport	KB-2024-002210	Mr Justice Julian Knowles 10 July 2024
4	Leeds Bradford Airport Luton Airport Newcastle Airport	KB-2024-002317	Mr Justice Ritchie 18 July 2024
5	Gatwick Airport	KB-2024-002336	Mr Justice Ritchie 19 July 2024
6	Birmingham Airport Bristol Airport Liverpool Airport	KB-2024-002473	Mr Justice Jacobs 6 August 2024
7	Southend Airport	KB-2024-002596	Mrs Justice Farbey 14 August 2024

6. Last year it was possible to achieve a certain amount of co-ordination with a view to saving costs and limiting the demands placed by these matters on Court resources, in that my firm acted in 4 out of the 7 actions listed above (numbers 1, 2, 4 and 6). However, our instructions arrived over time rather than all at once, and so multiple hearings were needed, despite the common ground between the different matters.

7. Although the precise terms of the Orders vary slightly, each of the injunctions granted in actions 1, 2, 4 and 6 in the table effectively provides for an annual review.

8. This year, therefore, there is the potential to achieve better co-ordination with a better use of the Court's time: Manchester, London Stansted and East Midlands Airports and the 7 other airports involved in actions 1, 4 and 6 have decided to join together and to ask the Court to undertake the annual review at the same hearing. I was not instructed in relation to the other airports last year (Heathrow, Gatwick and Southend): I believe they remain represented by other firms of solicitors. I understand that the solicitors for Heathrow and Southend Airports have arranged a review hearing sometime next month.

9. The Order in action 1 provided for a review hearing of 1.5 hours duration and the Order in action 6 provided for a review hearing of 2.5 hours duration. The Orders in this action and action 4 did not specify a time estimate for the review hearing. The Court has now listed the review hearings in all 4 actions together, with a time estimate of 1 day on 24.06.25.

10. I make this witness statement in support of the review of the Manchester, London Stansted and East Midlands Airport injunctions. I will be repeating or adopting much of the content of this witness statement in my statements in support of the annual reviews of the injunctions granted in the other actions.

Service of the Order dated 05.07.24

11. Each of the Orders dated 05.07.24 was served in accordance with paragraph 5 and in each case the last step took place on 12.05.24. My former colleague Nawaaz Allybokus filed Certificates of Service (one for each airport) dated 23.07.24.

12. At the hearing on 05.07.24, the description of the Defendants was amended to add reference to Extinction Rebellion. The Amended Claim Form and Amended Particulars of Claim was served in accordance with paragraph 5 on 23.07.25. My former colleague Nawaas Allybokus filed Certificates of Service (one for each airport) dated 23.07.24.

The Plans

13. I am informed by David McBride, Head of Legal (Airports) for Manchester Airports Group that there have been no changes to the:-

    13.1. Manchester Airport Byelaws 2024 and that the Plan attached to the Manchester Airport Order dated 05.07.24 remains accurate.

    13.2. Stansted Airport – London Byelaws 1996 and that the Plan 2 attached to the Stansted Airport Order dated 05.07.24 remains accurate.

    13.3. East Midlands Airport Byelaws 2001 and that the Plan attached to the East Midlands Airport Order dated 05.07.24 remains accurate.

UK Airport Protests

14. The table below records a summary of the protests against UK airports which took place in June – August 2024. It also includes a summary of the arrests, convictions and subsequent sentencing and other relevant incidents occurring after August 2024.

02.06.24	Extinction Rebellion conducted a protest at Farnborough Air Show which involved blocking the 3 main gates and parking the Extinction Rebellion pink boat across the Gulfstream gate
20.06.24	Two JSO activists sprayed 2 aircraft at London Stanstead Airport with orange paint after cutting through the perimeter fence at around 5.00 am
25.06.24	Four JSO activists were arrested at Gatwick Airport railway station equipped with suitcases containing bandages (suspected to have been intended to force the airport to close owing to the risk of damage to aircraft engines in the event of them being released near aircraft)
27.06.24	Six JSO activists were arrested at a meeting in London pursuant to powers in the Public Order Act 2023
19.07.24	Roger Hallam (along with four other JSO activists) had been found guilty of conspiring to organise protests to block the M25 motorway in November 2022 Mr Hallam was sentenced to 5 years imprisonment and each of the others were sentenced to 4 years imprisonment (reduced by the Court of Appeal on 07.03.25 – see below)
24.07.24	Ten JSO activists were arrested at Heathrow Airport as part of an intelligence led operation - some were equipped with cutting gear and glue

27.07.24	A protest which was due to be held at London City Airport was relocated to the Department of Transport on Horseferry Lane
29.07.24	Eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure
30.07.24	Two JSO activists were arrested at Heathrow Airport after spraying orange paint around the Terminal 5 entrance hall and on the destination boards in the departure lounge
31.07.24	A protest by JSO and Fossil Free London was held at the Docklands Light Railway station at City Airport JSO and Fossil Free London both uploaded photographs of the protest with the following message:- *"We've been served with an injunction which means even walking out of the wrong exit of this station could get us arrested."*
01.08.24	Six JSO activists blocked access to the departure gates at Heathrow Terminal 5
05.08.24	Five JSO activists were arrested on their way to Manchester Airport equipped with bolt cutters, angle grinders, glue, sand and banners carrying slogans including "oil kills".
16.01.25	The trial of the two JSO activists arrested at Heathrow Airport on 30.07.24 resulted in a hung jury
02.02.25	Extinction Rebellion held a demonstration at Farnborough Airport following a consultation period in relation to Farnborough Airport's expansion plans which ended in October 2024
17.02.25	Extinction Rebellion held a demonstration at Inverness Airport waving banners with *"Ban Private Jets"* and *"We're in a climate emergency, we need to step up and take action"*
21.02.25	Of the five JSO activists arrested on their way to Manchester Airport on 05.08.24, four were found guilty of conspiracy to commit a public nuisance and one was acquitted with sentencing adjourned to 23.05.25
07.03.25	The Court of Appeal delivered judgment in a conjoined appeal by sixteen JSO activists against sentencing Two of the sentences passed on 19.07.24 were reduced by 18 months (from 4 years to 30 months), the other three were reduced by a year (from 5 to 4 years in Roger Hallam's case and from 4 to 3 years in the other two) Of the other eleven appeals, one was reduced by 2 months but the other ten appeals were dismissed

20.03.25	Of the ten JSO activists arrested at Heathrow Airport on 24.07.24, nine were found guilty of conspiracy to cause a public nuisance at Heathrow Airport with sentencing adjourned to 16.05.25
27.03.25	Just Stop Oil announced the end of their campaign (see below)
27.03.25	On the same day as the JSO announcement, Youth Demand held a meeting to discuss issues including the climate crisis and a fresh wave of civil resistance in London in the Westminster Quaker Meeting House Six individuals were arrested
27.04.25	Youth Demand activists threw bright pink powder over elite runners participating in the London marathon as they crossed Tower Bridge The individuals taking part wore T-shirts that read "Youth Demand – Stop Arming Israel" – which appears to be their primary cause
16.05.25	Of the nine individuals convicted on 20.03.25, five were sentenced to terms of imprisonment of up to 15 months and four were given suspended sentences
27.05.25	Each of the four individuals convicted on 21.02.25 was sentenced to a term of imprisonment of between 18 and 30 months

15. Copies of media articles relating to the events recorded in this table are attached to this statement marked **"SSW17"**.

16. A copy of the Court of Appeal decision handed down on 07.03.25 is attached at **"SSW18"**.

17. The fact that the protest on 27.07.24 was relocated from London City Airport to the Department of Transport and the fact that the JSO and Fossil Free London protestors conducted their protest from outside the red line of the injunction plan demonstrate that the injunction granted by Mr Justice Julian Knowles in that case on 20.06.24 served its purpose. In both instances peaceful protests were went ahead but without causing unlawful interference to users of London City Airport.

27.03.25 – JSO Announcement

18. As noted in the chronology above, on 27.03.25, Just Stop Oil made the following announcement:-

> *"Three years after bursting on the scene in a blaze of orange, at the end of April we will be hanging up the hi vis.*

Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful.

So it is the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison. We have exposed the corruption at the heart of our legal system, which protects those causing death and destruction while prosecuting those seeking to minimize harm. Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK's oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen.

This is not the end of civil resistance. Governments everywhere are retreating from doing what is needed to protect us from the consequences of unchecked fossil fuel burning. As we head towards 2°C of global heating by the 2030s, the science is clear: billions of people will have to move or die and the global economy is going to collapse. This is unavoidable. We have been betrayed by a morally bankrupt political class.

As corporations and billionaires corrupt political systems across the world, we need a different approach. We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Nothing short of a revolution is going to protect us from the coming storms.

We are calling on everyone who wants to be a part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. Sign up here. See you on the streets.

ENDS"

19. Copies of media articles relating to this announcement and to the "final" JSO protest which took place in central London on 26.04.25 are attached marked **"SSW19"**.

18.05.25 - We are "plotting a very big comeback"

20. Whilst the announcement referred to above suggests that the risk of unlawful protests at UK airports has reduced, on 18.05.25 the following story appeared on GB News (both on television and on-line):-

> *"Now, I was getting pretty bored of the juvenile antics at the altar of climate change.*
>
> *We've seen it all vandals throwing soup over priceless artworks in galleries, defacing Stonehenge, ambushing theatre productions in the West End, blocking traffic, scaling motorway gantries, dousing private jets in paint, and even disrupting sports events all just to spoil the fun for everyone else.*

Remember them? They said they were disbanding after the government appeared to adopt their demand to end new oil and gas licences in Britain. Their actions, of course, cost the public tens of millions in police and court time.

But despite Ed Miliband bowing to their demands, I can exclusively reveal that Just Stop Oil is plotting a very big comeback.

On Ben Leo Tonight, we have gained access to secret Just Stop Oil meetings, where members are discussing a dramatic U-turn—planning to cause chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and even carrying out "citizens' arrests" on so-called climate criminals.

Speaking during an online meeting on Thursday night, one coordinator—known only as "Dave"—said protests should remain "action-based" and warned against becoming more peaceful, like Greenpeace.

The meeting continued with Dave insisting that it was essential to keep doing what he called the "spicy and naughty stuff" to generate media attention.

The group also discussed how to feed new protest ideas back to what they referred to as a "core team". There was frustration over communication with this mysterious leadership group, with some suggesting using 50-word briefs to make it easier for them to process ideas.

It raises serious questions: Who exactly is this core team? Who are these professional protesters reporting to—and who's funding them?

Chillingly, the group also spoke about carrying out citizen's arrests on so-called climate deniers. There was some introspection as well, with members questioning whether their public image was doing more harm than good.

But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to proceed with Just Stop Oil's revival, including talk of keeping protesters in safe houses to maintain morale.

Let's be clear: what we're dealing with here is a group of climate zealots plotting to commit criminal acts, backed by who knows what kind of funding, and being housed like some kind of eco-mafia.

And speaking of coordination—let's not pretend the climate agenda is a spontaneous grassroots movement. It's organised. It's funded. It's political.

So, who's paying to bus these protesters from London to Stonehenge, to airports, to art galleries and sports stadiums? Who's funding the Just Stop Oil safe houses where these scruffy, self-righteous agitators meticulously plan how to make Britain colder and poorer?

The police and the government must crack down on Just Stop Oil's plans for criminality before they gain traction again.

The last thing Britain needs is more disruption, more vandalism, and more self-indulgent eco-activism especially when a Labour government is already happily marching to the drumbeat of Net Zero extremism.

We'll be passing our findings to the police."

21. Far from distancing itself from this story, on 21.05.25 JSO circulated a link to the GB News story in a message to subscribers together the following comment:-

"GB News was right for once. We are "plotting a very big comeback".

22. Copies of the GB News story and the JSO message to subscribers are attached to this message marked **"SSW20"**.

Other Environmental / Climate Campaign Groups

23. Apart from JSO, there are other protest groups who are opposed to the use of fossil fuels including for example, Youth Demand (the junior branch of JSO formerly known as Youth Climate Swarm), Extinction Rebellion and Fossil Free London.

24. Extinction Rebellion ("XR") remains an active organisation both in the UK and internationally:-

24.1. on 07.09.24, XR activists chained themselves to the gates of the Rijksmuseum in Amsterdam in an attempt to force the museum to sever ties with ING Bank;

24.2. on 25.09.24, XR activists covered the Finnish Parliament House with red paint;

24.3. on 23.05.25, XR activists held a climate protest against Total Energies and its partners – including the occupation of BNP Paribas' offices in Paris.

25. Fossil Free London is another protest group involved in direct action. Their website includes videos which promote the right protest and training videos relating to direct action.

26. A relatively new organisation which is campaigning against the fossil fuel industry is "shut the system". In January 2025, this group cut fibre optic cables to Lloyds of London and prominent buildings involved in the insurance sector on Fenchurch

Street, Threadneedle Street, Leadenhall Street and Lime Street in London (and in Birmingham, Leeds and Sheffield).

27. An article concerning this story is attached to this statement marked **"SSW21"**.

Police Advice

28. On 21.05.25, the Metropolitan Police sent an email to the security team at London City Airport which included the following:-

> *" … the injunction at HAL [Heathrow Airport Limited] 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 appears to be a cycle of new groups emerging and this cannot be ruled out so maintaining it would be very much recommended."*

29. I believe the reference to *"… the Shell protest …"* relates to the Annual General Meeting of Shell plc held at the Soffitel Hotel at Heathrow Terminal 5 on 20.05.25. The Metropolitan Police told London City Airport's security team that a protest by environmental protest groups:-

> "*were forced to hold their protest at the Shell head office in central London rather than the AGM location at a hotel within the Heathrow Airport injuncted area, in order to avoid the risk of associated penalties for breaching of the injunction*."

30. I believe the references to *"… your experiences …"* is a reference to the events referred to in paragraph 19 above – including the fact that one of the protests due to take place at London City Airport was relocated to the Department of Transport.

31. A copy of the email (from which I have redacted personal information) is attached to this statement marked **"SSW22"**.

Conclusion

32. I am informed by David McBride and believe the Claimants' directors have concluded that they should ask the Court to extend the injunction for a further 12 months. I understand that they reached this decision after having considered carefully whether the threat which was clearly present last year has abated materially, especially in light of the JSO announcement in March.

33. Obviously, the question of whether the injunction has outlasted its need, is one for the judgment of the Court. However, based on the material to which I have referred, the Claimants (and, for what it is worth, I also) consider that there remains a compelling need for the injunction to remain in place. Climate change remains firmly on the political agenda. It continues to attract strong feelings and is still a subject about which campaigners are willing to contemplate disruptive action. The inference drawn by the Claimants (and by me) is that the injunctions granted over time have influenced the pattern of protest, which disruptive action being focused principally on targets which do not have the benefit of the Court's protection by way of injunction. The Claimants (and I) consider that the risk remains high that airports generally, including theirs, would come back into focus, if the injunction were now to be lifted. JSO's seeming change of heart in March 2025 was not adopted by all other campaign groups; and even as a statement of JSO's position, later events have shown that it was not an immutable repudiation of disruptive protest. The Claimants (and I) cannot discount the possibility, that JSO's March 2025 announcement may have been partly tactical: to make renewal of the injunctions harder — and disruptive protest at the airports correspondingly less risky. The risks are especially acute at this time of year: most of the incidents in which UK airports were targeted by environmental protestors in 2024 occurred between late June and August 2024 - the busiest period for holiday travel.

Notice of the Review Hearing

34. The Claimants intend to give notice of the review hearing in the manner provided for in para 5 of Orders dated 05.07.24 – namely by:-

    34.1. uploading copies of the application dated 02.06.25, the draft Order, a copy of this witness statement and exhibits and details of the review hearing to the injunction website;

    34.2. sending copies of the documents referred to in the previous paragraph to the 4 email addresses referred to in Schedule 3 to the Order dated 05.07.24 plus the following additional email addresses (noting that "Shut The System" does not operate a website and although "Fossil Free London" does have a website, this does not include an email address):- YouthDemandPress@protonmail.com

34.3. affixing a notice at each of the warning notice locations for each airport referring to the time and date of the review hearing and explaining where copies of the additional papers can be found and obtained in hard copy.

I believe that the facts stated in this Witness Statement and Exhibits are true.

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

I am duly authorised to make this statement on behalf of the Claimants.

_____

Stuart Sherbrooke Wortley

6 June 2025

Claim no: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) LEEDS BRADFORD AIRPORT LTD

AND THREE OTHERS

Claimants

-and-

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

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the injunction made by Order dated 19 July 2024 by Ritchie J ("**the Ritchie J 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 Ritchie J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Ritchie J Order

2. Paragraph 2 of the Ritchie J Order is amended so as to read:

   "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 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.

Claim no: KB-2024-2317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) LEEDS BRADFORD AIRPORT LTD

AND THREE OTHERS

Claimants

-and-

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

AND TWO OTHERS

Defendants

ORDER

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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.

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□□□

UPON the Claimants' claim by the claim form dated 16 July 2024

AND UPON the Claimants' application for an injunction dated 16 July 2024

AND UPON the injunction made by Order dated 5 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025 ("**the Application**")

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 statement of Stuart Sherbrooke Wortley dated 6 June 2025

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

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

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

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the Ritchie J Order

DEFINITIONS

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

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

https://www.leedsbradfordairport.co.uk/injunction at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

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

2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the First Defendants by:

    a. Uploading a copy onto the following website: https://www.leedsbradfordairport.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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the First Defendants and each of them.

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

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the First Defendants of any further applications or documents in the proceedings by the First, Second and Third Claimants shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

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 Claimants' solicitors 72 hours' notice of such application by email to 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 or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The First, Second and Third Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 1 will be the same as Plan 1 attached to the Ritchie J Order

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant will take steps to serve the First Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

(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 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
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Claim no: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

AND THREE OTHERS

Claimants

-and-

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

AND TWO OTHERS

Defendants

ORDER

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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 19 July 2024 by Ritchie J ("**the Ritchie J 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 Ritchie J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Ritchie J Order

2. Paragraph 2 of the Ritchie J Order is amended so as to read:

   "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 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.

Claim no: KB-2024-2317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(2) LONDON LUTON AIRPORT OPPERATIONS LIMITED

AND THREE OTHERS

Claimants

-and-

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

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

□□□

UPON the Claimants' claim by the claim form dated 16 July 2024

AND UPON the Claimants' application for an injunction dated 16 July 2024

AND UPON the injunction made by Order dated 5 July 2024 by Ritchie J ("**the Ritchie J 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 statement of Stuart Sherbrooke Wortley dated 6 June 2025

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

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

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

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London Luton Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the Ritchie J Order

DEFINITIONS

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

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address https://www.london-

luton.co.uk/corporate/lla-publications/injunction at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

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

2. This Order is subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the Second Defendants by:

    a. Uploading a copy onto the following website: https://www.london-luton.co.uk/corporate/lla-publications/injunction

    b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.

    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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Second Defendants and each of them.

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

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the Second Defendants of any further applications or documents in the proceedings by the Second Claimant shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

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 Claimants' solicitors 72 hours' notice of such application by email to 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 or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The Second Claimant shall have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 2 will be the same as Plan 2 attached to the Ritchie J Order

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND CLAIMANT

(1) The Second Claimant will take steps to serve the Second Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

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

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Claim no: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

AND THREE OTHERS

Claimants

-and-

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

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the injunction made by Order dated 19 July 2024 by Ritchie J ("**the Ritchie J 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 Ritchie J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Ritchie J Order

2. Paragraph 2 of the Ritchie J Order is amended so as to read:

   "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 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.

Claim no: KB-2024-2317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

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

AND TWO OTHERS

Claimants

-and-

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

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

□□□

UPON the Claimants' claim by the claim form dated 16 July 2024

AND UPON the Claimants' application for an injunction dated 16 July 2024

AND UPON the injunction made by Order dated 5 July 2024 by Ritchie J ("**the Ritchie J Order**")

AND UPON the Claimants' application dated 2 June 2025 ("**the Application**")

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 statement of Stuart Sherbrooke Wortley dated 6 June 2025

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

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

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

AND UPON the Claimants informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Newcastle International Airport, as defined by this Order, should be made by email to [ ]

AND UPON this order replacing and discharging the Ritchie J Order

DEFINITIONS

"**Newcastle International Airport**" means the land shown in red outlined in red on Plan 3 to the Claim Form appended to this Order in Schedule 1 ("**Plan 3**")

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

https://www.newcastleairport.com/about-your-airport/airport-company/injunction/ at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

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

2. 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 and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the First Defendants by:

    a. Uploading a copy onto the following website: https://www.newcastleairport.com/about-your-airport/airport-company/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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Third Defendants and each of them.

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

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the Third Defendants of any further applications or documents in the proceedings by the First, Second and Third Claimants shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

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 Claimants' solicitors 72 hours' notice of such application by email to 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 or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The Third and Fourth Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

□□□

SCHEDULE 1

Plan 3 will be the same as Plan 3 attached to the Ritchie J Order

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE THIRD AND FOURTH CLAIMANTS

(1) The Third and Fourth Claimants will take steps to serve the Third Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

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

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Amended pursuant to the order of the Honourable Mr Justice Ritchie dated 2□July 2024

Claim Form

In the	
Fee Account no.	
Help with Fees - Ref no. (if applicable)	**H W F** – –

You may be able to issue your claim online which may save time and money. Go to 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

SEAL

□1 □**LEEDS BRAD□ORD AIRPORT LIMITED**
o□Leeds LS19 7TU
□□□**LONDON L□TON AIRPORT OPERATIONS LIMITED**
o□Percival House, 134 Percival Way, London Luton Airport, Luton LU2 9NU
□□□**NE□ □ASTLE INTERNATIONAL AIRPORT LIMITED**
of Woolsington, Newcastle Upon Tyne, NE13 8BZ
(4) **NIAL SERVI□ES LIMITED**
of Unit 1,Prestwick Industrial Est., Ponteland, Newcastle Upon Tyne, NE20 9DA

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

Please refer to Schedule 1 attached to the Claim Form

Brief details of claim

Value

Defendant's name and address for service including postcode

	£
Amount claimed	
Court fee	
Legal representative's costs	
Total amount	

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

□□□

© Crown Copyright 2022

Claim no.	

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

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

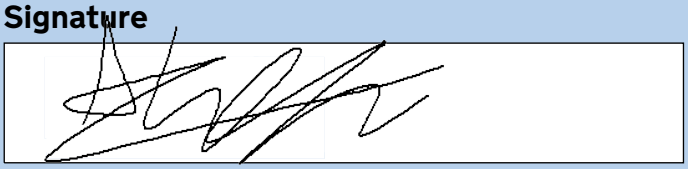
Note: you are reminded that a copy of this claim form must be served on all other parties.

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

Name of claimant's legal representative's firm

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

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

Building and street

Second line of address

Town or city

County (optional)

Postcode

If applicable

Phone number

DX number

Your Ref.

Email

SCHEDULE 1 TO THE CLAIM FORM

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

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

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

Amended pursuant to the order of the Honourable Mr Justice Ritchie dated 23 July 2024

CLAIM NO: KB – 2024 - 002317

IN THE HIGH COURT OF JUSTICE

KINGS BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

(4) NIAL SERVICES LIMITED

Claimants

-and-

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

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

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

Defendants

AMENDED PARTICULARS OF CLAIM

PURSUANT TO THE ORDER OF THE HONOURABLE MR JUSTICE RITCHIE

DATED 23 JULY 2024

Leeds Bradford Airport

1. The First Claimant is the operator of Leeds Bradford Airport, located in Leeds, LS19 7TU, shown outlined in red on Plan 1 ("**LBA**"). LBA serves around 4 million travelling passengers each year with an annual revenue of approximately £43 million.

2. The First Claimant is the registered proprietor of the land on which LBA 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 Claimant is entitled to an immediate right of possession occupation and control of LBA by virtue of its titles as shown in the Title Schedule.

4. Plan 1A identifies the areas within LBA over which the First Claimant lacks (or does not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests ("**the LBA Third Party Areas**") or public rights of way ("**the LBA Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First Claimant does not assert that it is the person with an immediate right of occupation or possession.

    a. The LBA Third Party Areas are indicated by blue and green shading. The blue shading indicates areas within LBA which are the subject of leases or other occupational arrangements. The green shading indicates parts of LBA which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and groundhandler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

    b. The LBA Highways are indicated by pink and purple shading. The pink highways are located at ground level and provide access to LBA to the First Claimant and its licensees (including members of the public). The purple highway runs beneath the runway at the airport.

5. As indicated on Plan 1A, there is one area shaded in blue which directly abuts the red line on the southern boundary of LBA. At that location, the boundary of LBA is not in the possession or control of the First Claimant. Apart from that exception:

access to or from the LBA Third Party Areas by the public from outside the airport, involves the use of areas of LBA which remain unencumbered by any such arrangement and in relation to which, accordingly, the First Claimant remains entitled to possession occupation and control by virtue of their interests shown in the Title Schedule.

6. Plan 1B identifies the various interests held by the First Claimant in the land on which LBA is situated. At the south east, abutting the land shown hatched in pink registered under title WYK232726 at HM Land Registry, are landing lights ("**the LBA Landing Lights**"). Title to the land on which those lights are situate is registered in a third party's name. By an agreement dated 10 December 1982, a predecessor in title to the First Claimant was granted the right to erect and maintain landing lights in the relevant area of land. That agreement is unregistered.

7. By virtue of s63 of the Airports Act 1996, the First Claimant has power to make byelaws with respect to LBA. Pursuant to the Leeds Bradford Airport Byelaws 2022, byelaw 3.24, no person has a right to use any part of LBA as defined therein for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. The plan which defines LBA for the purposes of the byelaws does not extend in the south to the LBA Landing Lights. Apart from that, it includes all the land outlined in red on Plan 1A together with other land (shaded in yellow on Plan 1A). As at the date of commencement of this claim, the First Claimant seeks no relief in relation to the yellow land, notwithstanding that such land is within the byelaws, because the yellow land is not within the operational boundary of LBA. The First Claimant does not, however, repudiate the right to seek relief in relation to such areas, should events materialise which make that course appropriate.

London Luton Airport

8. The Second Claimant is the operator of London Luton Airport, located in Luton, LU2 9LY, shown outlined in red on Plan 2 ("**Luton Airport**"). Luton Airport serves around 16.4 million travelling passengers each year with an annual revenue of approximately £296 million.

9. The Second Claimant is the proprietor of the land on which Luton 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 Second Claimant is entitled to an immediate right of possession occupation and control of Luton Airport, by virtue of its titles as shown in the Title Schedule.

11. Plan 2A identifies the areas within Luton Airport over which the Second Claimant lacks (or does not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the Luton Third Party Areas**") or public rights of way ("**the Luton Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Second Claimant does not assert that it is the person with an immediate right of occupation or possession.

    a. The Luton Third Party Areas are indicated in black, blue and green. The black land is a Direct Air-Rail Transit ("DART") and DART 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 the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

    b. The Luton Highways are indicated in pink. These provide access to Luton Airport to the Second Claimant and its licensees (including members of the public).

12. As indicated on Plan 2A, certain of the Luton Third Party Areas abut the red line on the western boundary of Plan 2A. At those locations, the boundary is not in the possession or control of the Second Claimant. Subject to that: access to or from the Luton Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Luton Airport which remain unencumbered by any such arrangement and in relation to which, accordingly, the Second Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

13. Plan 2B identifies the various interests held by the Second Claimant in the land on which Luton Airport is situated. To the east of the land shown hatched green, are various landing lights some of which are situate on the land shown shaded in blue registered under title HD544934 at HM Land Registry (which the Second Claimant has a proprietary interest in). The remainder of the landing lights are shown in red but are not situate on the land shaded in blue ("**the Luton Landing Lights**"). Title

to the land on which the Luton Landing Lights are situate is registered in a third party's name. The Second Claimant does not assert paper title to the land on which the Luton Landing Lights are situated. However, the Second Claimant has exclusive possession of the land in question by virtue of the installation of the lights, without consent from any person, and which have been in that location for around 20 years.

14. By virtue of s63 of the Airports Act 1996, the Second Claimant has power to make byelaws with respect to Luton Airport. Pursuant to the London Luton Airport Byelaws 2005, byelaw 2.16, no person has a right to use any part of Luton Airport for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the Luton Landing Lights, the plan which defines Luton Airport for the purposes of the byelaws includes all the land outlined in red on Plan 2A.

Newcastle Airport

15. The Third Claimant is the operator of Newcastle International Airport, located in Woolsington, Newcastle upon Tyne, NE13 8BZ, shown outlined in red on Plan 3 ("**Newcastle Airport**"). Newcastle Airport serves around 5 million travelling passengers each year with an annual revenue of approximately £65 million.

16. The Third and Fourth Claimants are the proprietors of the land on which Newcastle Airport 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.

17. Subject to the aforesaid interests of third parties, the Third and Fourth Claimants are entitled to an immediate right of possession occupation and control of Newcastle Airport, by virtue of its titles as shown in the Title Schedule and the agreements dated 21 January 2005; 4 May 2023; 20 October 1999; and 31 August 2020.

18. Plan 3A identifies the areas within Newcastle Airport over which the Third and Fourth Claimants lack (or do not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the Newcastle Third Party Areas**") or public rights of way ("**the Newcastle Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Third and Fourth Claimants do not assert that they are the person with an immediate right of occupation or possession.

a. The Newcastle Third Party Areas are indicated in black, blue and green. The black land is a 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 the whole or part(s) of aircraft hangars, airline and groundhandlers offices, fuel farms, general offices, storage units and warehouses.

b. The Newcastle Highways are indicated in pink. These provide access to Newcastle Airport to the Third and Fourth Claimants and their licensees (including members of the public).

19. As indicated on Plan 3A, parts of the Newcastle Third Party Areas, being those areas shaded in blue which abut the red line at the north of Plan 3A and on the eastern and western boundary of Plan 3A. At those locations, the boundary is not in the possession or control of the Third and/or Fourth Claimants. Subject to that: access to or from the Newcastle Third Party Areas by the public from outside the airport, in all instances necessarily involves the use of areas of Newcastle Airport which remain unencumbered by any such arrangement and in relation to which, accordingly, the Third and Fourth Claimant remain entitled to possession occupation and control by virtue of its interests shown in the Title Schedule.

20. Plan 3B identifies the Third and Fourth Claimants' various registered interests in the land on which Newcastle Airport is situated. On the western and eastern boundaries of the land registered under title number TY433695 at HM Land Registry, are landing lights ("**the Newcastle Landing Lights**"). Title to the land on which those lights are situate is registered in a third party's name. By agreements dated 21 January 2005; 4 May 2023; 20 October 1999; and 31 August 2020, the Third Claimant was granted rights to erect and maintain landing lights in the relevant areas of land. Such rights or interests thereby granted are unregistered.

21. By virtue of s63 of the Airports Act 1996, the Third Claimant has power to make byelaws with respect to Newcastle Airport. Pursuant to the Newcastle Airport Byelaws 2021, byelaw 4.12 and 4.18, no person has a right to use any part of Newcastle Airport for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the Newcastle Landing Lights, the plan which defines Newcastle Airport for the purposes of the byelaws includes all the land outlined in red on Plan 3A.

The Claimants' claims

22. 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 (save at LBA) a railway station.

23. In relation to each airport:

    a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).

    b. No wider consent subsists; and (subject to the highways described above) no public right of access, or way, subsists over the airports.

    c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.

    d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

24. 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 interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.

25. In relation to the landing lights:

a. For the LBA Landing Lights and/or the Newcastle Landing Lights, paragraph 23 above applies mutatis mutandis.

b. Alternatively and/or in respect of the LBA Landing Lights and/or the Luton Landing Lights and/or the Newcastle Landing Lights, paragraph 24a above applies mutatis mutandis and/or protest which occurs on the land on which the lights are situate interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the First and/or Second and/or Third Claimants' land, insofar as a need might arise to close off the runway for safety reasons in the event that the landing lights became compromised or threatened.

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

a. Unreasonably and substantially, with the 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, with (and/or to obstruct or hinder) the free passage along the highway, occasioning particular damage to the Claimants; and

c. Further, in respect of the tunnelled highway in pink on Plan 1A, unreasonably and substantially, with the First Claimant's ordinary use and enjoyment of LBA, insofar as a need might arise to close off the runway for safety reasons; and

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

The threats

27. 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:

28. 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…"

29. 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**").

30. 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.

31. 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?"*

32. 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?"

33. 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:[1]

*"**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**.*

…"

34. On 6 June 2024, an email was sent from 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/tZIoduqpqTMtE9dgMMhlaymvEZgO45jgJ19A)

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.

[1] As of 11 July 2024, £24,275 had been raised on this website.

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"

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

36. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at London Stansted Airport (in 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.

37. As a result of this direct action:

    a. It was necessary to suspend operations on the runway at 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.

38. Further, in respect of LBA and Luton Airport:

    a. in the period between 2019 and 2022, Extinction Rebellion repeatedly carried out protests about the planned expansion of LBA, including on highways and/or accessways to LBA. In September 2023, the First Claimant commenced construction works at LBA in order to expand the airport.

    b. in the period between 2020 and 30 May 2024, various environmental protest groups carried out protests against the expansion of Luton Airport.

39. In view of the circumstances described above, unless restrained by the Court, there is a strong probability that Persons Unknown will, for LBA, Luton Airport and/or Newcastle Airport

    a. trespass on the airports and/or

    b. by protest conducted on or from the Third Party Areas and/or on or from the land on which the LBA Landing Lights, Luton Landing Lights and/or Newcastle Landing Lights are situate, substantially interfere with the ordinary use and enjoyment of the airports so as to cause a nuisance actionable by the Claimants; and/or

    c. by protest conducted on or from the highways, obstruct those occasioning particular damage to the Claimants and/or interfere with the Claimants' right of access to the airports via those highways, so as to cause a nuisance actionable by the Claimants.

40. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.

41. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:

42. 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.

43. 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.

44. 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.

45. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.

46. 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.

47. 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.

48. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND THE FIRST CLAIMANT CLAIMS AGAINST THE FIRST DEFENDANT:

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

AND THE SECOND CLAIMANT CLAIMS AS AGAINST THE SECOND DEFENDANT:

(2) Subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent of the Second Claimant, enter, occupy or remain upon the land outlined in red on Plan 2.

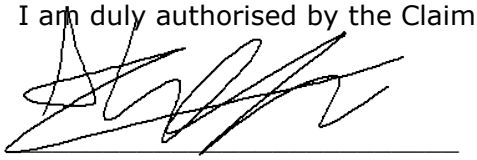
AND THE THIRD AND FOURTH CLAIMANTS CLAIM AGAINST THE THIRD DEFENDANT:

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

STATEMENT OF TRUTH

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

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



Alexander James Wright

Principal Associate

Eversheds Sutherland (International) LLP

Claimants' solicitor

Dated: ~~16~~ 23 July 2024

TITLE SCHEDULE TO THE PARTICULARS OF CLAIM

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

Title number	Freehold / Leasehold
WYK232726	Freehold
WYK269721	Freehold
WYK275282	Freehold
WYK461796	Freehold
WYK500833	Freehold
WYK500834	Freehold
WYK512407	Freehold
WYK547070	Freehold
WYK547071	Freehold
WYK570873	Freehold
WYK574741	Freehold
WYK624715	Freehold
WYK657177	Freehold
WYK657180	Freehold
WYK698270	Freehold
WYK698436	Freehold
WYK706576	Freehold
WYK775942	Freehold
WYK723309	Freehold
WYK806314	Freehold
WYK831477	Freehold
WYK857105	Freehold
WYK857106	Freehold
WYK395678	Freehold
WYK657178	Leasehold
WYK501284	Leasehold

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

Title number	Freehold / Leasehold
BD235078	Leasehold
BD206048	Leasehold
BD339131	Leasehold
BD332840	Leasehold
BD216008	Leasehold
HD544934	Leasehold

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

Title number	Freehold / Leasehold
TY349352	Freehold
TY476495	Freehold
TY433695	Freehold

5. The Fourth Claimant is the registered proprietor of the following title:-

Title number	Freehold / Leasehold
ND75730	Freehold

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N

Yeadon

Moor Side

Scotland

Map scale **1:10,000**

Assumes printed map area measures 395mm by 272mm.

ORBITAL WITNESS

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Wigmore

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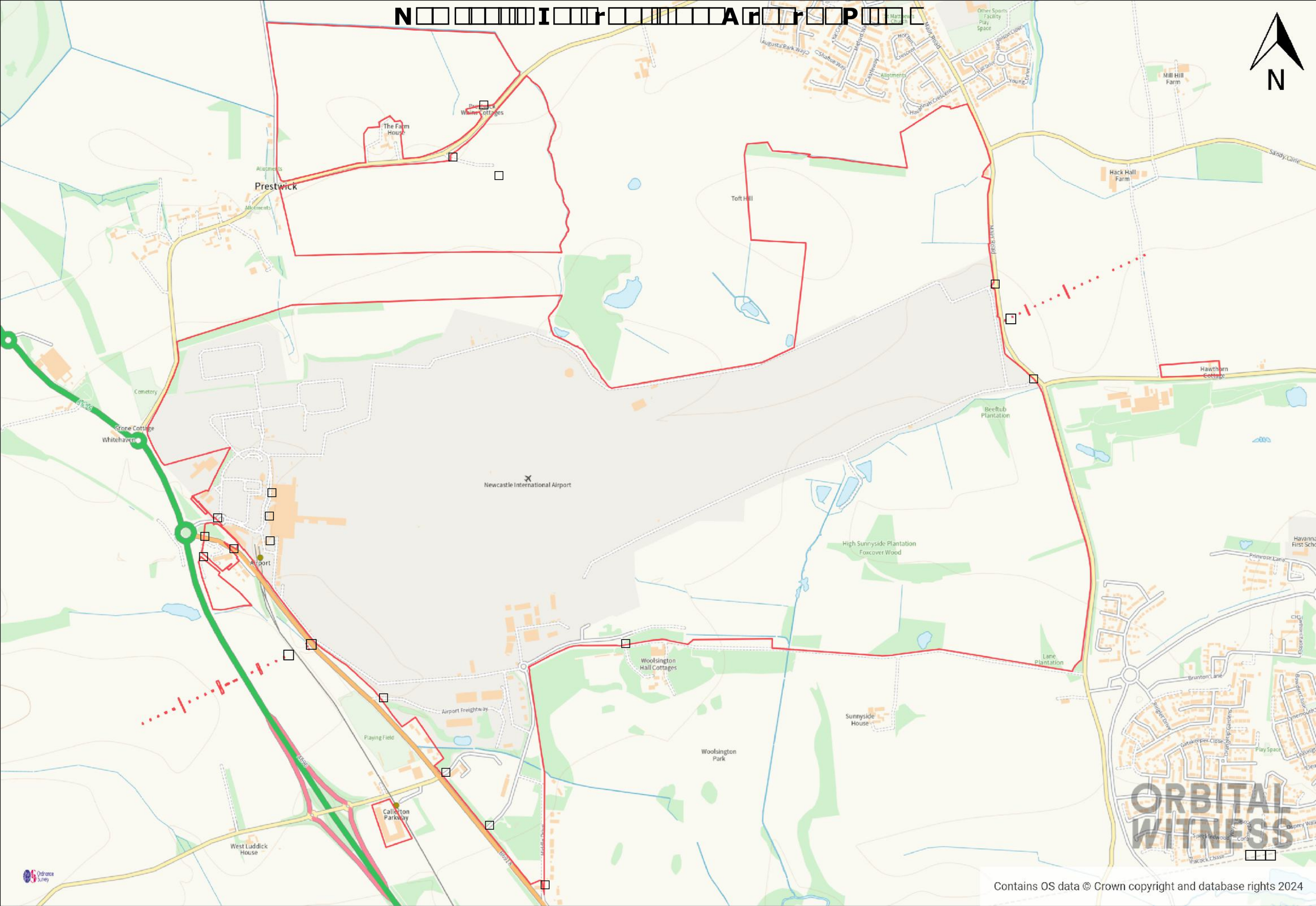

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- Injunction
- Wholly Third Party Areas
- Partly Third Party Aras
- Deviation from LBA Byalaw plan
- Public Highway - ground level
- Public highway - underground

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- Injunction
- Wholly Third Party Areas
- Partly Third Party Areas
- Public Highways
- Luton DART

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Injunction
Wholly Third Party Areas
Partly Third Party Areas
Public Highways
Underground Metro Station

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- WYK232726
- WYK269721
- WYK275282
- WYK461796
- WYK500833
- WYK500834
- WYK501284
- WYK512407
- WYK547070
- WYK547071
- WYK570873
- WYK574741
- WYK624715
- WYK657177
- WYK657178
- WYK657180
- WYK698270
- WYK698436
- WYK706576
- WYK775942
- WYK723309
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- WYK831477
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Map scale 1:10,000
When printed map area measures 395mm by

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HD544934
BD216008
BD206048
BD235078
BD332840
BD339131
Transfer 29.02.24

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ORBITAL WITNESS

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TY433695
ND75730
TY349352
TY476495

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Dinnington
Prestwick
Whitehaven
Newcastle International Airport
Woolsington Park
Woolsington Hall Cottages
Sunnyside House
West Luddick House
Black Callerton Hill
Dark Plantation
Hold House Farm
Fairney Burn
Callerton
Mill Hill Farm
Hack Hall Farm
Brunton Lane
Kingslet Drive
Allotments
Playing Field
Cemetery
Fascines Wood

ORBITAL WITNESS

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

CLAIM NO: KB-2024-002317

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

BETWEEN:-

(1) LEEDS BRADFORD AIRPORT LIMITED

AND THREE OTHERS

Claimants

- v -

KB-2024-002317

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

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

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

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

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

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

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

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

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

DEFINITIONS

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

"**Warning Notice**" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

https://www.leedsbradfordairport.co.uk/injunction. at which copies of this Order may be viewed and downloaded).

NOW IT IS ORDERED THAT:

INJUNCTION

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

2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits ("**the Claim Documents**") and this Order upon the First Defendant:

    a. Uploading a copy onto the following website: https://www.leedsbradfordairport.co.uk/injunction.

    b. Sending an email to each of the email addresses listed in Schedule 3 to this Order (1) stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and (2) attaching this Order.

    c. Affixing a notice at those locations marked with an "X" on Plan 1 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form of Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraph 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.

6. The Court will provide sealed copies of this Order to the First Claimant's solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.

8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3 and 4. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the First Defendant of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.

10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the First Claimant's solicitors 72 hours' notice of such application by email to 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 or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.

11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.

13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.

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

15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE FIRST CLAIMANT

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

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

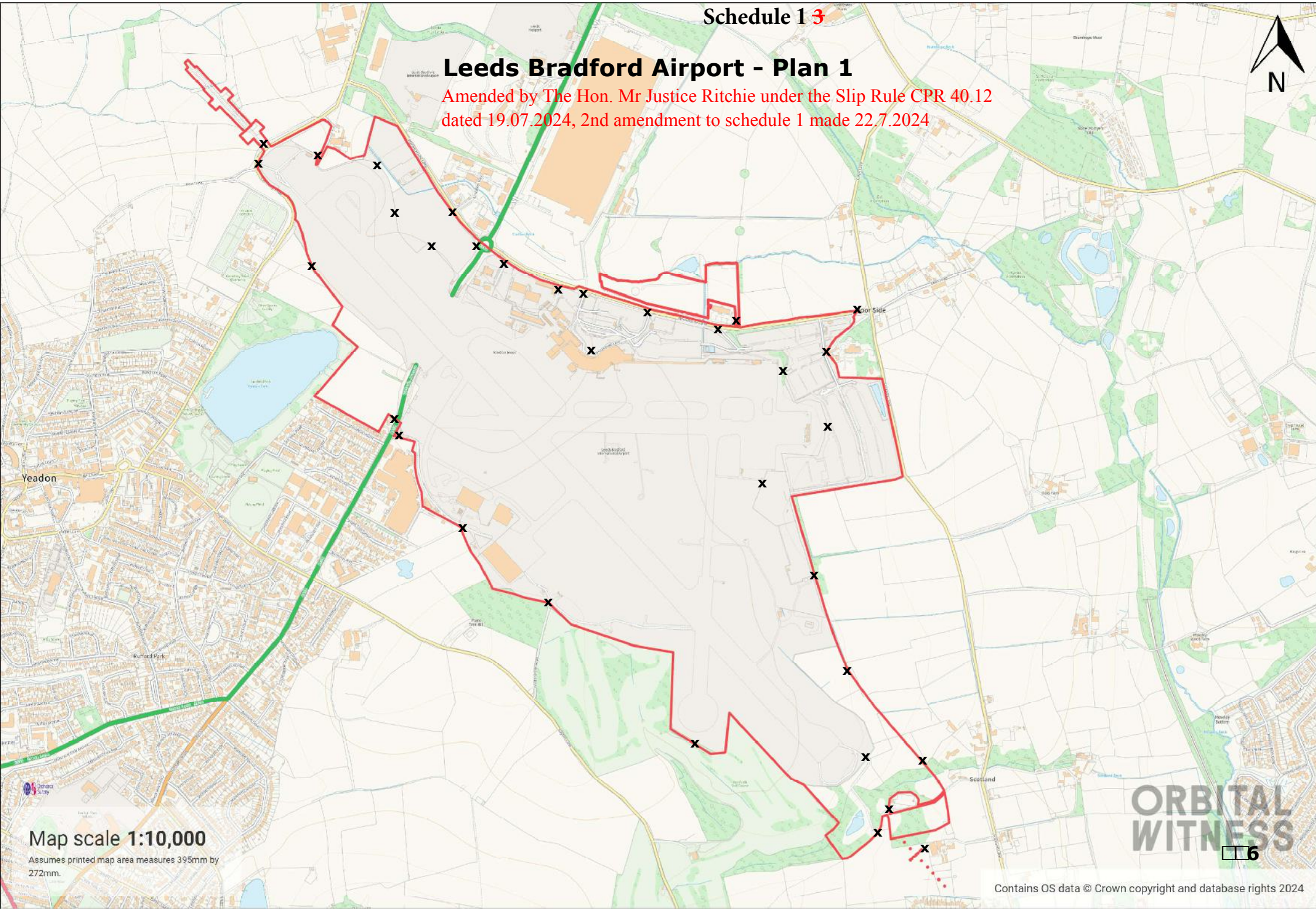
(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

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

Schedule 1 ~~3~~

Leeds Bradford Airport - Plan 1

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



SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant will take steps to serve the First Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

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

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")

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

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

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

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

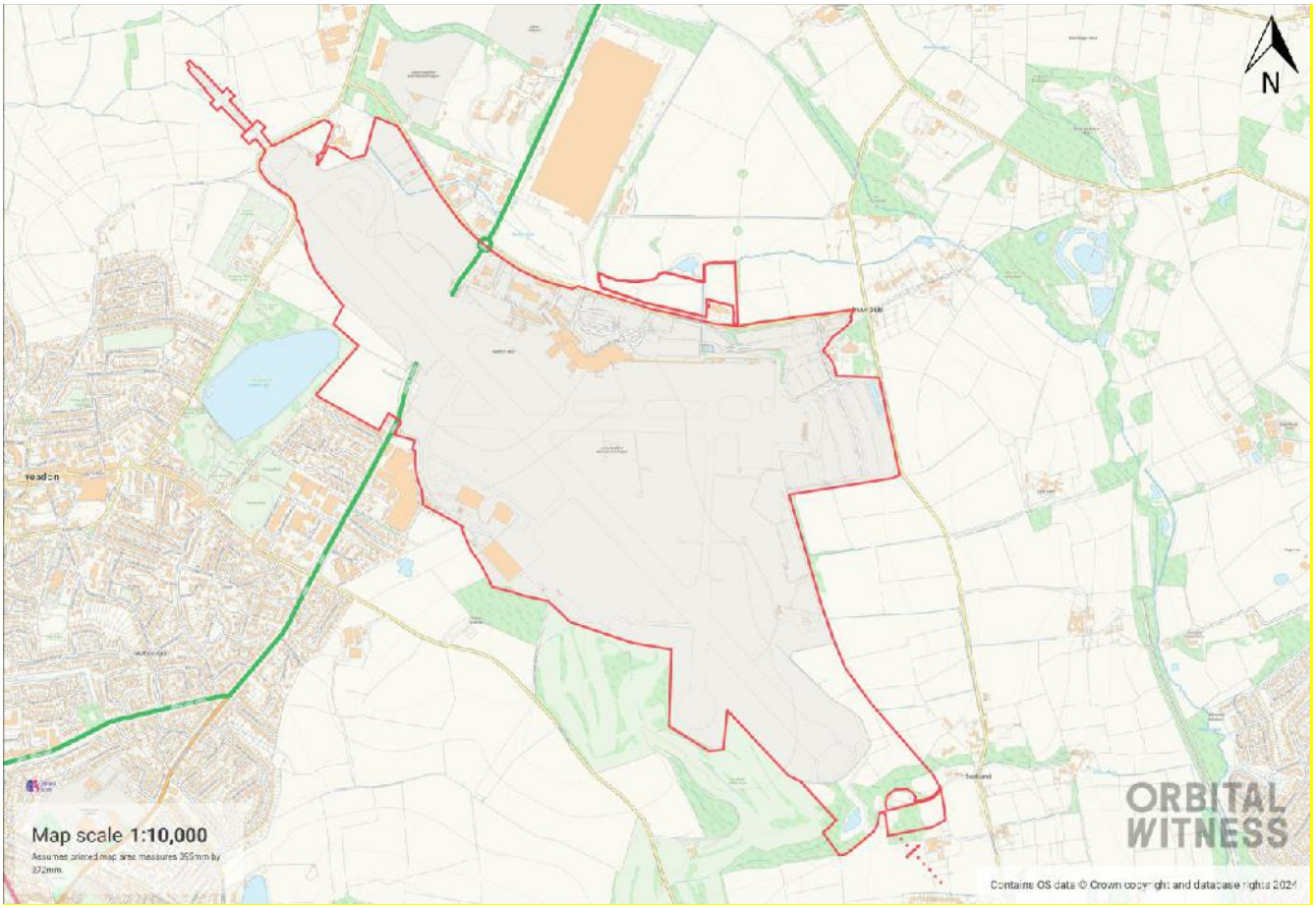
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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

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

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

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.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Map scale 1:10,000
ORBITAL
WITNESS
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CLAIM NO: KB-2024-002317

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

BETWEEN:-

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

Claimants

- v -

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

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

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

□□□

Defendants

ORDER

BEFORE: THE HONOURABLE MR JUSTICE RITCHIE sitting at the Royal Courts of Justice on 18 July 2024

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

AND UPON the Claimants' application for an injunction dated 16 July 2024 ("**the Application**").

AND UPON READING the Application and the first witness statement of Alexander James Wright dated 16 July 2024, the second witness statement of Alexander James Wright dated 17 July 2024, the third witness statement of Alexander James Wright dated 17 July 2024 and the fourth witness statement of Alexander James Wright dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("the Witness Statements")

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

AND UPON the Court granting the First Claimant an injunction on 18 July 2024 ("**the Leeds Bradford Order**") in respect of the land shown outlined in red on Plan 1 to the Claim Form ("**Leeds Bradford Airport**")

AND UPON the Court granting the Second Claimant an injunction on 18 July 2024 ("**the Luton Order**") in respect of the land shown outlined in red on Plan 2 to the Claim Form ("**Luton Airport**")

AND UPON the Court granting the Third and Fourth Claimants an injunction on 18 July 2024 ("**the Newcastle Order**") in respect of the land shown outlined in red on Plan 3 to the Claim Form ("**Newcastle Airport**")

NOW IT IS ORDERED THAT:

PERMISSION TO AMEND

1. The Claimants have permission to amend the Claim Form and Particulars of Claim relating to:

   a. The description of the Defendants;

   b. The plans attached to the claim form so as to use labelled “Plan 1”, “Plan 2” and “Plan 3”.

   c. Annexing the revised plans referred to in the particulars of claim.

   d. If so advised, by 4pm on 1 August 2024 to plead any claims against Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow.

   Ritchie J

   Made: 23.7.2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED

(2) LONDON LUTON AIRPORT OPERATIONS LIMITED

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED

(4) NIAL SERVICES LIMITED

Claimants

-and-

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

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

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

Defendants

NOTE OF "WITHOUT NOTICE" HEARING BEFORE

MR JUSTICE RITCHIE

18 JULY 2024

□□□

Hearing 18.07.24

The Hearing commenced at 10.30am.

The Judge had read the evidence (except for Alex Wright w/s #2, which he took a moment to read at the start of the hearing) and the Claimant's skeleton argument, and 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; no defendants of which Cs were aware and no steps taken to notify.

Mr Justice Ritchie was familiar with the jurisdiction having granted injunctions in favour of HS2 and Esso.

This is an emerging area of law and the principles expressed in caselaw are still in the nature of guidance and the courts are encouraged by the Supreme Court to make decisions as they unfold. The guiding principle that attracts the eye of equity is the "compelling need" which stimulates the court to intervene. The developments of the law and breaking down of headings is what is needed when compelling need is identified, and to satisfy the human rights aspect.

Preliminary Matters

TMKC explained that, because of *Wolverhampton,* this was not a without notice application in the ordinary sense, but the Cs had complied with it on a precautionary basis for the reasons set out in AW w/s #1 (HB/272-273).
TMKC addressed that the Claim Form + the Particulars of Claim needed to be amended but noted as there is no issue as to service this permission may not be required, nonetheless he sought permission to amend:-

1. the Claim Form (plans attached were not labelled); and
2. the Particulars of Claim (plans were attached to AW w/s but not POC despite being referred to)

Permission granted.

Witness Statements / Evidence

The Judge noted that para 7 of AW w/s #2 related to protests at Gatwick (no injunction in place) on 24 June 2024.

The Judge noted the arrests that had been made and referred to in AW w/s, but was critical that there was no copy of Mr McBride's witness statement, obtaining it online was not practicable. The Judge noted that it was hearsay evidence.

TWKC provided AW w/s #4 to the Judge (updated Plan 3A).

Issues

Judge's primary concerns:-

1- Why have the defendants not been named or notice provided to the individuals, they being the ones alleged in the evidence as the guiding light / drum beaters. If they are known to be part of the persuaders then why aren't they defendants?;

2- General queries concerning clarity of the areas covered by the injunction, highways and third party land etc.; and

3- *Definition of Persons Unknown ("PU") - currently the definition of PU would cover protesting about delayed luggage (for example) – the Judge considered that would be too wide and needs to be more focused.*

Titles

TMKC explained Plan 1 and Plan 1B.

To clarify the Judge's query on C's rights to claim an injunction over a national highway (included within the red line on Plan 1), TMKC explained it would be to restrain nuisance affecting the customers and operations of the airport; the byelaws themselves cover disruptive nuisance over the highway.

TMKC clarified Cs are not asking the court to grant an injunction in aid of the byelaws, and provided examples of terminal cases with injunctions granted over highways.

The Judge considered an example of individuals sitting in the tunnel and stated that it's got nothing to do with trespass. It is a nuisance to interfere with anyone's right with the use of the highway. The nuisance would be that it obstructs the passageway of staff and licences. It could also be framed within the economic torts.

TMKC discussed the runway lights; these are affected by complex tapestry of titles, however, the structures of the lights are owned by the Cs. The Judge considered that the ownership of the land did not matter because Cs owned the lights and there could be a danger if the lights were covered and the planes could not land because they could not see.

TMKC explained Plans 1A – 3A and 1B – 3B; the third party areas should not be carved out and to recognise that anyone protesting in these areas is doing so in the airport and it is not appropriate to try to draw that distinction. There is also potential for protestors to be misled / create confusion.

Airports' Distinctiveness

TMKC explained that airports are not like normal places. Even peaceful protests are problematic and could be used as a mask for more serious things. There is potential for a peaceful protest to become not peaceful and/or to be misinterpreted by security staff. Airports are key national infrastructure. Security is the single most important item on the agenda.

TMKC drew the Judge's attention to VJH w/s on responsibilities of operators (on safety); safety is an issue of huge importance and there is sufficient chain of evidence for the court to accept the submission.

TMKC discussed that the central element of this equitable jurisdiction is that anyone can come and say "no this is too wide" and at that point, there can be arguments about it. At this stage, it is appropriate to proceed on a precautionary basis which is intrinsic to this jurisdiction, at least when there is evidence that it goes beyond mere assertion.

TMKC explains that third party occupiers have been notified and no objections received to the claim.

Plans

<u>Leeds Bradford Airport</u>

TMKC explained Plan 1A and why internal layout plans of the green buildings have not been provided (complexity).

London Luton Airport

TMKC explained Plan 2B, Plan 2A (including the highways) and Plans 2C – 2I.

TMKC explained the railway which is within C2's titles / ownership.

Newcastle

TMKC explained Plan 3, Plan 3B, Plan 3A (as substituted by AW w/s #4) and Plans 3C-3D.

TMKC there has been no uniform practice developed in these cases about whether notice should be given to third parties (e.g. the difference in approach in claims by the MAG group airports with Heathrow).

Threat and the compelling need

TMKC provided summary of incidents AW w/s #1 - the environmental campaign in recent years and also referred to para 52 of AW w/2 #1 (HB/264) - Tweet by Just Stop Oil ("JSO").

Helps to explain why these injunctions are effective. They recognise that injunctions are special, still that much respect for the law.

The Judge queried whether arrested JSO members should be a named individual; TMKC explained that they are no longer considered to be a threat given that they had received sanctions.

TMKC explained that apart from the obligation to identify the name, notification should also be as effective as possible.

Judge was uncertain as to why individuals were not named as defendants where they could be as "troop leaders"; those that can be named, should be named but they should be notified at least, whether they are named is a matter for Cs.

TMKC refers to AW w/s #3 and the JSO letter to the prime minister and the explicitness of their recent statement on *taking action at airports* (HB/591).

Specific to the Airports (LBA/LTN/NCL)

Generic features which make airports vulnerable to peaceful protest which the attempted protest at Gatwick airport with the bandages evidences. The cascade effect of from one cancellation / delay also makes them particularly vulnerable and that they are dangerous places.

At these airports, the lack of airbridges create a special acute level of risk of protestors breaking away because passengers have to cross the apron to get to aircraft and runways are closer to terminals - when the passengers are out in the open, there are additional security risks.

Cs have tried to accommodate protest, there were cornered off protest areas for safe and peaceful protest; Judge proposed a recital in the Order for a contact for peaceful protests.

All the airports are also protected by byelaws which prohibit disruptive protest.

Draft Order

The Judge considered the definition of PU to be too wide "persons unknown whose purpose is or includes protest". The POC centre on protests that focus on fossil fuels. Appropriate wording is required that focuses on the actual substance of the complaint.

Cs have a continuing duty of full and frank disclosure (therefore it would provide to the Court all relevant information if it had to enforce the relief).

Cuadrilla – paras 60, 65 and 69 (AB/376) - no objection to framing an order which involves a subjective element. If there is a problem, C would have a duty to satisfy the evidential burden.

TMKC addressed other questions by the Judge:

1- Why have we not named individual – covered

The Judge granted permission to amend stating it will be "as you see fit".

2- Areas covered which were highway and third party land

TMKC submits that in relation to all third party areas it is necessary to make the injunction effective, the supporting reason that protest activity on third party land and/or highways would be a nuisance, a direct tort. There is the issue of silent protest on third party land which would not be a nuisance, but that is caught by the first, we can't have situations where security need to monitor peaceful protest, not in an airport – elsewhere maybe.

3. definition of PU being too wide

TMKC did not develop further on this.

The Judge suggested adding a note to the order.

TMKC stated that the balancing exercise remains and sought that the Judge evaluates the submissions in light of the skeleton argument.

Judgement

This is an *ex parte* application issued on 16.07.2024 for injunctions against PU to exclude them from 3 airports and for alternative service provisions, extempore judgement fit within that period.

This Judgment is focused on LBA but will apply to LTN and NCL.

The POC identified third party areas over which Cs lacked possession (Plans 1A, 2A and 3A).

Cs set out that:-

- the public had implied consent to enter the airports;
- without any right to protest or such activities as had ben threatened by JSO;
- any person entering or staying on for protests would be a trespasser.

Third party areas were identified to which Cs are not entitled to possession but it was pleaded that Cs are entitled to protect their interest.

Protests on third party areas / highways would constitute a breach of the airports byelaws and in submission of this, suggested it would constitute a nuisance.

The Judge identified the various threats of protests as noted in the witness evidence (including at LTN); where the byelaws and breach thereof had no or little off putting effect.

Judge summarised the evidence in AW, VJH, AM and NJ w/ss.

The claimants sought injunctions to be reviewed every 12 months,

The cause of action: trespass, public/private nuisance. There is no claim for an economic tort or conspiracy. It is based on *quia timet* as there is no threat of direct action, but there is imminent threat.

Secondly, having looked at the disclosure that was provided in the professional bundle provided by Eversheds I consider that full and frank disclosure has been provided

Sufficient evidence: the evidence of ownership is sufficient and that the historic evidence is sufficient for proof of a risk of trespass and of public/private nuisance at the airport or the roads.

A realistic defence: That is on the basis of if it is a defence to protesters entering these airports with the intention to disrupt or breach the byelaws, the range of protests that has been used by environmental groups in the past has been very wide, including locking on, damaging structures, spraying paint, sit-ins/glue-ins, and many others. For such activities I do not foresee any realistic defence. I take into account of course that any injunction will be against unlawful activities or in breach of the byelaws.

Balance of convenience / compelling justification: is there a compelling reason to grant the injunction - the most relevant event is the threat made to the new Prime Minister of the UK which is comparable to previous threats made, these threats have a history of not being made lightly and such threats being seen through, including trespass, public and private nuisance. The other public and direct activity which has created torts and perhaps crimes, was Stansted and Farnborough, the threat to other airports may have been undermined by substantial arrests including the one relating to the Gatwick bandages arrest.

Airports are part of the national infrastructure which are actually sensitive to threat, they are frighteningly complicated organisations involving the movement of thousands of members of the public near the movement of huge and highly combustible equipment. They are particularly sensitive to direct action/unlawful protest.

Fear of CEOs is that terrorism is facilitated by chaos. Human rights of passengers who businesses or holidays may be catastrophically interrupted or cancelled. Although not pleaded, it is worth taking on the knock on effect on employment, however, I don't have those in the front of my mind because there is no pleading in for economic torts.

JSO and XR have made good on their threats in the past in a way that has caused enormous tax payer and private financial expense and disruptions at oil terminals, roads, sporting events and as threatened, potentially at airports. I also take into account that the evidence before me shows that previous High Court decisions have been effective in preventing unlawful activity. Also take into account the protesters lawful right to express their views, lawful protesting set out in Mr Hodder's statement is the right of every English person and is not to be restricted.

There is compelling justification to prevent fossil fuel protesters from entering or staying at these three airports and from protesting there and from any direction which could cause chaos / danger or constitute the torts set out in the particulars of claim.

Would damages be an adequate remedy: Obviously not: (1) PU by definition are unknown; and (2) I do not know of any case in which a PU has stumped up for any chaos they have caused.

I do not think they would go anywhere near to compensate the chaos that could be caused at an airport, for instance, on the tarmac. Therefore, damages are not an adequate remedy. It is better to prevent the chaos than compensate / fail to compensate.

Identifying PUs: Needs to include "fossil fuels". It is a duty of this court, to make absolutely clear the boundaries of the definition of PUs and I consider there is a potential

lack of clarity in defining them as protestors. There may be lawful protests that would otherwise be caught by the current too wide definition.

Scope of the injunction: I do not consider that there is a compelling justification for the injunction to cover flights going in and out of the airport.

Injunction: I consider that this is sufficient but I would add "for the purpose of fossil fuel", and consent of Cs.

The geographic boundaries: In relation to areas within the possession of the claimant and private jet areas, in view of what happened on Stansted, it is necessary that the injunction covers those private operations which are at least within the freehold ownership.

Finally, landing lights – I consider that the injunction should cover the landing lights as they are equipment owned by the Cs and if Ds disrupt it would be extremely chaotic and dangerous.

Temporal limits: review annual is sufficient, safe and fair way to protect rights of PU.

Service: methods of alternative service, agreed as per draft Order and provided to Reuters.

Right to vary or set aside: right should also be granted specifically to Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow, those 3 persons should be served directly by alternative service (website/email address).

Tidy up matters: whilst Public Order Act 2023 and Byelaws have changed the landscape somewhat in this application, they do not undermine the need for a proactive approach toward what would be catastrophic tortious damage.

Permission to amend CF and POC.

Certificate of service

Name of court	Claim No.
IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION	KB-2024-002317
Name of Claimant Leeds Bradford Airport Limited and others	
Name of Defendant Persons Unknown (as more particularly described in the Claim Form)	

On what day did you serve? 26/07/2024

The date of service is 26/07/2024

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Three Injunction Orders dated 19.07.2024 and further Order dated 23.07.2024, Amended Claim Form, Amended Particulars of Claim, Hearing Bundle, Witness Evidence in support of the Application Notice (including exhibits), Claimant's Skeleton Argument, Note of Hearing

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Persons Unknown

How did you serve the documents?
(please tick the appropriate box)

- ☐ by first class post or other service which provides for delivery on the next business day
- ☐ by delivering to or leaving at a permitted place
- ☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*
- ☒ by other means permitted by the court *(please specify)*

  pursuant to paragraphs 3-8 of the Orders dated 19.07.2024, the last step for service was completed on 26.07.2024
- ☐ by Document Exchange
- ☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*
- ☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

(1) Web: https://www.leedsbradfordairport.co.uk/injunction; https://www.london-luton.co.uk/corporate-site/lla-publications/injunction; https://www.newcastleairport.com/about-your-airport/airport-company/injunction
(2) Emails: juststopoil@protonmail.com; juststopoilpress@protonmail.com; info@juststopoil.org; and enquiries@extinctionrebellion.uk
(3) Site: Leeds Bradford Airport, Leeds, LS19 7TU; London Luton Airport, Airport Way, London, LU2 9LY; Newcastle International Airport, Woolsington, Newcastle, NE13 8BZ

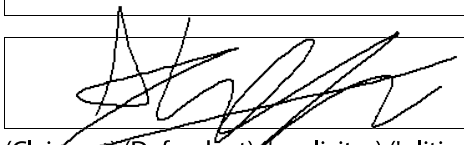
Being the ☐ claimant's ☐ defendant's ☐ solicitor's ☐ litigation friend

- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
- ☐ last known place of business
- ☐ last known principal place of business
- ☐ principal office of the partnership
- ☐ principal office of the corporation
- ☐ principal office of the company
- ☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- ☒ other *(please specify)*

  (1) C1-4's webpages; (2) D's email addresses; and (3) C1-4's Premises

I believe that the facts stated in this certificate are true.

Full name: Alexander Wright

Signed: 

(Claimant) (Defendant) ('s solicitor) ('s litigation friend)

Position or office held: Principal Associate

(If signing on behalf of firm or company)

Date: 12/08/2024

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Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim
A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	**Deemed day of service**
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Party: Claimants
Name: Alexander James Wright
Number: Second
Date: 17.07.2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v –

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN 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 CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN 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 CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN 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 CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

SECOND WITNESS STATEMENT OF

ALEXANDER JAMES WRIGHT

I ALEXANDER JAMES WRIGHT of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a Principal Associate in the firm of Eversheds Sutherland (International) LLP and assisting Stuart Wortley (Partner) who has conduct of these proceedings on behalf of the Claimants.

2. I make this witness statement in support of the Claimants' application for an injunction. I make it further to my first witness statement of 16 July 2024.

3. This witness statement has been produced by me with the assistance of my colleagues Nawaaz Allybokus and Emma Payne.

4. The statements in this witness statement are from my own knowledge, save where I state otherwise. Where statements are matters of information or belief, I provide the source of that information or belief.

OTHER AIRPORT PROTESTS

5. At paragraphs 67-76 of my first witness statement, I referred to protests which had occurred at other airports.

6. I noted the evidence filed in support of the injunctions granted in favour of Manchester Airport, Stansted Airport and East Midlands Airport in the claim under number KB-2024-0002132, which included a protest having occurred at Stansted airport on 20 June 2024.

7. I did not mention in that statement a further incident which was mentioned in the evidence in support of that application, which was an attempted protest at Gatwick airport. The evidence from Mr David McBride, head of legal at Manchester Airports Group stated at paragraph 47:

"***25 JUNE 2024 – DIRECT ACTION AT GATWICK AIRPORT***

47. On 26 June 2024, our security team received a briefing from the National Police Coordination Centre concerning the arrest of four JSO protestors at London Gatwick Airport. These individuals were not intending to travel but were in possession of bags containing several hundred bandages. The police suspect that they intended to distribute the bandages across a runway – forcing the closure of the airport until all of the bandages could be removed (owing to the risk of damage which might occur if any of the bandages was drawn into to an aircraft jet engine)."

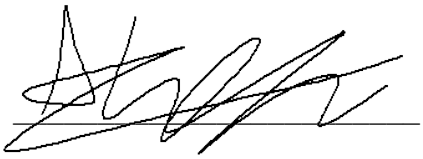
A copy of Mr McBride's witness statement is available online at https://assets.live.dxp.maginfrastructure.com/f/73114/x/270ba6fa6d/injunction-mag-hearing-bundle.pdf.

Statement of truth

I believe that the facts stated in this Witness Statement and Exhibits are true.

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

I am duly authorised to make this statement on the Claimants' behalf.



Alexander James Wright

17 July 2024

Party: Claimants
Name: Alexander James Wright
Number: Third
Date: 17.07.2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v –

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Defendants

THIRD WITNESS STATEMENT OF

ALEXANDER JAMES WRIGHT

I ALEXANDER JAMES WRIGHT of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a Principal Associate in the firm of Eversheds Sutherland (International) LLP and assisting Stuart Wortley (Partner) who has conduct of these proceedings on behalf of the Claimants.

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3. This witness statement has been produced by me with the assistance of my colleagues Nawaaz Allybokus and Emma Payne.

4. The statements in this witness statement are from my own knowledge, save where I state otherwise. Where statements are matters of information or belief, I provide the source of that information or belief.

5. I refer to exhibits marked **"AW1"** in this statement. They have been produced to me and I verify that the documents in those exhibits are true copies of the documents.

FURTHER DEVELOPMENTS

6. On 17 July 2024, I was informed by a colleague that Just Stop Oil had published on their website a letter which they had written to Keir Starmer, the prime minister of the United Kingdom. The letter stated:

> "Dear Prime Minister,
>
> We write to congratulate you on becoming Prime Minister and to acknowledge that one of the first steps of your new government has been to reaffirm your commitment to end new UK oil and gas licensing. This is an essential first step towards what is required to end the UK's contribution to the climate crisis. However, we all know that it is not enough.
>
> We also need to rapidly phase out our existing oil and gas projects and to end the use of fossil fuels across our economy. This is not only the view of Just Stop Oil; the call for a rapid phase out of fossil fuels is backed by climate science, by global equity considerations, by international law and by global public opinion.
>
> We last wrote to you in your role as leader of the Labour Party on 24 June to demand that, should you become our next Prime Minister, you immediately commit the UK government to **working with other nations to establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fair and just transition**.

> We indicated that unless such assurances were provided by 12 July, we would be forced to take action to protect our communities by engaging in a campaign of noncooperation against fossil fuel use, at airports across the country.
>
> We are writing now to let you know that since no such assurances have been received we remain in civil resistance and are preparing to take action, but that, as ever, we remain open to dialogue.
>
> The era of fossil fuels is over. It's time to stop waging war on humanity.
>
> Yours sincerely,
>
> Just Stop Oil. (emphasis added by underlining)"

7. The URL is: https://juststopoil.org/2024/07/16/just-stop-oil-letter-to-prime-minister-starmer/. A copy of the letter is at Exhibit "**AW1**".

Statement of truth

I believe that the facts stated in this Witness Statement and Exhibits are true.

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

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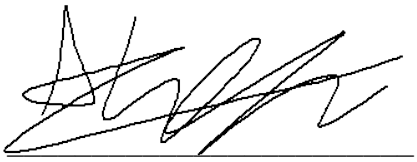

Alexander James Wright

17 July 2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v –

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Defendants

AW1

This is the exhibit marked "AW1" in the Third Witness Statement of Alexander James Wright.

Just Stop Oil Letter to Prime Minister Starmer

Press / July 16, 2024

Dear Prime Minister,

We write to congratulate you on becoming Prime Minister and to acknowledge that one of the first steps of your new government has been to reaffirm your commitment to end new UK oil and gas licensing. This is an essential first step towards what is required to end the UK's contribution to the climate crisis. However, we all know that it is not enough.

We also need to rapidly phase out our existing oil and gas projects and to end the use of fossil fuels across our economy. This is not only the view of Just Stop Oil; the call for a rapid phase out of fossil fuels is backed by climate science, by global equity considerations, by international law and by global public opinion.

We last wrote to you in your role as leader of the Labour Party on 24 June to demand that, should you become our next Prime Minister, you immediately commit the UK government to **working with other**

We indicated that unless such assurances were provided by 12 July, we would be forced to take action to protect our communities by engaging in a campaign of noncooperation against fossil fuel use, at airports across the country.

We are writing now to let you know that since no such assurances have been received we remain in civil resistance and are preparing to take action, but that, as ever, we remain open to dialogue.

The era of fossil fuels is over. It's time to stop waging war on humanity.

Yours sincerely,

Just Stop Oil.

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

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

Website: https://juststopoil.org/

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

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

Twitter: https://twitter.com/JustStop_Oil

Youtube: https://juststopoil.org/youtube

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

Notes to Editors

[1] Just Stop Oil is working with an international network of groups to demand our governments establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fast, fair, and just transition. This can be accomplished by endorsing the Fossil Fuel Non-Proliferation Treaty Initiative and seeking a negotiating mandate to establish the treaty.

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

Critical seed funding for Just Stop Oil was provided by Climate Emergency Fund and Adam McKay in 2022

Just Stop Oil 'Blue Lights' policy: our policy is, and has always been, to move out of the way for emergency vehicles with siren sounding and 'blue lights' on.

← Previous Post

Support
Just Stop Oil

Donate

Join Our Mailing List

EMAIL SUBSCRIPTION FORM

Email *

First Name *

Mobile Number *, 07400 123456

I'm happy to get occasional texts and calls about specific actions or about events I've signed up to.

Not in GB?

SUBMIT

Opt in to email updates from Just Stop Oil

Follow us on social media.

About us

Just Stop Oil is a nonviolent civil resistance group in the UK. In 2022 we started taking action to demand the UK Government stop licensing all new oil, gas and coal projects. We have won on this ✅. **Civil resistance works.**

Our new demand: That the UK Government sign up to a Fossil Fuel Treaty to Just Stop Oil by 2030.

Our governments must work together to establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fast, fair, and just transition.

This can be accomplished by endorsing the Fossil Fuel Non-Proliferation Treaty Initiative and seeking a negotiating mandate to establish the treaty.

FAQs | **The Campaign** | **Research**

Contact us

Press enquiries: juststopoilpress@protonmail.com
General enquiries: info@juststopoil.org
Donation enquiries: juststopoilgiving@protonmail.com
Volunteer enquiries: jsovolunteers@gmail.com
Book a speaker: contact@juststopoil.org

Stay in touch

SIGN UP FOR OUR NEWSLETTER

First Name

Last Name

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REGION (TO ADD YOU TO THE CORRECT REGIONAL MAILING LIST) *

East of England

ARE YOU A STUDENT? (IF YES, WE CAN ADD YOU TO OUR STUDENTS SPECIFIC EMAILING LIST)

☐ Yes

Not in GB?

ADD YOUR NAME

☑ Opt in to email updates from Just Stop Oil

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Just Stop Oil Privacy Policy

Party: Claimants
Name: Alexander James Wright
Number: Fourth
Date: 18.07.2024
Exhibit: AW1

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v –

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN 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 CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

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(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN 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 CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

FOURTH WITNESS STATEMENT OF

ALEXANDER JAMES WRIGHT

I ALEXANDER JAMES WRIGHT of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a Principal Associate in the firm of Eversheds Sutherland (International) LLP and assisting Stuart Wortley (Partner) who has conduct of these proceedings on behalf of the Claimants.

2. I make this witness statement in support of the Claimants' application for an injunction. I make it further to my first witness statement of 16 July 2024 ("**My First Witness Statement**") and my second and third witness statements of 17 July 2024.

3. This witness statement has been produced by me with the assistance of my colleagues Nawaaz Allybokus and Emma Payne.

4. The statements in this witness statement are from my own knowledge, save where I state otherwise. Where statements are matters of information or belief, I provide the source of that information or belief.

5. I refer to an exhibit marked **"AW1"** in this statement. They have been produced to me and I verify that the documents in those exhibits are true copies of the documents.

Newcastle International Airport – Plan 3A

1. My First Witness Statement refers to a plan titled 'Plan 3A' (which is exhibited to my First Witness Statement at Exhibit AW9).

2. Following the production of that plan, the Third Claimant identified that part of the land which is shown on it as a 'Wholly Third Party Area' to the East / South-East of the airport site was recently returned into the immediate ownership and control of the Third Claimant following a surrender of the relevant area of land from a third party tenant farmer (to whom the land was previously let).

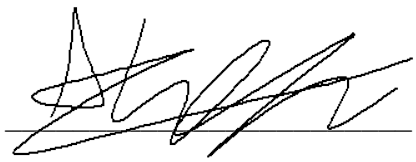
3. 'Plan 3A' exhibited to my First Witness Statement does not show this. An updated version of Plan 3A which reflects the above is exhibited to this witness statement at **Exhibit AW1**.

Statement of truth

I believe that the facts stated in this Witness Statement and Exhibit are true.

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

I am duly authorised to make this statement on the Claimants' behalf.



Alexander James Wright

18 July 2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N

(1) LEEDS BRADFORD AIRPORT LIMITED
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(4) NIAL SERVICES LIMITED

Claimants

- v –

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN 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 CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN 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 CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN 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 CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

AW1

This is the Exhibit marked "AW1" in the Fourth Witness Statement of Alexander James Wright

N□□ □□□□□□I□□r□□□□□□A□r□□r□□P□□□ □A

Injunction
Wholly Third Party Areas
Partly Third Party Areas
Public Highways
Underground Metro Station

N

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N244

Application notice

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

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Name of court **The High Court of Justice** **King's Bench Division**	**Claim no.** **KB-2024-2317**
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
	H W F - - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Leeds Bradford Airport Ltd and others	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	2 June 2025 02 Jun 2025

HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
KB-2024-002317

1. What is your name or, if you are a legal representative, the name of your firm?
   Eversheds Sutherland (International) LLP

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

   If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?
   1. To list a hearing (time estimate 1 day) to review the injunction made by orders of Ritchie J dated 18 July 2024 (and amended pursuant to the slip rule on 19 July and 22 July 2024) on 20 June 2025 or as close to that date as is convenient for the Court.

   2. To consolidate the claim under CPR rule 3.1(2)(h), alternatively case manage and hear it under rule 3.2(i) and/or (p) with the following claims:
   (a) London City Airport Ltd and ors v PU - claim no KB-2024-001765;
   (b) Manchester Airport Plc and ors v PU - claim no KB-2024-002132; and
   (c) Birmingham Airport Ltd and ors v PU - claim no KB-2024-002473 ("**the Other Airports Claims**").

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

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

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

7. Give details of any fixed trial date or period: N/A

8. What level of Judge does your hearing need? High Court Judge

9. Who should be served with this application?

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 Ritchie J are attached, together with the orders made by:-

   (a) Julian Knowles J dated 20 June 2024 made in claim no KB-2024-001765

   (b) HHJ Coe KC dated 5 July 2024 made in claim no KB-2024-002132; and

   (c) Jacobs J dated 6 August 2024 made in claim no KB-2024-002473.

The review hearing

2. Paragraph 2 of the Orders of Ritchie J in the instant case provide for those Orders to be reviewed *"... at intervals not exceeding 12 months"*.

3. The Claimants invite the Court to list the review hearing pursuant to paragraph 2 of that order on 20 June 2025 or as soon as is convenient thereafter.

4. No time estimate was provided for in the order of Ritchie J.

Consolidation / case management with the Other Airports Claims

5. All of the injunctions granted in the Other Airports Claims are subject to review at 12 month intervals and the Claimants in those cases also seek review of the injunctions and have, by Eversheds Sutherland (International) LLP also made applications of even date to this application (and also for consolidation or case management with this case and the Other Airports Claims.

6. In those cases:-

   (a) Paragraph 3 of the Order of Julian Knowles J made in claim number KB-2024-001765 provides for a time estimate of 1.5 hours for the hearing of the review application made in that claim.

   (b) Paragraph 2 of the order of Jacobs J dated 6 August 2024 made in claim number KB-2024-002473 provides a time estimate of 2.5 hours for the hearing of the review of the injunction made in that claim.

   (c) No time estimate is provided in HHJ Coe KC's order. However, it is anticipated that a similar time estimate would be required.

7. In view of the similarity of factual and legal issues in this claim and the Other Airports Claims, it would be beneficial for the claims to be consolidated, alternatively case managed and heard together, in order to determine the cases in accordance with the overriding objective and in specific to (a) minimise the demands placed on the court resources by a multiplicity of hearings which would require more than a day of court time; and (b) avoid the risk of inconsistent decisions.

8. 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

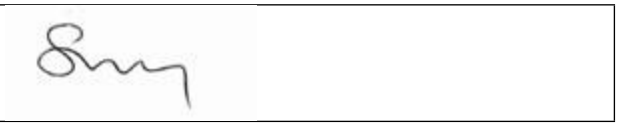
Statement of Truth

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	Month	Year
2	June	2025

Full name

Stuart Sherbrooke Wortley

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

Partner

Applicant's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Greater London

Postcode

E	C	2	V	7	W	S

If applicable

Phone number

0771 288 1393

Fax phone number

DX number

Your Ref.

SSW

Email

stuartwortley@eversheds-sutherland.com

Party: *Claimants*
Name: *S S Wortley*
Number: *First*
Date: *06.06.25*
Exhibits: *"SSW1" – "SSW5"*

CLAIM NO: KB-2024-2317

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v –

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

I STUART SHERBROOKE WORTLEY of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a partner in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants.

2. On 18.07.24, Mr Justice Ritchie granted injunctions to restrain the Defendants from entering, occupying or remaining on Leeds Bradford Airport, London Luton Airport and Newcastle International Airport (as defined in those Orders) until varied, discharged or extended by further order.

3. Paragraph 2 of the Orders provided for each of those injunctions to be reviewed by the Court periodically at intervals not exceeding 12 months.

4. I make this witness statement for the purposes of the review hearing which has been listed on 24.06.25.

2024 Airport Injunctions

5. Between 20 June and 14 August 2024, the following injunctions were granted to protect airports against environmental protestors opposed to the use of fossil fuels.

	Airport	**Action Number**	**Judge / Date of Order**
1	London City Airport	KB-2024-001765	Mr Justice Julian Knowles 20 June 2024
2	Manchester Airport Stansted Airport East Midlands Airport	KB-2024-002132	HHJ Rosalind Coe 5 July 2024
3	Heathrow Airport	KB-2024-002210	Mr Justice Julian Knowles 10 July 2024
4	Leeds Bradford Airport Luton Airport Newcastle Airport	KB-2024-002317	Mr Justice Ritchie 18 July 2024
5	Gatwick Airport	KB-2024-002336	Mr Justice Ritchie 19 July 2024
6	Birmingham Airport Bristol Airport Liverpool Airport	KB-2024-002473	Mr Justice Jacobs 6 August 2024
7	Southend Airport	KB-2024-002596	Mrs Justice Farbey 14 August 2024

6. Last year it was possible to achieve a certain amount of co-ordination with a view to saving costs and limiting the demands placed by these matters on Court resources, in that my firm acted in 4 out of the 7 actions listed above (numbers 1, 2, 4 and 6). However, our instructions arrived over time rather than all at once, and so multiple hearings were needed, despite the common ground between the different matters.

7. Although the precise terms of the Orders vary slightly, each of the injunctions granted in actions 1, 2, 4 and 6 in the table effectively provides for an annual review.

8. This year, therefore, there is the potential to achieve better co-ordination with a better use of the Court's time: Leeds Bradford, London Luton and Newcastle Airports

and the 7 other airports involved in actions 1, 2 and 6 have decided to join together and to ask the Court to undertake the annual review at the same hearing. I was not instructed in relation to the other airports last year (Heathrow, Gatwick and Southend): I believe they remain represented by other firms of solicitors. I understand that the solicitors for Heathrow and Southend Airports have arranged a review hearing sometime next month.

9. The Order in action 1 provided for a review hearing of 1.5 hours duration. The Order in action 6 provided for a review hearing of 2.5 hours duration. The Orders in this action and action 2 did not specify a time estimate for the review hearing. The Court has now listed the review hearings in all 4 actions together, with a time estimate of 1 day on 24 June 2025.

10. I make this witness statement in support of the review of the London City Airport injunction. I will be repeating or adopting much of the content of this witness statement in my statements in support of the annual reviews of the injunctions granted in the other actions.

Service of the Order dated 18.07.24

11. Each of the documents required to be served by the Orders dated 18.07.24 was served in accordance with paragraph 3 and in each case the last step took place on 26.07.24. My colleague Alex Wright filed a Certificate of Service dated 12.08.24.

The Plans

12. The injunctions granted in this action and in actions 2 and 6 in the table above and were based on the relevant airport byelaws (and therefore extend to all of the land which is subject to the Byelaws including land over which the Claimant would not be entitled to legal possession – including for example highways land and areas which are demised to third parties).

13. The injunctions in this case extends to the land edged red on Plan 1 (Leeds Bradford Airport), Plan 2 (London Luton Airport) and Plan 3 (Newcastle International Airport).

14. I am informed by Krystal Hayes, Legal Counsel for Leeds Bradford Airport that there have been no changes to the Leeds Bradford Airport Byelaws 2022 and that the Plan attached to the Leeds Bradford Airport Order dated 18.07.24 (as amended on 19 and

22.07.24) remains accurate. Although the terminal building has been extended since the Order granted last year, the building footprints are not shown on the Plan. The extended building remains entirely within the red line on that plan.

15. I am informed by David Norris, Head of Legal at London Luton Airport that there have been no changes to the London Luton Airport Byelaws 2005 and that the Plan attached to the London Luton Airport Order dated 18.07.24 remains accurate. I am further informed by Mr Norris that a revised set of London Luton Airport Byelaws is awaiting approval but that as and when the new Byelaws are introduced, that this will not affect the relief in these proceedings.

16. I am informed by Mark Hunt, Chief Financial Officer for Newcastle International Airport that there have been no changes to the Newcastle International Airport Byelaws 2021 and that the Plan attached to the Newcastle International Airport Order dated 18.07.24 remains accurate.

UK Airport Protests

17. The table below records a summary of the protests against UK airports which took place in June – August 2024. It also includes a summary of the arrests, convictions and subsequent sentencing and other relevant incidents occurring after August 2024.

02.06.24	Extinction Rebellion conducted a protest at Farnborough Air Show which involved blocking the 3 main gates and parking the Extinction Rebellion pink boat across the Gulfstream gate
20.06.24	Two JSO activists sprayed 2 aircraft at London Stanstead Airport with orange paint after cutting through the perimeter fence at around 5.00 am
25.06.24	Four JSO activists were arrested at Gatwick Airport railway station equipped with suitcases containing bandages (suspected to have been intended to force the airport to close owing to the risk of damage to aircraft engines in the event of them being released near aircraft)
27.06.24	Six JSO activists were arrested at a meeting in London pursuant to powers in the Public Order Act 2023
19.07.24	Roger Hallam (along with four other JSO activists) had been found guilty of conspiring to organise protests to block the M25 motorway in November 2022 Mr Hallam was sentenced to 5 years imprisonment and each of the others were sentenced to 4 years imprisonment (reduced by the Court of Appeal on 07.03.25 – see below)

24.07.24	Ten JSO activists were arrested at Heathrow Airport as part of an intelligence led operation - some were equipped with cutting gear and glue
27.07.24	A protest which was due to be held at London City Airport was relocated to the Department of Transport on Horseferry Lane
29.07.24	Eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure
30.07.24	Two JSO activists were arrested at Heathrow Airport after spraying orange paint around the Terminal 5 entrance hall and on the destination boards in the departure lounge
31.07.24	A protest by JSO and Fossil Free London was held at the Docklands Light Railway station at City Airport JSO and Fossil Free London both uploaded photographs of the protest with the following message:- *"We've been served with an injunction which means even walking out of the wrong exit of this station could get us arrested."*
01.08.24	Six JSO activists blocked access to the departure gates at Heathrow Terminal 5
05.08.24	Five JSO activists were arrested on their way to Manchester Airport equipped with bolt cutters, angle grinders, glue, sand and banners carrying slogans including "oil kills".
16.01.25	The trial of the two JSO activists arrested at Heathrow Airport on 30.07.24 resulted in a hung jury
02.02.25	Extinction Rebellion held a demonstration at Farnborough Airport following a consultation period in relation to Farnborough Airport's expansion plans which ended in October 2024
17.02.25	Extinction Rebellion held a demonstration at Inverness Airport waving banners with *"Ban Private Jets"* and *"We're in a climate emergency, we need to step up and take action"*
21.02.25	Of the five JSO activists arrested on their way to Manchester Airport on 05.08.24, four were found guilty of conspiracy to commit a public nuisance and one was acquitted with sentencing adjourned to 23.05.25
07.03.25	The Court of Appeal delivered judgment in a conjoined appeal by sixteen JSO activists against sentencing Two of the sentences passed on 19.07.24 were reduced by 18 months (from 4 years to 30 months), the other three were reduced by a year (from 5 to 4 years in Roger Hallam's case and from 4 to 3 years in the other two)

	Of the other eleven appeals, one was reduced by 2 months but the other ten appeals were dismissed
20.03.25	Of the ten JSO activists arrested at Heathrow Airport on 24.07.24, nine were found guilty of conspiracy to cause a public nuisance at Heathrow Airport with sentencing adjourned to 16.05.25
27.03.25	Just Stop Oil announced the end of their campaign (see below)
27.03.25	On the same day as the JSO announcement, Youth Demand held a meeting to discuss issues including the climate crisis and a fresh wave of civil resistance in London in the Westminster Quaker Meeting House Six individuals were arrested
27.04.25	Youth Demand activists threw bright pink powder over elite runners participating in the London marathon as they crossed Tower Bridge The individuals taking part wore T-shirts that read "Youth Demand – Stop Arming Israel" – which appears to be their primary cause
16.05.25	Of the nine individuals convicted on 20.03.25, five were sentenced to terms of imprisonment of up to 15 months and four were given suspended sentences
27.05.25	Each of the four individuals convicted on 21.02.25 was sentenced to a term of imprisonment of between 18 and 30 months

18. Copies of media articles relating to the events recorded in this table are attached to this statement marked **"SSW1"**.

19. A copy of the Court of Appeal decision handed down on 07.03.25 is attached at **"SSW2"**.

20. The fact that the protest on 27.07.24 was relocated from London City Airport to the Department of Transport and the fact that the JSO and Fossil Free London protestors conducted their protest from outside the red line of the injunction plan demonstrate that the injunction granted by Mr Justice Julian Knowles in that case on 20.06.24 served its purpose. In both instances peaceful protests were went ahead but without causing unlawful interference to users of London City Airport.

27.03.25 – JSO Announcement

21. As noted in the chronology above, on 27.03.25, Just Stop Oil made the following announcement:-

"Three years after bursting on the scene in a blaze of orange, at the end of April we will be hanging up the hi vis.

Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful.

So it is the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison. We have exposed the corruption at the heart of our legal system, which protects those causing death and destruction while prosecuting those seeking to minimize harm. Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK's oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen.

This is not the end of civil resistance. Governments everywhere are retreating from doing what is needed to protect us from the consequences of unchecked fossil fuel burning. As we head towards 2°C of global heating by the 2030s, the science is clear: billions of people will have to move or die and the global economy is going to collapse. This is unavoidable. We have been betrayed by a morally bankrupt political class.

As corporations and billionaires corrupt political systems across the world, we need a different approach. We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Nothing short of a revolution is going to protect us from the coming storms.

We are calling on everyone who wants to be a part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. Sign up here. See you on the streets.

ENDS"

22. Copies of media articles relating to this announcement and to the "final" JSO protest which took place in central London on 26.04.25 are attached marked **"SSW3"**.

18.05.25 - We are "plotting a very big comeback"

23. Whilst the announcement referred to above suggests that the risk of unlawful protests at UK airports has reduced, on 18.05.25 the following story appeared on GB News (both on television and on-line):-

"Now, I was getting pretty bored of the juvenile antics at the altar of climate change.

We've seen it all vandals throwing soup over priceless artworks in galleries, defacing Stonehenge, ambushing theatre productions in the West End, blocking traffic, scaling motorway gantries, dousing

private jets in paint, and even disrupting sports events all just to spoil the fun for everyone else.

Remember them? They said they were disbanding after the government appeared to adopt their demand to end new oil and gas licences in Britain. Their actions, of course, cost the public tens of millions in police and court time.

But despite Ed Miliband bowing to their demands, I can exclusively reveal that Just Stop Oil is plotting a very big comeback.

On Ben Leo Tonight, we have gained access to secret Just Stop Oil meetings, where members are discussing a dramatic U-turn—planning to cause chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and even carrying out "citizens' arrests" on so-called climate criminals.

Speaking during an online meeting on Thursday night, one coordinator—known only as "Dave"—said protests should remain "action-based" and warned against becoming more peaceful, like Greenpeace.

The meeting continued with Dave insisting that it was essential to keep doing what he called the "spicy and naughty stuff" to generate media attention.

The group also discussed how to feed new protest ideas back to what they referred to as a "core team". There was frustration over communication with this mysterious leadership group, with some suggesting using 50-word briefs to make it easier for them to process ideas.

It raises serious questions: Who exactly is this core team? Who are these professional protesters reporting to—and who's funding them?

Chillingly, the group also spoke about carrying out citizen's arrests on so-called climate deniers. There was some introspection as well, with members questioning whether their public image was doing more harm than good.

But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to proceed with Just Stop Oil's revival, including talk of keeping protesters in safe houses to maintain morale.

Let's be clear: what we're dealing with here is a group of climate zealots plotting to commit criminal acts, backed by who knows what kind of funding, and being housed like some kind of eco-mafia.

And speaking of coordination—let's not pretend the climate agenda is a spontaneous grassroots movement. It's organised. It's funded. It's political.

So, who's paying to bus these protesters from London to Stonehenge, to airports, to art galleries and sports stadiums? Who's funding the Just Stop Oil safe houses where these scruffy, self-

righteous agitators meticulously plan how to make Britain colder and poorer?

The police and the government must crack down on Just Stop Oil's plans for criminality before they gain traction again.

The last thing Britain needs is more disruption, more vandalism, and more self-indulgent eco-activism especially when a Labour government is already happily marching to the drumbeat of Net Zero extremism.

We'll be passing our findings to the police."

24. For my part, I acknowledge the possibility that this is tainted by sensationalism. However, JSO did not take efforts to repudiate what had been alleged. Instead, on 21.05.25, JSO circulated a link to the GB News story in a message to subscribers together the following comment:-

"GB News was right for once. We are "plotting a very big comeback".

25. Copies of the GB News story and the JSO message to subscribers are attached to this message marked **"SSW4"**.

Other Environmental / Climate Campaign Groups

26. Apart from JSO, there are other protest groups who are opposed to the use of fossil fuels including for example, Youth Demand (the junior branch of JSO formerly known as Youth Climate Swarm), Extinction Rebellion and Fossil Free London.

27. Extinction Rebellion ("XR") remains an active organisation both in the UK and internationally:-

    27.1. on 07.09.24, XR activists chained themselves to the gates of the Rijksmuseum in Amsterdam in an attempt to force the museum to sever ties with ING Bank;

    27.2. on 25.09.24, XR activists covered the Finnish Parliament House with red paint;

    27.3. on 23.05.25, XR activists held a climate protest against Total Energies and its partners – including the occupation of BNP Paribas' offices in Paris.

28. Fossil Free London is another protest group involved in direct action. Their website includes videos which promote the right protest and training videos relating to direct action.

29. A relatively new organisation which is campaigning against the fossil fuel industry is "shut the system". In January 2025, this group cut fibre optic cables to Lloyds of London and prominent buildings involved in the insurance sector on Fenchurch Street, Threadneedle Street, Leadenhall Street and Lime Street in London (and in Birmingham, Leeds and Sheffield).

30. An article concerning this story is attached to this statement marked **"SSW5"**.

Police Advice

31. On 21.05.25, the Metropolitan Police sent an email to the security team at London City Airport which included the following:-

> *" … the injunction at HAL [Heathrow Airport Limited] 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 appears to be a cycle of new groups emerging and this cannot be ruled out so maintaining it would be very much recommended."*

32. I believe the reference to *"… the Shell protest …"* relates to the Annual General Meeting of Shell plc held at the Soffitel Hotel at Heathrow Terminal 5 on 20.05.25. The Metropolitan Police told London City Airport's security team that a protest by environmental protest groups:-

> "*were forced to hold their protest at the Shell head office in central London rather than the AGM location at a hotel within the Heathrow Airport injuncted area, in order to avoid the risk of associated penalties for breaching of the injunction*."

33. I believe the references to *"… your experiences …"* is a reference to the events referred to in paragraph 19 above – including the fact that one of the protests due to take place at London City Airport was relocated to the Department of Transport.

34. A copy of the email (from which I have redacted personal information) is attached to this statement marked **"SSW6"**.

Conclusion

35. I am informed by Kunaal Wharfe, Mee-Ling Skeffington and Mark Hunt and believe the Claimants' directors have concluded that they should ask the Court to extend the injunction for a further 12 months. I understand that they reached this decision after

having considered carefully whether the threat which was clearly present last year has abated materially, especially in light of the JSO announcement in March.

36. Obviously, the question of whether the injunction has outlasted its need, is one for the judgment of the Court. However, based on the material to which I have referred, the Claimants (and, for what it is worth, I also) consider that there remains a compelling need for the injunction to remain in place. Climate change remains firmly on the political agenda. It continues to attract strong feelings and is still a subject about which campaigners are willing to contemplate disruptive action. The inference drawn by the Claimants (and by me) is that the injunctions granted over time have influenced the pattern of protest, which disruptive action being focused principally on targets which do not have the benefit of the Court's protection by way of injunction. The Claimants (and I) consider that the risk remains high that airports generally, including theirs, would come back into focus, if the injunction were now to be lifted. JSO's seeming change of heart in March 2025 was not adopted by all other campaign groups; and even as a statement of JSO's position, later events have shown that it was not an immutable repudiation of disruptive protest. The Claimants (and I) cannot discount the possibility, that JSO's March 2025 announcement may have been partly tactical: to make renewal of the injunctions harder — and disruptive protest at the airports correspondingly less risky. The risks are especially acute at this time of year: most of the incidents in which UK airports were targeted by environmental protestors in 2024 occurred between late June and August 2024 - the busiest period for holiday travel.

Notice of the Review Hearing

37. The Claimants intend to give notice of the review hearing in the manner provided for in para 3 of Order dated 18.07.24 – namely by:-

    37.1. Uploading a copy of the application dated 02.06.25, the draft Order, a copy of this witness statement and exhibits and details of the review hearing to each of the injunction websites;

    37.2. sending copies of the documents referred to in the previous paragraph to the email addresses referred to in Schedule 3 to the Order dated 18.07.24 plus the following additional email addresses (noting that "Shut The System" does not operate a website and although "Fossil Free London" does have a website, this does not include an email address):-

YouthDemandPress@protonmail.com

37.3. affixing a notice at each of the warning notice locations at each airport referring to the time and date of the review hearing and explaining where copies of the additional papers can be found and obtained in hard copy.

I believe that the facts stated in this Witness Statement and Exhibits are true.

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

I am duly authorised to make this statement on behalf of the Claimants.

_____

Stuart Sherbrooke Wortley

6 June 2025

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) BIRMINGHAM AIRPORT LIMITED

AND FIVE OTHERS

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT 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 OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the injunction made by Order dated 6 August 2024 by Jacobs J ("**the Jacobs J 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 Jacobs J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Jacobs J Order

2. Paragraph 2 of the Jacobs J Order is amended so as to read:

   "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 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.

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

(1) BIRMINGHAM AIRPORT LIMITED

AND FIVE OTHERS

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT 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 OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

□□□

UPON the Claimants' claim by the claim form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024

AND UPON the injunction made by Order dated 6 August 2024 by Jacobs J ("**the Jacobs J Order**")

AND UPON the Claimants' application dated 2 June 2025 ("**the Application**")

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 statement of Stuart Sherbrooke Wortley dated 6 June 2025

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

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

AND UPON the Claimants 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 [ ]

AND UPON this order replacing and discharging the Jacobs J Order

DEFINITIONS

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

"**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://corporate.birminghamairport.co.uk/injunction/ at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendants 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 (or any of them).

2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the First Defendants by:

    a. Uploading a copy onto the following website: https://corporate.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 notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the First Defendants and each of them.

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

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the First Defendants of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

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 Claimants' solicitors 72 hours' notice of such application by email to 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 or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The First Claimant have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 1 will be the same as Plan 1 attached to the Jacobs J Order

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

(1) The First Claimant will take steps to serve the First Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

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

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

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

AND FOUR OTHERS

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT 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 OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the injunction made by Order dated 06 August 2024 by Jacobs J ("**the Jacobs J 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 Jacobs J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Jacobs J Order

2. Paragraph 2 of the JacobsJ Order is amended so as to read:

   "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 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.

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

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

AND FIVE OTHERS

Claimants

-and-

(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT 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 OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the Claimants' claim by the claim form dated 31 July 2024

AND UPON the Claimants' application for an injunction dated 31 July 2024

AND UPON the injunction made by Order dated 6 August 2024 by Jacobs J ("**the Jacobs J 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 statement of Stuart Sherbrooke Wortley dated 6 June 2025

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

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

AND UPON the 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 [ ]

AND UPON this order replacing and discharging the Jacobs J Order

DEFINITIONS

"**Liverpool 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**")

"**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.liverpoolairport.com/injunction at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendants 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 First, Second and Third Claimants (or any of them).

2. This Order is subject to periodic review by the Court on application by the Second and Third Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the First Defendants by:

    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 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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Second Defendants and each of them.

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

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the Second Defendants of any further applications or documents in the proceedings by the Second and Third Claimants shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

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 Claimants' solicitors 72 hours' notice of such application by email to 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 or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The Second and Third Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 1 will be the same as Plan 1 attached to the Jacobs J Order

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND AND THIRD CLAIMANT

(1) The Second and Third Claimants will take steps to serve the Second Defendants with a note of the hearing which took place on 24 June 2025 by 4pm 27 June 2025.

(2) 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
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

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

AND THREE OTHERS

Claimants

-and-

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT 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 OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the injunction made by Order dated 06 August 2024 by HHJ Jacobs ("**the Jacobs J 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 Jacobs J Order

IT IS ORDERED that:

1. No order be made to the continuing effect of the Jacobs J Order

2. Paragraph 2 of the Jacobs J Order is amended so as to read:

   "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 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.

Claim no: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE:
ON:

B E T W E E N : -

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

AND THREE OTHERS

Claimants

-and-

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT 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 OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the Claimants' claim by the claim form dated 31 July 2024

□□□

AND UPON the Claimants' application for an injunction dated 31 July 2024

AND UPON the injunction made by Order dated 6 August 2024 by Jacobs J ("**the Jacobs J 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 statement of Stuart Sherbrooke Wortley dated 6 June 2025

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

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

AND UPON the 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 [ ]

AND UPON this order replacing and discharging the Jacobs J Order

DEFINITIONS

"**Bristol 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**")

"**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.bristolairport.co.uk/corporate/about-us/our-policies/injunction/ at which copies of this Order may be viewed and downloaded.

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendants 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 (or any of them).

2. This Order is subject to periodic review by the Court on application by the First, Second, Third, Fourth, Fifth and Sixth Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

SERVICE / NOTIFICATION

3. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service or notification of this order shall be validly effected on the Third Defendants by:

    a. Uploading a copy onto the following website: https://www.bristolairport.co.uk/corporate/about-us/our-policies/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 in the form in Schedule 4.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service or notification of this Order and of the Claim Documents upon the Third Defendants and each of them.

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

7. The deemed date of service of this Order shall be the date shown on the relevant certificate of service or notification on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

8. Service or notification on the Third Defendants of any further applications or documents in the proceedings by the Fourth, Fifth and Sixth Claimants shall be effected by carrying out each of the steps in paragraph 3.

9. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service or notification of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

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 Claimants' solicitors 72 hours' notice of such application by email to 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 or by writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

11. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimants' solicitors.

12. The Fourth, Fifth and Sixth Claimants have liberty to apply to vary, extend or discharge this Order or for further directions.

13. No acknowledgment of service, admission or defence is required by any party until further so ordered.

14. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

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

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

(2) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Plan 3 will be the same as Plan 3 attached to the Jacobs J Order

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

(1) The Fourth, Fifth and Sixth Claimants will take steps to serve the Third Defendants with a note of the hearing which took place on 24 June 2025 by 4pm on 27 June 2025.

(2) 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
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

The contents of the Warning Notice will remain unchanged, save for the insertion of an additional reference to any subsequent Order made by the Court.

Amended Pursuant to CPR 17.1(1)

Claim Form

In the High Court of Justice King's Bench Division	
Fee Account no.	PBA 0087211
Help with Fees - Ref no. (if applicable)	H W F – –

You may be able to issue your claim online which may save time and money. Go to www.moneyclaim.gov.uk to find out more.

For court use only	
Claim no.	KB-2024-002473
Issue date	31 July 2024

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

(☐) **BIRMIN☐☐AM AIRPORT LIMITED** of Diamond House, Birmingham Airport, Birmingham, West Midlands, B26 3QJ

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

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

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

(☐) **SO☐T☐ ☐EST AIRPORTS LIMITED** of Lulsgate House, Bristol Airport, Bristol BS48 3DW

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

SEAL
HIGH COURT OF JUSTICE
06 Aug 2024
QUEEN'S BENCH DIVISION
KB-2024-002473

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

P☐☐☐☐r☐☐r ☐☐S☐☐☐d☐☐☐ ☐ ☐☐☐☐☐☐☐d ☐☐ ☐☐☐ ☐☐☐☐☐ ☐☐r☐

Brief details of claim

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

Value

This is a non monetary claim

Defendant's name and address for service including postcode

	£
Amount claimed	
Court fee	£626
Legal representative's costs	TBC
Total amount	

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

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Claim no.	

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

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

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

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

☑ No

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

☑ Yes

☐ No

Claim no.	

Particulars of Claim

☑ attached

☐ to follow

Statement of truth

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

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

☐ **I believe** that the facts stated in this claim form and any attached sheets are true.

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

Signature

☐ Claimant

☐ Litigation friend (where claimant is a child or protected party)

☑ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
31	0 7	2 0 2 4

Full name

Stuart Sherbrooke Wortley

Name of claimant's legal representative's firm

Eversheds Sutherland (International) LLP

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

Partner

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

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Postcode

E C 2 V 7 W S

If applicable

Phone number

DX number

Your Ref.

AllyboM/362291.1

Email

Amended Schedule 1 to Claim Form

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

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

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

Amended pursuant to CPR 17.1(1)

CLAIM NO: KB – 2024 -002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

- v –

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

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

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

Defendants

AMENDED PARTICULARS OF CLAIM

Birmingham Airport

1. The First Claimant is the operator of Birmingham Airport, located in Airport Way, Birmingham B26 3QJ, shown edged in red on Plan 1 ("**BHX**"). BHX serves around 11.8 million travelling passengers each year with an annual revenue of approximately £152 million.

2. With the exception of the parcels of land referred to in paragraph 9, the First Claimant is the registered proprietor of all of the land on which BHX is situated as shown in red on Plan 1, through the interests shown in the Title Schedule and on Plan 1A attached hereto - but subject to the interests referred to in paragraph 4.

3. Subject to the aforesaid interests, the First Claimant is entitled to an immediate right of possession occupation and control of BHX by virtue of its titles as shown in the Title Schedule and on Plan 1A.

4. Plan 1B identifies the areas within BHX over which the First Claimant lacks (or does not in these proceedings assert) a full right of possession or control, by reason of the presence or existence thereon or thereover of third party interests ("**the BHX Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the First Claimant does not assert that it is the person with an immediate right of occupation or possession.

5. The BHX Third Party Areas are coloured blue and green on Plan 1B. The blue colouring indicates areas within BHX which are the subject of leases. The green colouring indicates parts of BHX which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

6. There are five areas coloured blue on Plan 1B (numbered 1-5) each of which directly abuts the red line boundary of BHX. In each of those locations, the boundary of BHX is not in the possession or control of the First Claimant.

7. With those exceptions, access to or from the BHX Third Party Areas by the public from outside the airport, necessarily involves the use of areas of BHX which remain unencumbered by any such arrangement and in relation to which, accordingly, the First Claimant remains entitled to possession occupation and control by virtue of their interests shown in the Title Schedule and on Plan 1A.

8. Within the BHX red line boundary, there are 3 parcels in respect of which the First Claimant is not the registered proprietor:-

    a. although the land on which the northern landing lights (coloured orange on Plan 1B) are situated is registered in the name of a third party company, the First Claimant asserts that it is entitled to the immediate right of occupation or possession of those lights and the structure which supports them. Some of the lights and some parts of the structure have been in place since around 1967 and others since 2008. All of the lights and structures have been maintained by the First Claimant or its predecessors throughout that period;

    b. on the south western boundary is an unregistered strip of land (coloured bright green on Plan 1A but omitted from the key on that plan) in respect of which the First Claimant asserts that it is entitled to the immediate right of occupation or possession; and

    c. on the eastern boundary is an Air Rail Link and an associated platform and station. By an agreement for lease dated 1 April 2013, Network Rail Infrastructure Limited agreed to grant and the First Claimant (then known as Birmingham International Airport Limited) agreed to take a lease of the land coloured purple on Plan 1B for a term of 199 years. The lease has not been completed but the First Claimant asserts that it is entitled to the immediate right of occupation or possession of the land coloured purple.

9. By virtue of s 63 of the Airports Act 1996, the First Claimant has power to make byelaws with respect to BHX. Pursuant to the Birmingham Airport Limited Byelaws 2021, byelaw 3.32, no person has a right to use any part of BHX as defined therein for demonstrations or public assemble which is likely to obstruct or interfere with the proper use of the airport or the safety or security of passengers or persons using the airport. The plan which defines BHX for the purposes of the byelaws does not extend to the landing lights. Apart from that, it includes all the land edged in red on Plan 1.

Liverpool Airport

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

11. The Second Claimant is the proprietor of the land on which LJLA is situated as shown in red on Plan 2, through the interests shown in the Title Schedule and Plan 2A attached hereto - but subject to the interests referred to in paragraph 14.

12. The Third Claimant has been joined to the proceedings as it is the registered proprietor of the land on which the western landing lights (coloured brown on Plan 2B) are situated, which is registered under Title Number MS575438.

13. Subject to the aforesaid interests, the Second Claimant (and the Third Claimant in respect of the western landing lights) is entitled to an immediate right of possession occupation and control of LJLA, by virtue of its titles as shown in the Title Schedule and Plan 2A.

14. Plan 2B identifies the areas within LJLA over which the Second Claimant lacks (or does not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the LJLA Third Party Areas**") or public rights of way ("**the LJLA Highways**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Second Claimant does not assert that it is the person with an immediate right of occupation or possession.

15. The LJLA Third Party Areas are coloured blue and green on Plan 2B. The blue colouring indicates areas within LJLA which are the subject of leases. The green colouring indicates parts of LJLA which include such areas. By way of example, the blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

16. The LJLA Highways are indicated in pink on Plan 2B. These provide access to LJLA to the Second Claimant and its licensees (including members of the public).

17. Access to or from the LJLA Third Party Areas by the public from outside the airport, necessarily involves the use of areas of LJLA which remain unencumbered by any such arrangement and in relation to which, accordingly, the Second Claimant remains entitled to possession occupation and control by virtue of its interests shown in the Title Schedule and on Plan 2A.

18. All except 2 of the eastern landing lights (coloured orange on Plan 2B) are situated on title numbers CH596568 and CH384543 in respect of which the Second Claimant is the registered proprietor. The Second Claimant asserts that it is entitled to the

immediate right of occupation or possession of the other 2 landing lights and the structure which supports them which are situated on unregistered land. The lights and the structure which supports them have been in this location since around 1960 and they have been maintained by the Second Claimant or its predecessors throughout that period.

19. By virtue of s 63 of the Airports Act 1996, the Second Claimant has power to make byelaws with respect to LJLA. Pursuant to the Liverpool John Lennon Airport Byelaws 2022, byelaw 2.18, no person has a right to use any part of LJLA for protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the landing lights, the plan which defines LJLA for the purposes of the byelaws includes all of the land edged in red on Plan 2.

Bristol Airport

20. The Fourth Claimant is the operator of Bristol Airport, located in Bristol BS48 3DY, shown edged in red on Plan 3 ("**BRS**"). BRS serves around 10 million travelling passengers each year with an annual revenue of approximately £179 million.

21. The Fourth, Fifth and Sixth Claimants are the proprietors of the land on which BRS is situated as shown in red on Plan 3, through the interests shown in the Title Schedule and Plan 3A hereto - but subject to the interests referred to in paragraph 23.

22. Subject to the aforesaid interests, the Fourth, Fifth and Sixth Claimants are entitled to an immediate right of possession occupation and control of BRS, by virtue of its titles as shown in the Title Schedule and Plan 3A.

23. Plan 3B identifies the areas within BRS over which the Fourth, Fifth and Sixth Claimants lack (or do not in these proceedings assert) a full right of possession of control, by reason of the presence or existence thereon or thereover of third party interests ("**the BRS Third Party Areas**"). In relation to all such areas, to an extent which might vary depending on the exact arrangement, the Fourth, Fifth and Sixth Claimants do not assert that they are the person with an immediate right of occupation or possession.

24. The BRS Third Party Areas are coloured blue and green on Plan 3B. The blue colouring indicates areas within BRS which are the subject of leases. The green colouring indicates parts of BRS which include such areas. By way of example, the

blue and green land includes the whole or part(s) of aircraft hangars, airline and ground handler offices, general offices, storage units, engineering buildings, vehicle depots and warehouses.

25. Access to or from the BRS Third Party Areas by the public from outside the airport, necessarily involves the use of areas of BRS which remain unencumbered by any such arrangement and in relation to which, accordingly, the Fourth, Fifth and Sixth Claimants remain entitled to possession occupation and control by virtue of its interests shown in the Title Schedule and on Plan 3A.

26. Although the land on which the western landing lights (coloured brown on Plan 3B) are situated is registered in the name of a third party individual, the Fourth Claimant asserts that it is entitled to the immediate right of occupation or possession of those lights and the structure which supports them. The lights and structure have been in place since around 2004 and have been maintained by the Fourth Claimant or its predecessors throughout that period.

27. By virtue of s63 of the Airports Act 1996, the Fourth Claimant has power to make byelaws with respect to BRS. Pursuant to the Bristol Airport Byelaws 2012, byelaw 4.17, no person has a right to organise or take part in any protest which is likely to obstruct or interfere with the proper use of the airport or the comfort or convenience or safety of passengers or persons using the airport. Save for the landing lights, the plan which defines BRS for the purposes of the byelaws includes all the land outlined in red on Plan 3.

The Claimants' claims

28. Each of the airports described above consists of many facilities which (without attempting an exhaustive list) include car parks, terminal buildings with facilities for the processing of passenger and other freight traffic, retail areas, lounge/ café/ refreshment areas, border control facilities, security points, customs and excise facilities, runways and taxiways, fuel facilities, management / airline facilities and (in the case of BHX) the Air Rail Link railway.

29. In relation to each airport:

    a. Members of the public have implied consent to enter for normal air-travel and directly related purposes (principally dropping-off and picking-up passengers). Others with lawful business at the airports also have implied or actual consent (principally those whose ordinary work duties involve them in being present at

the airport, or who are present as the contractors and/or lawful licensees/invitees/agents of such persons).

b. No wider consent subsists; and (subject to the highways described above) no public right of access, or way, subsists over the airports.

c. In particular, nobody has the Claimants' consent to enter, remain on or occupy the airports for the purposes of protest (whether by taking part in any demonstration, procession or public assembly or otherwise within the perimeter of the airport, or on any onward flight). No person has the consent of the Claimants to enter the airports for any of the purposes intimated by Just Stop Oil or for variations of those protest activities.

d. Accordingly, any person entering the airports for any such purpose is a trespasser; as is any person who, being on the airports (whether or not having entered with any such purpose) in fact protests.

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

a. The Claimants are not (or do not seek to show that they are) entitled to possession sufficient to support a claim in trespass. However, in order for their rights in relation to the other parts of the airports (in relation to which they are entitled to possession) to be effectively vindicated and protected, it is necessary and (or alternatively) proportionate and appropriate for the Court to make an order which does not distinguish between the airports generally (as shown outlined in red on the various plans) and the Third Party Areas within them; and

b. Further or alternatively, protest which occurs on the Third Party Areas interferes and/or threatens to interfere substantially and unreasonably with the ordinary use and enjoyment of the Claimants' retained land.

a. The like considerations apply in in relation to those of the landing lights not in the outright possession of the Claimants.

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

b. Unreasonably and substantially, with the Second and Third Claimants' right of access to their land via the highway for themselves and their licensees including members of the travelling public;

c. Unreasonably and substantially, with (and/or to obstruct or hinder) the free passage along the highway, occasioning particular damage to the Second and Third Claimants; and

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

The threats

32. The Claimants' airports have become explicit targets for environmental protest. The situation is dynamic and may be particularised further in the evidence: but as at the date of drafting these Particulars of Claim the Claimants identify and rely on the following non-exhaustive PARTICULARS:

33. In a tweet, dated 13 September 2023, the Just Stop Oil account stated, in relation to protests on highways: "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations…"

34. On 9 March 2024, at a meeting in Birmingham, supporters of the campaigning movement called "Just Stop Oil" discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the "**Airports Campaign**").

35. At this meeting, a co-founder of Just Stop Oil was reported to have advocated:

- Cutting through fences and gluing themselves to runway tarmac;
- Cycling in circles on runways;
- Climbing on to planes to prevent them from taking off;
- Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.

36. Since that meeting, Just Stop Oil has announced the following on its website:

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

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

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

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

37. It says, further:

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

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

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

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

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

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

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

…"

39. On 6 June 2024, an email was sent from info@juststopoil.org 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.

[1] As of 29 July 2024, £24,519 had been raised on this website.

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/tZIoduqpqTMtE9dgMMhlaymvEZgO45jgJ19A)

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"

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

41. On 20 June 2024, supporters of "Just Stop Oil" carried out direct action at London Stansted Airport (in 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.

42. As a result of this direct action:

    a. It was necessary to suspend operations on the runway at Stansted Airport for approximately 50 minutes.

    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.

43. On 25 June 2024, six JSO activists were arrested at Gatwick Airport and were found to be carrying luggage containing a large number of bandages thought to have been intended to interfere with jet engines or to block lavatories.

44. On 27 June 2024, six JSO activists were arrested by the Metropolitan Police whilst attending an event organised by JSO.

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

> *"**Since Tuesday, 31 supporters of Just Stop Oil have now been arrested** for possessing the strong convictions that governments and corporations do not have the right to prioritise oil profits over the safety and wellbeing of our loved-ones, communities and the many millions already suffering the effects of runaway climate breakdown.*
>
> *In a sane society, it would be those who are setting the stage for an end to ordered society that would be having their doors barged down and dragged into the back of a police van to be interrogated about the catastrophic criminal damages they are imposing on every living thing and on every future generation. Instead, it is ordinary people- mothers, grandparents and young people who are having their futures stolen from them, that the police come for.*
>
> ***The incoherent pattern of arrests we have seen over the last 24 hours suggests a rattled system**. They know that as climate breakdown intensifies, civil unrest will increase and one day there will not be enough police to cope with the millions stepping into action, as the full betrayal of the political establishment becomes clearer.*
>
> ***We will not be intimidated by the death throes of a broken system**. Nothing the state can throw at us is worse than the realities that will be imposed on all of us if the breakdown of our climate carries on unabated. We WILL be stepping into action in the summer because when the lives of your family are at risk, there is no other choice than to protect them…"*

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

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

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

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

    c. trespass on the airports and/or

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

    e. by protest conducted on or from the highways, obstruct those occasioning particular damage to the Claimants and/or interfere with the Claimants' right of access to the airports via those highways, so as to cause a nuisance actionable by the Claimants.

50. The Claimants seek injunctive relief to prevent the apprehended trespasses and public and/or private nuisances.

51. There is a compelling need for such relief which in outline (but not exhaustively) includes these matters:

52. Airports are particularly vulnerable, because of the potential for even relatively slight disruption to produce significant adverse consequences for large numbers of innocent members of the travelling public. Even when all that a protester achieves is relatively modest delay to a flight, the knock-on effects can be significant for the travelling public, not only because of the multitude of individual travel plans thereby immediately disturbed but also because of the risks (by way of example only) of aeroplanes missing take-off and/or landing slots, leading to flights failing to reach their intended destinations in timely fashion with knock-on effects for other flights, or because the delays might exhaust the time allowable before flight/cabin crews must be relieved, but with the relief crews in the wrong places and no alternatives readily to be found.

53. Non-disruptive forms of protest might at any moment escalate into forms of protest which are disruptive — by which point harm may already have occurred.

54. Even normal operations at airports include matters which are potentially dangerous, especially to untrained persons such as protesters who might be unaware of the extent of the hazards to which their activities expose themselves and others.

55. The assets normally present at airports include, notably, aeroplanes: each passenger jet of the kind typically used by the travelling public at these airports is worth many millions of £GBP. Each aircraft has multiple vulnerabilities and because of the risk that any unauthorised activity on or near an aircraft might have caused damage (perhaps unobserved at the time, even by the person causing it: such as ingestion of material into an engine) there is an enhanced risk that even the entirely passive presence of unauthorised persons near an aircraft may require the flight to be delayed and/or the aircraft to be taken out of service for inspection.

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

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

58. Additionally, there is a risk of protest activity being used as cover for actual terrorist attacks.

AND THE FIRST CLAIMANT CLAIMS AGAINST THE FIRST DEFENDANT:

(1) Subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months or such other period as the Court may determine,

an order that the First Defendants must not, without the consent of the First Claimant enter, occupy or remain upon the land outlined in red on Plan 1.

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

(2) Subject to periodic review by the Court on application by the Second and Third Claimants at intervals not exceeding 12 months or such other period as the Court may determine, an order that the Second Defendants must not, without the consent of the Second and Third Claimant, enter, occupy or remain upon the land outlined in red on Plan 2.

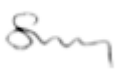
AND THE FOURTH, FIFTH AND SIXTH CLAIMANTS CLAIM AGAINST THE THIRD DEFENDANT:

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

STATEMENT OF TRUTH

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

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



_____

Stuart Sherbrooke Wortley
Partner
Eversheds Sutherland (International) LLP

Dated: 31 July 2024

Party: *Claimants*
Name: *Stuart S Wortley*
Number: *Second*
Date: *06.08.24*
Exhibit: *"SSW14"*

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

and

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

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

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

Defendants

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

I, Stuart Sherbrooke Wortley, of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. Paragraphs 23 to 28 of Graeme Gamble's witness statement **[HB/159-160]** are concerned with the BRS Airport Byelaws 2012 a copy of which is exhibited at **"GG1" [HB/167-186]**.

2. The reference to the BRS Airport Byelaws 2022 in paragraph 23 of Mr Gamble's witness statement is a typographical error (the correct date being 2012). The correct date is referred to in paragraph 5 of my Witness Statement dated 1 August 2024 **[HB/188]**.

3. The BRS Airport Byelaws 2012 were signed by Philip Graham on behalf of the Secretary of State for Transport on 1 January 2013 **[HB/185]**.

4. For the purposes of these byelaws, "the Airport" is defined as *"the aggregate of the land, buildings and works for the time being constituting Bristol Airport, shown delineated on the Plan."*

5. I am informed by Lydia Jacquety (who works with Mr Gamble at Bristol Airport) that in preparing these proceedings, the Fourth Claimant:-

    5.1. was unable to locate a copy of these byelaws which had been signed by Bristol Airport Limited;

    5.2. was only able to locate a black and white copy of the plan referred to in the definition of "the Airport" **[HB/171]**. A copy of this black and white plan is attached to this witness statement marked **"SSW14"**.

6. In preparing these proceedings, Mr Allybokus of my firm prepared a plan with a red line boundary plan (following the position of the airport boundary shown on the black and white plan).

7. For the avoidance of any doubt, and to ensure the colouring of the plan matches the definition of "the Airport" (but without making any other changes), and given the absence of any other signature on behalf of the Fourth Claimant, Mr Gamble signed the Bristol Airport Byelaws 2012 on 29 July 2024 **[HB/184]** having inserted a coloured plan into the byelaws **[HB/186]**.

Statement of truth

I believe that the facts stated in this Witness Statement and Exhibits are true.

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

I am duly authorised to make this statement on the Claimants' behalf.

_____

Stuart Sherbrooke Wortley

6 August 2024

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

and

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

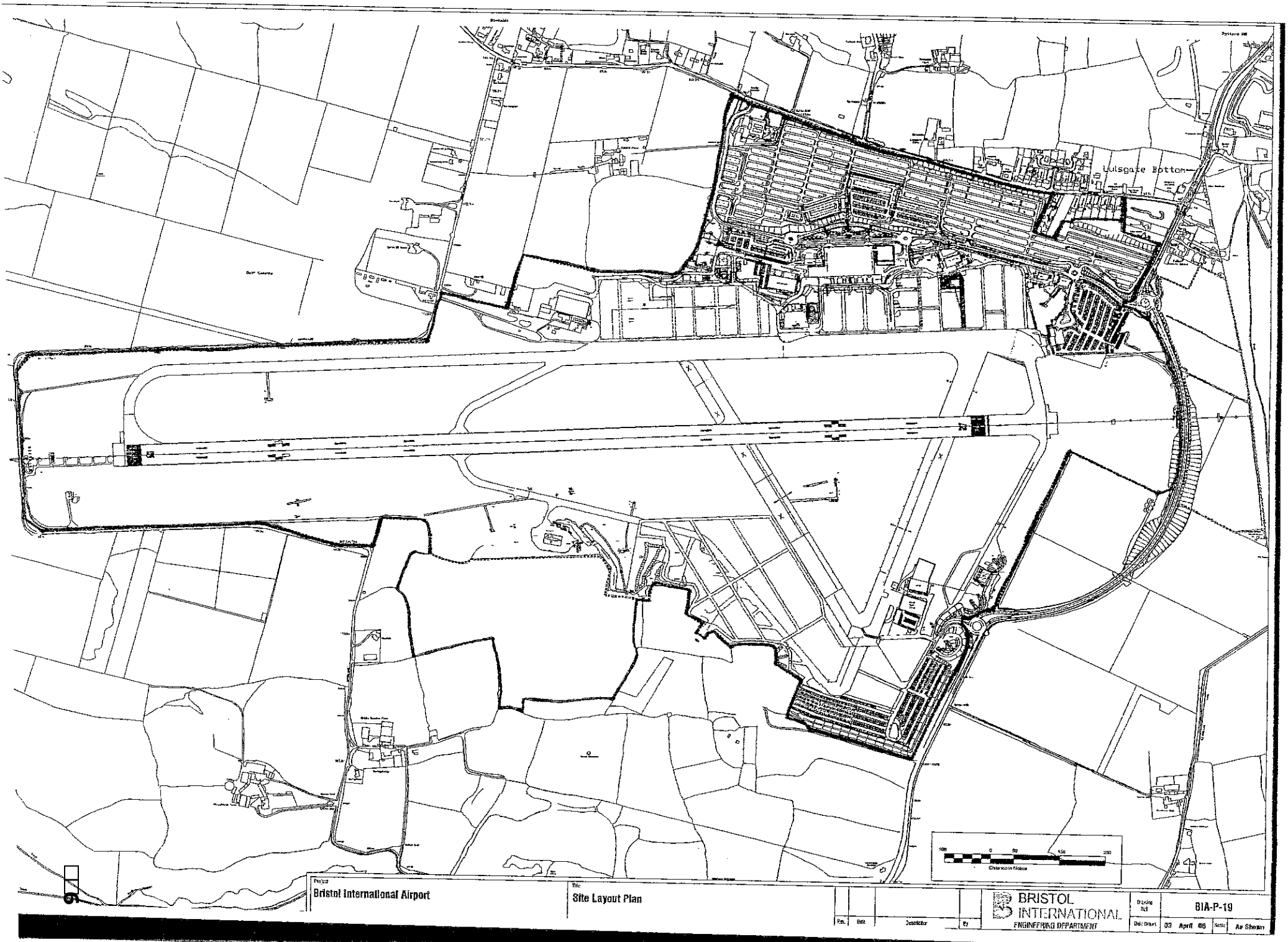
(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LIVERPOOL AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE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

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

Defendants

"SSW14"

This is the exhibit marked SSW14 referred to in the Witness Statement of Stuart Sherbrooke Wortley dated 5th August 2024



Project
Bristol International Airport

Title
Site Layout Plan

No.	Date	Description	By

BRISTOL INTERNATIONAL
ENGINEERING DEPARTMENT

Drawing No: BIA-P-19

Date Drawn: 03 April 98 Scale: As Shown

CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE MR JUSTICE JACOBS
DATED 6TH 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 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 OTHERWISE)

AND TWO OTHERS

Defendants

HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
06 Aug 2024
KB-2024-002473

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

BEFORE THE HONOURABLE MR JUSTICE JACOBS

ON 6 AUGUST 2024

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

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

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

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

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

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

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**").

"**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) 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 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 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:

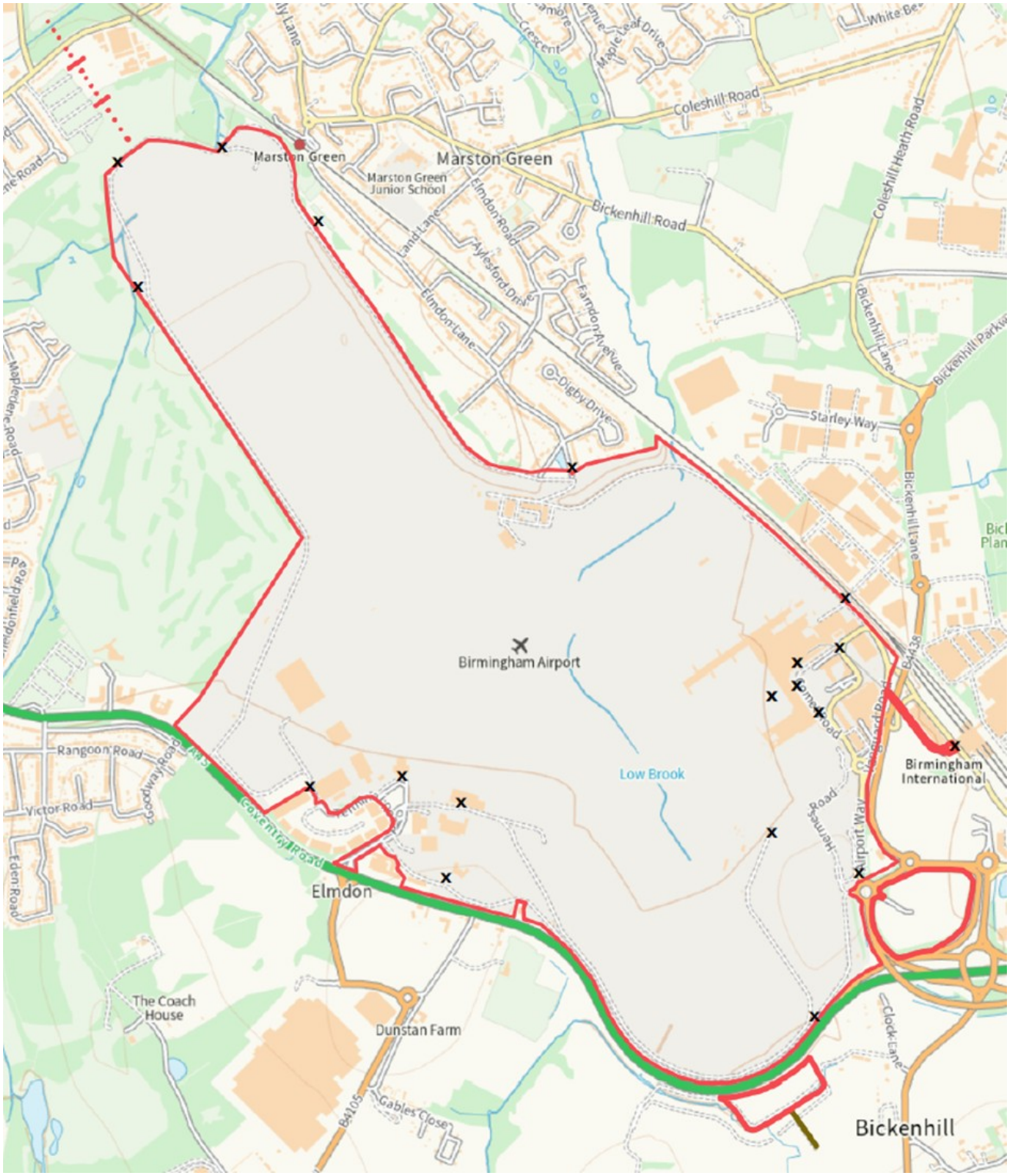
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

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

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


Marston Green
Marston Green
Marston Green Junior School
Coleshill Road
Bickenhill Road
Coleshill Heath Road
Bickenhill Lane
Starley Way
Elmdon Road
Elmdon Lane
Aylesford Drive
Farndon Avenue
Digby Drive
Maple Leaf Drive
Birmingham Airport
Low Brook
Birmingham International
Rangoon Road
Victor Road
Goodway Road
Eden Road
Coventry Road
Elmdon
The Coach House
Dunstan Farm
Gables Close
B4105
B4438
Hermes Road
Airport Way
Clock Lane
Bickenhill

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
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

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 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 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 without the prior consent of the First Claimant.

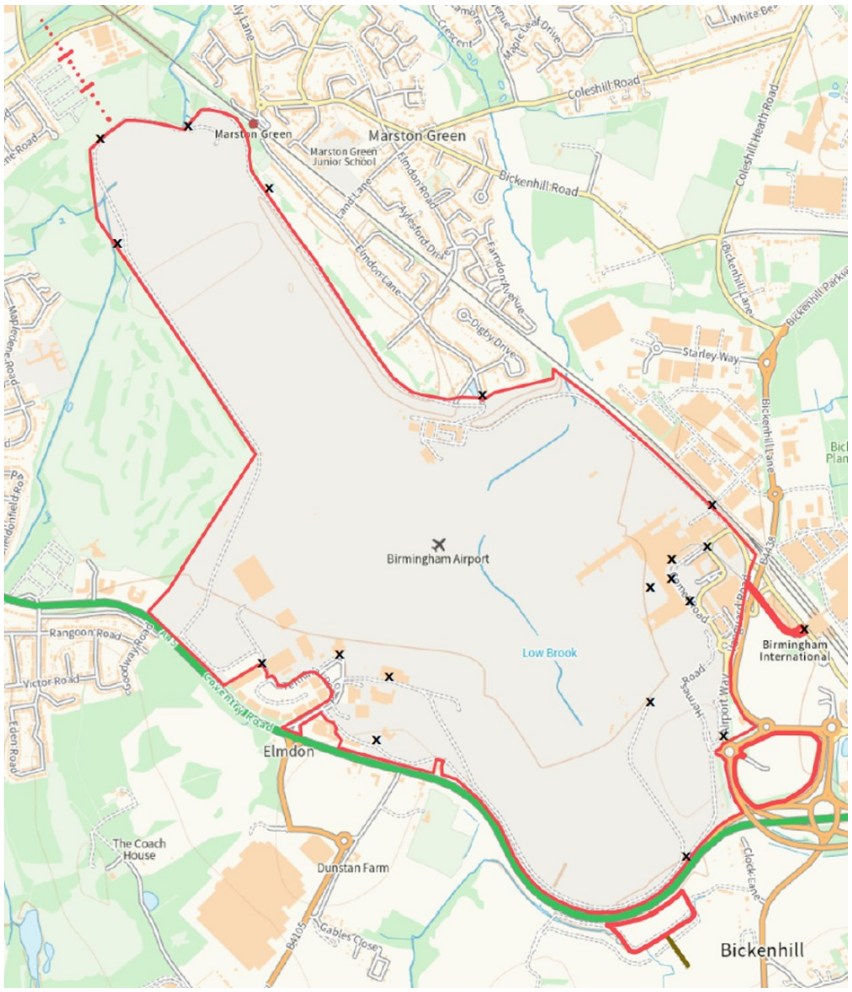
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

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 Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



CLAIM NO: KB-2024-002473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BEFORE MR JUSTICE JACOBS

DATED 6TH AUGUST 2024

BETWEEN:

(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

-and-

PERSONS UNKNOWN

As more particularly described in the Amended Claim Form

Defendant

ORDER

Before The Honourable Mr Justice Jacobs sitting at the Royal Courts of Justice, the Strand, London on 6 August 2024

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

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

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

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

AND UPON the Court granting the Claimants injunctions on 6 August 2024 in respect of the land shown outlined in red on Plans 1, 2 and 3 to the Amended Claim Form (the "**Orders**")

IT IS ORDERED THAT:

PERMISSION TO AMEND

1. To the extent required, the Claimants have permission to amend the Claim Form and Particulars of Claim as:

    a. To the description of the Defendants.

    b. To substitute a new plan 1 for Birmingham Airport.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2024-002473

BETWEEN

(1) BIRMINGHAM AIPORT 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

And

PERSONS UNKNOWN
as more particularly described in the Amended Claim Form

Defendants

NOTE OF "WITHOUT NOTICE" HEARING BEFORE MR JUSTICE JACOBS LISTED FOR 6 AUGUST 2024 AT 10:30

The hearing commenced at 10:30 on 6 August 2024. Appearing for the Claimant, Tim Morshead KC ("TM") and Peter Sibley ("PS") before Mr Justice Jacobs ("J").

1. TM thanked J for taking the matter in the vacation, and referred to how Cs were among the last airports not to be protected by an injunction. He commented that the injunctions still seem to be effective, and confirmed that this was the reason these proceedings were suitable vacation business.

2. TM outlined his proposed course, namely addressing preliminary matters, outlining the relevant facts and matters concerning the airports and the title position, highlighting the evidence of the threat including sweeping up alternative remedies, then addressing the legal framework and finally by making submissions. Finally, TM proposed to take J through the draft orders.

3. J indicated that he had read the witness evidence, the skeleton, some plans, the Valero decision, the Wolverhampton decision (although some time ago), the Gatwick decision and various airport injunction cases on Westlaw.

4. J noted that the case was listed, and that there had therefore been some notice to some extent.

5. TM confirmed this but referred to the need to keep notice of the hearing to a minimum.

Preliminary matters

6. TM handed up the Heathrow airport order and hearing note, along with a short supplementary witness statement from Stuart Wortley dated 6 August 2024.

7. J took time to read the statement.

8. TM explained the 6 August 2024 Stuart Wortley statement concerned the 2012 Bristol Byelaws.

9. J confirmed that this was not central to the case, the point being that the fact that there are byelaws does not prevent an injunction from being ordered.

10. TM further explained that the 2012 byelaws leave open as a question of fact what constitutes the airport. Mr Gamble in his witness statement simply attaches a plan without expressing a view or making this clear.

11. TM also drew J's attention to Mr Wortley's first witness statement ("Wortley 1") at pg 215, where there are three mistaken names in paragraph 99.

12. TM then referred to paragraph 20 of the skeleton, and the fact that relief is sought without distinguishing between the areas Cs can directly claim trespass in relation to, and those let out or occupied by 3rd parties. TM referred to how in fact, in the City Airport injunction proceedings, this approach was not adopted and the third party areas were carved out. However, the City Airport approach has not been followed in other similar airport cases since.

13. J asked if the issue of third party areas arises in respect of all of the other injunctions.

14. TM confirmed that it did. He explained that an airport has a general power and responsibilities for the airport as a whole, but as a matter of commerciality it lets out large areas, where private organisations conduct their operations. There are lots of arrangements the details of which it is inappropriate to get involved with. The activity Cs are seeking to stop is of a character that if allowed to take place fluidly on third party areas it would undermine substantially the effectiveness of the relief in relation to the generality of the areas. Also, there is the threat of nuisance arising from protest on third party areas. There are accordingly, two proper jurisprudential bases to restrain protest on the third party areas.

Factual position and title

15. TM then made submissions on the airports and the factual position on the ground. He referred to Wortley 1 which describes the title position in detail at paragraphs 10 to 22, and appends the title documents at pages 219 to 528 of the hearing bundle. TM said it was appropriate to trust

the exercise done by the solicitors. He noted that the product for each airport is the "A" series of plans for each airport.

16. J asked if the plans were annexed to the Particulars of Claim.

17. TM confirmed this.

18. TM explained that the title number on the legend on the left hand side of the A series of plans corresponds to the areas indicated on the plan itself. The upshot is to show that C1, with reference to the plan on pg 61, is the owner and prima facie entitled to maintain an action in trespass in relation to the red line area, on plan 1, most conveniently found on the draft order at page 9 of the bundle. TM explained that one of the odd features is that none of the airports have simple arrangements for landing lights. It is a mixture of outright ownership, long occupation and sometimes on unregistered land. Even assuming no paper title in relation to this, nevertheless the areas are occupied by the equipment. Relief is needed for effective protection, and or to prevent nuisance.

19. TM referred to plan 2A on page 63 of the bundle for the position in relation to Liverpool, and to plan 3A at page 65 of the bundle for the position for Bristol.

20. TM then referred to the next stage of the exercise carried out with reference to the "B" series of plans. Wortley 1 at paragraphs 25 - 31 deals with this, and pg 62 of the bundle shows the plan for Birmingham. This plan shows the areas in some sense carved out as third party rights. The blue areas on the plan are where everything is let out to a third party. The green areas of the plan indicate areas, typically terminals, where things are more complicated; some of that area is still retained by Cs, other parts are let out.

21. TM referred to the Birmingham Air Rail link and platform and the fact that C1 has an agreement for lease in respect of this and C1 is in fact the occupier.

22. J commented that he could not see the landing lights on plan 1B.

23. TM responded that the northern lights are shown, and the southern lights are in the area shaded in brown. The Liverpool plan at pg 64 of the bundle adopted the same convention concerning blue and green land. Liverpool airport, unlike the other two, has within it public highways. Prima facie, the public has a right of protest on this. In respect of Bristol airport, the equivalent plan is on pg 66, where the same colouring convention is used.

24. TM noted that it has been possible for Bristol airport to drill down and provide more minute detail as to what is found at the green areas, at pages 67, 68, 69 of the hearing bunlde. The parts outlined in blue are those bits within the green zones let out or licenced to third parties.

25. TM then addressed notification of intention to seek relief – he referred to Wortley 1 at paragraphs 32 to 37 – the major tenants were given notice. It is improbable that relief if granted would cause harm to anyone not notified but the liberty to apply provision can be relied on.

Airports

26. TM then referred to the sensitive features of airports – with reference to the witness statement of Mr Barton, at paragraphs 31 - 48, the witness statement of Mr Irving, at paragraphs 35 - 37, and the witness statement of Mr Gamble at paragraphs 36 - 38. The witnesses for Liverpool and Bristol, Gamble and Irving, follow the lead of the Birmingham witness, Barton.

27. TM summarised the evidence. He noted that it is clear from the evidence, that airports have a special sensitivity and vulnerability owing to the sheer volume of human and other traffic participating in airport activities. There is the movement of vast, delicate and dangerous machines, proximity to toxic and dangerous materials, and zones of interest for counter terrorism. It is a high stress high activity environment where there is a premium on normal behaviour and a strong interest in keeping unexpected behaviour to a minimum. There is a heightened risk as protest may be used as a mask for terrorism, with reference to pg 91 of the hearing bundle.

28. TM also noted another feature of airports, which has required other orders in airport injunction cases to have included reference to what amounts to intention or purpose in the definition of the defendants. A particular feature of airports makes this unavoidable, as one is not dealing with sealed sites, e.g. oil terminals, but sites where the public are allowed (some) access. There is no other practical way of dealing with this than by referring in some way to intention or purpose.

29. J asked what was done in previous cases in relation to the purpose point.

30. TM referred to how a distinctive feature of the draft orders in this case is that they follow the orders of Ritchie J, where he used the word purpose. The draft orders in this case respect this direction of travel from the judiciary but the wording in the Claim Form does not reflect this. The Claim Form is to be amended to ensure alignment between the descriptions in the orders and the pleadings.

31. TM also referred to another area of interest about airports, namely the economic and potential chaos factor and cascade impact of disruption and delays. Economic impacts are significant as the daily turnover is around £750,000. Airports are an integral part of life and when the wheels come off, the consequences are felt widely, as is well known.

Threat and compelling need

32. TM then turned to the next section of his submissions, namely the threat posed and the compelling need for the injunction – addressed at paragraphs 38 – 85 of Wortley 1. This sets out the history of JSO and provides a summary from 2022 onwards. The focus was on oil terminals, noting a shift in emphasis towards airports. TM quoted from an extract starting at pg 580 of the hearing bundle; a JSO post from 13 September 2023. TM noted that this was the start of a shift away from a focus on the oil industry and an admission that an injunction is an effective instrument. TM then referred to an article on pg 590 and 591 of the bundle being an article from the Mail Online relating to an undercover journalist from the Mail Online discovering JSO's airport plans. TM then referred to JSO coming clean about their airport plans following the Mail Online article at pg 604 of the bundle.

33. J commented that this was really as a result of the Mail Online exposure of their plans.

34. TM then referred to paragraphs 71 – 80 of Wortley 1 which describes, to the extent to which he is aware, that JSO's plan has materialised. TM referred to incidents on 2 June at Farnborough, 20 June at Stansted, 25 June at Gatwick, 27 June, 24 July at Heathrow, 29 July at Gatwick, and 30 July at Heathrow. This shows the threat specifically and on a sustained basis by campaigners. Wortley 1 describes other injunctions obtained by airports at paragraph 89.

35. J asked how similar the draft orders in this case were to the injunction order in Gatwick.

36. TM responded that Cs have laboured to align the relief sought in this case with what was granted by Ritchie J in Gatwick, which is the most refined order made in relation to airport protest injunctions.

37. One nuance noted by Ritchie J was in respect of the Gatwick railway station. Ritchie J was alive to people arriving at the rail station and not realising they were affected by the injunction, and so carved out the railway station. This had not been done here as C1 is in occupation of the whole of the railway station. TM noted that J might decide in this case that he should apply the injunction only outside of the precincts of the railway.

38. J asked why. He asked if this would be because would be protestors might not know of the injunction when stepping off a train.

39. TM responded that Ritchie J's nervousness was as a result of people getting off the train who might not have seen the notice. Ritchie J wanted to be clear of the moment beyond which someone cannot plausibly say they did not understand what they were told not to do.

40. TM commented that Wortley 1 explains injunctions granted previously appear to have been effective. This was evidenced by the September 23 admission by JSO and, as noted in Wortley

1, a protest scheduled for City airport on 27 July shifted to central London following the obtaining of an injunction.

Effectiveness of injunctions

41. J asked why injunctions are more effective than the general law.

42. TM ventured a guess, that some are willing to take their chances in front of a magistrate or jury, but are not willing to take their changes in front of a judge.

43. TM referred to the photo evidence at page 650 of the hearing bundle. He explained that this was the law working as it should. The general law may in these cases be treated without respect by the protestors that one would wish for. But at the moment, the principle that the courts are authoritative is as it should be, and is recognised as a sign that the activity which is enjoined must not happen. There cannot be a guarantee that there will be no breaches, but perfection must not be the enemy of the good.

Alternative remedies

44. TM noted that Cs are required by the Supreme Court in the Wolverhampton decision to have regard to alternative remedies, including Byelaws and the general law. The story is that the general law is not enough. It is part of the program of the protestors to risk arrest. Cs armed with an injunction have more control over the process than when enforcement is left to public authorities. The potential for delay is reduced with breach of injunctions. With Byelaws, the available sentences are generally modest with a maximum fine of £2500.

45. New offences are now on the statute book. Mr Hallam has now been sentenced to 5 years in prison. Once that sinks in the general law may have a greater deterrent effect.

46. J asked what Mr Hallam had been sentenced for, i.e. under what statute.

47. TM replied that it was a public order offence.

48. TM further commented that 5 years is a very long sentence, and it is possible that it will have a deterrent effect in the future, but that is not felt yet. Ritchie J in the Gatwick case noted that this was something to be assessed when the injunction is on for review. At the moment, there is no evidence that the general law is causing protests to abate. The answer to the requirement to consider alternative remedies, is that as matters stand, the evidence suggests that injunctions are doing what the general law cannot do. It is hoped that it will change but at the moment that is the position.

Legal Framework

49. TM then addressed the legal framework. As indicated in the Valero decision, Ritchie J's judgment is written on the basis that this is an emerging jurisdiction. No decision has a concrete description or prescribed set of questions. The court still has a part to play in working out the right response.

50. TM referred to the Wolverhampton decision at paragraph 167 where the court sets out the conclusions at that stage about the nature of the jurisdiction. TM submitted that the key controlling characteristic is compelling need. This is the key thing that attracts the eye of equity.

51. TM noted that the Supreme Court emphasised that this jurisdiction is at an early stage at para 185. He referred to paragraphs 222 and 224 of Wolverhampton where the Supreme Court dealt with the principle of the court enjoining lawful activity.

52. Then TM referred to paragraphs 225 - 226 where the Supreme Court dealt with the fact that the Supreme Court was dealing with traveller rather than protest cases.

53. TM then referred to the decision in Cuadrilla at paragraph 50.

54. TM then referred to the synthesis of the principles in Valero at paragraphs 57 to 58, a synthesis between the principles in Wolverhampton and established practice. He referred to the checklist but confirming that this is not the be all and end all.

55. TM also referred to paragraph 66 of Valero in relation to Articles 10 and 11. He submitted that Cs say the balancing exercise does not really fall to be applied in respect of the public highways in Liverpool, the only airport with public highway. TM invited the judge, if inclined to conduct the balancing exercise, to adopt Ritchie J's approach at paragraph 66 of Valero.

56. J asked if the highway point had arisen in other Airport cases.

57. TM responded that Leeds airport was an example.

Submissions

58. TM submitted that the court has the material before it from which to make an order.

59. TM referred to how if the protestors were present, they would likely invoke their strongly held beliefs, and an argument based on the convention.

60. TM referred in this regard to Ritchie J in Valero at para 66. Furthermore, he referred to the principle that the public has no right to be on private land except for purpose of the land owner's consent.

Note of judgment

61. J held that he was prepared to grant an injunction. This case is materially the same as other airport injunction cases and even if he is not strictly bound by those other cases, he ought to afford respect to those other cases and other decisions as a matter of precedent, unless there is some material point of distinction. J was of the view that the reasoning of Ritchie J is sufficient to persuade him to grant an injunction. J held that he did not need to find anything more. He noted that he has been taken through the law and tests and is satisfied on the main points of ownership, features of airports, the compelling need and that there is no substantial defence to be advanced. Ultimately following what has been said by Ritchie J, after giving careful consideration J considered it appropriate to grant an injunction.

62. TM commended this approach, and noted the danger of reinventing the wheel.

Order

63. J reviewed the draft orders against the order from the Gatwick decision at pg 728 of the hearing bundle.

64. TM commented that the descriptions of the defendants should be the same as in Gatwick with suitable amendments.

65. J considered that the shorter definition of "Warning Notice" in the Gatwick order should be used.

66. J queried whether there needed to be any carve out for the train station at Birmingham airport.

67. TM proposed inserting a new plan to the Birmingham airport order to address this point.

68. TM noted that paragraph 2 of the draft order should be amended in line with the Drax injunction order to include procedural machinery for the review hearing.

69. J noted that the draft order by paragraph 3 dispensed with service but referred to service in subsequent paragraphs.

70. TM referred to the nuance following Wolverhampton about how in these sui generis types of injunction cases, there is "notification" rather than service.

71. J proposed changing the "service and notification" wording in the draft order to "service or notification" to deal with this issue.

72. J proposed in respect of paragraph 11 of the draft order that reference to email service on Mr Hallam should be removed as he has been sentenced to 5 years in prison.

73. TM noted that although the points discussed were discussed in respect of Birmingham airport, save for the rail way station point, the same issues would apply to the other draft orders.

74. TM noted an issue common to all, namely that undertaking 1 in schedule 2 was duplicated in the body of the order and should be removed.

There was then a 15 minute adjournment between 12:15 and 12:30.

75. TM showed the judge an amended plan for Birmingham airport adjusting the red line boundary of the injunction around the railway station.

76. J approved this.

77. J asked for draft orders to be emailed to his clerk in red line and in final “clean” form.

The hearing concluded at 12:40.

N244

Application notice

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

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter

Name of court **The High Court of Justice** **King's Bench Division**	**Claim no.** **KB-2024-2473**
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
	H W F - - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Birmingham Airport Ltd and others	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	2 June 2025 02 Jun 2025

HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

KB-2024-002473

1. What is your name or, if you are a legal representative, the name of your firm?
   Eversheds Sutherland (International) LLP

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

   If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?
   1. To list a hearing (time estimate 1 day) to review the injunction made by orders of Jacobs J dated 6 August 2024 on 20 June 2025 or as close to that date as is convenient for the Court.

   2. To consolidate the claim under CPR rule 3.1(2)(h), alternatively case manage and hear it under rule 3.2(i) and/or (p) with the following claims:
   (a) London City Airport Ltd and ors v PU - claim no KB-2024-001765;
   (b) Manchester Airport Plc and ors v PU - claim no KB-2024-002132; and
   (c) Leeds Bradford Airport Ltd and ors v PU - claim no KB-2024-002317 ("**the Other Airports Claims**").

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

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

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

7. Give details of any fixed trial date or period — N/A

8. What level of Judge does your hearing need? — High Court Judge

9. Who should be served with this application?

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 Jacobs J are attached, together with the orders made by:-

   (a) Julian Knowles J dated 20 June 2024 made in claim no KB-2024-001765;

   (b) Her Honour Judge Coe KC dated 5 July 2024 made in claim no KB-2024-002132; and

   (c) Ritchie J dated 18 July 2024 made in claim no KB-2024-002317 (as amended pursuant to the slip rule on 19 and 21 July 2024).

The review hearing

2. Paragraph 2 of the Orders of Jacobs J in the instant case provide for those Orders to 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) with a time estimate of $2^1/_2$ hours".

3. The Claimants invite the Court to list the review hearing pursuant to paragraph 2 of that order on 20 June 2025 or as soon as is convenient thereafter.

Consolidation / case management with the Other Airports Claims

4. All of the injunctions granted in the Other Airports Claims are subject to review at 12 month intervals and the Claimants in those cases also seek review of the injunctions and have, by Eversheds Sutherland (International) LLP also made applications of even date to this application (and also for consolidation or case management with this case and the Other Airports Claims.

5. In those cases:-

   (a) Paragraph 3 of the Order of Julian Knowles J made in claim number KB-2024-001765 provides for a time estimate of 1.5 hours for the hearing of the review application made in that claim.

   (b) No time estimate is provided in the Orders of HHJ Coe KC or Ritchie J. However, it is anticipated that a similar time estimate would be required.

6. In view of the similarity of factual and legal issues in this claim and the Other Airports Claims, it would be beneficial for the claims to be consolidated, alternatively case managed and heard together, in order to determine the cases in accordance with the overriding objective and in specific to (a) minimise the demands placed on the court resources by a multiplicity of hearings which would require more than a day of court time; and (b) avoid the risk of inconsistent decisions.

7. 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

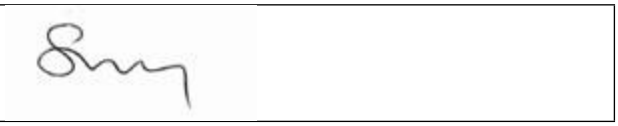
Statement of Truth

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	Month	Year
2	June	2025

Full name

Stuart Sherbrooke Wortley

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

Partner

Applicant's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Greater London

Postcode

E	C	2	V	7	W	S

If applicable

Phone number

0771 288 1393

Fax phone number

DX number

Your Ref.

SSW

Email

stuartwortley@eversheds-sutherland.com

Party: *Claimants*
Name: *S S Wortley*
Number: *Third*
Date: *06.06.25*
Exhibits: *"SSW15" – "SSW20"*

CLAIM NO: KB-2024-2473

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

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

Claimants

and

PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED
IN THE AMENDED CLAIM FORM

Defendants

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

I STUART SHERBROOKE WORTLEY of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a partner in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants.

2. On 06.08.24, Mr Justice Jacobs granted injunctions to restrain the Defendants from entering, occupying or remaining on Birmingham Airport, Bristol Airport and Liverpool Airport (as defined in those Orders) until varied, discharged or extended by further order.

3. Paragraph 2 of the Orders provided for each of those injunctions to be reviewed by the Court on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2.5 hours and permitted the Claimants to file and serve any evidence in support 14 days before the review hearing.

4. I make this witness statement for the purposes of the review hearing which has been listed on 24.06.25.

2024 Airport Injunctions

5. Between 20 June and 14 August 2024, the following injunctions were granted to protect airports against environmental protestors opposed to the use of fossil fuels.

	Airport	**Action Number**	**Judge / Date of Order**
1	London City Airport	KB-2024-001765	Mr Justice Julian Knowles 20 June 2024
2	Manchester Airport Stansted Airport East Midlands Airport	KB-2024-002132	HHJ Rosalind Coe 5 July 2024
3	Heathrow Airport	KB-2024-002210	Mr Justice Julian Knowles 10 July 2024
4	Leeds Bradford Airport Luton Airport Newcastle Airport	KB-2024-002317	Mr Justice Ritchie 18 July 2024
5	Gatwick Airport	KB-2024-002336	Mr Justice Ritchie 19 July 2024
6	Birmingham Airport Bristol Airport Liverpool Airport	KB-2024-002473	Mr Justice Jacobs 6 August 2024
7	Southend Airport	KB-2024-002596	Mrs Justice Farbey 14 August 2024

6. Last year it was possible to achieve a certain amount of co-ordination with a view to saving costs and limiting the demands placed by these matters on Court resources, in that my firm acted in 4 out of the 7 actions listed above (numbers 1, 2, 4 and 6). However, our instructions arrived over time rather than all at once, and so multiple hearings were needed, despite the common ground between the different matters.

7. Although the precise terms of the Orders vary slightly, each of the injunctions granted in actions 1, 2, 4 and 6 in the table effectively provides for an annual review.

8. This year, therefore, there is the potential to achieve better co-ordination with a better use of the Court's time: Birmingham, Liverpool and Bristol Airports and the 7 other airports involved in actions 1, 2 and 4 have decided to join together and to ask the Court to undertake the annual review at the same hearing. I was not instructed in relation to the other airports last year (Heathrow, Gatwick and Southend): I believe they remain represented by other firms of solicitors. I understand that the solicitors for Heathrow and Southend Airports have arranged a review hearing sometime next month.

9. As noted above, the Order in this action provided for a review hearing of 2.5 hours duration. The Order in action 1 provided for a review hearing of 1.5 hours duration. The Orders in actions 2 and 4 did not specify a time estimate for the review hearing. The Court has now listed the review hearings in all 4 actions together, with a time estimate of 1 day on 24 June 2025.

10. I make this witness statement in support of the review of the London City Airport injunction. I will be repeating or adopting much of the content of this witness statement in my statements in support of the annual reviews of the injunctions granted in the other actions.

Service of the Order dated 06.08.24

11. Each of the documents required to be served by the Orders dated 06.08.24 was served in accordance with paragraph 4. In each case the last step took place on 09.08.24 @ 10:48 when I sent an email message to the 4 email addresses referred to in Schedule 3 to the Orders.

The Plans

12. The injunctions granted in this action and in actions 2 and 4 in the table above and were based on the relevant airport byelaws (and therefore extend to all of the land which is subject to the Byelaws including land over which the Claimant would not be entitled to legal possession – including for example highways land and areas which are demised to third parties).

13. The injunctions in this case extend to the land edged red on Plan 1 (Birmingham Airport), Plan 2 (Liverpool John Lennon Airport) and Plan 3 (Bristol Airport).

14. I am informed by Kristen Garrett, General Counsel for Birmingham Airport that there have been no changes to the Birmingham Airport Byelaws 2021 and that the Plan attached to the Birmingham Airport Order dated 06.08.24 remains accurate.

15. I am informed by John Irving, Chief Executive Officer of Liverpool John Lennon Airport that there have been no changes to the Liverpool John Lennon Airport Byelaws 2022 and that the Plan 2 attached to the Liverpool John Lennon Airport Order dated 06.08.24 remains accurate.

16. I am informed by Graeme Gamble, Chief Operating Officer of Bristol Airport that there have been no changes to the Bristol Airport Byelaws 2012 and that the Plan attached to the Bristol Airport Order dated 06.08.24 therefore remains accurate.

UK Airport Protests

17. The table below records a summary of the protests against UK airports which took place in June – August 2024. It also includes a summary of the arrests, convictions and subsequent sentencing and other relevant incidents occurring after August 2024.

02.06.24	Extinction Rebellion conducted a protest at Farnborough Air Show which involved blocking the 3 main gates and parking the Extinction Rebellion pink boat across the Gulfstream gate
20.06.24	Two JSO activists sprayed 2 aircraft at London Stanstead Airport with orange paint after cutting through the perimeter fence at around 5.00 am
25.06.24	Four JSO activists were arrested at Gatwick Airport railway station equipped with suitcases containing bandages (suspected to have been

	intended to force the airport to close owing to the risk of damage to aircraft engines in the event of them being released near aircraft)
27.06.24	Six JSO activists were arrested at a meeting in London pursuant to powers in the Public Order Act 2023
19.07.24	Roger Hallam (along with four other JSO activists) had been found guilty of conspiring to organise protests to block the M25 motorway in November 2022 Mr Hallam was sentenced to 5 years imprisonment and each of the others were sentenced to 4 years imprisonment (reduced by the Court of Appeal on 07.03.25 – see below)
24.07.24	Ten JSO activists were arrested at Heathrow Airport as part of an intelligence led operation - some were equipped with cutting gear and glue
27.07.24	A protest which was due to be held at London City Airport was relocated to the Department of Transport on Horseferry Lane
29.07.24	Eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure
30.07.24	Two JSO activists were arrested at Heathrow Airport after spraying orange paint around the Terminal 5 entrance hall and on the destination boards in the departure lounge
31.07.24	A protest by JSO and Fossil Free London was held at the Docklands Light Railway station at City Airport JSO and Fossil Free London both uploaded photographs of the protest with the following message:- *"We've been served with an injunction which means even walking out of the wrong exit of this station could get us arrested."*
01.08.24	Six JSO activists blocked access to the departure gates at Heathrow Terminal 5
05.08.24	Five JSO activists were arrested on their way to Manchester Airport equipped with bolt cutters, angle grinders, glue, sand and banners carrying slogans including "oil kills".
16.01.25	The trial of the two JSO activists arrested at Heathrow Airport on 30.07.24 resulted in a hung jury
02.02.25	Extinction Rebellion held a demonstration at Farnborough Airport following a consultation period in relation to Farnborough Airport's expansion plans which ended in October 2024
17.02.25	Extinction Rebellion held a demonstration at Inverness Airport waving banners with *"Ban Private Jets"* and *"We're in a climate emergency, we need to step up and take action"*

21.02.25	Of the five JSO activists arrested on their way to Manchester Airport on 05.08.24, four were found guilty of conspiracy to commit a public nuisance and one was acquitted with sentencing adjourned to 23.05.25
07.03.25	The Court of Appeal delivered judgment in a conjoined appeal by sixteen JSO activists against sentencing Two of the sentences passed on 19.07.24 were reduced by 18 months (from 4 years to 30 months), the other three were reduced by a year (from 5 to 4 years in Roger Hallam's case and from 4 to 3 years in the other two) Of the other eleven appeals, one was reduced by 2 months but the other ten appeals were dismissed
20.03.25	Of the ten JSO activists arrested at Heathrow Airport on 24.07.24, nine were found guilty of conspiracy to cause a public nuisance at Heathrow Airport with sentencing adjourned to 16.05.25
27.03.25	Just Stop Oil announced the end of their campaign (see below)
27.03.25	On the same day as the JSO announcement, Youth Demand held a meeting to discuss issues including the climate crisis and a fresh wave of civil resistance in London in the Westminster Quaker Meeting House Six individuals were arrested
27.04.25	Youth Demand activists threw bright pink powder over elite runners participating in the London marathon as they crossed Tower Bridge The individuals taking part wore T-shirts that read "Youth Demand – Stop Arming Israel" – which appears to be their primary cause
16.05.25	Of the nine individuals convicted on 20.03.25, five were sentenced to terms of imprisonment of up to 15 months and four were given suspended sentences
27.05.25	Each of the four individuals convicted on 21.02.25 was sentenced to a term of imprisonment of between 18 and 30 months

18. Copies of media articles relating to the events recorded in this table are attached to this statement marked **"SSW15"**.

19. A copy of the Court of Appeal decision handed down on 07.03.25 is attached at **"SSW16"**.

20. The fact that the protest on 27.07.24 was relocated from London City Airport to the Department of Transport and the fact that the JSO and Fossil Free London protestors conducted their protest from outside the red line of the injunction plan demonstrate that the injunction granted by Mr Justice Julian Knowles in that case on 20.06.24

served its purpose. In both instances peaceful protests were went ahead but without causing unlawful interference to users of London City Airport.

27.03.25 – JSO Announcement

21. As noted in the chronology above, on 27.03.25, Just Stop Oil made the following announcement:-

> *"Three years after bursting on the scene in a blaze of orange, at the end of April we will be hanging up the hi vis.*
>
> *Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful.*
>
> *So it is the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison. We have exposed the corruption at the heart of our legal system, which protects those causing death and destruction while prosecuting those seeking to minimize harm. Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK's oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen.*
>
> *This is not the end of civil resistance. Governments everywhere are retreating from doing what is needed to protect us from the consequences of unchecked fossil fuel burning. As we head towards 2°C of global heating by the 2030s, the science is clear: billions of people will have to move or die and the global economy is going to collapse. This is unavoidable. We have been betrayed by a morally bankrupt political class.*
>
> *As corporations and billionaires corrupt political systems across the world, we need a different approach. We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Nothing short of a revolution is going to protect us from the coming storms.*
>
> *We are calling on everyone who wants to be a part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. Sign up here. See you on the streets.*
>
> *ENDS"*

22. Copies of media articles relating to this announcement and to the "final" JSO protest which took place in central London on 26.04.25 are attached marked **"SSW17"**.

18.05.25 - We are "plotting a very big comeback"

23. Whilst the announcement referred to above suggests that the risk of unlawful protests at UK airports has reduced, on 18.05.25 the following story appeared on GB News (both on television and on-line):-

> *"Now, I was getting pretty bored of the juvenile antics at the altar of climate change.*
>
> *We've seen it all vandals throwing soup over priceless artworks in galleries, defacing Stonehenge, ambushing theatre productions in the West End, blocking traffic, scaling motorway gantries, dousing private jets in paint, and even disrupting sports events all just to spoil the fun for everyone else.*
>
> *Remember them? They said they were disbanding after the government appeared to adopt their demand to end new oil and gas licences in Britain. Their actions, of course, cost the public tens of millions in police and court time.*
>
> *But despite Ed Miliband bowing to their demands, I can exclusively reveal that Just Stop Oil is plotting a very big comeback.*
>
> *On Ben Leo Tonight, we have gained access to secret Just Stop Oil meetings, where members are discussing a dramatic U-turn—planning to cause chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and even carrying out "citizens' arrests" on so-called climate criminals.*
>
> *Speaking during an online meeting on Thursday night, one coordinator—known only as "Dave"—said protests should remain "action-based" and warned against becoming more peaceful, like Greenpeace.*
>
> *The meeting continued with Dave insisting that it was essential to keep doing what he called the "spicy and naughty stuff" to generate media attention.*
>
> *The group also discussed how to feed new protest ideas back to what they referred to as a "core team". There was frustration over communication with this mysterious leadership group, with some suggesting using 50-word briefs to make it easier for them to process ideas.*
>
> *It raises serious questions: Who exactly is this core team? Who are these professional protesters reporting to—and who's funding them?*
>
> *Chillingly, the group also spoke about carrying out citizen's arrests on so-called climate deniers. There was some introspection as well, with members questioning whether their public image was doing more harm than good.*
>
> *But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to*

proceed with Just Stop Oil's revival, including talk of keeping protesters in safe houses to maintain morale.

Let's be clear: what we're dealing with here is a group of climate zealots plotting to commit criminal acts, backed by who knows what kind of funding, and being housed like some kind of eco-mafia.

And speaking of coordination—let's not pretend the climate agenda is a spontaneous grassroots movement. It's organised. It's funded. It's political.

So, who's paying to bus these protesters from London to Stonehenge, to airports, to art galleries and sports stadiums? Who's funding the Just Stop Oil safe houses where these scruffy, self-righteous agitators meticulously plan how to make Britain colder and poorer?

The police and the government must crack down on Just Stop Oil's plans for criminality before they gain traction again.

The last thing Britain needs is more disruption, more vandalism, and more self-indulgent eco-activism especially when a Labour government is already happily marching to the drumbeat of Net Zero extremism.

We'll be passing our findings to the police."

24. For my part, I acknowledge the possibility that this is tainted by sensationalism. However, JSO did not take efforts to repudiate what had been alleged. Instead, on 21.05.25, JSO circulated a link to the GB News story in a message to subscribers together the following comment:-

> *"GB News was right for once. We are "plotting a very big comeback".*

25. Copies of the GB News story and the JSO message to subscribers are attached to this message marked **"SSW18"**.

Other Environmental / Climate Campaign Groups

26. There are other protest groups who are opposed to the use of fossil fuels including for example, Youth Demand (the junior branch of JSO formerly known as Youth Climate Swarm), Extinction Rebellion and Fossil Free London.

27. Extinction Rebellion ("XR") remains an active organisation both in the UK and internationally:-

27.1. on 07.09.24, XR activists chained themselves to the gates of the Rijksmuseum in Amsterdam in an attempt to force the museum to sever ties with ING Bank;

27.2. on 25.09.24, XR activists covered the Finnish Parliament House with red paint;

27.3. on 23.05.25, XR activists held a climate protest against Total Energies and its partners – including the occupation of BNP Paribas' offices in Paris.

28. Fossil Free London is another protest group involved in direct action. Their website includes videos which promote the right protest and training videos relating to direct action.

29. A relatively new organisation which is campaigning against the fossil fuel industry is "shut the system". In January 2025, this group cut fibre optic cables to Lloyds of London and prominent buildings involved in the insurance sector on Fenchurch Street, Threadneedle Street, Leadenhall Street and Lime Street in London (and in Birmingham, Leeds and Sheffield).

30. An article concerning this story is attached to this statement marked **"SSW19"**.

Police Advice

31. On 21.05.25, the Metropolitan Police sent an email to the security team at London City Airport which included the following:-

> *" … the injunction at HAL [Heathrow Airport Limited] 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 appears to be a cycle of new groups emerging and this cannot be ruled out so maintaining it would be very much recommended."*

32. I believe the reference to *"… the Shell protest …"* relates to the Annual General Meeting of Shell plc held at the Soffitel Hotel at Heathrow Terminal 5 on 20.05.25. The Metropolitan Police told London City Airport's security team that a protest by environmental protest groups:-

> "*were forced to hold their protest at the Shell head office in central London rather than the AGM location at a hotel within the Heathrow Airport injuncted area, in order to avoid the risk of associated penalties for breaching of the injunction*."

33. I believe the references to *"… your experiences …"* is a reference to the events referred to in paragraph 19 above – including the fact that one of the protests due to take place at London City Airport was relocated to the Department of Transport.

34. A copy of the email (from which I have redacted personal information) is attached to this statement marked **"SSW20"**.

Conclusion

35. I am informed by Kristin Garrett, John Irving and Mark Hunt and believe the Claimants' directors have concluded that they should ask the Court to extend the injunction for a further 12 months from June 2025. I understand that they reached this decision after having considered carefully whether the threat which was clearly present last year has abated materially, especially in light of the JSO announcement in March.

36. Obviously, the question of whether the injunction has outlasted its need, is one for the judgment of the Court. However, based on the material to which I have referred, the Claimants (and, for what it is worth, I also) consider that there remains a compelling need for the injunction to remain in place. Climate change remains firmly on the political agenda. It continues to attract strong feelings and is still a subject about which campaigners are willing to contemplate disruptive action. The inference drawn by the Claimants (and by me) is that the injunctions granted over time have influenced the pattern of protest, which disruptive action being focused principally on targets which do not have the benefit of the Court's protection by way of injunction. The Claimants (and I) consider that the risk remains high that airports generally, including theirs, would come back into focus, if the injunction were now to be lifted. JSO's seeming change of heart in March 2025 was not adopted by all other campaign groups; and even as a statement of JSO's position, later events have shown that it was not an immutable repudiation of disruptive protest. The Claimants (and I) cannot discount the possibility, that JSO's March 2025 announcement may have been partly tactical: to make renewal of the injunctions harder — and disruptive protest at the airports correspondingly less risky. The risks are especially acute at this time of year: most of the incidents in which UK airports were targeted by environmental protestors in 2024 occurred between late June and August 2024 - the busiest period for holiday travel.

Notice of the Review Hearing

37. The Claimants intend to give notice of the review hearing in the manner provided for in para 4 of Order dated 06.08.24 – namely by:-

37.1. Uploading a copy of the application dated 02.06.25, the draft Order, a copy of this witness statement and exhibits and details of the review hearing to each of the injunction websites;

37.2. sending copies of the documents referred to in the previous paragraph to the email addresses referred to in Schedule 3 to the Order dated 18.07.24 plus the following additional email addresses (noting that "Shut The System" does not operate a website and although "Fossil Free London" does have a website, this does not include an email address):- YouthDemandPress@protonmail.com

37.3. affixing a notice at each of the warning notice locations at each airport referring to the time and date of the review hearing and explaining where copies of the additional papers can be found and obtained in hard copy.

I believe that the facts stated in this Witness Statement and Exhibits are true.

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

I am duly authorised to make this statement on behalf of the Claimants.

Stuart Sherbrooke Wortley

6 June 2025

Party: *Claimants*
Name: *S S Wortley*
Date: *16.06.25*
Exhibits: *"SSWA" and "SSWB"*

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

VARIOUS AIRPORTS
AS MORE PARTICULARLY DESCRIBED
IN THE (AMENDED) CLAIM FORMS

Claimants

and

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

Defendants

WITNESS STATEMENT OF

STUART SHERBROOKE WORTLEY

I STUART SHERBROOKE WORTLEY of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a partner in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants.

2. I make this witness statement in support of the June 2025 review hearings in each of the 4 actions (action numbers given above) which have been listed for hearing on 24.06.25.

Service of Evidence for Review Hearings

3. In each of these actions, it was necessary for the Claimants to serve the evidence in support of the review hearing by:-

   3.1. uploading the material to the relevant airport injunction website; and

   3.2. sending the material to the email addresses specified in the injunction Order.

4. In each of the actions (save for KB-2025-2473 which relates to Birmingham, Liverpool John Lennon and Bristol Airports) it was also necessary to affix notice of the review hearing (stating where documents can be found) at each of the relevant airport injunction warning notice locations (identified "X" on the relevant injunction plan). Whilst this was not a requirement of the Order in action number KB-2025-2473, in the interests of adopting a consistent approach my firm arranged for notices to be affixed to the warning notices at those Airports too.

5. Although the orders in action numbers KB-2025-2132 (Manchester, London Stansted and East Midlands Airports) and KB-2025-2317 (Leeds Bradford, London Luton and Newcastle International Airports) included provision for further applications and evidence to be served on the Defendants by alternative means, they did not set any time limit for doing so.

6. Each of the 4 orders provided that effective service would be given once the last step was completed. In each case, all steps were completed on Monday 09.06.25.

7. At each Airport (save for Birmingham Airport), the last step was my email message to the relevant email addresses, the time of which I have included in the table below. In the case of Birmingham Airport, the last step was the affixing of the notices (a step which the Order did not expressly require).

Airport	**Last Step**	**Date / Time**
London City	Email message	09.06.25 @ 18:47
Manchester	Email message	09.06.25 @ 19:03
London Stansted		
East Midlands		
Leeds Bradford	Email message	09.06.25 @ 19:04
London Luton		
Newcastle International		

Birmingham	Warning notice	09.06.25 @ 19:23
Liverpool John Lennon	Email message	09.06.25 @ 18:48
Bristol	Email message	

Filing of Evidence for Review Hearings

8. The orders in action numbers KB-2025-1765 (London City Airport) and KB-2025-2473 (Birmingham, Liverpool John Lennon and Bristol Airports) provided for evidence in support of the review hearing to be filed 14 days before the review hearing.

9. The orders in action numbers KB-2025-2132 (Manchester, London Stansted and East Midlands Airports) and KB-2025-2317 (Leeds Bradford, London Luton and Newcastle Airports) did not provide for the evidence to be filed at all.

10. In preparing this witness statement, I have noted that I have overlooked the need to file the further evidence in 2 of the actions (for which I apologise). That has been corrected today. My statements in all 4 actions has been filed.

No Named Defendants / Notice of Review Hearing to Third Parties

11. The following representative of each Airport has confirm that:-

    11.1. they do not know the name of an individual who threatens to protest at the Airport; and

    11.2. they will take steps to inform tenants and licensees of the review hearing on 24.06.25.

Airport	**Representative**
London City	Claire Hortop, Head of Legal
Manchester	David McBride, Head of Legal (Airports)
London Stansted	
East Midlands	
Leeds Bradford	Kunaal Wharfe, General Counsel
London Luton	David Morris, Head of Legal
Newcastle International	Mark Hunt, Chief Financial Officer
Birmingham	Kristin Garrett, General Counsel
Liverpool John Lennon	John Irving, Chief Executive Officer
Bristol	Graeme Gamble, Chief Operating Officer

Just Stop Oil – 2025 Training Programme

12. During the weekend of 14/15 June 2025, Just Stop Oil arranged an event branded "Seeds of Rebellion" which refers to a "six-week training programme" including Phoebe Plummer (referenced in my previous witness statement) as a guest speaker. A copy of an email message promoting this event is attached to this statement marked **"SSWA"**.

13. Since preparing my last witness statements in each of these 4 actions dated 06.06.25, my attention has been directed to the fundraising pages of the Just Stop Oil website. This also suggests that the Just Stop Oil campaign is a continuing campaign notwithstanding the announcement made in March 2025. The "Donate" page invites supporters to make monthly donations of between £4.00 and £50.00 with an announcement:-

> *"A new campaign is in the works – one that builds on our success as Just Stop Oil, and faces the grinding injustice of our political and economic system head on.* ***We're just getting started.****"*

A copy of this page is attached to this statement marked **"SSWB"**.

I believe that the facts stated in this Witness Statement and Exhibits are true.

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

I am duly authorised to make this statement on behalf of the Claimants.

Stuart Sherbrooke Wortley

16 June 2025

CLAIM NO: KB-2024-1765

CLAIM NO: KB-2024-2132

CLAIM NO: KB-2024-2317

CLAIM NO: KB-2024-2473

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KING'S BENCH DIVISION

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Claimants

and

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

Defendants

SSWA

This is the exhibit marked "SSWA" referred to in the witness statement of Stuart Wortley dated 16 June 2025.

Payne, Emma

From: Wortley, Stuart
Sent: 16 June 2025 16:59
To: Wortley, Stuart
Subject: "SSWA"

JUST STOP OIL

Dear Stuart,

Kabul is at risk of becoming the first modern city to run out of water. The world's oceans are a 'ticking timebomb' as ocean acidity reaches critical levels. UK government aid cuts could leave 12 million people without access to clean water in Ethiopia due to climate threats. **The climate crisis is here, it is already threatening millions of lives, and it is coming for us all.** In the face of this, our government is still refusing to act. They are the puppets of the fossil fuel and arms industries--condemning millions to death as th eycontinue to arm the genocide in Gaza and prop up the fossil fuel economy. The only way we will get real change is by **coming together in resistance** in a disciplined and sustained way.

*Join us in London for the **launch weekender** of Seeds of Revolution **training programme** on **Saturday 14th and Sunday 15th June** at **Waterloo Action Centre, SE1 7AA.** Register now:*

Register Now: June 14th & 15th

And it couldn't be easier, or more fun and fulfilling, as Just Stop Oil and Youth Demand kick off a **summer of resistance training**. Learn the theory behind nonviolent revolutions, and how to mass mobilise, harness the grass-root power of local groups, plan actions that cut through, and work, coordinate and lead others to pull off effective strategies. We'll even throw in some free vegan food!

Come and learn how we plant the seeds of the coming nonviolent revolution at two in-person events that bookend four **online sessions**—taking place **every Wednesday** in between. Here's everything you need to know…

Register Now for Launch Weekender

Zoom Sessions: Every Weds @ 6-8PM

Join our launch weekender

When: This Saturday 14th and Sunday 15th June, 10am-6pm

Where: Waterloo Action Centre, London SE1 7AA

We kick off our six-week training programme this weekend with two days of talks and workshops. We'll deep dive into everything from to crafting a campaign identity and DNA, to the necessity for nonviolent struggle, to how we combine street resistance and citizen assemblies to pull off a revolution in the UK. We will be joined by guest speakers including **Phoebe Plummer** as well as representatives from **Not Here to be Liked** and **Assemble**.

As well as teachings and discussion, expect to meet likeminded people in resistance. **Everyone is welcome**, old and young, seasoned veterans and fresh faces. There will be free vegan food, and for those who need it, there is support with travel costs and overnight accommodation. You won't want to miss this one, register now:

Register Now for This Weekend

Need Accommodation? Join This Chat

Travel Costs Holding You Back? We Can Help

Register now for the weekly Zoom sessions

Zoom Calls Wednesdays @ 6-8PM: June 18th, June 25th, July 2nd, July 9th

You'll feel invigorated after the in-person meet-up, keep the momentum going with our **weekly Zoom sessions every Wednesday** and learn even more about nonviolent resistance. You'll gain knowledge on everything from the mobilisation theory, to running local groups, to fostering healthy and resilient cultures, to leadership and how to design actions that cut through.

These sessions will explain all the different ways groups like Youth Demand and Just Stop Oil organise and put pressure on the government, and will be delivered by expert guest speakers from groups like Resilient Uprising. Join us every

Wednesday for four weeks, starting on June 18th at 6-8pm and then the same time on June 25th, July 2nd and July 9th. See the **full agenda** and **register now**:

Zoom Sessions: Every Weds @ 6-8PM

Celebrate at our training programme finale

When: Saturday 12th July at 11am-6pm

Where: London location TBC

The six-week programme of learning will climax with a **final event** for us all to come together **in-person**. Expect a celebratory mood with workshops on coordination and leadership, guest speakers and of course free food! Join our summer of resistance and don't miss a single part of this training programme. Everyone is welcome, **we want to meet you!** Register today:

Register Now for the Finale Event: Sat 12th July

Moved town or region? You can update your details with us here!

With love & gratitude,

Just Stop Oil

Support our work with a monthly donation!

Donate

Website | Facebook | Twitter

Instagram | LinkedIn | YouTube

This email was sent to stuartwortley@eversheds-sutherland.com. If you wish to unsubscribe from our mailing list, please click here to unsubscribe.

CLAIM NO: KB-2024-1765

CLAIM NO: KB-2024-2132

CLAIM NO: KB-2024-2317

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IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

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and

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SSWB

This is the exhibit marked "SSWB" referred to in the witness statement of Stuart Wortley dated 16 June 2025.

JUST STOP OIL

THERE'S MORE TO COME
HELP MAKE IT HAPPEN

Low Wage Supporter

Show solidarity with those taking action with Just Stop Oil's with a low wage monthly donation.

£4 per month

Subscribe

Most popular

Standard Supporter

Give an hour's wage each month to make our resistance movement possible and join as a supporter.

£15 per month

Subscribe

A new campaign is in the works — one that builds on our success as Just Stop Oil, and faces the grinding injustice of our political and economic system head on. **We're just getting started.**

Will you donate to help make it happen?

N244

Application notice

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

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter

Name of court The High Court of Justice, Kings Bench Division	**Claim no.** KB-2024-001765
Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
PBA0087211	H W F - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) London City Airport Ltd and another	
Defendant's name (including ref.) Persons unknown as more particularly described in the claim form	
Date	17.06.25

1. What is your name or, if you are a legal representative, the name of your firm?
   Eversheds Sutherland (International) LLP

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

   If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?
   Permission to amend the Claim Form by substituting the attached plan marked 1A for Plan 1 annexed to it.

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

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

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

7. Give details of any fixed trial date or period: 24.06.25

8. What level of Judge does your hearing need? High Court Judge

9. Who should be served with this application? Defendants

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.
   See para 10(a) and 10(b) of the Order of Mr Justice Julian Knowles dated 20.06.24

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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.
The Claimant applies for:-

Permission to amend the Claim Form and the annexed Plan 1 to exclude a defined area of land that was previously within the Claimants control but has since been leased to a third party and is no longer within its possession. The circumstances of the new lease are referred to in the witness statement of Stuart Sherbrooke Wortley dated 06.06.25.

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	Month	Year
1 7	0 6	2 0 2 5

Full name

Emma Payne

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

Paralegal

Applicant'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 V 2 7 W S

If applicable

Phone number

Fax phone number

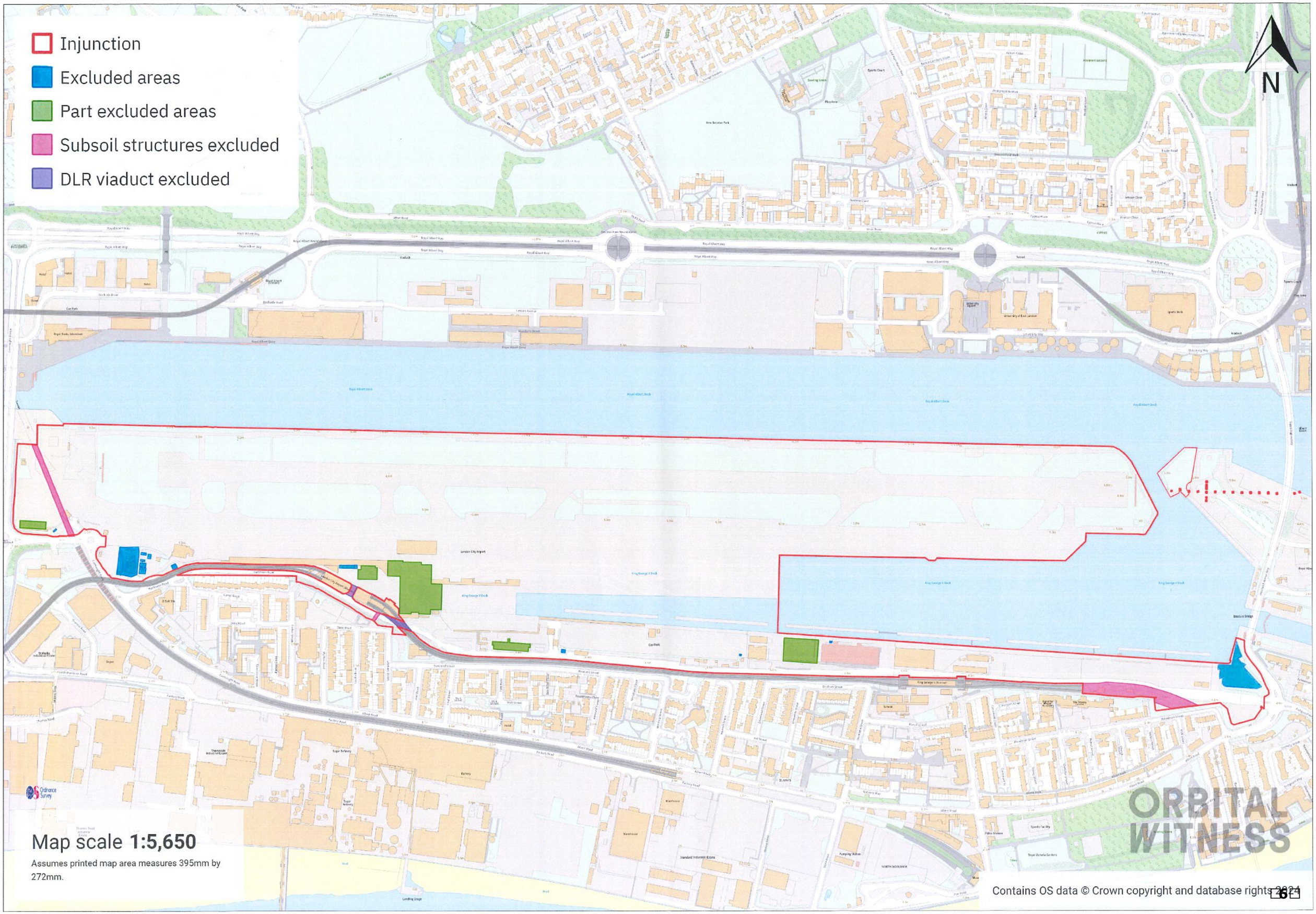
DX number

Your Ref.

2926599.000057

Email

emmapayne@eversheds-sutherland.com



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