

Dutch, Megan

From: Shell Service
Sent: 06 April 2023 14:20
To: 'michaela.marc@hotmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Application (30.03.23)
Attachments: Exhibit to Chris Gamble (CPG1 - PART 3) 30.03.23.pdf

Dear Recipient,

Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) ("the Shell Petrol Stations Proceedings")

In relation to the above proceedings, please see the attached, Part 3 of the Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023, by way of service on you:

A copy of the following documents will be served on you by separate email:

- Parts 4 to 9 Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023.

Eversheds Sutherland (International) LLP

Dutch, Megan

From: Shell Service
Sent: 06 April 2023 14:26
To: 'michaela.marc@hotmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Application (30.03.23)
Attachments: Exhibit to Chris Gamble (CPG1 - PART 5) 30.03.23.pdf

Dear Recipient,

Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) ("the Shell Petrol Stations Proceedings")

In relation to the above proceedings, please see the attached, Part 5 of the Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023, by way of service on you:

A copy of the following documents will be served on you by separate email:

- Parts 6 to 9 Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023.

Eversheds Sutherland (International) LLP

Dutch, Megan

From: Shell Service
Sent: 06 April 2023 14:29
To: 'michaela.marc@hotmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Application (30.03.23)
Attachments: Exhibit to Chris Gamble (CPG1 - PART 6) 30.03.23.pdf

Dear Recipient,

Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) ("the Shell Petrol Stations Proceedings")

In relation to the above proceedings, please see the attached, Part 6 of the Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023, by way of service on you:

A copy of the following documents will be served on you by separate email:

- Parts 7 to 9 Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023.

Eversheds Sutherland (International) LLP

Dutch, Megan

From: Shell Service
Sent: 06 April 2023 14:33
To: 'michaela.marc@hotmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Application (30.03.23)
Attachments: Exhibit to Chris Gamble (CPG1 - PART 7) 30.03.23.pdf

Dear Recipient,

Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) ("the Shell Petrol Stations Proceedings")

In relation to the above proceedings, please see the attached, Part 7 of the Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023, by way of service on you:

A copy of the following documents will be served on you by separate email:

- Parts 8 to 9 Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023.

Eversheds Sutherland (International) LLP

Dutch, Megan

From: Shell Service
Sent: 06 April 2023 14:39
To: 'michaela.marc@hotmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Application (30.03.23)
Attachments: Exhibit to Chris Gamble (CPG1 - PART 8) 30.03.23.pdf

Dear Recipient,

Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) ("the Shell Petrol Stations Proceedings")

In relation to the above proceedings, please see the attached, Part 8 of the Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023, by way of service on you:

A copy of the following documents will be served on you by separate email:

- Part 9 Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023.

Eversheds Sutherland (International) LLP

Dutch, Megan

From: Shell Service
Sent: 06 April 2023 14:41
To: 'michaela.marc@hotmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Application (30.03.23)
Attachments: Exhibit to Chris Gamble (CPG1 - PART 9) 30.03.23.pdf

Dear Recipient,

Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) ("the Shell Petrol Stations Proceedings")

In relation to the above proceedings, please see the attached, Part 9 of the Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023, by way of service on you:

Eversheds Sutherland (International) LLP

Dutch, Megan

From: Shell Service
Sent: 06 April 2023 15:19
To: 'michaela.marc@hotmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Application (30.03.23)

Dear Recipient,

Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) (“the Shell Petrol Stations Proceedings”)

In relation to the above proceedings, a copy of the following documents have today been served on you by email:

1. Sealed Application dated 30 March 2023 - QB-2022-0001420;
2. Draft Order - QB-2022-0001420;
3. the Order of May J dated 13 March 2023;
4. Letter from the court dated 13 March 2023 providing notification that the review hearing, at which the Court will consider whether or not to extend the injunctions currently granted in the Shell Petrol Stations Proceedings, the Shell Haven Proceedings and the Shell Centre Tower Proceedings, is listed for 25 April 2023 for 1.5 days in a 2-day window;
5. First Witness Statement of Ben Austin dated 30 March 2023;
6. Exhibit to the First Witness Statement of Ben Austin dated 30 March 2023;
7. First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023;
8. Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023;
9. First Witness Statement of Alison Judith Oldfield dated 29 March 2023; and
10. Exhibit to the First Witness Statement of Alison Judith Oldfield dated 29 March 2023.

A copy of the above documents can also be viewed at <https://shellservices.cmno.tech/>

Eversheds Sutherland (International) LLP

Certificate of service

| | |
|--|------------------------------------|
| Name of court High Court Of Justice King's Bench Division Royal Courts of Justice | Claim No. QB-2022-001420 |
| Name of Claimant Shell U.K. Oil Products Limited | |
| Name of Defendant Persons Unknown damaging and/or blocking the use of or access to any Shell Petrol Station in England and Wales | |

| | |
|-----------------------------------|---------------------|
| On what day did you serve? | 0 6 / 0 4 / 2 0 2 3 |
| The date of service is | 1 1 / 0 4 / 2 0 2 3 |

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Sealed Application dated 30 March 2023;
2. Draft Order;
3. the Order of May J dated 13 March 2023;
4. Letter from the court dated 13 March 2023 providing notification that the review hearing, at which the Court will consider whether or not to extend the injunctions currently granted in the Shell Petrol Stations Proceedings, the Shell Haven Proceedings and the Shell Centre Tower Proceedings, is listed for 25 April 2023 for 1.5 days in a 2-day window;
5. First Witness Statement of Ben Austin dated 30 March 2023;
6. Exhibit to the First Witness Statement of Ben Austin dated 30 March 2023;
7. First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023;
8. Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023;
9. First Witness Statement of Alison Judith Oldfield dated 29 March 2023; and
10. Exhibit to the First Witness Statement of Alison Judith Oldfield dated 29 March 2023.

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Defendant

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)*

x by other means permitted by the court *(please specify)*

in accordance with the Order of Mrs Justice McGowan dated 5 May 2022

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

See Appendix

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

x other *(please specify)*

See Appendix

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

Full name Alexander James Wright

Signed 

Claimant's solicitor

Position or office held Principal Associate

(If signing on behalf of firm or company)

Date 13 / 04 / 2023

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.

QB-2022-001420

The Order of Mrs Justice McGowan dated 5 May 2022 ("the Order") provides at paragraph 11 that:

"Service of any further document in these proceedings upon the Defendants (other than any Defendant who is subsequently named in these proceedings) shall be validly effected by:

- (i) sending it by email to each of the email addresses listed in the Third Schedule to the Order;*
- (ii) uploading it to the Claim Documents URL website; and*
- (iii) sending a copy to any person who has previously requested a copy of the Claim Documents from the Claimant or its solicitors, either by post or email (as was requested by that person).*

Such service shall be deemed effective on the latest date on which all of the said steps shall have been completed".

In accordance with the above provisions, (1) Sealed Application dated 30 March 2023; (2) Draft Order; (3) First Witness Statement of Benjamin Austin dated 30 March 2023; (4) Exhibit to the First Witness Statement of Benjamin Austin dated 30 March 2023; (5) First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023; (6) Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023; (7) First Witness Statement of Alison Judith Oldfield dated 29 March 2023; (8) Exhibit to the First Witness Statement of Alison Judith Oldfield dated 29 March 2023; (9) Letter from the court dated 13 March 2023 providing notification that the review hearing, at which the Court will consider whether or not to extend the injunction currently granted in these proceedings, is listed for 25 April 2023 for 1.5 days in a 2-day window were served; and (10) the Order of May J dated 13 March 2023:

1. by sending it by email to each of the email addresses listed in the Third Schedule to the Order (set out below) on 6 April 2023 – emails sent at 09:01, 09:21, 09:58, 10:10, 10:42, 10:52, 11:07, 12:46, 13:01, 13:16, 13:31, 13:47, 14:01, 14:17, 14:31, 14:46, 15:00, 15:25 and 15:30;
2. by uploading it to the Claim Documents URL website on 6 April 2023; and
3. sending a copy to:
 - 3.1 Weightmans LLP (solicitors for The Chief Constable of Surrey Police) by Courier on 6 April 2023 to 100 Old Hall Street, Liverpool L3 9QJ;
 - 3.2 out of an abundance of caution, Hodge Jones & Allen Solicitors Limited (solicitors acting previously for Jessica Branch, Andrew Daniel Smith and Nancy Friel) by Courier on 6 April 2023 to 180 North Gower Street, London NW1 2NB and by email to ahardy@hja.net on 6 April 2023 at 08:48;
 - 3.3 Michael Gibson by Courier on 6 April 2023 to 16 Bel Lane, Feltham TW13 6BY; and
 - 3.4 Michaela Marc by email on 6 April 2023 to michaela.marc@hotmail.com – emails sent at 13:08, 13:14, 13:25, 13:29, 13:34, 13:37, 14:06, 14:13, 14:20, 14:22, 14:26, 14:29, 14:33, 14:39, 14:41 and 15:19.

Email addresses listed in the Third Schedule to the Order

1. **EXTINCTION REBELLION UK**
 - 1.1 enquiries@extinctionrebellion.uk
 - 1.2 press@extinctionrebellion.uk
 - 1.3 xrvideo@protonmail.com
 - 1.4 xr-action@protonmail.com
 - 1.5 xraffinitysupport@protonmail.com
 - 1.6 xr-arrestwelfare@protonmail.com
 - 1.7 artsxr@gmail.com
 - 1.8 xr-CitizensAssembly@protonmail.com
 - 1.9 xr.connectingcommunities@gmail.com
 - 1.10 xrdemocracy@protonmail.com

- 1.11 xrnotables@gmail.com
- 1.12 integration@rebellion.earth
- 1.13 xr-international@protonmail.com
- 1.14 xr-legal@riseup.net
- 1.15 press@extinctionrebellion.uk
- 1.16 xr-newsletter@protonmail.com
- 1.17 xr-peoplesassembly@protonmail.com
- 1.18 xrpoliceliason@protonmail.com
- 1.19 rebelringers@rebellion.earth
- 1.20 xr.regenerativeculture@gmail.com
- 1.21 xr-regionaldevelopment@protonmail.com
- 1.22 RelationshipsXRUK@protonmail.com
- 1.23 xr.mandates@gmail.com
- 1.24 socialmedia@extinctionrebellion.uk
- 1.25 xrsocialmediaevents@gmail.com
- 1.26 eventsxr@gmail.com
- 1.27 xrbristol.regional@protonmail.com
- 1.28 xrcymru@protonmail.com
- 1.29 xr.eastengland@protonmail.com
- 1.30 xrlondoncoord@gmail.com
- 1.31 XRMidlands@protonmail.com
- 1.32 xrne@protonmail.com
- 1.33 support@xrnorth.org
- 1.34 xrni@rebellion.earth
- 1.35 xrscotland@gmail.com
- 1.36 XR-SouthEastRegionalTeam@protonmail.com
- 1.37 xr.regional.sw@protonmail.com
- 1.38 talksandtraining.xrbristol@protonmail.com
- 1.39 xrcymrutalksandtraining@gmail.com
- 1.40 eoexrtnt@protonmail.com
- 1.41 xrlondoncommunityevents@gmail.com
- 1.42 xrmidlandstraining@protonmail.com
- 1.43 XRNE.training@protonmail.com
- 1.44 xrnw.training@gmail.com
- 1.45 xryorkshire.training@gmail.com
- 1.46 xrni.tt@rebellion.earth
- 1.47 talksandtrainings.scotland@extinctionrebellion.uk
- 1.48 xrttse@gmail.com
- 1.49 xrsw.trainings@gmail.com

2. **JUST STOP OIL**

- 2.1 Ring2021@protonmail.com
- 2.2 juststopoil@protonmail.com
- 2.3 youthclimateswarm@protonmail.com

3. **YOUTH CLIMATE SWARM**

- 3.1 youthclimateswarm@protonmail.com

Dutch, Megan

From: Shell Service
Sent: 13 April 2023 11:50
To: Shell Service; 'enquiries@extinctionrebellion.uk'; 'press@extinctionrebellion.uk'; 'xrvideo@protonmail.com'; 'xr-action@protonmail.com'; 'xraffinitysupport@protonmail.com'; 'xr-arrestwelfare@protonmail.com'; 'artsxr@gmail.com'; 'xr-CitizensAssembly@protonmail.com'; 'xr.connectingcommunities@gmail.com'; 'xrdemocracy@protonmail.com'; 'xrnotables@gmail.com'; 'integration@rebellion.earth'; 'xr-international@protonmail.com'; 'xr-legal@riseup.net'; 'press@extinctionrebellion.uk'; 'xr-newsletter@protonmail.com'; 'xr-peoplesassembly@protonmail.com'; 'xrpoliceliaison@protonmail.com'; 'rebelringers@rebellion.earth'; 'xr.regenerativeculture@gmail.com'; 'xr-regionaldevelopment@protonmail.com'; 'RelationshipsXRUK@protonmail.com'; 'xr.mandates@gmail.com'; 'socialmedia@extinctionrebellion.uk'; 'xrsocialmediaevents@gmail.com'; 'eventsxr@gmail.com'; 'xrbristol.regional@protonmail.com'; 'xrcymru@protonmail.com'; 'xr.eastengland@protonmail.com'; 'xrlondoncoord@gmail.com'; 'XRMidlands@protonmail.com'; 'xrne@protonmail.com'; 'support@xrnorth.org'; 'xrni@rebellion.earth'; 'xrscotland@gmail.com'; 'XR-SouthEastRegionalTeam@protonmail.com'; 'xr.regional.sw@protonmail.com'; 'talksandtraining.xrbristol@protonmail.com'; 'xrcymrutalksandtraining@gmail.com'; 'eoexrtnt@protonmail.com'; 'xrlondoncommunityevents@gmail.com'; 'xrmidlandstraining@protonmail.com'; 'XRNE.training@protonmail.com'; 'xrnw.training@gmail.com'; 'xryorkshire.training@gmail.com'; 'xrni.tt@rebellion.earth'; 'talksandtrainings.scotland@extinctionrebellion.uk'; 'xrttse@gmail.com'; 'xrsw.trainings@gmail.com'; 'Ring2021@protonmail.com'; 'juststopoil@protonmail.com'; 'youthclimateswarm@protonmail.com'; 'youthclimateswarm@protonmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) - Sealed Application (30.03.23)
Attachments: QB-2022-001420 Draft Amended Claim Form (Shell Petrol Stations).PDF; Draft Amended PoC (PS) QB-2002-001420(212939078.2).docx

Dear Recipient,

In relation to the above proceedings, please see attached, Draft Amended Claim Form and Draft Amended Particulars of Claim which relate to our client's application dated 30 March 2023 in the above proceedings, by way of service on you.

Eversheds Sutherland (International) LLP

Dutch, Megan

From: Postmaster2
Sent: 13 April 2023 11:52
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- eoexrtnt@protonmail.com

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <eoexrtnt@protonmail.com>: Recipient address rejected: Mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Swan, Megan

From: Postmaster2
Sent: 13 April 2023 11:52
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- xr-peoplesassembly@protonmail.com

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <xr-peoplesassembly@protonmail.com>: Recipient address rejected: Mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Swan, Megan

From: Postmaster2
Sent: 13 April 2023 11:52
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- xrdemocracy@protonmail.com

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <xrdemocracy@protonmail.com>: Recipient address rejected: Mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Swan, Megan

From: Postmaster2
Sent: 13 April 2023 11:52
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- xrmidlandstraining@protonmail.com

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <xrmidlandstraining@protonmail.com>: Recipient address rejected: Mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Swan, Megan

From: Postmaster2
Sent: 13 April 2023 11:52
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- xrvideo@protonmail.com

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <xrvideo@protonmail.com>: Recipient address rejected: Mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Swan, Megan

From: Postmaster2
Sent: 13 April 2023 11:52
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- xr-international@protonmail.com

could not be delivered. The problem appears to be :
-- Recipient email address is possibly incorrect

Additional information follows :
-- 5.1.1 <xr-international@protonmail.com>: Recipient address rejected: Address does not exist

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Dutch, Megan

From: xr-legal@riseup.net
Sent: 13 April 2023 11:52
To: Shell Service
Subject: Autoreply for XR Legal Support

Hi there,

Thanks for getting in touch with the XR Legal Support Team.

We have received your email and are working on getting a response to you ASAP! We are currently quite low in capacity and so our response to your email(s) might be delayed.

If you don't hear from us within two weeks, please email back and we will do our best to get to you sooner.

In the meantime, please have a look at our website (<https://www.informeddissent.info>), as this may have information to answer your questions.

If your email is related to an upcoming court appearance, we will prioritise your email and get a response to you ASAP. Please also email the XR Arrest Welfare Team (XR-ArrestWelfare@protonmail.com) with the details of your court date.

If your email is related to trainings run by our team, see our Trainings Calendar for details about upcoming Trainings. This can be accessed at this link: <https://teamup.com/ksqtxh86ftomucpgu>

During Rebellions, where you need an urgent response or if someone has been arrested at an action you are at, please call the XR Legal Back Office on 07749 335574 and we will deal with your query that way.

In Solidarity,
XR Legal Support Team

Swan, Megan

From: Extinction Rebellion UK press team <press@extinctionrebellion.uk>
Sent: 13 April 2023 11:52
To: Shell Service
Subject: Thank you for contacting the Extinction Rebellion UK press team.

This inbox is constantly monitored by our team and we will reply to urgent inquiries promptly.

Read our latest press releases online here: <https://extinctionrebellion.uk/press/>

Find images from our latest actions here: <https://show.pics.io/xr-global-media-breaking-news-content-600ed2733c68d80019a19bc7/search?tagId=600ed6023c68d80019a19f6e>

(please credit the photographer named in the file)

If you'd like to receive our latest press releases please sign up here: <https://risingup.us19.list-manage.com/subscribe?u=62f20a42bfe8389a54fa6721e&id=78d1154dbe>

Extinction Rebellion is an international movement that uses non-violent civil disobedience in an attempt to halt mass extinction and minimise the risk of social collapse.

Read more about the vision and demands of XR: <https://extinctionrebellion.uk/the-truth/about-us/>

In love and rage,

XR UK press team

Swan, Megan

From: Arts XR <artsxr@gmail.com>
Sent: 13 April 2023 11:52
To: Shell Service
Subject: Resources from XR arts Re: Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) - Sealed Application (30.03.23)

Hello wonderful rebels!

We get lots of messages and hope the links below will help guide you to the right creative group contact. Please bear with us for responses.

With love, grief, rage and deep gratitude x

XR Art groups are at the heart and soul of XR's action design, messaging and outreach; from graphic design and Art Blockers printing to 3D protest architecture, music, choreography and dance.

The original Art group sits within M&M and is integral to XR's messaging and graphic design. Contact xrdesigngroup@gmail.com for graphic design support and introduction to the **XR Design Programme**. This includes download links for designers to use the font (strictly non-commercial use only), some banner templates, colour schemes, graphic assets and more. These can also be found on the XR website.

Creative Circle groups work closely with Action Planners: [XR Arts - Groups & Campaigns](#). Get in touch directly with your region or ask us here for a specific contact with your **Regional Arts coordinator** (this info is confidential).

XR Arts 'How To' guides, zines and videos are on page 2.

[XR Arts - Action Design](#) gives useful pointers when designing for an action, including information about Art Assets (banners, flags etc)

Visit [XR Art Blockers](#) or contact artblockers@gmail.com for printing, painting, woodblocks and flag-making guidelines.

2019 Guidelines: [Arts Working Group Guidelines doc](#).

Dutch, Megan

From: XR Social Media Events <xrsocialmediaevents@gmail.com>
Sent: 13 April 2023 11:52
To: Shell Service
Subject: Thanks for submitting your event for social media Re: Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) - Sealed Application (30.03.23)

Hi there,

Thanks for your email about XR Facebook events. This inbox is checked most days but we are all volunteers - please be patient if you don't hear back straight away.

If you are new to setting up and promoting XR Facebook events, please [take a look at the guide here](#). This is important if you are based in London and would like to set up an event there.

If you have an existing Facebook event and are looking for support to promote it, please flag that in your email and we will do what we can to help. Please state whether it's a London or UK wide event.

Please note, we are no longer able to accept co-host requests for regional or local events to be listed on the Extinction Rebellion or Extinction Rebellion UK Facebook pages. This is because there were too many events listed on these pages - it was very difficult for people to find events near them in the list. If your event is UK-wide or International, please do send a co-host request.

Alternatively, if you'd like to submit an XR event for the UK, London or International Facebook page, please make sure you have sent the below to me:

- Event name
- Event image (a Facebook banner is ideal)
- Event location
- Event start and end time
- Event date
- Event frequency (e.g. once a week)
- Short description of the event
- A URL (web link) if you are selling tickets or have a website with more info
- Private or open event?
- Child friendly?

That will help me get your event up on Facebook speedily. If you need anything extra or have questions, pop it in your reply.

Thanks,

Lorriane, Ben and the Social Media team

Swan, Megan

From: XR London <xrlondoncoord@gmail.com>
Sent: 13 April 2023 11:52
To: Shell Service
Subject: Thank you for your email Re: Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) - Sealed Application (30.03.23)

Thank you for your email to XR London Regional Coords. We check emails frequently, but have a lot of them to get through. Please bear with us, we will respond as soon as possible.

Thank you for your patience!

XR London Regional Team

--

London Regional Development

We are facing an unprecedented global emergency. Scientists agree we have entered a period of abrupt climate breakdown, and we are in the midst of a mass extinction of our own making. Help avert an ecological and civilizational catastrophe. Join [Extinction Rebellion!](#)

Swan, Megan

From: XR South West Talks and Trainings <xrsw.trainings@gmail.com>
Sent: 13 April 2023 11:52
To: Shell Service
Subject: Email currently not being monitored Re: Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) - Sealed Application (30.03.23)

Hi there, apologies but this email address is currently not being regularly monitored. For XR South West based Talks & Trainings queries, please contact xr_cornwall_talks_training@protonmail.com

Dutch, Megan

From: XR Connecting Communities <xr.connectingcommunities@gmail.com>
Sent: 13 April 2023 11:52
To: Shell Service
Subject: Thank you for your email! + Links Re: Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) - Sealed Application (30.03.23)

Hi there,

Thank you for your email! If we're a little slow, please bear with us - we will come to you as soon as possible. We have a lot going on behind the scenes!

We can offer you connections to groups in XR, advice on how to join or create a group... and more.

We'll be with you soon - in the meantime, check the links below.

Love and Rage,
The Connecting Communities team xx

These links might help!

1. **New to XR? Check out our onboarding guides and trainings:** <https://uk.rebellion.academy>
2. **XR Toolkit - how to guides!** <https://rebeltoolkit.extinctionrebellion.uk>
3. **Trying to find a local group?** <https://extinctionrebellion.uk/act-now/local-groups>
4. **Community group links:** <https://extinctionrebellion.uk/act-now/resources/communities>

PLEASE NOTE: The community group page is under construction and some groups are more active than others, if you don't get a response, don't be disheartened. Get in touch with us and we can help you.

--

Love & courage,
XR UK Connecting Communities

"If we wait for the governments, it'll be too little, too late; if we act as individuals, it'll be too little; but if we act as communities, it might just be enough, just in time."
Rob Hopkins

Dutch, Megan

From: Postmaster2
Sent: 17 April 2023 05:54
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- xr-regionaldevelopment@protonmail.com

could not be delivered. The problem appears to be :
-- Recipient server unavailable or busy

Additional information follows :
-- 4.2.2 <xr-regionaldevelopment@protonmail.com>: Recipient address rejected: Mailbox quota exceeded

This condition occurred after 30 attempt(s) to deliver over a period of 90 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Dutch, Megan

From: Postmaster2
Sent: 17 April 2023 08:43
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- youthclimateswarm@protonmail.com

could not be delivered. The problem appears to be :
-- Recipient server unavailable or busy

Additional information follows :
-- 4.2.2 <youthclimateswarm@protonmail.com>: Recipient address rejected: Mailbox quota exceeded

This condition occurred after 30 attempt(s) to deliver over a period of 92 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Dutch, Megan

From: Postmaster2
Sent: 17 April 2023 08:02
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- juststopoil@protonmail.com

could not be delivered. The problem appears to be :
-- Recipient server unavailable or busy

Additional information follows :
-- 4.2.2 <juststopoil@protonmail.com>: Recipient address rejected: Mailbox quota exceeded

This condition occurred after 30 attempt(s) to deliver over a period of 92 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

Delivered

Your item was delivered on **15-04-2023**.

Not the signature you expected? [Find out why.](#)

Tracking number:

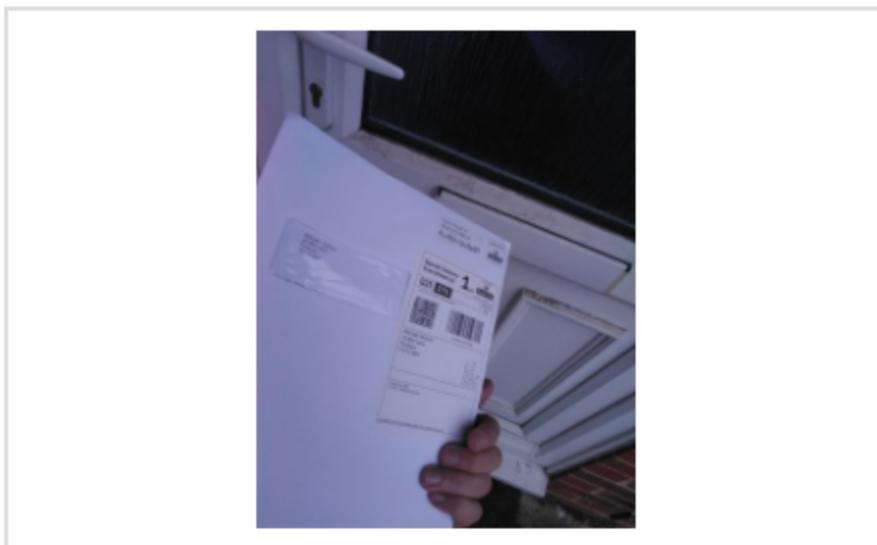
DS552930552GB

Service used:

Royal Mail Special Delivery
Guaranteed 1pm™



Proof of delivery



 [Rotate image](#)



 [Rotate image](#)

Signed for by: GIBSON

Account Postage GB
AC01372190014

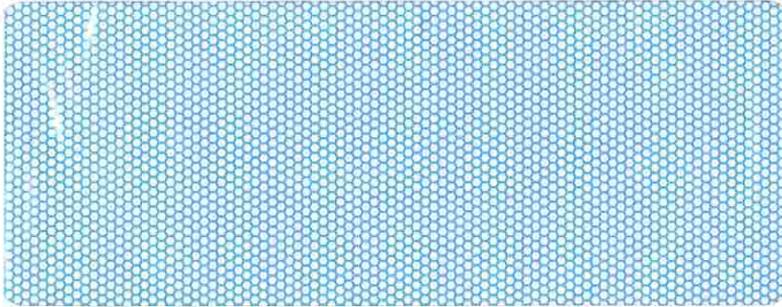
1



Delivered by



Royal Mail



Special Delivery
Guaranteed by

1 pm

Delivered By



Royal Mail

Postage on Account GB

Q25 D76

Large Letter

70g

32-013 721 9001-47A C6E 325



DS 5529 3055 2GB

Michael Gibson
16 Bel Lane
Feltham
TW13 6BY

Return Address
Eversheds
Sutherland LLP
One Wood Street
London
EC2V 7WS

Customer Ref:
13159 / 356009.000001

Royal Mail: UK's lowest average parcel carbon footprint 205g CO2e

**Eversheds Sutherland
(International) LLP**
Bridgewater Place
Water Lane
Leeds
LS11 5DR
United Kingdom

T: +44 20 7497 9797
F: +44 20 7919 4919
DX 12027 Leeds-27

eversheds-sutherland.com

Michael Gibson
16 Bel Lane
Feltham
TW13 6BY

Date: 14 April 2023
Our Ref: GRAYSTIR\356009.000001
Direct: + 44 113 200 4624
Email: isabellegrayston@eversheds-sutherland.com

By Special Delivery

Dear Mr Gibson

Shell U.K Oil Products Limited v Persons Unknown (Claim No: QB-2022-0001420)

We write further to our previous correspondence in respect of the above.

Please find enclosed, to the extent necessary, by way of service:

1. Draft Amended Claim Form; and
2. Draft Amended Particulars of Claim

Which relate to our client's application dated 30 March 2023 in the above proceedings.

Yours sincerely

Eversheds Sutherland (International) LLP

Eversheds Sutherland (International) LLP

cloud_uk\213045925\1\graystir

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Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities under Eversheds Sutherland. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.

IN THE HIGH COURT OF JUSTICE

CLAIM NO:

QUEEN'S BENCH DIVISION

BETWEEN

SHELL U.K. OIL PRODUCTS LIMITED

Claimant

- and -

**PERSONS UNKNOWN DAMAGING,
AND/OR BLOCKING THE USE OF OR
ACCESS TO ANY SHELL PETROL
STATION IN ENGLAND AND WALES, OR
TO ANY EQUIPMENT OR
INFRASTRUCTURE UPON IT, BY
EXPRESS OR IMPLIED AGREEMENT
WITH OTHERS, IN CONNECTION WITH
ENVIRONMENTAL PROTEST
CAMPAIGNS WITH THE INTENTION OF
DISRUPTING THE SALE OR SUPPLY OF
FUEL TO OR FROM THE SAID STATION**

Defendants

**[DRAFT] AMENDED
PARTICULARS OF CLAIM
BY ORDER OF []
DATED [] 2023**

1. THE CLAIMANT

- 1.1 The Claimant forms part of the group of companies ultimately owned and controlled by Shell plc, a company incorporated in the United Kingdom. Shell plc and its subsidiaries are referred to in this statement of case collectively as the Shell Group.
- 1.2 The Shell Group markets and sells fuels to the retail market through a global network of Shell-branded service stations. The Claimant sells fuel to the retail market in England and Wales via a network of petrol filling stations the “**Shell Petrol Stations**”. In respect of some (only) of the Shell Petrol Stations the Claimant or another Shell Group Company holds the freehold or leasehold interest in that site, and/or owns some of the equipment used for the dispensing of fuel at the site. The

Claimant controls the use of its branding upon the Shell Petrol Stations. However, the Shell Petrol Stations are all operated by third party operators, and their servants or agents. A number of them also include other retail businesses (such as convenience stores) operated under the Shell brand or otherwise.

- 1.3 **As at 3 May 2022, in total** there are 1,062 Shell Petrol Stations in England and Wales.
- 1.4 For the reasons hereinafter set out, the Claimant reasonably apprehends that, unless restrained by this court, persons unknown will carry out unlawful acts upon the Shell Petrol Stations, by agreement with others, with the intention to injure the Claimant, by reason of which the Claimant will suffer injury. By these proceedings the Claimant therefore seeks an injunction to restrain such actions.

2. FUEL FILLING STATION, COBHAM MOTORWAY SERVICE AREA

- 2.1 On 28 April 2022 groups of protestors associated with the Just Stop Oil environmental protest campaign targeted two petrol stations on the M25 motorway. One of those was a Shell Petrol Station at the motorway services known as Cobham service station (the “**Cobham Services**”).
- 2.2 The actions of the protestors on 28 April 2022, variously included the following:
 - 2.2.1 Smashing the screens of petrol pumps by hitting them with hammers;
 - 2.2.2 Spraying or writing graffiti on the petrol pump screens;
 - 2.2.3 Blocking access to incoming and outgoing cars;
 - 2.2.4 Gluing themselves to pumps and/or parts of the forecourt;
 - 2.2.5 Climbing onto a tanker, and gluing themselves to its cab.
- 2.3 Each of the said activities set out in paragraph 2.2 (the “**Unlawful Acts**”) above constituted an unlawful act, and each was carried out by persons acting in express or implied agreement with the intention of harming the Claimant.

PARTICULARS

- 2.3.1 The Unlawful Acts involved coordinated action by a group of persons. They were also carried out as a part of the wider Just Stop Oil Movement, with

some of those protesting carrying or displaying banners referring to the said movement. According to the movement's website:

“Just Stop Oil is a coalition of groups working together to ensure the Government commits to halting new fossil fuel licensing and production”.

- 2.3.2 The self-evident aim of those engaging in the Unlawful Acts was to disrupt the supply of fuel from the Shell Petrol Station at Cobham Services, harming the Claimant and Shell Group.
- 2.4 One reason why the Unlawful Acts, or acts of a similar nature, are particularly disruptive is because of the significant threat to health and safety of workers at the Shell Petrol Stations, and the wider public, which the activities of the protesters constitute in relation to a site which handles liquids which are highly flammable and (upon escape) environmentally hazardous, and upon which highly flammable vapours may also be present.
- 2.5 The protestors arrived at around 7am and were on site until they were removed by the Surrey Police Force. The said acts significantly prevented or impeded the sale of the Claimant's fuels from the Shell Petrol Station for a significant period, causing it loss and damage.

3. THE CLAIMANT'S REASONABLE ANTICIPATION OF FURTHER UNLAWFUL ACTS DIRECTED AGAINST IT BY THOSE ACTING IN COMBINATION WITH THE INTENTION OF HARMING THE CLAIMANT

- 3.1 The Claimant reasonably anticipates that, unless prevented by this Honourable Court, persons unknown will in the future combine to engage in further acts of a similar nature or effect to the Unlawful Acts with the intention of disrupting the sale of fuel by the Claimant through other Shell Petrol Stations.

PARTICULARS

- 3.1.1 **As at 3 May 2022, the The** home page of Just Stop Oil states that its campaign *“will mobilise 1000+ people from all walks of life to oppose the plans for new UK Oil fields during 2022”* (emphasis added)
- 3.1.2 The Claimant has repeatedly been the subject of protests in which protesters have attacked its properties, including:

- (i) On 1 April trespassers entered an oil terminal at Kingsbury, Warwickshire which is operated as a joint venture by the Shell Group and others, in relation to which very detailed safety protocols operate to limit ignition risk. They locked themselves to pipework within the terminal. Other protesters sought to disrupt access to the terminal by undermining the roadway which provides access to both fuel lorries and (as necessary) emergency vehicles.
- (ii) On 6 April 2022 and 13 April 2022, protesters caused damage to the Shell Centre in London.
- (iii) On or around 14 April 2022, as widely reported in the media, approximately five protesters carrying Just Stop Oil banners disabled the breaks of an Eddie Stobart fuel transporter lorry in Chiswick, and glued themselves to its roof.
- (iv) On 16 April 2022 six protesters acting under the banner of the Extinction Rebellion movement, climbed onto a Shell-branded petrol tanker on Bayswater Road, preventing it from moving.

3.1.3 In a press release issued on 28 April 2022 in the name of Just Stop Oil by a person or persons using the title “JSO Press”, the actions on 28 April 2022 were described as a “*significant escalation*” taken in response to enforcement action carried out by authorities in response to protest activities at other oil installations. The press release states:

“The supporters of Just Stop Oil will continue the disruption until the government makes a statement that it will end new oil and gas projects in the UK”

3.2 Any further conspiracy by persons to injure the Claimant by further unlawful acts of the kind which the Claimant seeks to restrain is very likely to cause further harm to the Claimant (and others) and risks causing very serious harm to the Claimant (and others), none of which is reasonably capable of being compensated in damages:

3.2.1 The activities of the protesters are positively designed to prevent the sale of the Claimant’s fuels from the Shell Petrol Stations, to the financial detriment of the Claimant.

3.2.2 The level of disruption caused by such activities is heightened by the fact that they have involved damage to equipment for the distribution of highly flammable

fuels and have taken place in areas in which highly flammable fuel vapours may be present.

- 3.2.3 Those engaging in the protests have shown themselves willing to hit petrol pumps with hammers. In the premises, they self-evidently have no, or no sufficient, regard for the risks which such activity may pose to the safety of themselves or others.
 - 3.2.4 Any activity which risks the integrity of the installations on the Shell Petrol Stations, or the safety of any workers or customers in the vicinity of a Shell Petrol Station, is a matter of the utmost gravity to the Shell Group generally, and to the Claimant in particular.
- 3.3 In the premises, the Claimant is entitled to, and seeks an order that each of the Defendants be prevented / forbidden from, in express or implied agreement with any other person, and with the intention of disrupting the sale or supply of fuel to or from a Shell Petrol Station, any of the following acts:
- 3.3.1 blocking or impeding access to any pedestrian or vehicular entrance to a Shell Petrol Station or to a building within the Shell Petrol Station;
 - 3.3.2 causing damage to any part of a Shell Petrol Station or to any equipment or infrastructure (including but not limited to fuel pumps) upon it;
 - 3.3.3 operating or disabling any switch or other device in or on a Shell Petrol Station so as to interrupt the supply of fuel from that Shell Petrol Station or from one of its fuel pumps, or so as to prevent the emergency interruption of the supply of fuel to the Shell Petrol Station;
 - 3.3.4 affixing themselves, or any object or person, to any part of a Shell Petrol Station, or to any other person or object on or in a Shell Petrol Station;
 - 3.3.5 erecting any structure in, on or against any part of a Shell Petrol Station;
 - 3.3.6 spraying, painting, pouring or writing any substance on any part of a Shell Petrol Station;
 - 3.3.7 encouraging or assisting any other person do any of the acts referred to in this sub-paragraph.

AND the Claimant claims:

1. An injunction in the terms set out in paragraph 3.3 or such other terms as the Court considers appropriate to prevent the actions complained of occurring at the Shell Petrol Stations and the obstruction of vehicular access to and from them;
2. Further or other relief.

Statement of Truth

The Claimant believes that the facts stated in these **Amended** Particulars of Claim are true. The Claimant understands 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 Claimant to sign this statement of truth.

Signed:

Dated:

CLAIM NO:

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

BETWEEN

SHELL U.K. OIL PRODUCTS LIMITED

Claimant

- and -

**PERSONS UNKNOWN DAMAGING, AND/OR
BLOCKING THE USE OF OR ACCESS TO ANY
SHELL PETROL STATION IN ENGLAND AND
WALES, OR TO ANY EQUIPMENT OR
INFRASTRUCTURE UPON IT, BY EXPRESS OR
IMPLIED AGREEMENT WITH OTHERS, IN
CONNECTION WITH ENVIRONMENTAL
PROTEST CAMPAIGNS WITH THE
INTENTION OF DISRUPTING THE SALE OR
SUPPLY OF FUEL TO OR FROM THE SAID
STATION**

Defendants

PARTICULARS OF CLAIM

**Cannon Place
78 Cannon Street
London EC4N 6AF**

**Eversheds Sutherland (Intl) LLP
Bridgewater Place, Water Lane
Leeds LS11 5DR**

Ref: Q10051.00007 OLDFIEA/SHELL

Solicitors for the Claimant



DRAFT AMENDED
Claim Form

IN THE HIGH COURT OF JUSTICE, QUEEN'S BENCH
DIVISION, ROYAL COURTS OF JUSTICE

| | |
|---|---|
| Fee Account no. | PBA0088890 |
| Help with Fees - Ref no. (if applicable) | H W F - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> |

For court use only

| | |
|------------|--|
| Claim no. | |
| Issue date | |

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.

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

SHELL U.K. OIL PRODUCTS LIMITED of
Shell centre
London
SE1 7NA



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

PERSONS UNKNOWN DAMAGING, AND/OR BLOCKING THE USE OF OR ACCESS TO ANY SHELL PETROL STATION IN ENGLAND AND WALES, OR TO ANY EQUIPMENT OR INFRASTRUCTURE UPON IT, BY EXPRESS OR IMPLIED AGREEMENT WITH OTHERS, IN CONNECTION WITH ENVIRONMENTAL PROTEST CAMPAIGNS WITH THE INTENTION OF DISRUPTING THE SALE OR SUPPLY OF FUEL TO OR FROM THE SAID STATION.

Brief details of claim

The Claimant seeks an injunction to restrain the Defendants from obstructing access to or damaging petrol stations using its brand, by unlawful means and in combination with others.

Value

The Claim is not for monetary relief.

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

High Court, Queen's Bench Division, the Royal Courts of Justice, Strand, London WC2A 2LL.

Defendant's name and address for service including postcode

youthclimateswarm@protonmail.com
(Youth Climate Swarm)

xr-legal@riseup.net;
enquiries@extinctionrebellion.uk
(Extinction Rebellion)

juststopoil@protonmail.co.uk
(Just Stop Oil)

| | £ |
|------------------------------|---------------|
| Amount claimed | |
| Court fee | 569.00 |
| Legal representative's costs | |
| Total amount | 569.00 |

Claim No.

Does, or will, your claim include any issues under the Human Rights Act 1998? Yes No

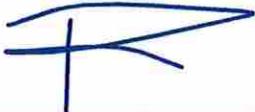
Particulars of Claim ~~(attached)~~ ~~(to follow)~~

Statement of Truth

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 believe that the facts stated in this particulars of claim are true.~~
- The Claimant believes that the facts stated in this particulars of claim are true. I am authorised by the claimant to sign this statement.**

Signature



- Claimant
- Litigation friend (where judgment creditor is a child or a patient)
- Claimant's legal representative (as defined by CPR 2.3(1))

Date

| Day | Month | Year |
|-----|-------|------|
| 4 | May | 2022 |

Full name

Emma Margaretha Florence Pinkerton

Name of claimant's legal representative's firm

CMS Cameron McKenna Nabarro Olswang 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

Cannon Place, 78 Cannon Street

Second line of address

-

Town or city

London

County (optional)

-

Postcode

E C 4 N 6 A F

If applicable

Phone number

02073673000

Fax phone number

-

DX number

DX 135316 London Cannon Place

Your Ref.

010051.00007

Email

Dutch, Megan

From: Wright, Alexander
Sent: 14 April 2023 12:05
To: Joanna.Carty@Weightmans.com; Lauren Farrell
Cc: Oldfield, Alison
Subject: Shell U.K Oil Products Limited v Persons Unknown (Claim No: QB-2022-0001420)
Attachments: Weightmans - letter including CF and PoC - 14 Apr 23.pdf

Dear Joanna / Lauren,

Please see attached letter, a hard copy of which is being issued in tonight's post.

Regards

Alex Wright | Principal Associate | Real Estate Dispute Resolution | Eversheds Sutherland

T: 44 161 831 8582

M: 44 7500 578 620

www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland

Helping our clients, our people and our communities to thrive

Delivered

Your item was delivered on **17-04-2023**.

Not the signature you expected? [Find out why.](#)

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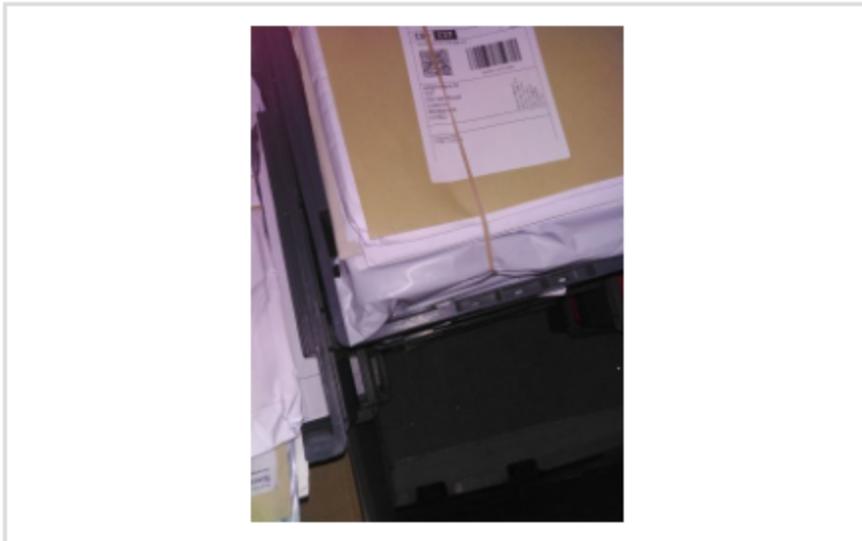
DS552930549GB

Service used:

Royal Mail Special Delivery
Guaranteed 1pm™



Proof of delivery



 [Rotate image](#)

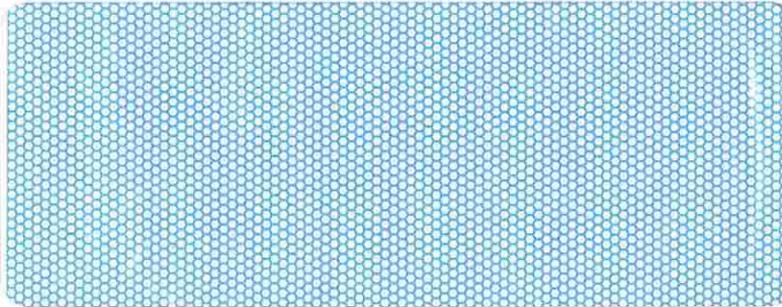


 [Rotate image](#)

Signed for by: 100

Account Postage GB
AC01372190014

1



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Guaranteed by

1 pm

Delivered By



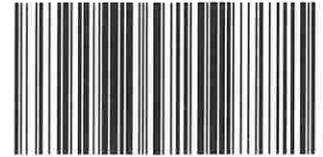
Postage on Account GB

C80 C37

Large Letter

70g

32-013 721 9001-47A C67 D85



DS 5529 3054 9GB

Weightmans LLP
100 Old Hall Street
Liverpool
L3 9QJ

Return Address
Eversheds
Sutherland LLP
One Wood Street
London
EC2V 7MS

Customer Ref:
13158 / 356009-000001

Royal Mail: UK's lowest average parcel carbon footprint 205g CO2e

**Eversheds Sutherland
(International) LLP**
Bridgewater Place
Water Lane
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T: +44 20 7497 9797
F: +44 20 7919 4919
DX 12027 Leeds-27

eversheds-sutherland.com

Weightmans LLP
100 Old Hall Street
Liverpool
L3 9QJ

Date: 14 April 2023
Our Ref: graystir\356009-000001
Direct: + 44 113 200 4624
Email: isabellegrayston@eversheds-sutherland.com

BY SPECIAL DELIVERY AND BY EMAIL TO joanna.carty@weightmans.com

Dear Weightmans LLP

Shell U.K Oil Products Limited v Persons Unknown (Claim No: QB-2022-0001420)

We write further to our previous correspondence in respect of the above.

Please find enclosed by way of service:

1. Draft Amended Claim Form; and
2. Draft Amended Particulars of Claim

Which relate to our client's application dated 30 March 2023 in the above proceedings.

Yours faithfully

Eversheds Sutherland (International) LLP

Eversheds Sutherland (International) LLP

cloud_uk\213045302\1\graystir

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IN THE HIGH COURT OF JUSTICE

CLAIM NO:

QUEEN'S BENCH DIVISION

BETWEEN

SHELL U.K. OIL PRODUCTS LIMITED

Claimant

- and -

**PERSONS UNKNOWN DAMAGING,
AND/OR BLOCKING THE USE OF OR
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EXPRESS OR IMPLIED AGREEMENT
WITH OTHERS, IN CONNECTION WITH
ENVIRONMENTAL PROTEST
CAMPAIGNS WITH THE INTENTION OF
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Defendants

**[DRAFT] AMENDED
PARTICULARS OF CLAIM
BY ORDER OF []
DATED [] 2023**

1. THE CLAIMANT

- 1.1 The Claimant forms part of the group of companies ultimately owned and controlled by Shell plc, a company incorporated in the United Kingdom. Shell plc and its subsidiaries are referred to in this statement of case collectively as the Shell Group.
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Claimant controls the use of its branding upon the Shell Petrol Stations. However, the Shell Petrol Stations are all operated by third party operators, and their servants or agents. A number of them also include other retail businesses (such as convenience stores) operated under the Shell brand or otherwise.

- 1.3 **As at 3 May 2022, in ~~the~~** total there are 1,062 Shell Petrol Stations in England and Wales.
- 1.4 For the reasons hereinafter set out, the Claimant reasonably apprehends that, unless restrained by this court, persons unknown will carry out unlawful acts upon the Shell Petrol Stations, by agreement with others, with the intention to injure the Claimant, by reason of which the Claimant will suffer injury. By these proceedings the Claimant therefore seeks an injunction to restrain such actions.

2. FUEL FILLING STATION, COBHAM MOTORWAY SERVICE AREA

- 2.1 On 28 April 2022 groups of protestors associated with the Just Stop Oil environmental protest campaign targeted two petrol stations on the M25 motorway. One of those was a Shell Petrol Station at the motorway services known as Cobham service station (the “**Cobham Services**”).
- 2.2 The actions of the protestors on 28 April 2022, variously included the following:
 - 2.2.1 Smashing the screens of petrol pumps by hitting them with hammers;
 - 2.2.2 Spraying or writing graffiti on the petrol pump screens;
 - 2.2.3 Blocking access to incoming and outgoing cars;
 - 2.2.4 Gluing themselves to pumps and/or parts of the forecourt;
 - 2.2.5 Climbing onto a tanker, and gluing themselves to its cab.
- 2.3 Each of the said activities set out in paragraph 2.2 (the “**Unlawful Acts**”) above constituted an unlawful act, and each was carried out by persons acting in express or implied agreement with the intention of harming the Claimant.

PARTICULARS

- 2.3.1 The Unlawful Acts involved coordinated action by a group of persons. They were also carried out as a part of the wider Just Stop Oil Movement, with

some of those protesting carrying or displaying banners referring to the said movement. According to the movement's website:

"Just Stop Oil is a coalition of groups working together to ensure the Government commits to halting new fossil fuel licensing and production".

- 2.3.2 The self-evident aim of those engaging in the Unlawful Acts was to disrupt the supply of fuel from the Shell Petrol Station at Cobham Services, harming the Claimant and Shell Group.
- 2.4 One reason why the Unlawful Acts, or acts of a similar nature, are particularly disruptive is because of the significant threat to health and safety of workers at the Shell Petrol Stations, and the wider public, which the activities of the protesters constitute in relation to a site which handles liquids which are highly flammable and (upon escape) environmentally hazardous, and upon which highly flammable vapours may also be present.
- 2.5 The protestors arrived at around 7am and were on site until they were removed by the Surrey Police Force. The said acts significantly prevented or impeded the sale of the Claimant's fuels from the Shell Petrol Station for a significant period, causing it loss and damage.

3. THE CLAIMANT'S REASONABLE ANTICIPATION OF FURTHER UNLAWFUL ACTS DIRECTED AGAINST IT BY THOSE ACTING IN COMBINATION WITH THE INTENTION OF HARMING THE CLAIMANT

- 3.1 The Claimant reasonably anticipates that, unless prevented by this Honourable Court, persons unknown will in the future combine to engage in further acts of a similar nature or effect to the Unlawful Acts with the intention of disrupting the sale of fuel by the Claimant through other Shell Petrol Stations.

PARTICULARS

- 3.1.1 **As at 3 May 2022, the** ~~The~~ home page of Just Stop Oil states that its campaign *"will mobilise 1000+ people from all walks of life to oppose the plans for new UK Oil fields during 2022"* (emphasis added)
- 3.1.2 The Claimant has repeatedly been the subject of protests in which protesters have attacked its properties, including:

- (i) On 1 April trespassers entered an oil terminal at Kingsbury, Warwickshire which is operated as a joint venture by the Shell Group and others, in relation to which very detailed safety protocols operate to limit ignition risk. They locked themselves to pipework within the terminal. Other protesters sought to disrupt access to the terminal by undermining the roadway which provides access to both fuel lorries and (as necessary) emergency vehicles.
- (ii) On 6 April 2022 and 13 April 2022, protesters caused damage to the Shell Centre in London.
- (iii) On or around 14 April 2022, as widely reported in the media, approximately five protesters carrying Just Stop Oil banners disabled the breaks of an Eddie Stobart fuel transporter lorry in Chiswick, and glued themselves to its roof.
- (iv) On 16 April 2022 six protesters acting under the banner of the Extinction Rebellion movement, climbed onto a Shell-branded petrol tanker on Bayswater Road, preventing it from moving.

3.1.3 In a press release issued on 28 April 2022 in the name of Just Stop Oil by a person or persons using the title “JSO Press”, the actions on 28 April 2022 were described as a “*significant escalation*” taken in response to enforcement action carried out by authorities in response to protest activities at other oil installations. The press release states:

“The supporters of Just Stop Oil will continue the disruption until the government makes a statement that it will end new oil and gas projects in the UK”

3.2 Any further conspiracy by persons to injure the Claimant by further unlawful acts of the kind which the Claimant seeks to restrain is very likely to cause further harm to the Claimant (and others) and risks causing very serious harm to the Claimant (and others), none of which is reasonably capable of being compensated in damages:

3.2.1 The activities of the protesters are positively designed to prevent the sale of the Claimant’s fuels from the Shell Petrol Stations, to the financial detriment of the Claimant.

3.2.2 The level of disruption caused by such activities is heightened by the fact that they have involved damage to equipment for the distribution of highly flammable

fuels and have taken place in areas in which highly flammable fuel vapours may be present.

- 3.2.3 Those engaging in the protests have shown themselves willing to hit petrol pumps with hammers. In the premises, they self-evidently have no, or no sufficient, regard for the risks which such activity may pose to the safety of themselves or others.
 - 3.2.4 Any activity which risks the integrity of the installations on the Shell Petrol Stations, or the safety of any workers or customers in the vicinity of a Shell Petrol Station, is a matter of the utmost gravity to the Shell Group generally, and to the Claimant in particular.
- 3.3 In the premises, the Claimant is entitled to, and seeks an order that each of the Defendants be prevented / forbidden from, in express or implied agreement with any other person, and with the intention of disrupting the sale or supply of fuel to or from a Shell Petrol Station, any of the following acts:
- 3.3.1 blocking or impeding access to any pedestrian or vehicular entrance to a Shell Petrol Station or to a building within the Shell Petrol Station;
 - 3.3.2 causing damage to any part of a Shell Petrol Station or to any equipment or infrastructure (including but not limited to fuel pumps) upon it;
 - 3.3.3 operating or disabling any switch or other device in or on a Shell Petrol Station so as to interrupt the supply of fuel from that Shell Petrol Station or from one of its fuel pumps, or so as to prevent the emergency interruption of the supply of fuel to the Shell Petrol Station;
 - 3.3.4 affixing themselves, or any object or person, to any part of a Shell Petrol Station, or to any other person or object on or in a Shell Petrol Station;
 - 3.3.5 erecting any structure in, on or against any part of a Shell Petrol Station;
 - 3.3.6 spraying, painting, pouring or writing any substance on any part of a Shell Petrol Station;
 - 3.3.7 encouraging or assisting any other person do any of the acts referred to in this sub-paragraph.

AND the Claimant claims:

1. An injunction in the terms set out in paragraph 3.3 or such other terms as the Court considers appropriate to prevent the actions complained of occurring at the Shell Petrol Stations and the obstruction of vehicular access to and from them;
2. Further or other relief.

Statement of Truth

The Claimant believes that the facts stated in these **Amended** Particulars of Claim are true. The Claimant understands 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 Claimant to sign this statement of truth.

Signed:

Dated:

CLAIM NO:

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

BETWEEN

SHELL U.K. OIL PRODUCTS LIMITED

Claimant

- and -

**PERSONS UNKNOWN DAMAGING, AND/OR
BLOCKING THE USE OF OR ACCESS TO ANY
SHELL PETROL STATION IN ENGLAND AND
WALES, OR TO ANY EQUIPMENT OR
INFRASTRUCTURE UPON IT, BY EXPRESS OR
IMPLIED AGREEMENT WITH OTHERS, IN
CONNECTION WITH **ENVIRONMENTAL**
PROTEST CAMPAIGNS WITH THE
INTENTION OF DISRUPTING THE SALE OR
SUPPLY OF FUEL TO OR FROM THE SAID
STATION**

Defendants

PARTICULARS OF CLAIM

**~~Cannon Place~~
~~78 Cannon Street~~
~~London EC4N 6AF~~**

**Eversheds Sutherland (Intl) LLP
Bridgewater Place, Water Lane
Leeds LS11 5DR**

Ref: 010051.00007 OLDFIEA/SHELL

Solicitors for the Claimant



DRAFT AMENDED
Claim Form

IN THE HIGH COURT OF JUSTICE, QUEEN'S BENCH
DIVISION, ROYAL COURTS OF JUSTICE

| | |
|---|---|
| Fee Account no. | PBA0088890 |
| Help with Fees - Ref no. (if applicable) | H W F - <input type="text"/> <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/> |

For court use only

| | |
|------------|--|
| Claim no. | |
| Issue date | |

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.

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

SHELL U.K. OIL PRODUCTS LIMITED of
Shell centre
London
SE1 7NA



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

PERSONS UNKNOWN DAMAGING, AND/OR BLOCKING THE USE OF OR ACCESS TO ANY SHELL PETROL STATION IN ENGLAND AND WALES, OR TO ANY EQUIPMENT OR INFRASTRUCTURE UPON WHICH, BY EXPRESS OR IMPLIED AGREEMENT WITH OTHERS, IN CONNECTION WITH ENVIRONMENTAL PROTEST CAMPAIGNS WITH THE INTENTION OF DISRUPTING THE SALE OR SUPPLY OF FUEL TO OR FROM THE SAID STATION.

Brief details of claim

The Claimant seeks an injunction to restrain the Defendants from obstructing access to or damaging petrol stations using its brand, by unlawful means and in combination with others.

Value

The Claim is not for monetary relief.

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

High Court, Queen's Bench Division, the Royal Courts of Justice, Strand, London WC2A 2LL.

Defendant's name and address for service including postcode

youthclimateswarm@protonmail.com
(Youth Climate Swarm)

xr-legal@riseup.net;
enquiries@extinctionrebellion.uk
(Extinction Rebellion)

juststopoil@protonmail.co.uk
(Just Stop Oil)

| | £ |
|------------------------------|---------------|
| Amount claimed | |
| Court fee | 569.00 |
| Legal representative's costs | |
| Total amount | 569.00 |

| | |
|-----------|--|
| Claim No. | |
|-----------|--|

Does, or will, your claim include any issues under the Human Rights Act 1998? Yes No

Particulars of Claim ~~(attached)~~ ~~(to follow)~~

Statement of Truth

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 believe that the facts stated in this particulars of claim are true.~~
- The Claimant believes that the facts stated in this particulars of claim are true. I am authorised by the claimant to sign this statement.**

Signature



- Claimant
- Litigation friend (where judgment creditor is a child or a patient)
- Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

Month

Year

4

May

2022

Full name

Emma Margaretha Florence Pinkerton

Name of claimant's legal representative's firm

CMS Cameron McKenna Nabarro Olswang 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

Cannon Place, 78 Cannon Street

Second line of address

-

Town or city

London

County (optional)

-

Postcode

E C 4 N 6 A F

If applicable

Phone number

02073673000

Fax phone number

-

DX number

DX 135316 London Cannon Place

Your Ref.

010051.00007

Email

Dutch, Megan

From: Wright, Alexander
Sent: 14 April 2023 12:03
To: AHardy@hja.net
Cc: Oldfield, Alison
Subject: Shell UK Oil v Persons Unknown; Our ref: 1046651.0002/Your ref: CASEYLZ
\L&DM-00000049
Attachments: HJA - letter including CF and PoC - 14 Apr 23.pdf

Dear Alice,

Please see the attached letter, a hard copy of which is being issued in today's post also.

Regards

Alex Wright | Principal Associate | Real Estate Dispute Resolution | Eversheds Sutherland

T: 44 161 831 8582

M: 44 7500 578 620

www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland

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Proof of delivery

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A handwritten signature in black ink, appearing to be "KAVON".

Your item was delivered on **17-04-2023**.

Signed for by: KAVON

Service used: Royal Mail Special Delivery Guaranteed 1pm™

Delivered at: 12:21, Monday 17 April 2023

Account Postage GB
AC01372190014

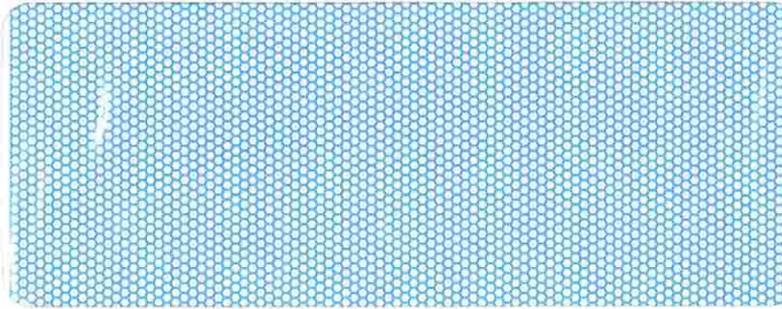
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Hodge Jones and Allen
Solicitors Limited
180 North Gower Street
London
NW1 2NB

Return Address
Eversheds
Sutherland LLP
One Wood Street
London
EC2V 7WS

Customer Ref:
13160 / 356009-000001

Royal Mail: UK's lowest average parcel carbon footprint 205g CO2e

**Eversheds Sutherland
(International) LLP**
Bridgewater Place
Water Lane
Leeds
LS11 5DR
United Kingdom

T: +44 20 7497 9797
F: +44 20 7919 4919
DX 12027 Leeds-27

eversheds-sutherland.com

Hodge Jones and Allen Solicitors Limited
180 North Gower Street
London
NW1 2NB

Date: 14 April 2023
Our Ref: GRAYSTIR\356009-000001
Direct: + 44 113 200 4624
Email: isabellegrayston@eversheds-sutherland.com

BY SPECIAL DELIVERY AND BY EMAIL: AHardy@hja.net

Dear Hodge Jones and Allen Solicitors Limited

Shell U.K Oil Products Limited v Persons Unknown (Claim No: QB: 2022-0001420)

We write further to our previous correspondence in respect of the above.

Please find enclosed, to the extent necessary, by way of service:

1. Draft Amended Claim Form; and
2. Draft Amended Particulars of Claim

Which relate to our client's application dated 30 March 2023 in the above proceedings.

Yours faithfully

Eversheds Sutherland (International) LLP

Eversheds Sutherland (International) LLP

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IN THE HIGH COURT OF JUSTICE

CLAIM NO:

QUEEN'S BENCH DIVISION

BETWEEN

SHELL U.K. OIL PRODUCTS LIMITED

Claimant

- and -

PERSONS UNKNOWN DAMAGING,
AND/OR BLOCKING THE USE OF OR
ACCESS TO ANY SHELL PETROL
STATION IN ENGLAND AND WALES, OR
TO ANY EQUIPMENT OR
INFRASTRUCTURE UPON IT, BY
EXPRESS OR IMPLIED AGREEMENT
WITH OTHERS, IN CONNECTION WITH
ENVIRONMENTAL PROTEST
CAMPAIGNS WITH THE INTENTION OF
DISRUPTING THE SALE OR SUPPLY OF
FUEL TO OR FROM THE SAID STATION

Defendants

**[DRAFT] AMENDED
PARTICULARS OF CLAIM
BY ORDER OF []
DATED [] 2023**

1. THE CLAIMANT

- 1.1 The Claimant forms part of the group of companies ultimately owned and controlled by Shell plc, a company incorporated in the United Kingdom. Shell plc and its subsidiaries are referred to in this statement of case collectively as the Shell Group.
- 1.2 The Shell Group markets and sells fuels to the retail market through a global network of Shell-branded service stations. The Claimant sells fuel to the retail market in England and Wales via a network of petrol filling stations the “**Shell Petrol Stations**”. In respect of some (only) of the Shell Petrol Stations the Claimant or another Shell Group Company holds the freehold or leasehold interest in that site, and/or owns some of the equipment used for the dispensing of fuel at the site. The

Claimant controls the use of its branding upon the Shell Petrol Stations. However, the Shell Petrol Stations are all operated by third party operators, and their servants or agents. A number of them also include other retail businesses (such as convenience stores) operated under the Shell brand or otherwise.

- 1.3 **As at 3 May 2022, in total** there are 1,062 Shell Petrol Stations in England and Wales.
- 1.4 For the reasons hereinafter set out, the Claimant reasonably apprehends that, unless restrained by this court, persons unknown will carry out unlawful acts upon the Shell Petrol Stations, by agreement with others, with the intention to injure the Claimant, by reason of which the Claimant will suffer injury. By these proceedings the Claimant therefore seeks an injunction to restrain such actions.

2. FUEL FILLING STATION, COBHAM MOTORWAY SERVICE AREA

- 2.1 On 28 April 2022 groups of protestors associated with the Just Stop Oil environmental protest campaign targeted two petrol stations on the M25 motorway. One of those was a Shell Petrol Station at the motorway services known as Cobham service station (the “**Cobham Services**”).
- 2.2 The actions of the protestors on 28 April 2022, variously included the following:
 - 2.2.1 Smashing the screens of petrol pumps by hitting them with hammers;
 - 2.2.2 Spraying or writing graffiti on the petrol pump screens;
 - 2.2.3 Blocking access to incoming and outgoing cars;
 - 2.2.4 Gluing themselves to pumps and/or parts of the forecourt;
 - 2.2.5 Climbing onto a tanker, and gluing themselves to its cab.
- 2.3 Each of the said activities set out in paragraph 2.2 (the “**Unlawful Acts**”) above constituted an unlawful act, and each was carried out by persons acting in express or implied agreement with the intention of harming the Claimant.

PARTICULARS

- 2.3.1 The Unlawful Acts involved coordinated action by a group of persons. They were also carried out as a part of the wider Just Stop Oil Movement, with

some of those protesting carrying or displaying banners referring to the said movement. According to the movement's website:

"Just Stop Oil is a coalition of groups working together to ensure the Government commits to halting new fossil fuel licensing and production".

- 2.3.2 The self-evident aim of those engaging in the Unlawful Acts was to disrupt the supply of fuel from the Shell Petrol Station at Cobham Services, harming the Claimant and Shell Group.
- 2.4 One reason why the Unlawful Acts, or acts of a similar nature, are particularly disruptive is because of the significant threat to health and safety of workers at the Shell Petrol Stations, and the wider public, which the activities of the protesters constitute in relation to a site which handles liquids which are highly flammable and (upon escape) environmentally hazardous, and upon which highly flammable vapours may also be present.
- 2.5 The protestors arrived at around 7am and were on site until they were removed by the Surrey Police Force. The said acts significantly prevented or impeded the sale of the Claimant's fuels from the Shell Petrol Station for a significant period, causing it loss and damage.

3. THE CLAIMANT'S REASONABLE ANTICIPATION OF FURTHER UNLAWFUL ACTS DIRECTED AGAINST IT BY THOSE ACTING IN COMBINATION WITH THE INTENTION OF HARMING THE CLAIMANT

- 3.1 The Claimant reasonably anticipates that, unless prevented by this Honourable Court, persons unknown will in the future combine to engage in further acts of a similar nature or effect to the Unlawful Acts with the intention of disrupting the sale of fuel by the Claimant through other Shell Petrol Stations.

PARTICULARS

- 3.1.1 **As at 3 May 2022, the** ~~The~~ home page of Just Stop Oil states that its campaign *"will mobilise 1000+ people from all walks of life to oppose the plans for new UK Oil fields during 2022"* (emphasis added)
- 3.1.2 The Claimant has repeatedly been the subject of protests in which protesters have attacked its properties, including:

- (i) On 1 April trespassers entered an oil terminal at Kingsbury, Warwickshire which is operated as a joint venture by the Shell Group and others, in relation to which very detailed safety protocols operate to limit ignition risk. They locked themselves to pipework within the terminal. Other protesters sought to disrupt access to the terminal by undermining the roadway which provides access to both fuel lorries and (as necessary) emergency vehicles.
- (ii) On 6 April 2022 and 13 April 2022, protesters caused damage to the Shell Centre in London.
- (iii) On or around 14 April 2022, as widely reported in the media, approximately five protesters carrying Just Stop Oil banners disabled the breaks of an Eddie Stobart fuel transporter lorry in Chiswick, and glued themselves to its roof.
- (iv) On 16 April 2022 six protesters acting under the banner of the Extinction Rebellion movement, climbed onto a Shell-branded petrol tanker on Bayswater Road, preventing it from moving.

3.1.3 In a press release issued on 28 April 2022 in the name of Just Stop Oil by a person or persons using the title “JSO Press”, the actions on 28 April 2022 were described as a “*significant escalation*” taken in response to enforcement action carried out by authorities in response to protest activities at other oil installations. The press release states:

“The supporters of Just Stop Oil will continue the disruption until the government makes a statement that it will end new oil and gas projects in the UK”

3.2 Any further conspiracy by persons to injure the Claimant by further unlawful acts of the kind which the Claimant seeks to restrain is very likely to cause further harm to the Claimant (and others) and risks causing very serious harm to the Claimant (and others), none of which is reasonably capable of being compensated in damages:

- 3.2.1 The activities of the protesters are positively designed to prevent the sale of the Claimant’s fuels from the Shell Petrol Stations, to the financial detriment of the Claimant.
- 3.2.2 The level of disruption caused by such activities is heightened by the fact that they have involved damage to equipment for the distribution of highly flammable

fuels and have taken place in areas in which highly flammable fuel vapours may be present.

- 3.2.3 Those engaging in the protests have shown themselves willing to hit petrol pumps with hammers. In the premises, they self-evidently have no, or no sufficient, regard for the risks which such activity may pose to the safety of themselves or others.
 - 3.2.4 Any activity which risks the integrity of the installations on the Shell Petrol Stations, or the safety of any workers or customers in the vicinity of a Shell Petrol Station, is a matter of the utmost gravity to the Shell Group generally, and to the Claimant in particular.
- 3.3 In the premises, the Claimant is entitled to, and seeks an order that each of the Defendants be prevented / forbidden from, in express or implied agreement with any other person, and with the intention of disrupting the sale or supply of fuel to or from a Shell Petrol Station, any of the following acts:
- 3.3.1 blocking or impeding access to any pedestrian or vehicular entrance to a Shell Petrol Station or to a building within the Shell Petrol Station;
 - 3.3.2 causing damage to any part of a Shell Petrol Station or to any equipment or infrastructure (including but not limited to fuel pumps) upon it;
 - 3.3.3 operating or disabling any switch or other device in or on a Shell Petrol Station so as to interrupt the supply of fuel from that Shell Petrol Station or from one of its fuel pumps, or so as to prevent the emergency interruption of the supply of fuel to the Shell Petrol Station;
 - 3.3.4 affixing themselves, or any object or person, to any part of a Shell Petrol Station, or to any other person or object on or in a Shell Petrol Station;
 - 3.3.5 erecting any structure in, on or against any part of a Shell Petrol Station;
 - 3.3.6 spraying, painting, pouring or writing any substance on any part of a Shell Petrol Station;
 - 3.3.7 encouraging or assisting any other person do any of the acts referred to in this sub-paragraph.

AND the Claimant claims:

1. An injunction in the terms set out in paragraph 3.3 or such other terms as the Court considers appropriate to prevent the actions complained of occurring at the Shell Petrol Stations and the obstruction of vehicular access to and from them;
2. Further or other relief.

Statement of Truth

The Claimant believes that the facts stated in these **Amended** Particulars of Claim are true. The Claimant understands 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 Claimant to sign this statement of truth.

Signed:

Dated:

CLAIM NO:

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

BETWEEN

SHELL U.K. OIL PRODUCTS LIMITED

Claimant

- and -

**PERSONS UNKNOWN DAMAGING, AND/OR
BLOCKING THE USE OF OR ACCESS TO ANY
SHELL PETROL STATION IN ENGLAND AND
WALES, OR TO ANY EQUIPMENT OR
INFRASTRUCTURE UPON IT, BY EXPRESS OR
IMPLIED AGREEMENT WITH OTHERS, IN
CONNECTION WITH ENVIRONMENTAL
PROTEST CAMPAIGNS WITH THE
INTENTION OF DISRUPTING THE SALE OR
SUPPLY OF FUEL TO OR FROM THE SAID
STATION**

Defendants

PARTICULARS OF CLAIM

**~~Cannon Place~~
~~78 Cannon Street~~
~~London EC4N 6AF~~**

**Eversheds Sutherland (Intl) LLP
Bridgewater Place, Water Lane
Leeds LS11 5DR**

Ref: Q10051.00007 OLDFIEA/SHELL

Solicitors for the Claimant



DRAFT AMENDED
Claim Form

IN THE HIGH COURT OF JUSTICE, QUEEN'S BENCH
DIVISION, ROYAL COURTS OF JUSTICE

| | |
|---|---|
| Fee Account no. | PBA0088890 |
| Help with Fees - Ref no. (if applicable) | H W F - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> |

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| | |
|------------|--|
| Claim no. | |
| Issue date | |

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.

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

SHELL U.K. OIL PRODUCTS LIMITED of
Shell centre
London
SE1 7NA



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

PERSONS UNKNOWN DAMAGING, AND/OR BLOCKING THE USE OF OR ACCESS TO ANY SHELL PETROL STATION IN ENGLAND AND WALES, OR TO ANY EQUIPMENT OR INFRASTRUCTURE UPON WHICH, BY EXPRESS OR IMPLIED AGREEMENT WITH OTHERS, IN CONNECTION WITH ENVIRONMENTAL PROTEST CAMPAIGNS WITH THE INTENTION OF DISRUPTING THE SALE OR SUPPLY OF FUEL TO OR FROM THE SAID STATION.

Brief details of claim

The Claimant seeks an injunction to restrain the Defendants from obstructing access to or damaging petrol stations using its brand, by unlawful means and in combination with others.

Value

The Claim is not for monetary relief.

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

High Court, Queen's Bench Division, the Royal Courts of Justice, Strand, London WC2A 2LL.

Defendant's name and address for service including postcode

youthclimateswarm@protonmail.com
(Youth Climate Swarm)

xr-legal@riseup.net;
enquiries@extinctionrebellion.uk
(Extinction Rebellion)

juststopoil@protonmail.co.uk
(Just Stop Oil)

| | £ |
|------------------------------|---------------|
| Amount claimed | |
| Court fee | 569.00 |
| Legal representative's costs | |
| Total amount | 569.00 |

| | |
|-----------|--|
| Claim No. | |
|-----------|--|

Does, or will, your claim include any issues under the Human Rights Act 1998? Yes No

Particulars of Claim ~~(attached)~~ ~~(to follow)~~

Statement of Truth

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 believe that the facts stated in this particulars of claim are true.~~
- The Claimant believes that the facts stated in this particulars of claim are true. I am authorised by the claimant to sign this statement.**

Signature



- Claimant
- Litigation friend (where judgment creditor is a child or a patient)
- Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

Month

Year

4

May

2022

Full name

Emma Margaretha Florence Pinkerton

Name of claimant's legal representative's firm

CMS Cameron McKenna Nabarro Olswang 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

Cannon Place, 78 Cannon Street

Second line of address

-

Town or city

London

County (optional)

-

Postcode

E | C | 4 | N | 6 | A | F

If applicable

Phone number

02073673000

Fax phone number

-

DX number

DX 135316 London Cannon Place

Your Ref.

010051.00007

Email

Dutch, Megan

From: Shell Service
Sent: 13 April 2023 11:50
To: 'michaela.marc@hotmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Application (30.03.23)
Attachments: QB-2022-001420 Draft Amended Claim Form (Shell Petrol Stations).PDF; Draft Amended PoC (PS) QB-2002-001420(212939078.2).docx

Dear Recipient,

In relation to the above proceedings, please see attached, Draft Amended Claim Form and Draft Amended Particulars of Claim which relate to our client's application dated 30 March 2023 in the above proceedings, by way of service on you.

Eversheds Sutherland (International) LLP

Dutch, Megan

From: Shell Service
Sent: 13 April 2023 11:50
To: 'nick.hofman1951@gmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420)
Attachments: QB-2022-001420 Draft Amended Claim Form (Shell Petrol Stations).PDF; Draft Amended PoC (PS) QB-2002-001420(212939078.2).docx

Dear Recipient,

In relation to the above proceedings, please see attached, Draft Amended Claim Form and Draft Amended Particulars of Claim which relate to our client's application dated 30 March 2023 in the above proceedings, by way of service on you.

Eversheds Sutherland (International) LLP

Certificate of service

| | |
|--|------------------------------------|
| Name of court High Court Of Justice King's Bench Division Royal Courts of Justice | Claim No. QB-2022-001420 |
| Name of Claimant Shell U.K. Oil Products Limited | |
| Name of Defendant Persons Unknown damaging and/or blocking the use of or access to any Shell Petrol Station in England and Wales | |

On what day did you serve? 1 3 / 0 4 / 2 0 2 3
The date of service is 1 8 / 0 4 / 2 0 2 3

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

1. Draft Amended Particulars of Claim; and
 2. Draft Amended Claim Form.

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

Defendant

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)

in accordance with the Order of Mrs Justice McGowan dated 5 May 2022

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

See Appendix

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)*

See Appendix

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

Full name Alexander James Wright

Signed 

Position or office held Principal Associate

Claimant's solicitor

(If signing on behalf of firm or company)

Date 1 4 / 0 4 / 2 0 2 3

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.

QB-2022-001420

The Order of Mrs Justice McGowan dated 5 May 2022 (“the Order”) provides at paragraph 11 that:

“Service of any further document in these proceedings upon the Defendants (other than any Defendant who is subsequently named in these proceedings) shall be validly effected by:

- (i) sending it by email to each of the email addresses listed in the Third Schedule to the Order;*
- (ii) uploading it to the Claim Documents URL website; and*
- (iii) sending a copy to any person who has previously requested a copy of the Claim Documents from the Claimant or its solicitors, either by post or email (as was requested by that person).*

Such service shall be deemed effective on the latest date on which all of the said steps shall have been completed”.

In accordance with the above provisions, (1) Draft Amended Claim Form; and (2) Draft Amended Particulars of Claim were served:

1. by sending it by email to each of the email addresses listed in the Third Schedule to the Order (set out below) on 13 April 2023 – email sent at 11:50;
2. by uploading it to the Claim Documents URL website on 13 April 2023; and
3. sending a copy to:
 - 3.1 Weightmans LLP (solicitors for The Chief Constable of Surrey Police) by Special Delivery on 14 April 2023 to 100 Old Hall Street, Liverpool L3 9QJ and by email to joanna.carty@weightmans.com and lauren.farrell@weightmans.com on 14 April 2023 at 12:05;
 - 3.2 out of an abundance of caution, Hodge Jones & Allen Solicitors Limited (solicitors acting previously for Jessica Branch, Andrew Daniel Smith and Nancy Fried) by Special Delivery on 14 April 2023 to 180 North Gower Street, London NW1 2NB and by email to ahardy@hja.net on 14 April 2023 at 12:03;
 - 3.3 Michael Gibson by Special Delivery on 14 April 2023 to 16 Bel Lane, Feltham TW13 6BY;
 - 3.4 Michaela Marc by email on 13 April 2023 to michaela.marc@hotmail.com – email sent at 11:50; and
 - 3.5 by email to nick.hofman1951@gmail.com on 13 April 2023 – email sent at 11:50.

Email addresses listed in the Third Schedule to the Order

1. **EXTINCTION REBELLION UK**
 - 1.1 enquiries@extinctionrebellion.uk
 - 1.2 press@extinctionrebellion.uk
 - 1.3 xrvideo@protonmail.com
 - 1.4 xr-action@protonmail.com
 - 1.5 xraffinitysupport@protonmail.com
 - 1.6 xr-arrestwelfare@protonmail.com
 - 1.7 artsxr@gmail.com
 - 1.8 xr-CitizensAssembly@protonmail.com
 - 1.9 xr.connectingcommunities@gmail.com
 - 1.10 xrdemocracy@protonmail.com
 - 1.11 xrnotables@gmail.com
 - 1.12 integration@rebellion.earth
 - 1.13 xr-international@protonmail.com
 - 1.14 xr-legal@riseup.net
 - 1.15 press@extinctionrebellion.uk
 - 1.16 xr-newsletter@protonmail.com

- 1.17 xr-peoplesassembly@protonmail.com
- 1.18 xrpoliceliaison@protonmail.com
- 1.19 rebelringers@rebellion.earth
- 1.20 xr.regenerativeculture@gmail.com
- 1.21 xr-regionaldevelopment@protonmail.com
- 1.22 RelationshipsXRUK@protonmail.com
- 1.23 xr.mandates@gmail.com
- 1.24 socialmedia@extinctionrebellion.uk
- 1.25 xrsocialmediaevents@gmail.com
- 1.26 eventsxr@gmail.com
- 1.27 xrbristol.regional@protonmail.com
- 1.28 xrcymru@protonmail.com
- 1.29 xr.eastengland@protonmail.com
- 1.30 xrlondoncoord@gmail.com
- 1.31 XRMidlands@protonmail.com
- 1.32 xrne@protonmail.com
- 1.33 support@xrnorth.org
- 1.34 xrni@rebellion.earth
- 1.35 xrscotland@gmail.com
- 1.36 XR-SouthEastRegionalTeam@protonmail.com
- 1.37 xr.regional.sw@protonmail.com
- 1.38 talksandtraining.xrbristol@protonmail.com
- 1.39 xrcymrutalksandtraining@gmail.com
- 1.40 eoexrtnt@protonmail.com
- 1.41 xrlondoncommunityevents@gmail.com
- 1.42 xrmidlandstraining@protonmail.com
- 1.43 XRNE.training@protonmail.com
- 1.44 xrnw.training@gmail.com
- 1.45 xryorkshire.training@gmail.com
- 1.46 xrni.tt@rebellion.earth
- 1.47 talksandtrainings.scotland@extinctionrebellion.uk
- 1.48 xrttse@gmail.com
- 1.49 xrsw.trainings@gmail.com

2. **JUST STOP OIL**

- 2.1 Ring2021@protonmail.com
- 2.2 juststopoil@protonmail.com
- 2.3 youthclimateswarm@protonmail.com

3. **YOUTH CLIMATE SWARM**

- 3.1 youthclimateswarm@protonmail.com