

Second Witness Statement

Party: Claimants

Exhibit: AJO2

Date: 19 April 2023

Claim No: QB-2022-001420

Claim No: QB-2022-001241

Claim No: QB-2022-001259

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

SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED

Claimant (QB-2022-001259)

SHELL U.K. OIL PRODUCTS LIMITED

Claimant (QB-2022-001420)

SHELL U.K. LIMITED

Claimant: (QB-2022-001241)

- and -

**PERSONS UNKNOWN ENTERING OR REMAINING IN OR ON THE BUILDING KNOWN AS
SHELL CENTRE TOWER, BELVEDERE ROAD, LONDON ("SHELL CENTRE TOWER") WITHOUT
THE CONSENT OF THE CLAIMANT, OR DAMAGING THE BUILDING OR DAMAGING OR
BLOCKING THE ENTRANCES TO THE SAID BUILDING**

Defendant (QB-2022-001259)

**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**

Defendant (QB-2022-001420)

**PERSONS UNKNOWN ENTERING OR REMAINING AT THE CLAIMANT'S SITE KNOWN AS
SHELL HAVEN, STANFORD-LE-HOPE (AND AS FURTHER DEFINED IN THE PARTICULARS
OF CLAIM) WITHOUT THE CONSENT OF THE CLAIMANT, OR BLOCKING
THE ENTRANCES TO THAT SITE**

Defendant (QB-2022-001241)

Second Witness Statement of Alison Judith Oldfield

I, **Alison Judith Oldfield** of Eversheds Sutherland (International) LLP ("**Eversheds Sutherland**") of Water Lane, Leeds LS11 5DR **WILL SAY AS FOLLOWS:**

1. **INTRODUCTION**

1.1 I am a partner at Eversheds Sutherland and have conduct of this matter on behalf of each of the Claimants in the subject proceedings.

1.2 Unless I state otherwise, the facts in this statement are within my knowledge and true. Where the facts are not within my knowledge, they are true to the best of my knowledge and belief, and I identify the source of my knowledge.

1.3 References to page numbers in this statement are to page numbers in **Exhibit AJO2**.

1.4 This witness statement is made in respect of the subject proceedings, being:

1.4.1 the proceedings with Claim Number QB-2022-001259 - which relate to Shell Centre Tower, Belvedere Road, London ("**the Shell Centre Tower Proceedings**") - in which Shell International Petroleum Company Limited ("**SIPC**") is the Claimant;

1.4.2 the proceedings with Claim Number QB-2022-001420 - which relate to Shell petrol stations in England and Wales ("**the Shell Petrol Stations Proceedings**") - in which Shell U.K. Oil Products Limited is the Claimant ("**SUKOP**"); and

1.4.3 the proceedings with Claim Number QB-2022-001241 which relate to the oil refinery known as Shell Haven, Stanford Le-Hope the Manorway, Stanford Le-Hope ("**the Shell Haven Proceedings**") - in which Shell U.K. Limited is the Claimant ("**Shell UK**").

(SIPC, SUKOP and Shell UK together being "**the Claimants**" and the Shell Centre Tower Proceedings, the Shell Petrol Stations Proceedings and the Shell Haven Proceedings together being "**the Proceedings**").

1.5 In this statement I address the service of documents in respect of each of the Proceedings.

SERVICE OF DOCUMENTS

2. **The Shell Centre Tower Proceedings**

2.1 Paragraph 9 of the Order of Mr Justice Bennathan dated 3 May 2022 ("**3 May 2022 Shell Centre Tower Order**") provides 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 <https://shellservices.cmno.tech/>; 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”.

2.2 In respect of the Shell Centre Tower Proceedings the following documents have been served:

2.2.1 Sealed Application dated 30 March 2023;

2.2.2 Draft Order;

2.2.3 Third Witness Statement of Keith Garwood dated 30 March 2023 and Exhibit to the Third Witness Statement of Keith Garwood dated 30 March 2023;

2.2.4 First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023 and Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023;

2.2.5 First Witness Statement of Alison Judith Oldfield dated 29 March 2023 and Exhibit to the First Witness Statement of Alison Judith Oldfield dated 29 March 2023; and

2.2.6 Letter from the court dated 13 March 2023 providing notification that the review hearing is listed for 25 April 2023 for 1.5 days in a 2-day window.

(together known as the “**Shell Centre Tower Documents**”)

Service by email - the Third Schedule to the Order

2.3 In accordance with the provisions of paragraph 9(i) of the 3 May 2022 Shell Centre Tower Order, the Shell Tower Centre Documents were served by email to each of the email addresses listed in the Third Schedule of the 3 May 2022 Shell Centre Tower Order as set out in the table below – from an email address, shell.service@eversheds-sutherland.com, which Eversheds Sutherland have created from which to serve the various documents in this matter. My colleague, Alex Wright (Principal Associate), and I have access to and control of this dedicated email address.

Item No.	Document(s) Served	Subject	Email date/time (Exhibit Reference)
1.	<p>1. Sealed Application dated 30 March 2023</p> <p>2. Draft Order</p> <p>3. Letter from the court dated 13 March 2023 providing notification that the review hearing is listed for 25 April 2023 for 1.5 days in a 2-day window.</p>	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	6 April 2023 09:01 (Pages 1 - 2 of Exhibit AJO2)
2.	<p>4. Third Witness Statement of Keith Garwood dated 30 March 2023</p> <p>5. First Witness Statement of Alison Judith Oldfield dated 29 March 2023</p> <p>6. First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023</p>	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	6 April 2023 09:21 (Pages 3 - 4 of Exhibit AJO2)
3.	7. Exhibit to the First Witness Statement of Alison Judith Oldfield dated 29 March 2023	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	6 April 2023 Part 1 - 10:52 Part 2 - 11:07 (Pages 5 - 6 of Exhibit AJO2)
4.	8. Exhibit to Third Witness Statement of Keith Garwood dated 30 March 2023	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International	6 April 2023 Part 1 - 11:26 Part 2: 11:34 (Pages 7 - 8 of Exhibit AJO2)

		Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	
5.	9. Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	6 April 2023 Part 1 - 12:46 Part 2 - 13:01 Part 3 - 13:16 Part 4 - 13:31 Part 5 - 13:47 Part 6 - 14:01 Part 7 - 14:17 Part 8 - 14:31 Part 9 - 14:46 (Pages 9 - 17 of Exhibit AJO2)

2.4 A further email was sent at 15:00 to (a) confirm the totality of the documents served by email; and (b) advise that copies of the Shell Tower Centre Documents can also be viewed at <https://shellservices.cmno.tech/>. A copy of this email is exhibited at pages 18 - 19 of **Exhibit AJO2**.

2.5 I should note that 46 automatic responses were received in response to the above emails. Having reviewed the timings of the automated responses, I believe that:

2.5.1 30 of these automatic responses were received in respect of emails which relate to documents sent collectively in respect of the Shell Tower Proceedings, the Shell Haven Proceedings and the Shell Petrol Station Proceedings (being item numbers 1, 2, 3 and 5 in the above table) – as the relevant email(s) sent contained attachments relevant to the Proceedings collectively. By way of illustration, (a) the email sent at 9:01 (exhibited at pages 1-2 of **Exhibit AJO2**) attached the sealed application and draft order in respect of each of the separate Proceedings and the email sent 10:52 and 11:07 (exhibited at pages 5-6 of **Exhibit AJO2**), attached the exhibits to my First Witness Statement (in two parts) – such documents relate to each of the Proceedings. These 30 emails can be broken down into the following sub-categories:

2.5.1.1 4 of the 30 emails were received from xr-international@protonmail.com which advised that the emails could not be delivered as the recipient's email address is possibly incorrect. A copy of the relevant emails are exhibited at pages 20 – 23 of Exhibit AJO2;

- 2.5.1.2 22 of the 30 emails appear to be automatic responses received from the following 6 email accounts: eoextrnt@protonmail.com, xrmidlandstraining@protonmail.com, xrdemocracy@protonmail.com, support@xrnorth.org, xrvideo@protonmail.com and xr-peoplesassembly@protonmail.com which advised that the emails could not be delivered as the relevant recipient's mailbox is full. A copy of the relevant emails are exhibited at pages 24 - 45 of **Exhibit AJO2**. I understand from this firm's IT team that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full; and
- 2.5.1.3 4 of the 30 emails were received from press@extinctionrebellion.uk which appear to be automatic tailored responses to any emails received. These emails are titled "Thank you for contacting the Extinction Rebellion UK press team" and states that "This inbox is constantly monitored by our team and we will reply to urgent inquiries promptly". A copy of the relevant emails are exhibited at pages 45 - 49 of **Exhibit AJO2**.

Together, these 30 emails are defined as the "**Wider Automated Responses**".

- 2.5.2 in response to the emails issued which related to the Shell Centre Tower Proceedings only (being item number 4), and having reviewed the timings of the automated responses, I believe that a total of 12 of the 46 automatic responses were:
- 2.5.3 automatic responses received from the following 6 email accounts: eoextrnt@protonmail.com, xrmidlandstraining@protonmail.com, xrdemocracy@protonmail.com, support@xrnorth.org, xrvideo@protonmail.com and xr-peoplesassembly@protonmail.com, These 12 automated responses advised that the emails could not be delivered as the relevant recipient's mailbox is full. A copy of the relevant emails are exhibited at pages 50 - 61 of **Exhibit AJO2**. I understand from this firm's IT team that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full;
- 2.5.4 2 emails were received from xr-international@protonmail.com which advised that the emails could not be delivered as the recipient's email address is possibly incorrect. A copy of the relevant emails are exhibited at pages 62 - 63 of **Exhibit AJO2**; and
- 2.5.5 2 emails were received from press@extinctionrebellion.uk which appear to be automatic tailored responses to any emails received. These emails are titled

"Thank you for contacting the Extinction Rebellion UK press team" and states that "This inbox is constantly monitored by our team and we will reply to urgent inquiries promptly". A copy of the relevant emails are exhibited at pages 64 - 65 of **Exhibit AJ02**.

2.6 Further Email Responses Received on 10 April 2023

2.6.1 Further to issuing the Shell Tower Documents, the Shell Haven Documents and the Shell Petrol Station Documents by email as set out above and below (on 6 April 2023) a further 56 email responses were received on 10 April 2023 from 6 email accounts. As these automated responses were received after issuing the respective emails in respect of the Shell Tower Documents, the Shell Haven Documents and the Shell Petrol Station Documents by email it is not possible to reasonably conclude to which email these "bounce backs" are in respect of.

2.6.2 All 56 emails advised that an email could not be delivered as the recipient's mailbox is full. A copy of the relevant emails are exhibited at pages 66 – 121 of **Exhibit AJ02** but are also summarised in the below table.

Email Account	No. Received	Reason
talksandtraining.xrbristol@protonmail.com	16	Mailbox quota exceeded
youthclimateswarm@protonmail.com	4	Mailbox quota exceeded
xrne.training@protonmail.com	2	Mailbox quota exceeded
juststopoil@protonmail.com	22	Mailbox quota exceeded
xr.eastengland@protonmail.com	6	Mailbox quota exceeded
xr-regionaldevelopment@protonmail.com	6	Mailbox quota exceeded

2.6.3 I understand from this firm's IT team that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full.

2.7 The automatic responses referred to at paragraphs 2.5.1.1 and 2.5.1.2, 2.5.3, 2.5.4 and 2.6.2 above, derive from 11 email addresses out of the total 49 email addresses linked to Extinction Rebellion, 1 email address out of the total 3 linked to Just Stop Oil and 1 email address out of the total 1 email addresses for Youth Climate Swarm, to which the abovementioned emails were sent.

2.8 Apart from the automated response referred to above, no responses from any of the other 38 addresses linked to Extinction Rebellion were received. I have no reason to believe that the emails sent to the other 38 email addresses to which the abovementioned emails were sent were not delivered or received, and no 'bounce back' or delivery failure notifications in this regard were received. Similarly apart from the automated response referred to

above no responses from any of the other email addresses linked to Just Stop Oil were received.

2.9 I therefore consider that the remaining 38 emails sent to the email addresses linked to Extinction Rebellion and the remaining 2 emails sent to the email addresses linked to Just Stop Oil were sufficient for effecting service of the Shell Centre Tower Documents on these groups.

2.10 In respect of Youth Climate Swarm, this was the only email address provided for within the addresses listed in the 3 May 2022 Shell Centre Tower Order. I do not consider that there are further steps to be taken in respect of effecting service of the Shell Centre Tower Documents on this group as:

2.10.1 this firm's IT team believes that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full; and

2.10.2 only 4 automatic responses were received in response to 16 emails sent to youthclimateswarm@protonmail.com in respect of the Shell Centre Tower Proceedings, I therefore have no reason to believe that the other 12 emails sent were not received – bringing the proceedings and the hearing on 25 April to their attention.

2.11 For the reasons explained above, I believe that the steps taken in relation to service of documents upon the email addresses referred to at paragraphs 2.3 and 2.4 complied with the requirement upon SIPC to send emails to the addresses listed in the 3 May 2022 Shell Centre Tower Order.

Service by uploading to <https://shellservices.cmno.tech>

2.12 I am informed by Ms Pinkerton of the Claimants' previous solicitors (CMS Cameron McKenna Nabarro Olswang LLP ("CMS")) that a copy of the Shell Centre Tower Documents were uploaded to <https://shellservices.cmno.tech> on 6 April 2023, in compliance with paragraph 9(ii) of the 3 May 2022 Shell Centre Tower Order. A printout of the webpage at <https://shellservices.cmno.tech> showing that these documents continues to be uploaded to it is exhibited at page 122 of **Exhibit AJO2**.

Service by courier/email

2.13 In addition, copies of the Shell Centre Tower Documents were served (albeit perhaps not strictly required in all instances):

2.13.1 in compliance with paragraph 9(iii) of the Shell Centre Tower Order, upon the Metropolitan Police both by Courier on 5 April 2023 and by email on 6 April 2023 sent at 08:33 to julia.bartholomew@met.police.uk. Copies of the letter (together

with proof of delivery) and the email are exhibited at pages 123, 124 and 125 of **Exhibit AJO2**.

2.13.2 in compliance with paragraph 9(iii) of the Shell Centre Tower Order, upon Raphael Dalzell by email on 6 April 2023 at 14:35, 14:40, 14:48, 14:52, 14:57, 14:59, 15:04, 15:06, 15:08, 15:09, 15:12, 15:16, 15:18, 15:23, 15:27 and 15:30. Copies of the emails are exhibited at pages 126 - and 141 of **Exhibit AJO2**.

2.14 In the circumstances I believe that service of the Shell Centre Tower Documents has been effected by the manner prescribed by the 3 May 2022 Shell Centre Tower Order. A Certificate of Service in relation to the Shell Centre Tower Documents has been filed. A copy of the Certificate is exhibited at pages 142 – 146 of **Exhibit AJO2**.

3. **The Shell Haven Proceedings**

3.1 Paragraph 9 of the Order of Mr Justice Bennathan dated 3 May 2022 (“3 May 2022 Shell Haven Order”) provides 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 <https://shellservices.cmno.tech/>; 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”.

3.2 In respect of the Shell Haven Proceedings the following documents have been served:

3.2.1 Sealed Application dated 30 March 2023;

3.2.2 Draft Order;

3.2.3 First Witness Statement of Fay Lashbrook dated 30 March 2023 and Exhibit to the First Witness Statement of Fay Lashbrook dated 30 March 2023;

- 3.2.4 First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023 and Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023;
- 3.2.5 First Witness Statement of Alison Judith Oldfield dated 29 March 2023 and Exhibit to the First Witness Statement of Alison Judith Oldfield dated 29 March 2023; and
- 3.2.6 Letter from the court dated 13 March 2023 providing notification that the review hearing is listed for 25 April 2023 for 1.5 days in a 2-day window.

(together known as the "**Shell Haven Documents**")

Service by email

- 3.3 In accordance with the provisions of paragraph 9(i) of the 3 May 2022 Shell Haven Order the Shell Haven Documents were served by email to each of the email addresses listed in the Third Schedule of the 3 May 2022 Shell Haven Order as set out in the table below – from the email address described at paragraph 2.3 above.

Item No.	Document Served	Subject	Email date/time (Exhibit Reference)
1.	1. Sealed Application dated 30 March 2023 2. Draft Order 3. Letter from the court dated 13 March 2023 providing notification that the review hearings is listed for 25 April 2023 for 1.5 days in a 2-day window.	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	6 April 2023 09:01 (Pages 1-2 of Exhibit AJ02)
2.	4. First Witness Statement of Fay Lashbrook dated 30 March 2023 5. First Witness Statement of Alison Judith Oldfield dated 29 March 2023 6. First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	6 April 2023 09:21 (Pages 3 -4 of Exhibit AJ02)

3.	7. Exhibit to the First Witness Statement of Alison Judith Oldfield dated 29 March 2023	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	6 April 2023 Part 1 – 10:52 Part 2 – 11:07 (Pages 5 - 6 of Exhibit AJO2)
4.	8. Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	6 April 2023 Part 1 - 12:46 Part 2 – 13:01 Part 3 – 13:16 Part 4 – 13:31 Part 5 – 13:47 Part 6 – 14:01 Part 7 – 14:17 Part 8 – 14:31 Part 9 – 14:46 6 (Pages 9 – 17 of Exhibit AJO2)
5.	9. Exhibit to the First Witness Statement of Fay Lashbrook dated 30 March 2023	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	7 April 2023 11:48 - Part 1 12:04 - Part 2 12:16 - Part 3 12:31 - Part 4 15:34 - Part 4a Resend to XR-legal 15:44 - Part 4b Resend to XR-legal (Pages 147 - 152 of Exhibit AJO2)

3.4 A further email was also sent at 15:00 to (a) confirm the totality of the documents served by email (being those referred to at paragraph 2.1 above) and (b) advise that copies of the

Shell Haven Documents can also be viewed at <https://shellservices.cmno.tech/>. A copy of this email is exhibited at page 18 of **Exhibit AJO2**.

3.5 I should note that 63 automatic responses were received in response to the above emails. Having reviewed the timings of the automated responses, I believe that:

3.5.1 30 of these 63 automatic responses are the Wider Automated Responses as explained in more detail at paragraph 2.5.1 above (believed to be received in respect of item numbers 1, 2, 3 and 4 in the above table)). A copy of these emails can be found at pages 20 – 49 of **Exhibit AJO2**.

3.5.2 in response to the emails issued which related to the Shell Haven Proceedings only (being item number 5), 24 appear to be automatic responses received from the following 6 email accounts: eoextrnt@protonmail.com, xrmidlandstraining@protonmail.com, xrdemocracy@protonmail.com, support@xrnorth.org, xrvideo@protonmail.com, xr-peoplesassembly@protonmail.com, which advised that the emails could not be delivered as the recipient's mailbox is full. A copy of the relevant emails are exhibited at pages 153-176 of **Exhibit AJO2**. I understand from this firm's IT team that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full;

3.5.3 4 emails were received from xr-international@protonmail.com which advised that the emails could not be delivered as the recipient's email address is possibly incorrect. A copy of the relevant emails are exhibited at pages 177 - 180 of **Exhibit AJO2**;

3.5.4 4 emails were received from press@extinctionrebellion.uk which appear to be automatic tailored responses to any emails received. These emails are titled "Thank you for contacting the Extinction Rebellion UK press team" and states that "This inbox is constantly monitored by our team and we will reply to urgent inquiries promptly". A copy of the relevant emails are exhibited at pages of 181 - 184 **Exhibit AJO2**; and

3.5.5 1 email was received from xr-legal@riseup.net which advised that the message file was too big – being Part 4 of the Exhibit to Fay Lashbrook's witness statement. A copy of the relevant email(s) is exhibited at page 185 of **Exhibit AJO2**. The relevant attachment was then subsequently re-sent in smaller parts on 6 April 2023 at 15:34 and 15:44 exhibited at pages 151 - 152 of **Exhibit AJO2**– to which no bounce back was received.

3.6 The automatic responses referred to at paragraphs 2.5.1.1, 2.5.1.2, 3.5.2 and 3.5.3 above, derive from 11 email addresses out of the total 49 email addresses linked to Extinction Rebellion, 1 email address out of the total 3 linked to Just Stop Oil and 1 email address out

of the total 1 email addresses for Youth Climate Swarm, to which the abovementioned emails were sent.

3.7 Apart from the automated response referred to above, no responses from any of the other 38 addresses linked to Extinction Rebellion were received. I have no reason to believe that the emails sent to the other 38 email addresses to which the abovementioned emails were sent were not delivered or received, and no 'bounce back' or delivery failure notifications in this regard were received. Similarly apart from the automated response referred to above no responses from any of the other email address linked to Just Stop Oil.

3.8 I therefore consider that the remaining 38 emails sent to the email addresses linked to Extinction Rebellion and the remaining 2 emails sent to the email addresses linked to Just Stop Oil were sufficient for effecting service of the Shell Centre Tower Documents on these groups.

3.9 In respect of Youth Climate Swarm, this was the only email address provided for within the addresses listed in the 3 May 2022 Shell Haven Order. I do not consider that there are further steps to be taken in respect of effecting service of the Shell Haven Documents on this group as:

3.9.1 this firm's IT team believes that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full; and

3.9.2 only 4 automatic responses were received in response to the 18 emails sent to youthclimateswarm@protonmail.com in respect of the Shell Haven Proceedings, I therefore have not reason to believe reason to believe that the other 14 emails sent were not received – bringing the proceedings and the hearing on 25 April to their attention.

3.10 The steps taken in relation to service of documents upon the email addresses referred to at paragraphs 3.3 and 3.4 complied with the requirement upon the Claimants to send emails to the addresses listed in the 3 May 2022 Shell Haven Order .

Service by uploading to <https://shellservices.cmno.tech>

3.11 I am informed by Ms Pinkerton of the Claimants' previous solicitors (CMS) that a copy of the Shell Haven Documents were also uploaded to <https://shellservices.cmno.tech> on 6 April 2023, in compliance with paragraph 9(ii) of the 3 May 2022 Shell Haven Order. A printout of the webpage at <https://shellservices.cmno.tech> showing that these documents continues to be uploaded to it is exhibited at page 186 of **Exhibit AJO2**.

Service by courier/email

3.12 In addition, copies of the Shell Haven Documents were served (albeit perhaps not strictly required in all instances) in compliance with paragraph 9(iii) of the 3 May 2022 Shell Haven Order, upon the Chief Constable of Essex by Courier on 5 April 2023 and by email to adam.hunt@essex.police.uk on 6 April 2023. A copy of the letter (together with proof of delivery) and email are exhibited respectively at pages 187, 188 and 189 of **Exhibit AJO2**.

3.13 In the circumstances I believe that service of the Shell Haven Documents has been effected by the manner prescribed by the 3 May 2022 Shell Haven Order. A Certificate of Service in relation to the Shell Haven Documents has been filed. A copy of the Certificate is exhibited at pages 190 - 194 of **Exhibit AJO2**.

4. **The Shell Petrol Station Proceedings**

4.1 Paragraph 11 of the Order of Mrs Justice McGowan dated 5 May 2022 ("**the 5 May 2022 Shell Petrol Stations Order**") provides 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".

4.2 In respect of the Shell Petrol Station Proceedings the following documents have been served:

4.2.1 Sealed Application dated 30 March;

4.2.2 Draft Order;

4.2.3 Order of May J Dated 13 March 2023;

4.2.4 First Witness Statement of Ben Austin dated 30 March 2023 and Exhibit to the First Witness Statement of Ben Austin dated 30 March 2023;

4.2.5 First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023 and Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023;

4.2.6 First Witness Statement of Alison Judith Oldfield dated 29 March 2023 and Exhibit to the First Witness Statement of Alison Judith Oldfield dated 29 March 2023;

4.2.7 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;

(together known as the “**Shell Petrol Station Documents**”)

Service by email

4.3 In accordance with the provisions of paragraph 11(i) of the 5 May 2022 Shell Petrol Stations Order the Shell Petrol Station Documents were served by sending an email to each of the email addresses listed in the Third Schedule of the 5 May 2022 Shell Petrol Stations Order as set out in the table below – from the email address described at paragraph 2.3 above.

Item No.	Document Served	Subject	Email date/time (Exhibit Reference)
1.	1. Sealed Application dated 30 March 2023 2. Draft Order 3. 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. 4. Order of May J Dated 13 March 2023	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	6 April 2023 09:01 (Pages 1-2 of Exhibit AJO2)
2.	5. First Witness Statement of Ben Austin dated 30 March 2023	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K.	6 April 2023 09:21

	6. First Witness Statement of Alison Judith Oldfield dated 29 March 2023 7. First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023	Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	(Pages 3 -4 of Exhibit AJO2)
3.	8. Exhibit to the First Witness Statement of Alison Judith Oldfield dated 29 March 2023	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	6 April 2023 Part 1 – 10:52 Part 2 – 11:07 (Pages 5 - 6 of Exhibit AJO2)
4.	9. Exhibit to the First Witness Statement of Christopher Prichard-Gamble dated 30 March 2023	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	6 April 2023 Part 1 - 12:46 Part 2 – 13:01 Part 3 – 13:16 Part 4 – 13:31 Part 5 – 13:47 Part 6 – 14:01 Part 7 – 14:17 Part 8 – 14:31 Part 9 – 14:46 (Pages 9 – 17 of Exhibit AJO2)
5.	10. Exhibit to the First Witness Statement of Ben Austin dated 30 March 2023	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell	6 April 2023 09:58 - Part 1 10:10 – Part 2 10:42 – Part 3 15:25 - Part 3 split and resent to XR-legal@riseup.ent

		International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Application (30.03.23)	15:30 - Part 3 split and resent to XR-legal@riseup.ent (Pages 195 - 202 of Exhibit AJO2)
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4.4 A further email was also sent at 15:00 to (a) confirm the totality of the documents served by email (being those referred to at paragraph 2.1 above) and (b) advise that copies of the Shell Tower Centre Documents can also be viewed at <https://shellservices.cmno.tech/>. A copy of this email is exhibited at page 18 of **Exhibit AJO2**.

4.5 I should note that 55 automatic responses were received in response to the above emails sent on 6 April 2023. Having reviewed the timings of the automated responses, I believe that:

4.5.1 30 of these 55 automatic responses are the Wider Automated Responses as explained in more detail at paragraph 2.5.1 above (believed to be received in respect of item numbers 1, 2, 3 and 4)). A copy of these emails can be found at pages 20 – 49 of **Exhibit AJO2**;

4.5.2 16 appear to be automatic responses (believed to be in respect of item number 5) received from the following 6 email accounts: xrmidlandstraining@protonmail.com, xrdemocracy@protonmail.com, support@xrnorth.org, xrvideo@protonmail.com, xr-peoplesassembly@protonmail.com, and eoexrtnt@protonmail.com which advised that the emails could not be delivered as the recipient's mailbox is full. A copy of the relevant emails are exhibited at pages 203 – 218 of **Exhibit AJO2**. I understand from this firm's IT team that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full;

4.5.3 3 emails were received from xr-international@protonmail.com which advised that the emails could not be delivered as the recipient's email address is possibly incorrect. A copy of the relevant emails are exhibited at pages 219 - 221 of **Exhibit AJO2**;

4.5.4 3 emails were received from press@extinctionrebellion.uk which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at pages 222 – 224 of **Exhibit AJO2**; and

4.5.5 3 emails were received from xr-legal@riseup.net which advised that the message file was too big – in respect of each of the parts for item 5. A copy of

the relevant emails are exhibited at pages 225 - 227 of **Exhibit AJO2**. As set out in the above table, this relevant attachment was subsequently re-sent in smaller parts on 6 April 2023 at 15:25 and 15:30 at pages 201 - 202 of **Exhibit AJO2** – to which no bounce back was received.

- 4.6 The automatic responses referred to at paragraphs 2.5.1.1, 2.5.1.2, 4.5.2 and 4.5.3 above, derive from 11 email addresses out of the total 49 email addresses linked to Extinction Rebellion, 1 email address out of the total 3 linked to Just Stop Oil and 1 email address out of the total 1 email addresses for Youth Climate Swarm, to which the abovementioned emails were sent.
- 4.7 Apart from the automated response referred to above, no responses from any of the other 38 addresses linked to Extinction Rebellion were received. I have no reason to believe that the emails sent to the other 38 email addresses to which the abovementioned emails were sent were not delivered or received, and no 'bounce back' or delivery failure notifications in this regard were received. Similarly apart from the automated response referred to at above no responses from any of the other email address linked to Just Stop Oil.
- 4.8 I therefore consider that the remaining 38 emails sent to the email addresses linked to Extinction Rebellion and the remaining 2 emails sent to the email addresses linked to Just Stop Oil were sufficient for effecting service of the Shell Petrol Stations Documents on these groups.
- 4.9 In respect of Youth Climate Swarm, this was the only email address provided for within the addresses listed in the 5 May 2022 Shell Petrol Stations Order. I do not consider that there are further steps to be taken in respect of effecting service of the Shell Petrol Stations Documents on this group as:
- 4.9.1 this firm's IT team believes that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full; and
- 4.9.2 only 4 automatic responses were received in response to 16 emails sent to youthclimateswarm@protonmail.com in respect of the Shell Petrol Station Proceedings therefore have not reason to believe reason to believe that the other 12 emails sent were not received – bringing the proceedings and the hearing on 25 April to their attention.
- 4.10 The steps taken in relation to service of documents upon the email addresses referred to at paragraphs 4.3 and 4.4 complied with the requirement upon the Claimants to send emails to the addresses listed in the 5 May 2022 Shell Petrol Stations Order.

Service by uploading to <https://shellservices.cmno.tech>

- 4.11 I am informed by Ms Pinkerton of the Claimants' previous solicitors (CMS) that a copy of the Shell Petrol Station Documents were also uploaded to <https://shellservices.cmno.tech> on 6 April 2023, in compliance with paragraph 11(ii) of the 5 May 2022 Shell Petrol Station Order. A printout of the webpage at <https://shellservices.cmno.tech> showing that these documents continues to be to be uploaded to it is exhibited at page 228 of **Exhibit AJO2**.

Service by courier/email

- 4.12 In addition, copies of the Shell Petrol Station Documents were served (albeit perhaps not strictly required in all instances) under the service provisions of paragraph 11(iii) of the 5 May 2022 Shell Petrol Station Order on:

4.12.1 Mr Michael Gibson by Courier on 6 April 2023. Copies of the letter (together with proof of delivery) are exhibited at pages 229 - 230 of **Exhibit AJO2**;

4.12.2 Weightmans LLP (being solicitors for the Chief Constable of Surrey Police) by Courier on 6 April 2023. Copies of the letter (together with proof of delivery) are exhibited at pages 231 and 232 of **Exhibit AJO2**;

4.12.3 Hodge Jones and Allen (being solicitors for Jessica Branch, Andrew Daniel Smith and Nancy Friel) by Courier on 6 April 2023 and by email to ahardy@hja.net at 08:48 on 6 April 2023. Copies of the letter (together with proof of delivery) and email are exhibited at pages 233 to 236 of **Exhibit AJO2**; and

4.12.4 Michaela Marc by email on 6 April 2023, sent at 13:08, 13:14, 13:25, 13:29, 13:34, 13:37, 14:06, 14:13, 14:20, 14:26, 14:29, 14:33, 14:39, 14:41 and 15:19. A copy of the emails are exhibited at pages 237 to 251 of **Exhibit AJO2**.

1.1.1 In the circumstances I believe that service of the Shell Petrol Station Documents has been effected by the manner prescribed by the 5 May 2022 Shell Petrol Station Order. A Certificate of Service in relation to the Shell Petrol Station Documents have been filed. A copy of the Certificate is exhibited at pages 252 to 256 of **Exhibit AJO2**.

5. **Shell Petrol Station Proceedings - Draft Amended Particulars of Claim and Draft Amended Claim Form**

- 5.1 In addition to the Shell Petrol Station Documents, a copy of the Draft Amended Particulars of Claim and Draft Amended Claim Form have also been served in the Shell Petrol Station Proceedings.

Service by email

5.2 In accordance with the provisions of paragraph 11(i) of the 5 May 2022 Shell Petrol Stations Order the Draft Amended Particulars of Claim and Draft Amended Claim Form were served by sending an email to each of the email addresses listed in the Third Schedule of the 5 May 2022 Shell Petrol Stations Order as set out in the table below – from the email address described at paragraph 2.3 above.

Document Served	Subject	Email date/time (Exhibit Reference)
1. Draft Amended Particulars of Claim - QB-2022-001420 2. Draft Amended Claim Form - QB-2022-001420.	Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) - Sealed Application (30.03.23)	13 April 2023 11:50 (Page 257 of Exhibit AJO2)

5.3 In response to the above email sent on 13 April 2023, which attached an electronic version of the Draft Amended Particulars of Claim and Draft Amended Claim Form, and having reviewed the timings of the automated responses, I believe that we received 13 automatic responses which can be categorised as follows:

5.3.1 5 emails in total were received from: xrmidlandstraining@protonmail.com, xrdemocracy@protonmail.com, xrvideo@protonmail.com, xr-peoplesassembly@protonmail.com, and eoexrtnt@protonmail.com and which advised that the emails could not be delivered as the recipient’s mailbox is full. A copy of the relevant emails are exhibited at pages 258 - 262 of **Exhibit AJO2**. I understand from this firm’s IT team that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full;

5.3.2 1 email was received from xr-international@protonmail.com which advised that the emails could not be delivered as the recipient’s email address is possible incorrect. A copy of the relevant emails are exhibited at pages 263 of **Exhibit AJO2**; and

5.3.3 7 emails were received from press@extinctionrebellion.uk (1) and xrsocialmediaevents@gmail.com (1) and artsxr@gmail.com (1) and xrlondoncoord@gmail.com (1) and xrsw.trainings@gmail.com (1) and xr-legal@riseup.net (1) and xr.connectingcommunities@gmail.com (1) which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at pages 264 – 270 of **Exhibit AJO2**.

- 5.4 Three further automated responses were received on 17 April 2023 from xr-regionaldevelopment@protonmail.com, juststopoil@protonmail.com and youthclimateswarm@protonmail.com which advised that the emails could not be delivered as the recipient's mailbox is full. A copy of the relevant emails are exhibited at pages 271 - 273 of **Exhibit AJO2**. I understand from this firm's IT team that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full
- 5.5 The automatic responses referred to at paragraphs 5.3.1, 5.3.2 and 5.4 above, derive from 7 email addresses out of the total 49 email addresses linked to Extinction Rebellion.
- 5.6 Apart from the automated response referred to above, no responses from any of the other 42 addresses linked to Extinction Rebellion was received. I have no reason to believe that the emails sent to the other 42 email addresses to which the abovementioned emails were sent were not delivered or received, and no 'bounce back' or delivery failure notifications in this regard were received.
- 5.7 I therefore consider that the remaining 42 emails sent to the email addresses linked to Extinction Rebellion were sufficient for effecting service of the Draft Amended Particulars of Claim and Draft Amended Claim Form on this group.
- 5.8 In respect of
- 5.8.1 Just Stop Oil, apart from the automated response referred to at above no responses from any of the other email address linked to Just Stop Oil were received; and
- 5.8.2 Youth Climate Swarm, this was the only email address provided for within the addresses listed in the 3 May 2022 Shell Haven Order. I do not consider that there are further steps to be taken in respect of effecting service of the Shell Haven Documents on this group as this firm's IT team believes that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full.
- 5.9 I therefore consider that the emails sent to the email addresses linked to Just Stop Oil and Youth Climate Swarm were sufficient for effecting service of the Draft Amended Particulars of Claim and Draft Amended Claim Form.
- 5.10 The steps taken in relation to service of documents upon the email addresses referred to at paragraph 5.2 complied with the requirement upon the Claimants to send emails to the addresses listed in the 5 May 2022 Shell Petrol Station Order.

Service by uploading to <https://shellservices.cmno.tech>

5.11 I am informed by Claire Quinn of the Claimants' previous solicitors (CMS) that a copy of the Draft Amended Particulars of Claim and Draft Amended Claim Form in respect of each of the Shell Petrol Station Proceedings were also uploaded to <https://shellservices.cmno.tech> on 13 April 2023, in compliance with paragraph 11(ii) of the 5 May 2022 Shell Petrol Station Order. A printout of the webpage at <https://shellservices.cmno.tech> showing that these documents continues to be uploaded to it is exhibited at page 228 of **Exhibit AJO2**.

Service by courier/email on 13 and 14 April 2023

5.12 In addition, copies of the Draft Amended Particulars of Claim and Draft Amended Claim Form were served (albeit perhaps not strictly required in all instances) under the service provisions of paragraph 11(iii) of the 5 May 2022 Shell Petrol Station Order on:

5.12.1 Mr Michael Gibson by Special Delivery on 14 April 2023. Copies of the letter (together with proof of delivery) are exhibited at pages 274 - 285 of **Exhibit AJO2**;

5.12.2 Weightmans LLP (being solicitors for the Chief Constable of Surrey Police) by Special Delivery on 14 April 2023 and by email to joanna.carty@weightmans.com and lauren.farrell@weightmans.com on 14 April 2023 at 12:05. Copies of the letter (together with proof of delivery) and email are exhibited at pages 289 - 304 of **Exhibit AJO2**;

5.12.3 Hodge Jones and Allen (being solicitors for Jessica Branch, Andrew Daniel Smith and Nancy Friel) by Special Delivery on 14 April 2023 and by email to ahardy@hja.net sent at 12:03 on 14 April 2023. Copies of the letters (together with proof of deliveries) and emails are exhibited at pages 305 - 320 of **Exhibit AJO2**;

5.12.4 Michaela Marc by email to michaela.marc@hotmail.com sent on 13 April 2023 at 11:50. A copy of the email is exhibited at page 321 of **Exhibit AJO2**.

5.12.5 by email to ck.hofman1951@gmail.com sent on 13 April 2023 at 11:50. A copy of the email is exhibited at page 322 of **Exhibit AJO2**.

5.13 In the circumstances I believe that service of the Draft Amended Particulars of Claim and Draft Amended Claim Form in respect of the Shell Petrol Station Proceedings has been effected by the manner prescribed by the 5 May 2022 Shell Petrol Station Order. A Certificate of Service in relation to these documents has been filed. A copy of the Certificate is exhibited at pages 323 - 327 of **Exhibit AJ02**.

Statement of Truth

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



Alison Judith Oldfield

Dated: 19 April 2023