

Sixth Witness Statement

Party: Claimants

Exhibit: AJ06

Date: 12 March 2024

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 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)

Sixth 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 AJ06**.

1.4 This witness statement is made in respect of three sets of 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**").

(I will refer to SIPC, SUKOP and Shell UK together as "**the Claimants**" and the Shell Centre Tower Proceedings, the Shell Petrol Stations Proceedings and the Shell Haven Proceedings together as "**the Proceedings**").

1.5 In this statement I will explain how various documents relating to each of the Proceedings have been served.

SERVICE OF DOCUMENTS

2. The Shell Centre Tower Proceedings – April 2023

2.1 Paragraph 2 of the Order of Mrs Justice Hill dated 28 April 2023 ("**28 April 2023 Shell Centre Tower Order**") provides that:

"Pursuant to CPR 6.15 and 6.27 and r. 81.4(c) and (d), service of this Order shall be effected upon the Defendants as follows:

2.1 *The Claimant shall affix at each entrance of the Shell Centre Tower, and around its perimeters at no fewer than 2 other locations (but so there shall be at least 1 on each aspect of the Shell Centre Tower), warning notices, no smaller than A4 in size. The said warning notices shall:*

2.1.1 warn of the existence and general nature of this Order, and of the consequences of breaching it;

2.1.2 identify a point of contact and contact details from which copies of the Order may be requested;

2.1.3 identify the website address <http://www.noticespublic.com/> at which copies of the Order may be viewed and downloaded.

2.2 *The Claimant shall upload to <http://www.noticespublic.com/> an electronic copy of the Order and a transcript (if available) of the hearing at which this Order was granted.*

2.3 *The Claimant shall send by email a copy of the Order and a link to <http://www.noticespublic.com/> to each of the email addresses listed in the Second Schedule to this Order.*

A copy of the 28 April 2023 Shell Centre Tower Order is exhibited at **pages 1 - 7** of **Exhibit AJ06**.

2.2 Paragraph 3 of 28 April 2023 Shell Centre Tower Order provides that:

Pursuant to CPR 6.12(3), 6.27 and 81.4(c) and (d) this Order shall be deemed to be served on the latest date on which all of the methods of service referred to in paragraph 2 have been completed, such date to be verified by the completion of a certificate of service or witness statement.

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

2.3.1 28 April 2023 Shell Centre Tower Order

Service by email - the Second Schedule to the 28 April 2023 Shell Centre Tower Order

2.4 In accordance with the provisions of paragraph 2 of the 28 April 2023 Shell Centre Tower Order, the 28 April 2023 Shell Centre Tower Order was served by email on each of the email addresses listed in the Second Schedule of the 28 April 2023 Shell Centre Tower Order. I set out the detail of the timing and subject line of the email in the table below. Those emails were sent from an email address, "shell.service@eversheds-sutherland.com", which Eversheds Sutherland has created in order to serve the various documents in this matter. My colleagues, Alex Wright (Principal Associate) and Bethany Taylor (Associate), and I have access to and control of this dedicated email address.

Item No.	Document(s) Served	Subject	Email date/time (Exhibit Reference)
	28 April 2023 Shell Centre Tower Order	Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sealed Order (28.04.23)	28 April 2023 at 15:59 (Page 8 of Exhibit AJO6)

2.5 11 automatic responses were received in response to the above email. Having reviewed the timings of the automated responses, I believe that:

2.5.1 1 of these automatic responses was received from xrbristol.regional@protonmail.com noting "mailbox quota exceeded". This automated response was received on 2 May 2023. Two additional automated responses were received from this mailbox the same day, in response I believe to the two further emails which were also sent to it on 28 April 2023 in respect of the Shell Haven Proceedings and the Shell Petrol Station Proceedings respectively (as described at paragraphs 3.4 and 4.4 below). It is, however, not possible to identify on the face of them which specific automatic response relates to each of these three emails sent on 28 April 2023. 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. Together, these 3 emails are defined as the "Wider Automated Responses" (exhibited at pages 9 - 11 of Exhibit AJO6).

2.5.2 a total of 10 of the 11 automatic responses were:

2.5.2.1 automatic responses received from the following 9 email accounts: eoexrtnt@protonmail.com, juststopoil@protonmail.com, xrmidlandstraining@protonmail.com, xrdemocracy@protonmail.com, support@xrnorth.org, xrvideo@protonmail.com, xr-regionaldevelopment@protonmail.com, youthclimateswarm@protonmail.com and xr-peoplesassembly@protonmail.com. These 9 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 12 - 20 of Exhibit AJO6. 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;

2.5.2.2 1 email was received from press@extinctionrebellion.uk which appears to be an automatic tailored response to any emails received. A copy of the relevant email is exhibited at **page 21 of Exhibit AJO6.**

2.6 The automatic responses referred to at paragraphs 2.5.1 and 2.5.2.1 above, derived from

2.6.1 8 email addresses out of the total 48 email addresses linked to Extinction Rebellion;

2.6.2 2 email addresses out of the total 3 linked to Just Stop Oil; and

2.6.3 1 email address, being the only email address, for Youth Climate Swarm to which the email was sent.

2.7 Apart from the automated responses referred to at paragraphs 2.5.1 and 2.5.2.1 and 2.5.2.2, no responses from any of the other 40 addresses linked to Extinction Rebellion were received. I have no reason to believe that the emails sent to the other 40 email addresses to which the email of 28 April 2023 was sent were not delivered or received, and no other 'bounce back' or delivery failure notifications were received. Similarly apart from the automated response referred to at paragraphs 2.5.1 and 2.5.2.1 and 2.5.2.2 no responses from any of the other email addresses linked to Just Stop Oil were received.

2.8 I therefore consider that the remaining 40 emails sent to the email addresses linked to Extinction Rebellion and the remaining 1 email sent to the email addresses linked to Just Stop Oil were sufficient for effecting service of the 28 April 2023 Shell Centre Tower Order on these groups.

2.9 In respect of Youth Climate Swarm, this was the only email address provided for within the addresses listed in the 28 April 2023 Shell Centre Tower Order. I do not consider that there are further steps which could reasonably be taken in respect of effecting service of the 28 April 2023 Shell Centre Tower Order on this group. This firm's IT team believes that this email was properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full.

2.10 For the reasons explained above, I believe that the steps taken in relation to service of documents upon the email addresses referred to at paragraph 2.4 above complied with the requirement upon SIPC to serve the 28 April 2023 Shell Centre Tower Order by way of emails to the various addresses listed in that Order.

Service by uploading to <http://www.noticespublic.com/>

2.11 A copy of the 28 April 2023 Shell Centre Tower Order was uploaded to <http://www.noticespublic.com/> on 28 April 2023, in compliance with paragraph 2.2 of the

28 April 2023 Shell Centre Tower Order. A screenshot of the webpage at <http://www.noticespublic.com/> showing that the 28 April 2023 Shell Centre Tower Order has been uploaded to that website is exhibited at **page 22** of **Exhibit AJO6**.

Service by affixing to the Shell Centre Tower

- 2.12 Warning notices have been affixed to the entrance of the Shell Centre Tower and around its perimeters at no fewer than 2 other locations, in accordance with paragraph 2.1 of the 28 April 2023 Shell Centre Tower Order. Those warning notices were affixed on 29 April 2023. Photographs demonstrating that this was done are exhibited at **pages 23 and 24** of **Exhibit AJO6**

Service by courier/email

- 2.13 In addition, copies of the 28 April 2023 Shell Centre Tower Order were served (albeit perhaps not strictly required in all instances) in compliance with paragraph 2.3 of the 28 April 2023 Shell Centre Tower Order:

2.13.1 upon the Metropolitan Police by email on 2 May 2023 sent at 10:33 to julia.bartholomew@met.police.uk. A copy of the email is exhibited at **page 25** of **Exhibit AJO6**.

2.13.2 upon Raphael Dalzell by email on 2 May 2023 dated 10:32 to [REDACTED]. A copy of the email is exhibited at **page 26** of **Exhibit AJO23**.

2.13.3 upon Hodge James and Allen Solicitors Limited at 180 North Gower Street, London, NW1 2NB by first class post sent on 2 May 2023. Copies of this letter and proof of delivery are exhibited at **pages 27 - 30** of **Exhibit AJO6**.

- 2.14 In the circumstances I believe that service of the 28 April 2023 Shell Centre Tower Order has been effected by the manner prescribed in that Order. A Certificate of Service in relation to the 28 April 2023 Shell Centre Tower Order has been filed. A copy of the Certificate is exhibited at **pages 31 - 34** of **Exhibit AJO6**.

3. The Shell Haven Proceedings - April 2023

- 3.1 Paragraph 2 of the Order of Mrs Justice Hill dated 28 April 2023 ("**28 April 2023 Shell Haven Order**") provides that:

2. "Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of this Order shall be effected upon the Defendants as follows:

2.1 The Claimant shall affix at each entrance to Shell Haven, and around the perimeters of Shell Haven at no fewer than 10 locations, warning notices, no smaller than A3 in size. The said warning notices shall:

2.1.1 warn of the existence and general nature of this Order, and of the consequences of breaching it;

2.1.2 identify a point of contact and contact details from which copies of the Order may be requested

2.1.3 identify the website address <http://www.noticespublic.com/> at which copies of the Order may be viewed and downloaded.

2.2 The Claimant shall upload to <http://www.noticespublic.com/> a copy of the Order and a transcript (if available) of the hearing at which this Order was granted.

2.3 The Claimant shall send by email a copy of the Order and a link to <http://www.noticespublic.com/> to each of the email addresses listed in the Second Schedule to this Order.

A copy of the 28 April 2023 Shell Haven Order is exhibited at **pages 35 - 41** of **Exhibit AJ06**.

3.2 Paragraph 3 of 28 April 2023 Shell Haven Order provides that:

"Pursuant to CPR 6.12(3), 6.27 and 81.4(c) and (d) this Order shall be deemed to be served on the latest date on which all of the methods of service referred to in paragraph 2 have been completed, such date to be verified by the completion of a certificate of service or witness statement."

3.3 In respect of the Shell Haven Proceedings the following document has been served:

3.3.1 28 April 2023 Shell Haven Order.

Service by email - The Second Schedule to the 28 April 2023 Haven Order

3.4 In accordance with the provisions of paragraph 2 of the 28 April 2023 Shell Haven Order, the 28 April 2023 Shell Haven Order was served by email on each of the email addresses listed in the Second Schedule of the 28 April 2023 Shell Haven Order. I set out the detail of the timing and subject line of the email in the table below. Those emails were sent from an email address, shell.service@eversheds-sutherland.com, which Eversheds Sutherland has created from which to serve the various documents in this matter. My colleagues, Alex Wright (Principal Associate) and Bethany Taylor (Associate), and I have access to and control of this dedicated email address.

Item No.	Document(s) Served	Subject	Email date/time (Exhibit Reference)
	28 April 2023 Shell Haven Order	Shell U.K Limited v Persons Unknown (QB-2022-001241) - Sealed Order (28.04.23)	28 April 2023 at 16:28 (Page 42 of Exhibit AJO6)

3.5 11 automatic responses were received in response to the above email. Having reviewed the timings of the automated responses, I believe that:

3.5.1 1 of these automatic responses was received from xrbristol.regional@protonmail.com noting "mailbox quota exceeded" (exhibited at **pages 9 - 11** of **Exhibit AJO6**), being one of the Wider Automated Responses.

3.5.2 a total of 10 of the 11 automatic responses were:

3.5.2.1 automatic responses received from the following 9 email accounts:
eoexrtnt@protonmail.com, juststopoil@protonmail.com,
support@xrnorth.org xrdemocracy@protonmail.com
xrmidlandstraining@protonmail.com, xr-peopleassembly@prontonmail.com
regionaldevelopment@prontonmail.com, xrvideo@prontonmail.com and
youthclimateswarm@prontonmail.com. These 9 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 43 - 51** of **Exhibit AJO6**. 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;

3.5.2.2 1 email was received from press@extinctionrebellion.uk which appears to be an automatic tailored response to any emails received. A copy of the relevant email is exhibited at **page 52** of **Exhibit AJO6**.

3.6 The automatic responses referred to at paragraphs 3.5.1 and 3.5.2.1 above derived from:

3.6.1 8 email addresses out of the total 48 email addresses linked to Extinction Rebellion;

- 3.6.2 2 email address out of the total 3 linked to Just Stop Oil; and
- 3.6.3 1 email address, being the only email address, for Youth Climate Swarm to which the email was sent.
- 3.7 Apart from the automated responses referred to at paragraphs 3.5.1, 3.5.2.1 and 3.5.2.2, no responses from any of the other 40 addresses linked to Extinction Rebellion were received. I have no reason to believe that the email sent to the other 40 email addresses serving copies of the 28 April 2023 Shell Haven Order was sent was not delivered or received, and no other 'bounce back' or delivery failure notifications in this regard was received. Similarly apart from the automated response referred to at paragraphs 3.5.2 and 3.5.2.1 and 3.5.2.2 no responses from any of the other email addresses linked to Just Stop Oil were received.
- 3.8 I therefore consider that the remaining 40 emails sent to the email addresses linked to Extinction Rebellion and the remaining 1 email sent to the email addresses linked to Just Stop Oil were sufficient for effecting service of the 28 April 2023 Shell Haven Order 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 28 April 2023 Shell Haven Order. I do not consider that there are further steps which could reasonably be taken to effect service of the 28 April 2023 Shell Haven Order on this group. 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.
- 3.10 For the reasons explained above, I believe that the steps taken in relation to service of documents upon the email addresses referred to at paragraph 3.4 complied with the requirement upon Shell UK to serve the 28 April 2023 Shell Centre Tower Order by way of emails to the various addresses listed in the Second Schedule of the 28 April 2023 Shell Haven Order.
- Service by uploading to <https://www.noticespublic.com/>*
- 3.11 A copy of the 28 April 2023 Shell Haven Order was uploaded to <http://www.noticespublic.com/> on 28 April 2023, in compliance with paragraph 2.2 of the 28 April 2023 Shell Haven Order. A printout of the webpage at <http://www.noticespublic.com/> showing that the 28 April 2023 Shell Haven Order was uploaded to that website is exhibited at **page 53 of Exhibit AJO6**.
- Service by affixing to the Shell Haven*
- 3.12 Warning notices were affixed to each entrance at Shell Haven and around the perimeters of Shell Haven at no fewer than 10 locations, in accordance with paragraph 2.1 of the 28 April 2023 Shell Haven Order. Such warning notices were affixed on 2 May 2023. Photographs demonstrating that this was done are exhibited at **page 54 of Exhibit AJO6**

Service by courier/email

3.13 In addition, copies of the 28 April 2023 Shell Haven Order were served (albeit perhaps not strictly required in all instances) in compliance with paragraph 2.3 of the 28 April 2023 Shell Haven Order:

3.13.1 upon the Essex Police Legal Department by email on 2 May 2023 at 12:30 to adam.hunt@essex.police.uk and by Special Delivery at Essex Police Legal Department, Essex Police HQ, PO Box 2 Springfield, Chelmsford. Essex, CM2 6DA. Copies of the email and letter are exhibited at **pages 55 - 56** of **Exhibit AJO6**.

3.13.2 upon Hodge James and Allen Solicitors Limited at 180 North Gower Street, London, NW1 2NB on 2 May 2023. Copies of the letter and proof of delivery are exhibited at **pages 57 - 60** of **Exhibit AJO6**.

3.14 In the circumstances I believe that service of the 28 April 2023 Shell Haven Order has been effected by the manner prescribed by that Order. A Certificate of Service in relation to the 28 April 2023 Shell Haven Order has been filed. A copy of the Certificate is exhibited at **pages 61 - 64** of **Exhibit AJO6**.

4. The Shell Petrol Station Proceedings - April 2023

4.1 Paragraph 2 of the Order of Mrs Justice Hill dated 28 April 2023 ("**the 28 April 2023 Shell Petrol Stations Order**") provides that:

2. "Pursuant to CPR 6.15 and 6.27, service of this Order shall be effected upon the Defendants as follows:

2.1 The Claimant shall use all reasonable endeavours to arrange to affix and retain warning notices at each Shell Petrol Station by either Method A or Method B as set out below.

2.1.1 Method A

2.1.1.1 Warning notices, no smaller than A3 in size shall be affixed:

(a) at each entrance onto each Shell Petrol Station

(b) on every upright steel structure forming part of the canopy infrastructure under which the fuel pumps are located within each Shell Petrol Station forecourt

(c) at each entry door to every retail establishment within any Shell Petrol Station

2.1.2 Method B

2.1.2.1 Warning notices no smaller than A4 in size shall be affixed:

(a) at each entrance onto the forecourt of each Shell Petrol Station

(b) at a prominent location on at least one stanchion (forming part of the steel canopy infrastructure) per set / row of fuel pumps (also known as an island) located within the forecourt of each Shell Petrol Station

2.2 The said warning notices shall:

2.2.1 warn of the existence and general nature of this Order and of the consequences of breaching it;

2.1.2 identify a point of contact and contact details from which copies of the Order may be requested

2.1.3 identify the website address <http://www.noticespublic.com/> at which copies of the Order may be viewed and downloaded.

2.3 The Claimant will ensure that notification of the existence of the Order is made available on its website address at www.shell.co.uk, along with a link to <http://www.noticespublic.com/>.

2.4 The Claimant shall upload to <http://www.noticespublic.com/> copies of the Order and a transcript (if available) of the hearing at which this Order was granted.

2.5 The Claimant shall send by email a copy of the Order and a link to <http://www.noticespublic.com/> to each of the email addresses listed in the Second Schedule to this Order."

A copy of the 28 April 2023 Shell Petrol Stations Order is exhibited at **pages 65 - 71** of **Exhibit AJO6**.

4.2 Paragraph 3 of 28 April 2023 Shell Petrol Stations Order provides that:

"Pursuant to CPR 6.12(3), 6.27 and 81.4(c) and (d) this Order shall be deemed to be served on the latest date on which all of the methods of service referred to in paragraph 2 have been completed, such date to be verified by the completion of a certificate of service or witness statement."

4.3 In respect of the Shell Petrol Stations Proceedings the following documents have been served:

4.3.1 28 April 2023 Shell Petrol Stations Order.

Service by email - The Second Schedule to the Order

4.4 In accordance with the provisions of paragraph 2.5 of the 28 April 2023 Shell Petrol Stations Order, the 28 April 2023 Shell Petrol Stations Order was served by email to each of the email addresses listed in the Second Schedule of the 28 April 2023 Shell Petrol Stations Order. I set out the detail of the timing and subject line of the email in the table below. Those emails were sent from an email address, shell.service@eversheds-sutherland.com, which Eversheds Sutherland has created in order to serve the various documents in this matter. My colleagues, Alex Wright (Principal Associate) and Bethany Taylor (Associate), and I have access to and control of this dedicated email address.

Item No.	Document(s) Served	Subject	Email date/time (Exhibit Reference)
	28 April 2023 Shell Petrol Stations Order	Shell U.K Oil Products Limited v Persons Unknown (QB-2022-001240) - Sealed Order (28.04.23)	28 April 2023 at 13:41 (Page 72 of Exhibit AJ67)

4.5 18 automatic responses were received in response to the above emails. Having reviewed the timings of the automated responses, I believe that:

4.5.1 1 of these automatic responses was received on 2 May 2023 from xrbristol.regional@protonmail.com noting the "mailbox quota exceeded" (exhibited at **pages 9 - 11 of Exhibit AJ06**), being one of the Wider Automated Responses.

4.5.2 a total of 17 of the 18 automatic responses were:

4.5.2.1 automatic responses received from the following 10 email accounts: eoexrtnt@protonmail.com, juststopoil@protonmail.com, support@xrnorth.org xrbristol.regional@protonmail.com, xrdemocracy@protonmail.com, xrmidlandstraining@protonmail.com, peoplesassembly@prontonmail.com, regionaldevelopment@prontonmail.com, xrvideo@prontonmail.com and youthclimateswarm@prontonmail.com. These 10 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 73 - 82 of Exhibit AJ06**. 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;

4.5.2.2 7 automatic responses were also received from xr-legal@riseup.net, xrsw.trainings@gmail.com, artsxr@gmail.com, press@extinctionrebellion.uk, xrlondoncoord@gmail.com, xr.connectingcommunities@gmail.com and xrsocialmediaevents@gmail.com which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at **pages 83 - 90 of Exhibit AJ06.**

4.6 The automatic responses referred to at paragraphs 3.5.1 and 4.5.2.1 above derived from:

4.6.1 8 email addresses out of the total 48 email addresses linked to Extinction Rebellion,;

4.6.2 2 email address out of the total 3 linked to Just Stop Oil; and

4.6.3 1 email address, being the only email address, for Youth Climate Swarm to which the email was sent.

4.7 Apart from the automated response referred to at paragraphs 3.5, 3.5.2.1 and 4.5.2.2, no responses from any of the other 40 addresses linked to Extinction Rebellion were received. I have no reason to believe that the emails sent to the other 40 email addresses to which the above email of 28 April 2023 was sent were not delivered or received, and no other 'bounce back' or delivery failure notifications in this regard were received. Similarly apart from the automated response referred to at paragraphs 3.5.2 and 3.5.2.1 and 3.5.2.2 no responses from any of the other email addresses linked to Just Stop Oil were received.

4.8 I therefore consider that the remaining 40 emails sent to the email addresses linked to Extinction Rebellion and the remaining 1 email sent to the email addresses linked to Just Stop Oil were sufficient for effecting service of the 28 April 2023 Shell Petrol Stations Order 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 28 April 2023 Shell Petrol Stations Order. I do not consider that there are further steps which could reasonably be taken in respect of effecting service of the Shell Petrol Stations Documents on this group. This firm's IT team believes that this email was properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full.

4.10 For the reasons explained above, I believe that the steps taken in relation to service of 28 April 2023 Shell Petrol Stations Order upon the email addresses referred to at paragraph

3.2 complied with the requirement upon SUKOP to serve the 28 April 2023 Shell Petrol Stations Order by way of emails to the various addresses listed in that Order.

Service by notification of the order being made available on www.shell.co.uk

- 4.11 Notification of the existence of the 28 April 2023 Shell Petrol Stations Order was made available on the website address at www.shell.co.uk, along with a link to <http://www.noticespublic.com/copy>. The relevant webpage now provides notification of the existence of a subsequent order (being the 23 May 2023 Shell Petrol Stations Order) made in these proceedings and which supersedes the 28 April 2023 Shell Petrol Stations Order. A printout of the webpage at www.shell.co.uk showing notification of the 23 May 2023 Shell Petrol Stations Order (as well as the 23 May 2023 Shell Tower Order and the 23 May Shell Haven Order) is exhibited at **pages 91 - 92 of Exhibit AJO6**.

Service by uploading the order to <http://www.noticespublic.com/>

- 4.12 A copy of the 28 April 2023 Shell Petrol Stations Order was uploaded to <http://www.noticespublic.com/> in compliance with paragraph 2.3 of the 28 April 2023 Shell Petrol Station Order on 28 April 2023. A printout of the webpage at <http://www.noticespublic.com/> showing that 28 April 2023 Shell Petrol Station Order is uploaded to that website is exhibited at **page 93 of Exhibit AJO6**.

Service by affixing to the Shell Petrol Station

- 4.13 SUKOP has used all reasonable endeavours to arrange to affix and retain warning notices in the form of the 28 April 2023 Shell Petrol Station Order at each Shell Petrol Station. Such warning notices have been superseded, however, by those to be affixed in accordance with a subsequent order in these proceedings (the 23 May 2023 Shell Petrol Stations Order – see below further).

Service by courier/email

- 4.14 In addition, copies of the 28 April 2023 Shell Petrol Stations Order were served (albeit perhaps not strictly required in all instances):

4.14.1 upon the Weightmans LLP by email on at 12:31 on 2 May 2023 to Joanna.carty@weightmans.com and Special Delivery on 2 May 2023 to Weightmans LLP, 100 Old Hall Street, Liverpool L3 9QJ. Copies of the email and letter are exhibited at pages **94 - 95 of Exhibit AJO6**.

4.14.2 upon Michael Gibson by Special Delivery on 2 May 2023 to [REDACTED]. Copies of the letter and proof of delivery are exhibited at **pages 96 - 99 of Exhibit AJO23**.

4.14.3 upon Hodge James and Allen Solicitors Limited on 2 May 2023 at 180 North Gower Street, London, NW1 2NB. Copies of the letter and proof of delivery are exhibited at **pages 100 - 102 of Exhibit AJO6.**

4.14.4 upon Michaela Marc by email on 2 May 2023 at 10:29 to [REDACTED] A copy of the email is exhibited at **page 104 of Exhibit AJO6.**

4.14.5 upon Nick Hofman by email on 2 May 2023 at 10:31 to [REDACTED] A copy of the email is exhibited at **page 105 of Exhibit AJO6.**

4.15 In the circumstances I believe that service of the 28 April 2023 Shell Petrol Stations Order has been effected by the manner prescribed by the 28 April 2023 Shell Petrol Stations Order. A Certificate of Service in relation to the 28 April 2023 Shell Petrol Stations Order has been filed. A copy of the Certificate is exhibited at **pages 106 - 110 of Exhibit AJO6.**

5. Shell Petrol Station Proceedings – Third Party Disclosure

5.1 In addition to the 28 April 2023 Shell Petrol Stations Order, a copy of the Third Party Disclosure Order made by Mrs Justice Hill dated 28 April 2023 ("**28 April 2023 Shell Petrol Stations Third Party Disclosure Order**") made in connection with the Shell Petrol Stations Proceedings has also been served in the Shell Petrol Stations Proceedings. A copy of this order is exhibited at pages **111 – 114 of Exhibit AJO6.**

5.2 Paragraph 10 of the 28 April 2023 Shell Petrol Stations Third Party Disclosure Order requires that:

"10. A sealed copy of this Order shall be served by the Claimant/Applicant on the Respondent."

Service by email

5.3 In accordance with the provisions of paragraph 10 of the 28 April 2023 Shell Petrol Stations Third Party Disclosure Order a copy of such order was served by sending an email to the Respondent at Julia.Bartholomew@met.police.uk as set out in the table below.

Item No	Document Served	Subject	Email date/time (Exhibit Reference)
	28 April 2023 Shell Petrol Station Third Party Disclosure Order	QB-2022-001420 - Shell v Persons Unknown	28 April 2023 12:46 (Page 115 of Exhibit AJO6)

- 5.4 No automated response was received following service of the email.
- 5.5 In the circumstances I believe that service of the 28 April Shell Petrol Stations Third Party Disclosure Order in respect of the Shell Petrol Station Proceedings has been effected by the manner prescribed by the 28 April Shell Petrol Stations Third Party Disclosure Order.

6. The Proceedings - 23 May 2023 Orders

6.1 On 23 May 2023, Mrs Justice Hill handed down judgement in respect of the return hearings that took place for all three sets of Proceedings. In all three sets of proceedings a further injunction was granted. As I will explain, steps were then taken to serve that Order upon the various Defendants.

6.2 Paragraph 7 of the Order of Mrs Justice Hill dated 23 May 2023 in respect of the Shell Centre Tower Proceedings ("**23 May 2023 Shell Centre Tower Order**") provides that:

"Pursuant to CPR r.6.15 and r.6.27 and rr.81.4(c) and (d), service of this Order shall be validly effected by:

a. replacing each of the warning notices which are currently affixed at the entrances and around the perimeter of Shell Centre Tower, so as to include the information at paragraph 8 below;

b. procuring that a notice containing the information indicated at paragraph 8 below is:

i. uploaded to <http://www.noticespublic.com/>;

ii. sent to the email addresses set out in the Third Schedule of this Order;

iii. sent to any person who has previously requested a copy of documents in these proceedings from the Claimant or its solicitors, either by post or email (as was requested by that person)."

6.3 Paragraph 7 of the Order of Mrs Justice Hill dated 23 May 2023 in respect of the Shell Haven Proceedings ("**23 May 2023 Shell Haven Order**") provides that:

"Pursuant to CPR r.6.15 and r.6.27 and rr.81.4(c) and (d), service of this Order shall be validly effected by:

a. replacing each of the warning notices which are currently affixed at the entrances and around the perimeter of Shell Haven so as to include the information at paragraph 8 below;

b. procuring that a notice containing the information indicated at paragraph 8 below is:

i. uploaded to <http://www.noticespublic.com/>;

ii. sent to the email addresses set out in the Third Schedule of this Order."

6.4 Paragraph 8 of the Order of Mrs Justice Hill dated 23 May 2023 in respect of the Shell Petrol Stations Proceedings ("**23 May 2023 Shell Petrol Station Order**") provides that:

"Pursuant to CPR r.6.15 and r.6.27 and rr.81.4(c) and (d), service of this Order shall be validly effected by;

a. replacing the warning notices currently affixed at each Shell Petrol Station, so as to include the information at paragraph 9 below;

b. procuring that a notice containing the information indicated at paragraph 9 below is:

i. uploaded to <http://www.noticespublic.com/>;

ii. sent to the email addresses set out in the Fourth Schedule of this Order;

iii. sent to any person who has previously requested a copy of documents in these proceedings from the Claimant or its solicitors, either by post or email (as was requested by that person)"

6.5 In respect of the Proceedings the following documents have been served:

6.5.1 the 23 May 2023 Shell Centre Tower Order;

6.5.2 the 23 May 2023 Shell Haven Order; and

6.5.3 the 23 May 2023 Shell Petrol Station Order.

(together known as the "**the May 2023 Orders**")

The 23 May 2023 Shell Centre Tower Order and the 23 May 2023 Shell Haven Order

Service by email - the Third Schedule to the Order

6.6 A copy of the 23 May 2023 Shell Centre Tower Order is exhibited at **pages 116 - 126** of **Exhibit AJO6**. A copy of the 23 May 2023 Shell Haven Order is exhibited at **pages 127 - 140** of **Exhibit AJO6** In accordance with:

6.6.1 the provisions of paragraph 7 b(ii) of the 23 May 2023 Shell Centre Tower Order, a copy the 23 May 2023 Shell Centre Tower Order and accompanying warning notice were served by email on each of the email addresses listed in the Third Schedule of the 23 May 2023 Shell Centre Tower Order as set out in the table below;

6.6.2 the provisions of paragraph 7 b(ii) of the 23 May 2023 Shell Haven Order a copy of the 23 May 2023 Shell Haven Order and accompanying warning notice were served by email on each of the email addresses listed in the Third Schedule of the 23 May 2023 Shell Haven Order.

I set out the detail of the timing and subject line of the email in the table below. Those emails were sent from an email address, shell.service@eversheds-sutherland.com, which Eversheds Sutherland has created in order to serve the various documents in this matter. My colleagues, Alex Wright (Principal Associate) and Bethany Taylor (Associate), and I have access to and control of this dedicated email address.

Item No.	Document(s) Served	Subject	Email date/time (Exhibit Reference)
	<p>in relation to the Shell Haven Proceedings, sealed order dated 23 May 2023 and the notice which is to be sent pursuant to paragraph 7(b)(ii) of such order; and</p> <p>in relation to the Shell Centre Tower Proceedings, sealed order dated 23 May 2023 and the notice which is to be sent pursuant to paragraph 7(b)(ii) of such order.</p>	<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 Orders (23.05.23)</p>	<p>25 May 2023 09:06 (Pages 141 - 142 of Exhibit AJO6)</p>

6.7 A copy of the warning notices referred to at paragraphs 6.6.1 and 6.6.2 above is exhibited at pages **143 - 144** of **Exhibit AJO6**.

6.8 10 automatic responses were received in response to the email dealing with service of the 23 May 2023 Shell Haven and Shell Centre Tower Orders. Having reviewed the timings of the automated responses, I believe that:

6.8.1 automatic responses were received from the following 7 email accounts: eoexrtnt@protonmail.com, xrbristol.regional@protonmail.com, xrmidlandstraining@protonmail.com, xrdemocracy@protonmail.com, xrvideo@protonmail.com, youthclimateswarm@protonmail.com and xr-peoplesassembly@protonmail.com. These 7 automated responses advised that the emails could not be delivered as the relevant recipient's mailbox was full. A copy of the relevant emails are exhibited at **pages 145 - 151** of **Exhibit AJO6**. 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;

6.8.2 1 automated response was received from support@xrnorth.org which stated that the "Recipient email address is possibly incorrect". The email address however is as per the address stipulated in the 23 May 2023 Shell Centre Tower Order

and the 23 May 2023 Shell Haven Order. A copy of the relevant email is exhibited at **page 152** of **Exhibit AJ06**; and

6.8.3 automatic responses received from the following 2 email accounts: press@extinctionrebellion.uk and xr-legal@riseup.net. These appear to be automatic tailored responses to any emails received. A copy of the relevant emails is exhibited at **pages 153 - 154** of Exhibit **AJ06**.

6.9 The automatic responses referred to at paragraphs 6.8.1. and 6.8.2 above derived from:

6.9.1 8 email addresses out of the total 48 email addresses linked to Extinction Rebellion; and

6.9.2 1 email address, being the only email address, for Youth Climate Swarm to which the emails relating to the 2 Orders of 23 May 2023 were sent.

6.10 Apart from the automated response referred to at paragraphs 6.8.1 and 6.8.2 and 6.8.3 above, no responses from any of the other 40 addresses linked to Extinction Rebellion were received. I have no reason to believe that the emails sent to the other 40 email addresses to which these emails were sent were not delivered or received, and no other 'bounce back' or delivery failure notifications in this regard were received.

6.11 I therefore consider that the remaining 40 emails sent to the email addresses linked to Extinction Rebellion were sufficient for effecting service of the 23 May 2023 Shell Centre Tower Order and the 23 May 2023 Shell Haven Order on these groups.

6.12 In respect of Youth Climate Swarm, this was the only email address provided for within the addresses listed in the 23 May 2023 Shell Centre Tower Order and the 23 May 2023 Shell Haven Order. I do not consider that further steps could reasonably be taken in order to effect service of the 23 May 2023 Shell Centre Tower Order and the 23 May 2023 Shell Haven Order on this group. Indeed, 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.

6.13 For the reasons explained above, I believe that the steps taken in relation to service of documents upon the email addresses referred to at paragraph 6.6 above complied with the requirement upon SIPC and Shell UK to send emails to the addresses listed in the 23 May 2023 Shell Centre Tower Order and the 23 May 2023 Shell Haven Order.

Service by uploading to <http://www.noticespublic.com/>

6.14 A copy of the 23 May 2023 Shell Centre Tower Order and the 23 May 2023 Shell Haven Order and the respective warning notices were uploaded to <http://www.noticespublic.com/> on **25 May 2023**, in compliance with:

6.14.1 paragraph 7b(i) of the 23 May 2023 Shell Centre Tower Order; and

6.14.2 paragraph 7b(i) of the 23 May 2023 Shell Haven Order.

6.15 A printout of the webpage at <http://www.noticespublic.com/> showing that these documents continue to be uploaded to that website are exhibited at **pages 155 and 156** of **Exhibit AJO6**.

Service by affixing to the Shell Haven

6.16 A copy of the 23 May 2023 Shell Haven Order and/or the relevant warning notice has replaced each of the then existing warning notices which were previously affixed at the entrances and around the perimeter of Shell Haven on 24 May 2023, in accordance with paragraph 7(a) of the 23 May 2023 Shell Haven Order. Evidence that this has been done are exhibited at **pages 157 - 158** of **Exhibit AJO6**

Service by affixing to the Shell Centre Tower

6.17 A copy of the 23 May 2023 Shell Centre Tower Order and/or the relevant warning notice replaced each of the then existing warning notices which were previously affixed at the entrances and around the perimeter of Shell Centre Tower on 24 May 2023, in accordance with paragraph 7(a) of the 23 May 2023 Shell Centre Tower Order.

Service by courier/email of 23 May 2023 Shell Tower Order

6.18 In addition, copies of the 23 May 2023 Shell Centre Tower Order and Notice were served (albeit perhaps not strictly required in all instances) in compliance with paragraph 7(b)(iii) of the 23 May 2023 Shell Tower Order, upon Raphael Dalzell by email on 25 May 2023 at 09:26 to [REDACTED] A copy of the email is exhibited at **page 159** of **Exhibit AJO6**.

6.19 Unlike previous orders served in connection with the Shell Tower Proceedings, copies of the 23 May 2023 Shell Haven Order and Notice were not emailed to the Metropolitan Police or Weightmans LLP as they had confirmed that, going forward they only wished to be served with orders connected to the Third Party Disclosure aspect of the Shell Petrol Station Proceedings.

6.20 In addition, copies of the 23 May 2023 Shell Centre Tower Order and accompanying Notice were served (albeit perhaps not strictly required) upon Hodge James and Allen Solicitors Limited at 180 North Gower Street, London, NW1 2NB and by email on 25 May 2023 at 16:34 to ahardy@hja.net. Copies of this email, letter and proof of delivery are exhibited at **pages 160 - 163** of **Exhibit AJO6**.

6.21 In the circumstances I believe that service of the 23 May 2023 Shell Centre Tower Order has been effected by the manner prescribed by the 23 May 2023 Shell Centre Tower Order.

Service by courier/email of 23 May 2023 Shell Haven Order

- 6.22 Unlike previous orders served in connection with the Shell Haven Proceedings, copies of the 23 May 2023 Shell Haven Order and Notice were not emailed to Weightmans LLP or Essex Police as those entities had confirmed that, going forward they only wished to be served with orders connected to the Third Party Disclosure aspect as opposed to the wider Shell Haven Proceedings.
- 6.23 In addition, copies of the 23 May 2023 Shell Haven Order and accompanying Notice were served (albeit perhaps not strictly required) upon Hodge James and Allen Solicitors Limited at 180 North Gower Street, London, NW1 2NB and by email on 25 May 2023 at 16:34 to ahardy@hja.net. Copies of this email, letter and proof of delivery are exhibited at **pages 160 - 163 of Exhibit AJ06**.
- 6.24 In the circumstances I believe that service of the 23 May 2023 Shell Haven Order has been effected by the manner prescribed by the 23 May 2023 Shell Haven Order.
- 6.25 In the circumstances I believe that service of the 23 May 2023 Shell Centre Tower Order and the 23 May 2023 Shell Haven Order has been effected by the manner prescribed by the 23 May 2023 Shell Centre Tower Order and the 23 May 2023 Shell Haven Order. A Certificate of Service in relation to the 23 May 2023 Shell Haven Order and the 23 May 2023 Shell Centre Tower Order has been filed (one for each set of proceedings). A copy of the Certificates are exhibited at **pages 164 - 167** and **pages 168 - 171** respectively of **Exhibit AJ06**.

The 23 May 2023 Shell Petrol Stations Order

- 6.26 The manner by which the 23 May 2023 Shell Petrol Stations Order was served is described and addressed fully in my third witness statement in the Shell Petrol Stations Proceedings dated 10 October 2023. I therefore do not repeat such matters here.
- 6.27 SUKOP made an application in the Shell Petrol Stations Proceedings on 12 October 2023 ("**the October 2023 Application**") which amongst other things sought:
- 6.27.1 permission to amend its Particulars of Claim and Claim Form in such proceedings; and
- 6.27.2 an order pursuant to CPR r.6.15(2) that the steps already taken by it to effect service of the 23 May 2023 Shell Petrol Stations Order at not less than half of the Shell Petrol Stations (which, as I have said, were set out in my third witness statement) amounted to good service and that the 23 May 2023 Shell Petrol Stations Order was deemed to have been served on 24 July 2023
- 6.28 By order dated 12 October 2023 Mrs Justice Hill ("**the 12 October 2023 Order**"):
- 6.28.1 granted permission for SUKOP to amend its Particulars of Claim and Claim Form in the Shell Petrol Stations Proceedings; and

6.28.2 ordered that the steps already taken by SUKOP to effect service of the 23 May 2023 Shell Petrol Stations Order amounted to good service and that such order was deemed to have been served on 24 July 2023.

7. Service of documents arising out of the October 2023 Application

7.1 Sealed Application Notice dated 12 October 2023 and ancillary documents

7.1.1 Paragraph 4 of the 28 April 2023 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:

4.1.1 sending it by email to each of the email addresses listed in the Second Schedule to the Order;

4.1.2 uploading it to <http://www.noticespublic.com/>; and

4.1.3 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”

Paragraph 4.1.1 - Service by email - The Second Schedule to the Order

7.1.2 In accordance with the provisions of paragraph 4.1.1 of the 28 April 2023 Shell Petrol Stations Order, a copy of (a) Sealed Application Notice dated 12 October 2023; (b) Third Witness Statement of Alison Oldfield dated 10 October 2023; (c) Exhibits to Third Witness Statement of Alison Oldfield dated 10 October 2023; (4) Draft Order; (5) Draft Amended Claim Form; and (6) Draft Amended Particulars of Claim (together “**the October 2023 Application Documents**”) were served by email on each of the email addresses listed in the Second Schedule of the 28 April 2023 Shell Petrol Stations Order. I set out the detail of the timing and subject line of the email in the table below. Those emails were sent from an email address, shell.service@eversheds-sutherland.com, which Eversheds Sutherland has created in order to serve the various documents in this matter. My colleagues, Alex Wright (Principal Associate) and Bethany Taylor (Associate), and I have access to and control of this dedicated email address.

	Document(s) Served	Subject	Email date/time (Exhibit Reference)

Item No.			
	The October 2023 Application Documents	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Application Notice – 12 October 2023	19 October 2023 at 12:16, 12.38 and 12:47 (Pages 172 – 175 of Exhibit AJO6)

7.1.3 32 automatic responses were received in response to the above emails. Having reviewed the timings of the automated responses, I believe that:

7.1.3.1 18 automatic responses were received from the following email accounts: eoexrtnt@protonmail.com, xrdemocracy@protonmail.com, xrmidlandstraining@protonmail.com, peoplesassembly@prontonmail.com, regionaldevelopment@prontonmail.com and youthclimateswarm@prontonmail.com. These 18 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 176 - 193** of **Exhibit AJO6**. 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;

7.1.3.2 11 automatic responses were also received from xr-legal@riseup.net, xrsw.trainings@gmail.com, artsxr@gmail.com, enquiries@extinctionrebellion.uk, press@extinctionrebellion.uk (three emails were received from this account), xrlondoncoord@gmail.com, xr.connectingcommunities@gmail.com, xrlondoncommunityevents@gmail.com and xrsocialmediaevents@gmail.com which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at **pages 194 - 204** of **Exhibit AJO6**; and

7.1.3.3 3 automated response were received from support@xrnorth.org which stated that the “Recipient email address is possibly

incorrect". The email address however is as per the address stipulated in the 28 April 2023 Shell Petrol Stations Order. A copy of the relevant email is exhibited at **page 205 – 207 of Exhibit AJ06.**

- 7.1.4 The automatic responses referred to at paragraphs 7.1.3.1 and 7.1.3.3 above derived from:
- 7.1.4.1 6 email addresses out of the total 48 email addresses linked to Extinction Rebellion;
 - 7.1.4.2 1 email address out of the total 3 linked to Just Stop Oil; and
 - 7.1.4.3 1 email address, being the only email address, for Youth Climate Swarm to which the abovementioned emails were sent.
- 7.1.5 Apart from the automated response referred to at paragraphs 7.1.3.1 to 7.1.3.3, no responses from any of the other 42 addresses linked to Extinction Rebellion were received. I have no reason to believe that the emails sent to the other 42 email addresses to which the above emails sent on 19 October 2023 were sent were not delivered or received, and no other 'bounce back' or delivery failure notifications were received. Similarly apart from the automated response referred to at paragraph 7.1.3.1 no responses from any of the other email addresses linked to Just Stop Oil were received.
- 7.1.6 I therefore consider that the remaining 42 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 October 2023 Application Documents on these groups.
- 7.1.7 In respect of Youth Climate Swarm, this was the only email address provided for within the addresses listed in the 28 April 2023 Shell Petrol Stations Order. I do not consider that there are further steps which could reasonably be taken in respect of effecting service of the October 2023 Application Documents on this group. 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.
- 7.1.8 For the reasons explained above, I believe that the steps taken in relation to service of the October 2023 Application Documents upon the email addresses referred to at paragraph 7.1.2 complied with the requirement upon SUKOP to serve them by way of emails to the various addresses listed in the 28 April 2023 Shell Petrol Stations Order.

Paragraph 4.1.2 - Service by uploading a copy to <http://www.noticespublic.com/>

7.1.9 A copy of the October 2023 Application Documents were uploaded to <http://www.noticespublic.com/> in compliance with paragraph 4.1.2 of the 28 April 2023 Shell Petrol Stations Order on 19 October 2023. A printout of the webpage at <http://www.noticespublic.com/showing> that such documents are uploaded to that website is exhibited at **page 208** of **Exhibit AJ06**.

Paragraph 4.1.3 - Service by post/email

7.1.10 In addition, copies of the October 2023 Application Documents were served (albeit perhaps not strictly required in all instances) in compliance with paragraph 4.1.3 of the 28 April 2023 Shell Petrol Stations Order by sending a copy to:

7.1.10.1 Michael Gibson (by Special Delivery at [REDACTED] on 20 October 2023. Copies of the letter and proof of delivery are exhibited at **pages 209 - 211** of **Exhibit AJ06**.

7.1.10.2 Bindmans LLP (by Special Delivery to 236 Grey's Inn Road, London, WC1X 8HB) on 20 October 2023. Copies of the letter and proof of delivery are exhibited at **pages 212 - 214** of **Exhibit AJ06**

7.1.10.3 Hodge James and Allen Solicitors Limited (solicitors acting previously for Jessica Branch, Andrew Daniel Smith and Nancy Field) (by Special Delivery to 180 North Gower Street, London NW1 2NB) on 20 October 2023. Copies of the proof of delivery are exhibited at **pages 215 - 217** of **Exhibit AJ06**.

7.1.10.4 Jessica Branch (by Hand at [REDACTED]) on 25 October 2023. Proof of delivery is exhibited at **pages 218 - 221** of **Exhibit AJ06**.

7.1.10.5 Michaela Marc by emails sent on 19 October 2023 at 11:59, 12:10 and 12:19 to [REDACTED]. A copy of the email is exhibited at **pages 222 - 224** of **Exhibit AJ06**.

7.1.10.6 Nick Hofman by emails sent on 19 October 2023 at 12:04, 12:14 and 12:24 to [REDACTED]. A copy of the emails is exhibited at **pages 225 - 227** of **Exhibit AJ06**.

7.1.11 A copy of the October 2023 Application Documents were not served on Weightmans LLP as they have confirmed that they now only wish to be served with orders connected to the Third Party Disclosure aspect as opposed to the wider Shell Petrol Stations Proceedings.

7.1.12 In the circumstances I believe that service of the October 2023 Application Documents has been effected by the manner prescribed by the 28 April 2023

Shell Petrol Station Order. A Certificate of Service in relation to the October 2023 Application Documents has been filed. A copy of the Certificate is exhibited at **pages 228 - 231 of Exhibit AJ06.**

7.2 Sealed copy of the 12 October 2023 Order

7.2.1 Paragraph 5 of the 12 October 2023 Order provides that:

5. "Pursuant to CPR r.6.15 and r.6.27 and rr.81.4(c) and (d), service of this Order shall be validly effected by:

a. uploading a copy to <http://www.noticespublic.com/>;

b. sending a copy to the email addresses set out in the Fourth Schedule of the Order of Mrs Justice Hill dated 23 May 2023; and

c. [sending a copy to any person who has previously requested a copy of documents in these proceedings from the Claimant or its solicitors, either by post or email (as was requested by that person)].

Paragraph 5(a) - Service by uploading a copy to <http://www.noticespublic.com/>

7.2.2 A copy of the 12 October 2023 Order was uploaded to <http://www.noticespublic.com/> in compliance with paragraph 5(a) of the 12 October Order on 19 October 2023. A printout of the webpage at <http://www.noticespublic.com/> showing that such documents are uploaded to that website is exhibited at **page 232 of Exhibit AJ06.**

Paragraph 5(b) - Service by email - The Fourth Schedule to the 23 May 2023 Shell Petrol Stations Order

7.2.3 In accordance with the provisions of paragraph 5(b) of the 12 October 2023 Order, a copy of the 12 October 2023 Order was served by email on each of the email addresses listed in the Fourth Schedule of the 23 May 2023 Shell Petrol Stations Order. I set out the detail of the timing and subject line of the email in the table below. Those emails were sent from an email address, shell.service@eversheds-sutherland.com, which Eversheds Sutherland has created from which to serve the various documents in this matter. My colleagues, Alex Wright (Principal Associate) and Bethany Taylor (Associate), and I have access to and control of this dedicated email address.

Item No.	Document(s) Served	Subject	Email date/time (Exhibit Reference)

	12 October 2023 Order 12	Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Order - 12 October 2023	19 October 2023 at 13:24 (Page 233 of Exhibit AJO6)
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7.2.1 8 automatic responses were received in response to the above email. Having reviewed the timings of the automated responses, I believe that:

7.2.1.1 6 automatic responses were received from the following email accounts: eoexrtnt@protonmail.com, xrdemocracy@protonmail.com, xrmidlandstraining@protonmail.com, peoplesassembly@prontonmail.com, regionaldevelopment@prontonmail.com and youthclimateswarm@prontonmail.com. These 6 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 234 - 239** of **Exhibit AJO6**. 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;

7.2.1.2 1 automatic response was also received from press@extinctionrebellion.uk which appears to be an automatic tailored response to any emails received. A copy of the relevant email is exhibited at **page 240** of **Exhibit AJO6**; and

7.2.1.3 1 automated response was received from support@xrnorth.org which states that the "Recipient email address is possibly incorrect". The email address however is as per the address stipulated in the Fourth Schedule of the 23 May 2023 Shell Petrol Stations Order. A copy of the relevant email is exhibited at **page 241** of **Exhibit AJO6**

7.2.2 The automatic responses referred to at paragraphs 7.2.1.1 and 7.2.1.3 above derive from:

7.2.2.1 6 email addresses out of the total 48 email addresses linked to Extinction Rebellion;

7.2.2.2 1 email address out of the total 3 linked to Just Stop Oil; and

- 7.2.2.3 1 email address, being the only email address, for Youth Climate Swarm, to which the email was sent.
- 7.2.3 Apart from the automated response referred to at paragraphs 7.2.1.1 to 7.2.1.3, no responses from any of the other 42 addresses linked to Extinction Rebellion were received. I have no reason to believe that the emails sent to the other 42 email addresses to which the above email was sent was not delivered or received, and no other 'bounce back' or delivery failure notifications were received. Similarly apart from the automated response referred to at paragraphs at paragraphs 7.2.1.1 to 7.2.1.3 no responses from any of the other email addresses linked to Just Stop Oil were received.
- 7.2.4 I therefore consider that the remaining 42 emails sent to the email addresses linked to Extinction Rebellion and the remaining 2 email sent to the email addresses linked to Just Stop Oil were sufficient for effecting service of the 12 October 2023 Order on these groups.
- 7.2.5 In respect of Youth Climate Swarm, this was the only email address provided for within the addresses listed in the Fourth Schedule of the 23 May 2023 Shell Petrol Stations Order. I do not consider that there are further steps which could reasonably be taken in respect of effecting service of the 12 October 2023 Order on this group. This firm's IT team believes that this email was properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full.
- 7.2.6 For the reasons explained above, I believe that the steps taken in relation to service of the 12 October 2023 Order upon the email addresses referred to at paragraph 7.2.3 complied with the requirement upon SUKOP to serve the 12 October 2023 Order by way of emails to the various addresses listed in the Fourth Schedule of the 23 May 2023 Shell Petrol Stations Order.

Paragraph 5(c) - Service by post/email

- 7.2.7 In addition, copies of the 12 October 2023 Order were served (albeit perhaps not strictly required in all instances) in compliance with paragraph 5(c) of the 12 October 2023 Order by sending a copy to:
- 7.2.7.1 Michael Gibson (by Special Delivery at [REDACTED] [REDACTED] on 20 October 2023. Copies of the letter and proof of delivery are exhibited at **pages 209 - 211** of **Exhibit AJ06**.
- 7.2.7.2 Bindmans LLP (by Special Delivery to 236 Grey's Inn Road, London, WC1X 8HB) on 20 October 2023. Copies of the letter and proof of delivery are exhibited at **pages 212 - 214** of **Exhibit AJ06**

- 7.2.7.3 Hodge James and Allen Solicitors Limited (solicitors acting previously for Jessica Branch, Andrew Daniel Smith and Nancy Field) (by Special Delivery to 180 North Gower Street, London NW1 2NB) on 20 October 2023. Copies of the proof of delivery are exhibited at **pages 215 – 217** of **Exhibit AJO6**.
- 7.2.7.4 Jessica Branch (by Hand at [REDACTED]) on 25 October 2023. Proof of delivery is exhibited at **pages 218 – 221** of **Exhibit AJO6**.
- 7.2.7.5 Michaela Marc by email sent on 19 October 2023 at 12:52 to [REDACTED]. A copy of the email is exhibited at **page 242** of **Exhibit AJO6**.
- 7.2.7.6 Nick Hofman by email sent on 19 October 2023 at 12:52 to [REDACTED]. A copy of the emails is exhibited at **page 243** of **Exhibit AJO6**.
- 7.2.8 A copy of the 12 October 2023 Order was not served on Weightmans LLP as they have confirmed that they now only wish to be served with orders connected to the Third Party Disclosure aspect as opposed to the wider Shell Petrol Stations Proceedings.
- 7.2.9 In the circumstances I believe that service of the 12 October 2023 Order has been effected by the manner prescribed by the 12 October 2023 Order. A Certificate of Service in relation to the service of the 12 October 2023 Order has been filed. A copy of the Certificate is exhibited at **pages 244 - 247** of **Exhibit AJO6**.
- 7.3 Amended Claim Form (unsealed) and Amended Particulars of Claim
- 7.3.1 Paragraphs 5 and 7 of the 12 October 2023 Order provides that:
5. *"Pursuant to CPR r.6.15 and r.6.27 and rr.81.4(c) and (d), service of this Order shall be validly effected by:*
- a. uploading a copy to <http://www.noticespublic.com/>;*
- b. sending a copy to the email addresses set out in the Fourth Schedule of the Order of Mrs Justice Hill dated 23 May 2023; and*
- c. [sending a copy to any person who has previously requested a copy of documents in these proceedings from the Claimant or its solicitors, either by post or email (as was requested by that person)].*

7. "Pursuant to CPR 6.15(4)(b) and 6.27, the amended Claim Form and amended Particulars of Claim shall be deemed to be served on the latest date on which all the methods of service referred to in paragraph 5 have been completed in respect of this order, such date to be verified by the completion of a certificate of service"

Paragraphs 5(a) and 7 – Service by uploading a copy to <http://www.noticespublic.com/>

7.3.2 A copy of the a copy of the Amended Claim Form (unsealed) and Amended Particulars of Claim were uploaded to <http://www.noticespublic.com/> in compliance with paragraphs 5(a) and 7 of the 12 October Order on 19 October 2023. A printout of the webpage at <http://www.noticespublic.com/> showing that such documents are uploaded to that website is exhibited at **page 248** of **Exhibit AJO6**.

Paragraphs 5(b) and 7 - Service by email - The Fourth Schedule to the 23 May 2023 Shell Petrol Stations Order

7.3.3 In accordance with the provisions of paragraph 5(b) and 7 of the 12 October 2023 Order, a copy of the Amended Claim Form (unsealed) and Amended Particulars of Claim were served by email to each of the email addresses listed in the Fourth Schedule of the 23 May 2023 Shell Petrol Stations Order. I set out the detail of the timing and subject line of the email in the table below. Those emails were sent from an email address, shell.service@eversheds-sutherland.com, which Eversheds Sutherland has created in order to serve the various documents in this matter. My colleagues, Alex Wright (Principal Associate) and Bethany Taylor (Associate), and I have access to and control of this dedicated email address.

Item No.	Document(s) Served	Subject	Email date/time (Exhibit Reference)
	Amended Claim Form (unsealed) and Amended Particulars of Claim	Shell U.K. Oil Products Limited v Persons Unknown (Claim No: QB-2022-001420) ("the Shell Petrol Stations Proceedings")	19 October 2023 at 16:22 (Page 249 of Exhibit AJO6)

7.3.4 10 automatic responses were received in response to the above emails. Having reviewed the timings of the automated responses, I believe that:

- 7.3.4.1 8 automatic responses were received from the following email accounts: eoexrtnt@protonmail.com, xrdemocracy@protonmail.com, xrmidlandstraining@protonmail.com, peoplesassembly@prontonmail.com, regionaldevelopment@prontonmail.com, juststopoil@protonmail.com, xrvideo@protonmail.com and youthclimateswarm@prontonmail.com. These 8 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 250 - 257** of **Exhibit AJO6**. 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;
- 7.3.4.2 1 automatic response was also received from press@extinctionrebellion.uk which appears to be an automatic tailored response to any emails received. A copy of the relevant email is exhibited at **page 258** of **Exhibit AJO6**; and
- 7.3.4.3 1 automated response was received from support@xrnorth.org which states that the "Recipient email address is possibly incorrect". The email address however is as per the address stipulated in the Fourth Schedule of the 23 May 2023 Shell Petrol Stations Order. A copy of the relevant email is exhibited at **page 259** of **Exhibit AJO6**
- 7.3.5 The automatic responses referred to at paragraphs 7.3.4.1 and 7.3.4.3 above derived from:
- 7.3.5.1 7 email addresses out of the total 48 email addresses linked to Extinction Rebellion;
- 7.3.5.2 2 email address out of the total 3 linked to Just Stop Oil; and
- 7.3.5.3 1 email address, being the only email address, for Youth Climate Swarm to which the email was sent.
- 7.3.6 Apart from the automated response referred to at paragraphs 7.3.4.1 to 7.3.4.3, no responses from any of the other 41 addresses linked to Extinction Rebellion were received. I have no reason to believe that the emails sent to the other 41 email addresses to which the emails were sent were not delivered or received, and no other 'bounce back' or delivery failure notifications were received. Similarly apart from the automated response referred to at paragraphs 7.3.4.1

and 7.3.4.3 no responses from any of the other email addresses linked to Just Stop Oil were received.

- 7.3.7 I therefore consider that the remaining 41 emails sent to the email addresses linked to Extinction Rebellion and the remaining 1 email sent to the email addresses linked to Just Stop Oil were sufficient for effecting service of the Amended Claim Form (unsealed) and Amended Particulars of Claim on these groups.
- 7.3.8 In respect of Youth Climate Swarm, this was the only email address provided for within the addresses listed in the Fourth Schedule of the 23 May 2023 Shell Petrol Stations Order. I do not consider that there are further steps which could reasonably be taken in respect of effecting service of the Amended Claim Form (unsealed) and Amended Particulars of Claim on this group. This firm's IT team believes that this email was properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full.
- 7.3.9 For the reasons explained above, I believe that the steps taken in relation to service of the Amended Claim Form (unsealed) and Amended Particulars of Claim upon the email addresses referred to at paragraph 7.3.3 complied with the requirement upon SUKOP to serve the Amended Claim Form (unsealed) and Amended Particulars of Claim by way of email emails to the various addresses listed in the Fourth Schedule of the 23 May 2023 Shell Petrol Stations Order.

Paragraphs 5(c) and 7 - Service by post/email

- 7.3.10 In addition, copies of the Amended Claim Form (unsealed) and Amended Particulars of Claim were served (albeit perhaps not strictly required in all instances) in compliance with paragraph 5(c) and 7 of the 12 October 2023 Order by sending a copy to:
- 7.3.10.1 Michael Gibson (by Special Delivery at [REDACTED] on 20 October 2023. Copies of the letter and proof of delivery are exhibited at **pages 209 - 211** of **Exhibit AJ06**.
- 7.3.10.2 Bindmans LLP (by Special Delivery to 236 Grey's Inn Road, London, WC1X 8HB) on 20 October 2023. Copies of the letter and proof of delivery are exhibited at **pages 212 - 214** of **Exhibit AJ06**
- 7.3.10.3 Hodge James and Allen Solicitors Limited (solicitors acting previously for Jessica Branch, Andrew Daniel Smith and Nancy Field) (by Special Delivery to 180 North Gower Street, London NW1 2NB) on 20 October 2023. Copies of the proof of delivery are exhibited at **pages 215 - 217** of **Exhibit AJ06**.

- 7.3.10.4 Jessica Branch (by Hand at [REDACTED]) on 25 October 2023. Proof of delivery is exhibited at **pages 218 – 221 of Exhibit AJ06.**
- 7.3.10.5 Michaela Marc by email sent on 19 October 2023 at 16:23 to [REDACTED]. A copy of the email is exhibited at **page 260 of Exhibit AJ06.**
- 7.3.10.6 Nick Hofman by email sent on 19 October 2023 at 16:24 to [REDACTED]. A copy of the emails is exhibited at **page 261 of Exhibit AJ06.**
- 7.3.11 A copy of the Amended Claim Form (unsealed) and Amended Particulars of Claim were not served on Weightmans LLP as they have confirmed that they now only wish to be served with orders connected to the Third Party Disclosure aspect as opposed to the wider Shell Petrol Stations Proceedings.
- 7.4 In the circumstances I believe that service of the Amended Claim Form (unsealed) and Amended Particulars of Claim has been effected by the manner prescribed by the 12 October 2023 Order. A Certificate of Service in relation to the service of the Amended Claim Form (unsealed) and Amended Particulars of Claim has been filed. A copy of the Certificate is exhibited at **pages 262 - 265 of Exhibit AJ06.**
- 7.5 Sealed Amended Claim Form dated 19 October 2023 (sealed 24 October 2023)

Paragraphs 5(a) and 7 – Service by uploading a copy to <http://www.noticespublic.com/>

- 7.5.1 A copy of the Sealed Amended Claim Form dated 19 October 2023 (sealed 24 October 2023) was uploaded to <http://www.noticespublic.com/> in compliance with paragraphs 5(a) and 7 of the 12 October Order on 26 October 2023. A printout of the webpage at <http://www.noticespublic.com/> showing that such documents are uploaded to that website is exhibited at **page 266 of Exhibit AJ06.**

Paragraphs 5(b) and 7 - Service by email - The Fourth Schedule to the 23 May 2023 Shell Petrol Stations Order

- 7.5.2 In accordance with the provisions of paragraph 5(b) and 7 of the 12 October 2023 Order, a copy of the Sealed Amended Claim Form dated 19 October 2023 (sealed 24 October 2023) was served by email to each of the email addresses listed in the Fourth Schedule of the 23 May 2023 Shell Petrol Stations Order. I set out the detail of the timing and the subject line of the email in the table below. Those emails were sent from an email address, shell.service@eversheds-sutherland.com, which Eversheds Sutherland has created in order to serve the various documents in this matter. My colleagues, Alex Wright (Principal

Associate) and Bethany Taylor (Associate), and I have access to and control of this dedicated email address.

Item No.	Document(s) Served	Subject	Email date/time (Exhibit Reference)
	Sealed Amended Claim Form dated 19 October 2023 (sealed 24 October 2023)	RE: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Amended Claim Form and Amended Particulars of Claim	26 October 2023 at 11:19 (Page(s) 267 - 268 of Exhibit AJO6)

7.5.3 16 automatic responses were received in response to the above emails. Having reviewed the timings of the automated responses, I believe that:

7.5.3.1 7 automatic responses were received from the following email accounts: eoexrtnt@protonmail.com, xrdemocracy@protonmail.com, xrmidlandstraining@protonmail.com, xrpoliceliason@protonmail.com, peoplesassembly@prontonmail.com, regionaldevelopment@prontonmail.com and youthclimateswarm@prontonmail.com. These 18 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 269 - 275** of **Exhibit AJO6**. 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;

7.5.3.2 8 automatic responses were also received from xr-legal@riseup.net, xrsw.trainings@gmail.com, artsxr@gmail.com, press@extinctionrebellion.uk, xrlondoncoord@gmail.com, xr.connectingcommunities@gmail.com, xrlondoncommunityevents@gmail.com and xrsocialmediaevents@gmail.com which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at **pages 276 - 283** of **Exhibit AJO6**; and

- 7.5.3.3 1 automated response was received from support@xrnorth.org which states that the "Recipient email address is possibly incorrect". The email address however is as per the address stipulated in the Fourth Schedule of the 23 May 2023 Shell Petrol Stations Order. A copy of the relevant email is exhibited at **page 284 of Exhibit AJ06**
- 7.5.4 The automatic responses referred to at paragraphs 7.5.3.1 and 7.5.3.3 above derived from:
- 7.5.4.1 7 email addresses out of the total 48 email addresses linked to Extinction Rebellion;
- 7.5.4.2 1 email address out of the total 3 linked to Just Stop Oil; and
- 7.5.4.3 1 email address, being the only email address, for Youth Climate Swarm, to which the abovementioned emails were sent.
- 7.5.5 Apart from the automated response referred to at paragraphs 7.5.3.1 to 7.5.3.3, no responses from any of the other 41 addresses linked to Extinction Rebellion were received. I have no reason to believe that the emails sent to the other 41 email addresses to which the email of 26 October 2023 were sent were not delivered or received, and no other 'bounce back' or delivery failure notifications were received. Similarly apart from the automated response referred to at paragraphs 7.5.3.1 to 7.5.3.3 no responses from any of the other email addresses linked to Just Stop Oil were received.
- 7.5.6 I therefore consider that the remaining 41 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 Sealed Amended Claim Form dated 19 October 2023 (sealed 24 October 2023) on these groups.
- 7.5.7 In respect of Youth Climate Swarm, this was the only email address provided for within the addresses listed in the Fourth Schedule of the 23 May 2023 Shell Petrol Stations Order. I do not consider that there are further steps which could reasonably be taken in respect of effecting service of the Sealed Amended Claim Form dated 19 October 2023 (sealed 24 October 2023) on this group. 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.
- 7.5.8 For the reasons explained above, I believe that the steps taken in relation to service of the Sealed Amended Claim Form dated 19 October 2023 (sealed 24 October 2023) upon the email addresses referred to at paragraph 7.5.2 complied with the requirement upon SUKOP to serve the Sealed Amended Claim Form

dated 19 October 2023 (sealed 24 October 2023) by way of emails to the various addresses listed in the Fourth Schedule of the 23 May 2023 Shell Petrol Stations Order.

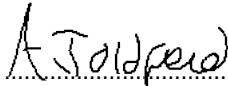
Paragraphs 5(c) and 7 - Service by post/email

- 7.5.9 In addition, a copy of the Sealed Amended Claim Form dated 19 October 2023 (sealed 24 October 2023) was served (albeit perhaps not strictly required in all instances) in compliance with paragraph 5(c) and 7 of the 12 October 2023 Order by sending a copy to:
- 7.5.9.1 Michael Gibson (by Special Delivery at [REDACTED] on 27 October 2023. Copies of the letter and proof of delivery are exhibited at **pages 285 - 287** of **Exhibit AJ06**.
- 7.5.9.2 Bindmans LLP (by Special Delivery to 236 Grey's Inn Road, London, WC1X 8HB) on 27 October 2023. Copies of the letter and proof of delivery are exhibited at **pages 288 - 290** of **Exhibit AJ06**
- 7.5.9.3 Jessica Branch (by Hand at [REDACTED]) on 26 October 2023. Proof of delivery is exhibited at **pages 291 - 293** of **Exhibit AJ06**.
- 7.5.9.4 Hodge James and Allen Solicitors Limited (solicitors acting previously for Jessica Branch, Andrew Daniel Smith and Nancy Field) (by Special Delivery to 180 North Gower Street, London NW1 2NB) on 27 October 2023. Copies of the proof of delivery are exhibited at **pages 294 - 296** of **Exhibit AJ06**.
- 7.5.9.5 Michaela Marc by email sent on 26 October 2023 at 11:20 to [REDACTED]. A copy of the email is exhibited at **page 297** of **Exhibit AJ06**.
- 7.5.9.6 Nick Hofman by email sent on 26 October 2023 at 11:18 to [REDACTED]. A copy of the emails is exhibited at **page 298** of **Exhibit AJ06**.
- 7.5.10 A copy of the Sealed Amended Claim Form dated 19 October 2023 (sealed 24 October 2023) was not served on Weightmans LLP as they have confirmed that they now only wish to be served with orders connected to the Third Party Disclosure aspect as opposed to the wider Shell Petrol Stations Proceedings.
- 7.5.11 In the circumstances I believe that service of the Sealed Amended Claim Form dated 19 October 2023 (sealed 24 October 2023) has been effected by the manner prescribed by the 12 October 2023 Order. A Certificate of Service in relation to the service of the Sealed Amended Claim Form dated 19 October

2023 (sealed 24 October 2023) has been filed. A copy of the Certificate is exhibited at **pages 299 - 302** of **Exhibit AJ06**.

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: