

**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 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)

**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)

SUPPLEMENTAL BUNDLE INDEX FOR HEARING ON 17 APRIL 2024

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

Claim No. QB-2022-001420

SHELL U.K. OIL PRODUCTS LIMITED

Claimant

- and -

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

First Defendant

Louis McKechnie

Second Defendant

Louise Harris

Third Defendant

Callum Goode

Fourth Defendant

Christopher Ford

Fifth Defendant

Sean Jordan

(also known as Sean Irish, John Jordan, John Michael Jordan and Sean O'Rourke)

Sixth Defendant

Emma Ireland

Seventh Defendant

Charles Philip Laurie

Eight Defendant

Michael Edward Davies also previously known as Michael Edward Jones

Ninth Defendant

Tessa-Marie Burns (also known as Tez Burns)

Tenth Defendant

Simon Reding

Eleventh Defendant

Kate Bramfit

Twelfth Defendant

Margaret Reid

Thirteenth Defendant

David Nixon

Fourteenth Defendant

Samuel Holland

Fifteenth Defendant

DRAFT ORDER

PENAL NOTICE

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

IMPORTANT NOTICE TO DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible.

Any other person who knows of this Order and does anything which helps or permits the Defendants to breach the terms of this Order may also be held to be in contempt of Court and may be imprisoned, fined, or have their assets seized.

A Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instructions or with his encouragement.

You have the right to ask the Court to vary or discharge this Order (which is explained below)

RECITALS

UPON the Claimant's application dated 12 February 2024 and the review hearing being listed pursuant to paragraph 17 of the Order of Soole J dated 15 March 2024 (the "**Soole J Order**")

AND UPON hearing from Leading Counsel for the Claimants

IT IS ORDERED:

DEFINITIONS:

1. the "**Named Defendants**" means the Second Defendant to the Fifteenth Defendant

2. the “**Shell Petrol Stations Injunction Order**” means the Order of Hill J dated 23 May 2023 in these proceedings
3. “**Shell Petrol Station**” means all petrol stations in England and Wales displaying Shell branding (including any retail unit forming a part of such a petrol station, whatever the branding of the retail unit)
4. “**Warning Notice**” means a notice substantially in the form as set out in the Fifth Schedule (warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (<https://www.noticespublic.com/>) at which copies of this Order may be viewed and downloaded)

INJUNCTION

5. This Order shall continue to operate until the date of final hearing, with a backstop of [23:59 on 12 November 2024] unless varied, discharged or extended by further order, whichever is sooner.
6. The Defendants and each of them must not do any of the acts listed in paragraphs [7] and [8] of this Order in express or implied agreement with any other person and with the intention of disrupting the sale or supply of fuel to or from a Shell Petrol Station.
7. The acts referred to above are:
 - a. directly blocking or impeding access to any pedestrian or vehicular entrance to a Shell Petrol Station forecourt or to a building within the Shell Petrol Station.
 - b. causing damage to any part of a Shell Petrol Station or to any equipment or infrastructure (including but not limited to fuel pumps) upon it;
 - c. operating or disabling any switch or other device in or on a Shell Petrol Station so as to interrupt the supply of fuel from that Shell Petrol Station, or from one of its fuel pumps, or so as to prevent the emergency interruption of the supply of fuel at the Shell Petrol Station; and
 - d. causing damage to any part of a Shell Petrol Station, whether by:
 - i. affixing or locking themselves, or any object or person, to any part of a Shell Petrol Station, or to any other person or object on or in a Shell Petrol Station;
 - ii. erecting any structure in, on or against any part of a Shell Petrol Station;
 - iii. spraying, painting, pouring, depositing or writing in any substance on to any part of a Shell Petrol Station.
8. A Defendant who is ordered not to do something must not:
 - a. do it himself/herself/themselves or in any other way;
 - b. do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions, or by another person acting with his/her/their encouragement or assistance.

DIRECTIONS TO FINAL HEARING

9. The Defendants who may wish to defend the claims or any of them and to be heard at the final hearing shall, file and serve a Defence by no later than 15 May 2024 or such other date as the Court considers appropriate.
10. The Claimant shall file and serve its Replies (if any) to any Defences by 19 June 2024.

11. The Claimant shall file and serve any updating evidence that they wish to rely upon in support of its claim for the final hearing and/or in response to any Defences by 3 July 2024.
12. The Defendants shall file and serve any evidence that they seek to rely upon in response to the claim by 24 July 2024.
13. This claim (together with claims QB-2022-001241 and QB-2022-001259) to be listed for a final hearing on the first available date after 24 July 2024 with a time estimate of 2.5 days.
14. Skeleton Arguments are to be filed two days before the final hearing date.
15. The Claimants are to file (by hard copy and electronic means) and serve (by electronic means only) two copies of the hearing bundle in a form compliant with the Kings Bench Division Guide 2023 by no later than 5 days before the final hearing date.
16. Any Defendant who has not complied with paragraph [9] above or any other person who claims to be affected by this Order and wishes to vary or discharge it or to be heard at the final hearing, shall apply to the Court for permission to be heard and must inform the Claimant's solicitors by email to the addresses specified below 48 hours before making such application of the nature of such application and the basis for it. Any such person must provide their full name and address, and address for service to the Claimant and to the Court, and must, if appropriate, also apply to be joined as a Defendant to these proceedings at the same time. Any person who fails to comply with this paragraph shall not be permitted to take any further role in these proceedings without further order of the Court.

SERVICE OF THIS ORDER

17. Pursuant to CPR 6.15 and 6.27 and CPR 81.4(c) and (d), service of this Order (with the addresses in the Third Schedule redacted) shall be validly effected on the First Defendant as follows :
 - a. 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:

Method A

Warning notices, no smaller than A4 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 the entry door to every retail establishment within any Shell Petrol Station*

Method B

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*
 - b. Procuring that a Warning Notice is:
 - i. uploaded to <https://www.noticespublic.com/>
 - ii. sent to any person (or their solicitor) 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).
 - c. Sending an email to each of the addresses set out in the Third Schedule of this Order providing a link to and, specifically notifying them that a copy of the Warning Notice and this Order is available at, <https://www.noticespublic.com/>

- d. Uploading a copy of this Order to <https://www.noticespublic.com/>
 - e. Sending a link to www.noticespublic.com data site where this Order is uploaded to any person or their solicitor 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).
18. In addition and pursuant to CPR 6.15 and 6.27 and CPR 81.4(c) and (d), service of this Order (with the addresses in the Third Schedule redacted) shall be validly effected on the Named Defendants (as the case may be) as follows:
- a. In respect of the Fifth to Ninth and the Eleventh to Fourteenth Defendants, by posting of copies of this Order to the last known address which was supplied to the Claimant by the relevant police authority (as set out in the Third Schedule to this Order), by first class post, special delivery and/or by hand delivery to such address (or by sending an email and providing a link to the Claimant's website (<https://www.noticespublic.com/>) and specifically noting in the message that a copy of the Order is available via that website to the email address which has been previously supplied to the Claimant by any Defendant for the purposes of electronic service and at which the Defendant has notified the Claimant in writing that they wish to be served pursuant to CPR Practice Direction 6A paragraph 4.1)
 - b. To the extent that it is possible to do so in practice, in respect of the Second Defendant's (McKechnie) social media account (as set out below) by providing a link to the Claimant's website (<https://www.noticespublic.com/>) and specifically noting in the message that a copy of the Order is available via that website:
 - c. To the extent that it is possible to do so in practice, in respect of the Third Defendant's (Harris) social media account (as set out below) by providing a link to the Claimant's website (<https://www.noticespublic.com/>) and specifically noting in the message that a copy of the Order is available via that website:
 - d. To the extent that it is possible to do so in practice, in respect of the Fourth Defendant (Goode), by the sending of a message to the Fourth Defendant's social media account (as set out below) providing a link to the Claimant's website (<https://www.noticespublic.com/>) on which copies of the said future document(s) are available and specifically noting in the message that copies of such document(s) are available via that website:
 - e. To the extent that it is possible to do so in practice, in respect of the Tenth Defendant's (Burns) social media account (as set out below) by providing a link to the Claimant's website (<https://www.noticespublic.com/>) and specifically noting in the message that a copy of the Order is available via that website:
 - f. In respect of the Second, Third, Fourth and Tenth Named Defendants service shall be validly effected by service in accordance with paragraphs 17 c and d above and 18 (g) below (from the date upon which the Claimant is notified of such address).
 - g. If and to the extent the Claimant is notified by a relevant Defendant of any specific address which the relevant Defendant may be served with documents relating to these proceedings, by posting a copy of this Order to such address by first class post, special delivery and/or by hand to the address so supplied (or is supplied with an email address by the relevant Defendant for the purposes of electronic service and at which the Defendant has notified the Claimant in writing that they wish to be served pursuant to CPR Practice Direction 6A

paragraph 4.1, by sending an email and providing a link to the Claimant's website (<https://www.noticespublic.com/>) and specifically noting in the message that a copy of the Order is available via that website).

19. Pursuant to CPR 6.15 and 6.27, service of this Order shall:

- a. be verified by the completion of a certificate of service to be filed by the Claimant with the Court or a witness statement verified by a statement of truth in accordance with CPR r.22(1)(b)
- b. be deemed served on:
 - i. the First Defendant on the latest date on which compliance with the methods of service referred to in paragraph [17a above have been completed at not less than half of the Shell Petrol Stations and also paragraphs [17b to e] (such date shall be specified by the certificate of service); and
 - ii. the Named Defendants on the latest date on which compliance with the methods of service referred to at paragraph 18 have been completed (as applicable to them individually) (such relevant date for each of the Named Defendants shall be specified by the certificate of service)

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

LIBERTY TO APPLY

21. Any person affected by this Order may apply to the Court at any time to vary or discharge it or any part (including in relation to the methods of alternative service) but if they wish to do so they must inform the Claimant's solicitors by email to the address specified below 48 hours before making such application of the nature of such application and the basis for it. Any such person who is not a Named Defendant must provide their full name and address, and address for service to the Claimant's solicitors on the details below and to the Court and must, if appropriate, also apply to be joined as a Defendant to these proceedings at the same time.

22. The Parties have liberty to apply to extend this Order or to seek further directions.

COSTS

23. Costs in the case

COMMUNICATION WITH THE CLAIMANT

The Claimant's solicitors contact details are as follows:

Eversheds Sutherland (International) LLP
Bridgewater Place, Water Lane, Leeds LS11 5DR
Reference: OLDFIEA/SHELL
shell.service@eversheds-sutherland.com

**First Schedule
Documents read by the court**

Second Schedule

The Claimant gave the following undertaking to the Court:

1. To pay any damages which the Defendants (or any other party served with or notified of this Order) shall sustain as a result of the making of this Order, and which the Court considers ought to be paid.

Third Schedule
(list of email addresses)

1. **EXTINCTION REBELLION UK**
- 1.1 enquiries@extinctionrebellion.uk
- 1.2 press@extinctionrebellion.uk
- 1.3 xrvideo@protonmail.com
- 1.4 xr-action@protonmail.com
- 1.5 xraffinitysupport@protonmail.com
- 1.6 xr-arrestwelfare@protonmail.com
- 1.7 artsxr@gmail.com
- 1.8 xr-CitizensAssembly@protonmail.com
- 1.9 xr.connectingcommunities@gmail.com
- 1.10 xrdemocracy@protonmail.com
- 1.11 xrnotables@gmail.com
- 1.12 integration@rebellion.earth
- 1.13 xr-legal@riseup.net
- 1.14 press@extinctionrebellion.uk
- 1.15 xr-newsletter@protonmail.com
- 1.16 xr-peoplesassembly@protonmail.com
- 1.17 xrpoliceliaison@protonmail.com
- 1.18 rebelringers@rebellion.earth
- 1.19 xr.regenerativeculture@gmail.com
- 1.20 xr-regionaldevelopment@protonmail.com
- 1.21 RelationshipsXRUK@protonmail.com
- 1.22 xr.mandates@gmail.com
- 1.23 socialmedia@extinctionrebellion.uk
- 1.24 xrsocialmediaevents@gmail.com
- 1.25 eventsxr@gmail.com
- 1.26 xrbristol.regional@protonmail.com
- 1.27 xrcymru@protonmail.com
- 1.28 xr.eastengland@protonmail.com

- 1.29 xrlondoncoord@gmail.com
- 1.30 XRMidlands@protonmail.com
- 1.31 xrne@protonmail.com
- 1.32 support@xrnorth.org
- 1.33 xrni@rebellion.earth
- 1.34 xrscotland@gmail.com
- 1.35 XR-SouthEastRegionalTeam@protonmail.com
- 1.36 xr.regional.sw@protonmail.com
- 1.37 talksandtraining.xrbristol@protonmail.com
- 1.38 xrcymrutalksandtraining@gmail.com
- 1.39 eoexrtnt@protonmail.com
- 1.40 xrlondoncommunityevents@gmail.com
- 1.41 xrmidlandstraining@protonmail.com
- 1.42 XRNE.training@protonmail.com
- 1.43 xrnw.training@gmail.com
- 1.44 xryorkshire.training@gmail.com
- 1.45 xrni.tt@rebellion.earth
- 1.46 talksandtrainings.scotland@extinctionrebellion.uk
- 1.47 xrttse@gmail.com
- 1.48 xrsw.trainings@gmail.com
- 2. **JUST STOP OIL**
- 2.1 Ring2021@protonmail.com
- 2.2 juststopoil@protonmail.com
- 2.3 youthclimateswarm@protonmail.com
- 3. **YOUTH CLIMATE SWARM**
- 3.1 youthclimateswarm@protonmail.com

Fourth Schedule 3
Addresses of Named Defendants

Name	Address
Christopher Ford	
Sean Jordan (also known as Sean Irish, John Jordan, John Michael Jordan and Sean O'Rourke)	
Emma Ireland	By email only
Charles Philip Laurie	Sent by email only
Michael Edward Davies also previously known as Michael Edward Jones	
Simon Reding	
Kate Bramfit	
Margaret Reid	
David Nixon	

Fifth Schedule

Shell U.K. Oil Products Limited

Important Notice HIGH COURT INJUNCTION

(claim no QB-2022-001420)

On _____ 2024 and following a review hearing held on _____ April 2024, an injunction (the **"Order"**) was made by the High Court of Justice prohibiting anyone acting by express or implied agreement with others, in connection with protest campaigns, from disrupting the sale or supply of fuel to or from any Shell branded petrol station in England and Wales (the **'Shell Petrol Station'**).

The Order prohibits:

1. Directly blocking or impeding access to any pedestrian or vehicular entrance to a Shell Petrol Station forecourt or to a building within the Shell Petrol Station;
2. Causing damage to any part of a Shell Petrol Station or to any equipment or infrastructure (including but not limited to fuel pumps) upon it;
3. Operating or disabling any switch or other device in or on a Shell Petrol Station so as to interrupt the supply of fuel from that Shell Petrol Station, or from one of its fuel pumps, or so as to prevent the emergency interruption of the supply of fuel at the Shell Petrol Station.
4. Causing damage to any part of a Shell Petrol Station, whether by:
 - a. affixing or locking themselves, or any object or person, to any part of a Shell Petrol Station, or to any other person or object on or in a Shell Petrol Station;
 - b. erecting any structure in, on or against any part of a Shell Petrol Station;
 - c. spraying, painting, pouring, depositing or writing in any substance on to any part of a Shell Petrol Station.

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

Anyone in breach of the Order will be in contempt of court and may be imprisoned, fined or have their assets seized. The persons affected by the Order are Persons Unknown acting in connection with, and associated to, environmental campaigns and protests with the intention of disrupting the sale or supply of fuel to or from Shell Petrol Stations.

This means that you must not do any of these things on this Shell Petrol Station.

If you do, you may be sent to prison or have your assets seized.

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform Shell UK Oil Products Limited's solicitors by email to the address specified below 48 hours before making such application of the nature of such application and the basis for it.

Copies of the relevant court documents relating to the Order, including a copy of the Order, may be viewed:-

- (i) at <http://www.noticespublic.com/>
- (ii) by contacting Alison Oldfield at Eversheds Sutherland (International) LLP on 020 7919 4500 or by email at shell.service@eversheds-sutherland.com.

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

Claim No. QB-2022-001241

SHELL U.K. LIMITED

Claimant

- and -

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

DRAFT ORDER

PENAL NOTICE

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

IMPORTANT NOTICE TO DEFENDANTS

This Order prohibits from you doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible.

Any other person who knows of this Order and does anything which helps or permits the Defendants to breach the terms of this Order may also be held to be in contempt of Court and may be imprisoned, fined or have their assets seized.

A Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instructions or with his encouragement.

You have the right to ask the Court to vary or discharge this Order (which is explained below)

RECITALS

UPON the Claimant's application dated 12 February 2024 and the review hearing being listed pursuant to paragraph 17 of the Order of Soole J dated 15 March 2024 (the "**Soole J Order**")

AND UPON hearing from Leading Counsel for the Claimant

IT IS ORDERED:

DEFINITIONS:

1. the “**Shell Haven Injunction Order**” means the Order of Hill J dated 23 May 2023 in these proceedings
2. “**Shell Haven**” means the parts of the Claimant’s land known as Shell Haven, Stanford-Le-Hope, Essex which are enclosed or bounded by fences, gates, gateways and parts of the River Thames. The general location of the said boundaries are shown in red and/or blue on the plan appended to this Order in the Fourth Schedule and marked “Plan of Shell Haven Site”
3. “**Warning Notice**” means a notice substantially in the form as set out in the [Fifth] Schedule to this Order (warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (<https://www.noticespublic.com/>) at which copies of this Order may be viewed and downloaded)

INJUNCTION

4. This Order shall continue to operate until the date of final hearing, with a backstop of 23:59 on [12 November 2024] unless varied, discharged or extended by further order.
5. The Defendants and each of them must not do any of the acts listed in paragraphs [6] and [7] of this Order in express or implied agreement with any other person.
6. The acts referred to above are:
 - a. entering or remaining upon any part of Shell Haven without the consent of the Claimant;
 - b. blocking access to any of the gateways to Shell Haven the locations of which are identified and marked blue on “Plan 1” and “Plan 2” which are appended to this Order in the Fourth Schedule;
 - c. causing damage to any part of Shell Haven whether by:
 - i. affixing themselves, or any object, or thing, to any part of Shell Haven, or to any other person or object or thing on or at Shell Haven;
 - ii. erecting any structure in, on or against Shell Haven;
 - iii. spraying, painting, pouring, sticking or writing with any substance on or inside any part of Shell Haven; or
 - iv. otherwise.
7. A Defendant who is ordered not to do something must not do it himself/herself/themselves or in any other way. He/she/they must not do it by means of another person acting on

his/her/their behalf, or acting on his/her/their instructions, or by another person acting with his/her/their encouragement.

DIRECTIONS TO FINAL HEARING

8. The Defendants who may wish to defend the claims or any of them and to be heard at the final hearing shall, file and serve a Defence by no later than 15 May 2024 or such other date as the Court considers appropriate.
9. The Claimant is to file and serve its Replies (if any) to any Defences by 19 June 2024.
10. The Claimant shall file and serve any updating evidence that they wish to rely upon in support of its claim for the final hearing and/or in response to any Defences by 3 July 2024.
11. The Defendants shall file and serve any evidence that they seek to rely upon in response to the claim by 24 July 2024.
12. This claim (together with claims QB-2022-001259 and QB-2022-001420) to be listed for a final hearing on the first available date after 24 July 2024 with a time estimate of 2.5 days.
13. Skeleton Arguments are to be filed two days before the final hearing date.
14. The Claimants are to file (by hard copy and electronic means) and serve (by electronic means only) two copies of the hearing bundle in a form compliant with the Kings Bench Division Guide 2023 by no later than 5 days before the final hearing date.
15. Any Defendant who has not complied with paragraph [8] above or any other person who claims to be affected by this Order and wishes to vary or discharge it or to be heard at the final hearing, shall apply to the Court for permission to be heard and must inform the Claimant's solicitors by email to the addresses specified below 48 hours before making such application of the nature of such application and the basis for it. Any such person must provide their full name and address, and address for service to the Claimant and to the Court, and must, if appropriate, also apply to be joined as a Defendant to these proceedings at the same time. Any person who fails to comply with this paragraph shall not be permitted to take any further role in these proceedings without further order of the Court.

SERVICE OF THIS ORDER

16. Pursuant to CPR 6.15 and 6.27 and CPR 81.4(c) and (d), service of this Order shall be validly effected upon the Defendants as follows:
 - a. replacing each of the warning notices which are currently affixed at the entrances around the perimeter of Shell Haven with a Warning Notice;
 - b. procuring that a Warning Notice is:
 - i. uploaded to <https://www.noticespublic.com/>
 - ii. sent to any person (or their solicitor) 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).
 - c. Sending an email to each of the addresses set out in the Third Schedule of this Order providing a link to and, specifically notifying them that a copy of the Warning Notice and this Order is available at, <https://www.noticespublic.com/>
 - d. uploading a copy of this Order to <https://www.noticespublic.com/>
 - e. sending a link to www.noticespublic.com data site where this Order has been uploaded to any person or their solicitor 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).

17. Pursuant to CPR 6.15 and 6.27, this Order shall:

- a. be verified by the completion of a certificate of service to be filed by the Claimant with the Court or a witness statement verified by a statement of truth in accordance with CPR r.22(1)(b);
- b. be deemed to be served on the latest date on which all the methods of service referred to in paragraph [16] above have been completed (such date shall be specified by the certificate of service).

18. The taking of such steps as are set out in paragraph 16 shall be good and sufficient service of this Order upon the Defendants and each of them.

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

LIBERTY TO APPLY

20. Any person affected by this Order may apply to the Court at any time to vary or discharge it or any part (including in relation to the methods of alternative service) but if they wish to do so they must inform the Claimant's solicitors by email to the address specified below 48 hours before making such application of the nature of such application and the basis for it. Such person must provide their full name and address, and address for service to the Claimant's solicitors on the details below and to the Court and must, if appropriate, also apply to be joined as a Defendant to these proceedings at the same time.

21. The Parties have liberty to apply to extend this Order or to seek further directions.

COSTS

22. Costs in the case

COMMUNICATION WITH THE CLAIMANT

The Claimant's solicitors and their contact details are as follows:

Eversheds Sutherland (International) LLP
Bridgewater Place, Water Lane, Leeds LS11 5DR
Reference: OLDFIEA/SHELL
shell.service@eversheds-sutherland.com

First Schedule

1.

Insert list of documents read by the court in considering the making of this Order

Second Schedule

The Claimant gave the following undertaking to the Court:

1. To pay any damages which the Defendants (or any other party served with or notified of this Order) shall sustain as a result of the making of this Order, and which the Court considers ought to be paid.

Third Schedule
(list of email addresses)

1. **EXTINCTION REBELLION UK**
- 1.1 enquiries@extinctionrebellion.uk
- 1.2 press@extinctionrebellion.uk
- 1.3 xrvideo@protonmail.com
- 1.4 xr-action@protonmail.com
- 1.5 xraffinitysupport@protonmail.com
- 1.6 xr-arrestwelfare@protonmail.com
- 1.7 artsxr@gmail.com
- 1.8 xr-CitizensAssembly@protonmail.com
- 1.9 xr.connectingcommunities@gmail.com
- 1.10 xrdemocracy@protonmail.com
- 1.11 xrnotables@gmail.com
- 1.12 integration@rebellion.earth
- 1.13 xr-legal@riseup.net
- 1.14 press@extinctionrebellion.uk
- 1.15 xr-newsletter@protonmail.com
- 1.16 xr-peoplesassembly@protonmail.com
- 1.17 xrpoliceliaison@protonmail.com
- 1.18 rebelringers@rebellion.earth
- 1.19 xr.regenerativeculture@gmail.com
- 1.20 xr-regionaldevelopment@protonmail.com
- 1.21 RelationshipsXRUK@protonmail.com
- 1.22 xr.mandates@gmail.com
- 1.23 socialmedia@extinctionrebellion.uk
- 1.24 xrsocialmediaevents@gmail.com
- 1.25 eventsxr@gmail.com
- 1.26 xrbristol.regional@protonmail.com
- 1.27 xrcymru@protonmail.com
- 1.28 xr.eastengland@protonmail.com

- 1.29 xrlondoncoord@gmail.com
- 1.30 XRMidlands@protonmail.com
- 1.31 xrne@protonmail.com
- 1.32 support@xrnorth.org
- 1.33 xrni@rebellion.earth
- 1.34 xrscotland@gmail.com
- 1.35 XR-SouthEastRegionalTeam@protonmail.com
- 1.36 xr.regional.sw@protonmail.com
- 1.37 talksandtraining.xrbristol@protonmail.com
- 1.38 xrcymrutalksandtraining@gmail.com
- 1.39 eoexrtnt@protonmail.com
- 1.40 xrlondoncommunityevents@gmail.com
- 1.41 xrmidlandstraining@protonmail.com
- 1.42 XRNE.training@protonmail.com
- 1.43 xrnw.training@gmail.com
- 1.44 xryorkshire.training@gmail.com
- 1.45 xrni.tt@rebellion.earth
- 1.46 talksandtrainings.scotland@extinctionrebellion.uk
- 1.47 xrttse@gmail.com
- 1.48 xrsw.trainings@gmail.com
- 2. **JUST STOP OIL**
- 2.1 Ring2021@protonmail.com
- 2.2 juststopoil@protonmail.com
- 2.3 youthclimateswarm@protonmail.com
- 3. **YOUTH CLIMATE SWARM**
- 3.1 youthclimateswarm@protonmail.com

Fourth Schedule
Ian of Shell Haven Site

Important Notice

High Court of Justice - Claim No QB-2022-001241

On _____ 2024 and following a review hearing held on _____ April 2024, an injunction was made by the High Court of Justice prohibiting anyone from entering on or remaining at any part of Shell Haven, Stanford-Le-Hope, Essex (the "**Site**") without the owners' permission (the "**Order**").

The Order prohibits:

1. Entering or remaining upon any part of the Site without the consent of Shell U.K. Limited
2. Blocking access to any of the gateways to the Site;
3. Causing damage to any part of the Site whether by:
 - a. Affixing themselves, or any object, or thing, to any part of the Site or to any other person or object or thing on or at the Site
 - b. Erecting any structure in, on or against the Site
 - c. Spraying, painting, pouring, sticking or writing with any substance on or inside any part of the Site; or
 - d. otherwise.

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

Anyone in breach of the Order will be in contempt of court and may be imprisoned, fined or have their assets seized. The persons affected by the Order are Persons Unknown undertaking any of the prohibited actions listed.

This means that you must not do any of these things, or go beyond this notice and enter this Site without permission.

If you do, you may be sent to prison or have your assets seized.

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform Shell U.K. Limited's solicitors by email to the address specified below 48 hours before making such application of the nature of such application and the basis for it.

Copies of the relevant court documents relating to the Order, including a copy of the Order, may be viewed:-

- (i) at <http://www.noticespublic.com/>
- (ii) by contacting Alison Oldfield at Eversheds Sutherland (International) LLP on 020 7919 4500 or by email at shell.service@eversheds-sutherland.com.

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

Claim No. QB-2022-001259

SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED

Claimant

- 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

DRAFT ORDER

PENAL NOTICE

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

IMPORTANT NOTICE TO DEFENDANTS

This Order prohibits from you doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible.

Any other person who knows of this Order and does anything which helps or permits the Defendants to breach the terms of this Order may also be held to be in contempt of Court and may be imprisoned, fined or have their assets seized.

A Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instructions or with his encouragement.

You have the right to ask the Court to vary or discharge this Order (which is explained below)

RECITALS

UPON the Claimant's application dated 12 February 2024 and the review hearing being listed pursuant to paragraph 17 of the Order of Soole J dated 15 Mach 2024 (the "**Soole J Order**")

AND UPON hearing from Leading Counsel for the Claimants

IT IS ORDERED:

DEFINITIONS:

1. the “**Shell Centre Tower Injunction Order**” means the Order of Hill J dated 23 May 2023 in these proceedings
2. “**Shell Centre Tower**” means the building outlined in red and/or blue on the plan which is attached to this Order (but including any canopy) marked “BUILDING PLAN” known as and situated at Shell Centre Tower, Shell Centre, Belvedere Road, London.
3. “**Warning Notice**” means a notice substantially in the form as set out in the [Fifth] Schedule to this Order (warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (<https://www.noticespublic.com/>) at which copies of this Order may be viewed and downloaded)

INJUNCTION

4. This Order shall continue to operate until the date of final hearing, with a backstop of 23:59 on [12 November 2024] unless varied, discharged or extended by further order.
5. The Defendants and each of them must not do any of the acts listed in paragraphs [6] and [7] of this Order in express or implied agreement with any other person.
6. The acts referred to above are:
 - a. entering or remaining upon any part of the Shell Centre Tower without the consent of the Claimant;
 - b. blocking access to any of the doors which provide access and egress to and from the Shell Centre Tower;
 - c. causing damage to any part of the Shell Centre Tower whether by:
 - i. affixing themselves, or any object, or thing, to any part of the Shell Centre Tower, or to any other person or object or thing on or in Shell Centre Tower;
 - ii. erecting any structure in, on or against Shell Centre Tower;
 - iii. spraying, painting, pouring, sticking or writing with any substance on or inside any part of Shell Centre Tower; or
 - iv. otherwise.
7. A Defendant who is ordered not to do something must not do it himself/herself/themselves or in any other way. He/she/they must not do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions, or by another person acting with his/her/their encouragement.

DIRECTIONS TO FINAL HEARING

8. The Defendants who may wish to defend the claims or any of them and to be heard at the final hearing shall, file and serve a Defence by no later than 15 May 2024 or such other date as the Court considers appropriate.
9. The Claimant shall file and serve its Replies (if any) to any Defences by 19 June 2024.
10. The Claimant shall file and serve any updating evidence that they wish to rely upon in support of its claim for the final hearing and/or in response to any Defences by 3 July 2024.
11. The Defendants shall file and serve any evidence that they seek to rely upon in response to the claim by 24 July 2024.
12. This claim (together with claims QB-2022-001241 and QB-2022-001420) to be listed for a final hearing on the first available date after [date of Ds evidence] with a time estimate of 2.5 days.
13. Skeleton Arguments are to be filed two days before the final hearing date.
14. The Claimants are to file (by hard copy and electronic means) and serve (by electronic means only) two copies of the hearing bundle in a form compliant with the Kings Bench Division Guide 2023 by no later than 5 days before the final hearing date.
15. Any Defendant who has not complied with paragraph [8] above or any other person who claims to be affected by this Order and wishes to vary or discharge it or to be heard at the final hearing, shall apply to the Court for permission to be heard and must inform the Claimant's solicitors by email to the addresses specified below 48 hours before making such application of the nature of such application and the basis for it. Any such person must provide their full name and address, and address for service to the Claimant and to the Court, and must, if appropriate, also apply to be joined as a Defendant to these proceedings at the same time. Any person who fails to comply with this paragraph shall not be permitted to take any further role in these proceedings without further order of the Court.

SERVICE OF THIS ORDER

16. Pursuant to CPR 6.15 and 6.27 and CPR 81.4(c) and (d), service of this Order shall be validly effected upon the Defendants as follows:
 - a. replacing each of the warning notices which are currently affixed at the entrances around the perimeter of Shell Centre with a Warning Notice;
 - b. procuring that a Warning Notice is:
 - i. uploaded to <https://www.noticespublic.com/>
 - ii. sent to any person (or their solicitor) 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).
 - c. Sending an email to each of the addresses set out in the Third Schedule of this Order providing a link to and, specifically notifying them that a copy of the warning notice and this Order is available at, <https://www.noticespublic.com/>
 - d. uploading a copy of this order to <https://www.noticespublic.com/>
 - e. sending a link to this Order on the www.noticespublic.com data site to any person (or their solicitor) 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).
17. Pursuant to CPR 6.15 and 6.27, this Order shall:
 - a. be verified by the completion of a certificate of service to be filed by the Claimant with the Court or a witness statement verified by a statement of truth in accordance with CPR r.22(1)(b); and

- b. be deemed to be served on the latest date on which all the methods of service referred to in paragraphs [16] above have been completed (such date shall be specified by the certificate of service).

18. The taking of such steps as are set out in paragraph 16 shall be good and sufficient service of this Order upon the Defendants and each of them.

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

LIBERTY TO APPLY

20. Any person affected by this Order may apply to the Court at any time to vary or discharge it or any part (including in relation to the methods of alternative service) but if they wish to do so they must inform the Claimant's solicitors by email to the address specified below 48 hours before making such application of the nature of such application and the basis for it. Such person must provide their full name and address, and address for service to the Claimant's solicitors on the details below and to the Court and must, if appropriate, also apply to be joined as a Defendant to these proceedings at the same time

21. The Parties have liberty to apply to extend this Order or to seek further directions.

COSTS

22. Costs in the case

COMMUNICATION WITH THE CLAIMANT

The Claimant's solicitors and their contact details are as follows:

Eversheds Sutherland (International) LLP
Bridgewater Place, Water Lane, Leeds LS11 5DR
Reference: OLDFIEA/SHELL
shell.service@eversheds-sutherland.com

First Schedule

Insert list of documents read by the court in considering the making of this Order

Second Schedule

The Claimant gave the following undertaking to the Court:

1. To pay any damages which the Defendants (or any other party served with or notified of this Order) shall sustain as a result of the making of this Order, and which the Court considers ought to be paid.

Third Schedule
(list of email addresses)

1. **EXTINCTION REBELLION UK**
- 1.1 enquiries@extinctionrebellion.uk
- 1.2 press@extinctionrebellion.uk
- 1.3 xrvideo@protonmail.com
- 1.4 xr-action@protonmail.com
- 1.5 xraffinitysupport@protonmail.com
- 1.6 xr-arrestwelfare@protonmail.com
- 1.7 artsxr@gmail.com
- 1.8 xr-CitizensAssembly@protonmail.com
- 1.9 xr.connectingcommunities@gmail.com
- 1.10 xrdemocracy@protonmail.com
- 1.11 xrnotables@gmail.com
- 1.12 integration@rebellion.earth
- 1.13 xr-legal@riseup.net
- 1.14 press@extinctionrebellion.uk
- 1.15 xr-newsletter@protonmail.com
- 1.16 xr-peoplesassembly@protonmail.com
- 1.17 xrpoliceliaison@protonmail.com
- 1.18 rebelringers@rebellion.earth
- 1.19 xr.regenerativeculture@gmail.com
- 1.20 xr-regionaldevelopment@protonmail.com
- 1.21 RelationshipsXRUK@protonmail.com
- 1.22 xr.mandates@gmail.com
- 1.23 socialmedia@extinctionrebellion.uk
- 1.24 xrsocialmediaevents@gmail.com
- 1.25 eventsxr@gmail.com
- 1.26 xrbristol.regional@protonmail.com
- 1.27 xrcymru@protonmail.com
- 1.28 xr.eastengland@protonmail.com

- 1.29 xrlondoncoord@gmail.com
- 1.30 XRMidlands@protonmail.com
- 1.31 xrne@protonmail.com
- 1.32 support@xrnorth.org
- 1.33 xrni@rebellion.earth
- 1.34 xrscotland@gmail.com
- 1.35 XR-SouthEastRegionalTeam@protonmail.com
- 1.36 xr.regional.sw@protonmail.com
- 1.37 talksandtraining.xrbristol@protonmail.com
- 1.38 xrcymrutalksandtraining@gmail.com
- 1.39 eoexrtnt@protonmail.com
- 1.40 xrlondoncommunityevents@gmail.com
- 1.41 xrmidlandstraining@protonmail.com
- 1.42 XRNE.training@protonmail.com
- 1.43 xrnw.training@gmail.com
- 1.44 xryorkshire.training@gmail.com
- 1.45 xrni.tt@rebellion.earth
- 1.46 talksandtrainings.scotland@extinctionrebellion.uk
- 1.47 xrttse@gmail.com
- 1.48 xrsw.trainings@gmail.com
- 2. **JUST STOP OIL**
- 2.1 Ring2021@protonmail.com
- 2.2 juststopoil@protonmail.com
- 2.3 youthclimateswarm@protonmail.com
- 3. **YOUTH CLIMATE SWARM**
- 3.1 youthclimateswarm@protonmail.com

Fourth Schedule Plans

Fifth Schedule

SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED

Important Notice

High Court of Justice - Claim No QB-2022-001259

On 2024 and following a review hearing held on April 2024, an injunction was made by the High Court of Justice prohibiting anyone from entering on or remaining at any part of the Shell Centre Tower, Shell Centre, Belvedere Road, London (the "Shell Centre Tower") without the owners' permission (the "Order").

The Order prohibits:

1. Entering or remaining upon any part of the Shell Centre Tower without the consent of Shell International Petroleum Company Limited
2. Blocking access to any of the doors which provide access and egress to and from the Shell Centre Tower
3. Causing damage to any part of the Shell Centre Tower whether by:
 - a. Affixing yourself, or any object, or thing, to any part of the Shell Centre Tower, or to any other person or object or thing on or in Shell Centre Tower
 - b. Erecting any structure in, on or against Shell Centre Tower
 - c. Spraying, painting, pouring, sticking or writing with any substance on or inside any part of Shell Centre Tower; or
 - d. otherwise

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

Anyone in breach of the Order will be in contempt of court and may be imprisoned, fined or have their assets seized. The persons affected by the Order are Persons Unknown undertaking any of the prohibited actions listed.

This means that you must not do any of these things, or go beyond this notice and enter Shell Centre Tower without permission.

If you do, you may be sent to prison or have your assets seized.

Any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform Shell International Petroleum Company Limited's solicitors by email to the address specified below 48 hours before making such application of the nature of such application and the basis for it.

Copies of the relevant court documents relating to the Order, including a copy of the Order, may be viewed:-

- (i) at <http://www.noticespublic.com/>
- (ii) by contacting Alison Oldfield at Eversheds Sutherland (International) LLP on 020 7919 4500 or by email at shell.service@eversheds-sutherland.com

4. Have you attached a draft of the order you are applying for?

Yes No

5. How do you want to have this application dealt with?

at a hearing without a hearing
 at a remote hearing

6. How long do you think the hearing will last?

Hours Minutes

Is this time estimate agreed by all parties?

Yes No

7. Give details of any fixed trial date or period

Review Hearing listed on 17 April 2024.
Claimant considers this application can be heard
at the same time without impacting the time
estimate

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

Claimant will arrange service on the
Defendants

9a. Please give the service address, (other than details
of the claimant or defendant) of any party named in
question 9.

Claimant will arrange service on
interested parties

10. What information will you be relying on, in support of your application?

- the attached witness statement
 the statement of case
 the evidence set out in the box below

If necessary, please continue on a separate sheet.

The attached Eighth Witness Statement of Alison Oldfield dated 11 April 2024

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

No


Statement of Truth

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

I believe that the facts stated in section 10 (and any continuation sheets) are true.

The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature



Applicant

Litigation friend (where applicant is a child or a Protected Party)

Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

Month

Year

11

April

2024

Full name

Alison Oldfield

Name of applicant's legal representative's firm

Eversheds Sutherland (Intl) LLP

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

Partner

Applicant's address to which documents should be sent.

Building and street

Bridgewater Place, Water Lane

Second line of address

Town or city

Leeds

County (optional)

Postcode

L S 1 1 5 D R

If applicable

Phone number

020 7497 9797

Fax phone number

020 7919 4919

DX number

DX 12027 Leeds - 27

Your Ref.

Email

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

SHELL U.K. OIL PRODUCTS LIMITED

- and -

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

First Defendant

Louis McKechnie

Second Defendant

Louise Harris

Third Defendant

Callum Goode

Fourth Defendant

Christopher Ford

Fifth Defendant

**Sean Jordan
(also known as Sean Irish, John Jordan, John Michael Jordan and Sean O'Rourke)**

Sixth Defendant

Emma Ireland

Seventh Defendant

Charles Philip Laurie

Eight Defendant

Michael Edward Davies also previously known as Michael Edward Jones

Ninth Defendant

Tessa-Marie Burns (also known as Tez Burns)

Tenth Defendant

Simon Reding

Eleventh Defendant

Kate Bramfit

Twelfth Defendant

Margaret Reid

Thirteenth Defendant

David Nixon

Fourteenth Defendant

Samuel Holland

Fifteenth Defendant

DRAFT ORDER

RECITALS

UPON the Claimants' application dated 12 February 2024 and the review hearing being listed pursuant to paragraph 17 of the Order of Soole J dated 15 March 2024 (the "**Soole J Order**")

UPON the Claimants' further application dated 11 April 2024 to vary paragraph 7 of the Soole J Order relating to alternative service of future documents on Named Defendants and to vary paragraph 4.1.3 of Hills J's order dated 28 April 2023 (the "**PS Hill Order**"), relating to the provision of documents to interested parties.

UPON hearing from Leading Counsel for the Claimants

IT IS ORDERED:

SERVICE OF THE 2024 DOCUMENTS ON THE NAMED DEFENDANTS

1. The Soole J Order, the second witness statement of Christopher Pritchard Gamble, the fourth witness statement of Benjamin Austin, the sixth, seventh, eighth and ninth witness statements of Alison Oldfield, the Re-Amended Claim Form Re-Amended Particulars of Claim, the application notice dated April 2024 and draft order in support, notice of hearing dated 2024 and the Claimants' Skeleton argument dated 2024 shall together be referred to as the "**2024 Documents**".
2. Pursuant to CPR 6.15 and 6.27 the following steps already taken by the Claimant to bring the 2024 Documents to the attention of the Named Defendants shall be good service:
 - a. The posting between [DATES] of copies to the last known address which was supplied to the Claimant by the relevant police authority (and as set out in Schedule 1 to this Order), by first class post, special delivery and/or by hand delivery to the address supplied.
 - b. In addition, in respect of the Third (Harris) Defendant, by the sending of the message at various dates between 18 March 2024 and [date] to the Third (Harris) Defendant's social media account as (set out below) providing a link to the Claimants' website (<https://www.noticespublic.com/>) on which copies of the 2024 Documents were available via that website

- c. In respect of the seventh (Ireland) and eight (Laurie) Defendant by sending by email in accordance with CPR Rule 6A paragraph 4.1.

PROVISION OF THE 2024 DOCUMENTS TO NON PARTIES

3. Pursuant to CPR 6.15 and 6.27 the following steps already taken by each of the Claimants to bring the 2024 Documents to the attention of Jessica Branch, an individual who has previously requested copies of documents in these proceedings, shall constitute compliance with paragraph 4.1.3 of the PS Hill J Order :
 - a. By leaving the 2024 Documents at the last known place of abode of Jessica Branch and;
 - b. by hand delivering and by sending copies of the 2024 Documents by email to Jessica Branch's solicitors Bindmans LLP.

VARIATION OF SOOLE J ORDER RELATING TO SERVICE OF FUTURE DOCUMENTS ON NAMED DEFENDANTS

4. Paragraph 7 of the Soole J Order (in respect of further documents only) is replaced with paragraph [5] below.
5. Pursuant to CPR 6.15 and 6.27 and CPR 81.4(c) and (d), any further documents in these proceedings (including service of this Order (with the addresses in Schedule 1 and social media account details redacted)) upon the Named Defendants (save for the Second (McKechnie), Third (Harris), Fourth (Goode), Tenth (Burns) Defendants as to which paragraphs 5 e to i below (as applicable) apply), and save for the Fifteenth (Holland) Defendant (as to whom paragraphs 7 and 8 below apply), shall be validly effected by:
 - a. Sending an email to each of the addresses listed in Schedule 2 to this Order and providing a link to notifying them that copies of such documents are available at <https://www.noticespublic.com/>
 - b. Uploading it to <https://www.noticespublic.com/>
 - c. In respect of the Fifth to Ninth and the Eleventh to Fourteenth Defendants, by posting copies to the last known address which was supplied to the Claimant by the relevant police authority (and as set out in the unredacted Schedule 1 to this Order), by first class post, special delivery and/or by hand delivery to such address; or
 - d. where a Named Defendant has notified the Claimant in writing pursuant to CPR Practice Direction 6A paragraph 4.1 that they wish to be served by email, by sending an email to the email address which has been previously supplied to the Claimant by any Named Defendant for the purposes of electronic service, providing a link to the Claimant's website (<https://www.noticespublic.com/> and specifically noting in the message that a copy of such documents are available via that website
 - e. To the extent that it is possible to do so in practice, in respect of the Second Defendant (McKechnie), by the sending of a message to the Second Defendant's social media account (as set out below) providing a link to the Claimant's website (<https://www.noticespublic.com/>) on which copies of the said future document(s) are available and specifically noting in the message that copies of such document(s) are available via that website:
 - f. To the extent that it is possible to do so in practice, in respect of the Third Defendant (Harris), by the sending of a message to the Third Defendant's social media account (as set out below) providing a link to the Claimant's website (<https://www.noticespublic.com/>) on which copies of the said future document(s) are

available and specifically noting in the message that copies of such document(s) are available via that website:

- g. To the extent that it is possible to do so in practice, in respect of the Fourth Defendant (Goode), by the sending of a message to the Fourth Defendant's social media account (as set out below) providing a link to the Claimant's website (<https://www.noticespublic.com/>) on which copies of the said future document(s) are available and specifically noting in the message that copies of such document(s) are available via that website:
 - h. To the extent that it is possible to do so in practice, in respect of the Tenth Defendant (Burns), by the sending of a message to the Tenth Defendant's social media account (as set out below) providing a link to the Claimant's website (<https://www.noticespublic.com/>) on which copies of the said future document(s) are available and specifically noting in the message that copies of such document(s) are available via that website:
 - i. If and to the extent the Claimant is notified by a relevant Named Defendant of a specific address which the relevant Named Defendant may be served with documents relating to these proceedings, by posting a copy of such documents to such address by first class post, special delivery and/or by hand to the address so supplied (or if the Claimant is supplied with an email address by the relevant Defendant for the purposes of electronic service and at which the Defendant has notified the Claimant in writing that they wish to be served pursuant to CPR Practice Direction 6A paragraph 4.1, by sending an email and providing a link to the Claimant's website (<https://www.noticespublic.com/>) and specifically noting in the message that a copy of such documents are available via that website).
6. Pursuant to CPR 6.15 and 6.27 and CPR 81.4(c) and (d), service of this Order (with the addresses in Schedule 1 and social media details redacted) and any further document in these proceedings upon the Second (McKechnie), Third (Harris), Fourth (Goode) and Tenth (Burns) Defendants shall be validly effected by service in accordance with paragraphs [5a, b and d- i] above (as applicable to them individually).
 7. Paragraph 8 of the Soole J Order is replaced by paragraph 8 below.
 8. Pursuant to CPR 6.15 and 6.27 and CPR 81.4(c) and (d), service of this Order (with the addresses in Schedule 1 and social media details redacted) and any further document in these proceedings upon the Fifteenth Defendant shall be validly effected by service in accordance with paragraphs 5a, b and i above (from the date upon which the Claimant is notified of such address).
 9. For the avoidance of doubt, service of future documents on the Named Defendants shall be deemed effective on the latest day on which all the methods of service referred to above have been completed (as applicable to them individually). Such date shall be specified by the relevant certificate of service.
 10. In relation to paragraphs [5], [6] and 8 (where service by alternative methods is required), the period for filing a defence for the purposes of CPR 6.15(4) shall be the date 15th May 2024 (being the date set out in paragraph 16 of the Soole J Order).
 11. The Court will provide sealed copies of this Order to the Claimant's solicitors for service (whose details are set out below).

VARIATION OF HILL J ORDERS RELATING TO SERVICE OF FUTURE DOCUMENTS ON FIRST DEFENDANTS AND NON PARTIES

12. Paragraph 4.1.3 of the PS Hill J Order is replaced with paragraph 13 below.

13. Pursuant to CPR 6.15 and 6.27, service of any further document (including service of this Order (with the addresses in Schedule 1 and social media details redacted)) in these Proceedings, shall be validly effected by:
- a. Sending an email to each of the addresses listed in Schedule 2 to this Order and providing a link to notifying them that copies of such documents are available at <https://www.noticespublic.com/>
 - b. Uploading it to <https://www.noticespublic.com/>
 - c. sending a link to the documents on the www.noticespublic.com data site to any person or their solicitor 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).

LIBERTY TO APPLY

14. Any person affected by this Order may apply to the Court at any time to vary or discharge it or any part (including in relation to the methods of alternative service) but if they wish to do so they must inform the Claimants' solicitors by email to the address specified below 48 hours before making such application of the nature of such application and the basis for it. Any such person who is not a Named Defendant must provide their full name and address, and address for service to the Claimants' solicitors on the details below and to the Court and must, if appropriate, also apply to be joined as a Defendant to these proceedings at the same time.

15. The Parties have liberty to apply to extend this Order or to seek further directions.

COSTS

16. Costs in the case

COMMUNICATION WITH THE CLAIMANT

The Claimants' solicitors contact details are as follows:

Eversheds Sutherland (International) LLP
Bridgewater Place, Water Lane, Leeds LS11 5DR
Reference: OLDFIEA/SHELL
Shell.service@eversheds-sutherland.com

Schedule 1
Addresses of Named Defendants

No	Name	Address
2.	Louis McKechnie	
3.	Louise Harris	
4.	Callum Goode	
5.	Christopher Ford	
6.	Sean Jordan (also known as Sean Irish, John Jordan, John Michael Jordan and Sean O'Rourke)	
7.	Emma Ireland	
8.	Charles Philip Laurie	Sent by email only
9.	Michael Edward Davies also previously known as Michael Edward Jones	
10.	Tessa-Marie Burns (also known as Tez Burns)	

No	Name	Address
11.	Simon Reding	
12.	Kate Bramfit	
13.	Margaret Reid	
14.	David Nixon	

Schedule 2
(list of email addresses)

1. **EXTINCTION REBELLION UK**
- 1.1 enquiries@extinctionrebellion.uk
- 1.2 press@extinctionrebellion.uk
- 1.3 xrvideo@protonmail.com
- 1.4 xr-action@protonmail.com
- 1.5 xraffinitysupport@protonmail.com
- 1.6 xr-arrestwelfare@protonmail.com
- 1.7 artsxr@gmail.com
- 1.8 xr-CitizensAssembly@protonmail.com
- 1.9 xr.connectingcommunities@gmail.com
- 1.10 xrdemocracy@protonmail.com
- 1.11 xrnotables@gmail.com
- 1.12 integration@rebellion.earth
- 1.13 xr-legal@riseup.net
- 1.14 press@extinctionrebellion.uk
- 1.15 xr-newsletter@protonmail.com
- 1.16 xr-peoplesassembly@protonmail.com
- 1.17 xrpoliceliaison@protonmail.com
- 1.18 rebelringers@rebellion.earth
- 1.19 xr.regenerativeculture@gmail.com
- 1.20 xr-regionaldevelopment@protonmail.com
- 1.21 RelationshipsXRUK@protonmail.com
- 1.22 xr.mandates@gmail.com
- 1.23 socialmedia@extinctionrebellion.uk
- 1.24 xrsocialmediaevents@gmail.com
- 1.25 eventsxr@gmail.com
- 1.26 xrbristol.regional@protonmail.com
- 1.27 xrcymru@protonmail.com
- 1.28 xr.eastengland@protonmail.com

- 1.29 xrlondoncoord@gmail.com
- 1.30 XRMidlands@protonmail.com
- 1.31 xrne@protonmail.com
- 1.32 support@xrnorth.org
- 1.33 xrni@rebellion.earth
- 1.34 xrscotland@gmail.com
- 1.35 XR-SouthEastRegionalTeam@protonmail.com
- 1.36 xr.regional.sw@protonmail.com
- 1.37 talksandtraining.xrbristol@protonmail.com
- 1.38 xrcymrutalksandtraining@gmail.com
- 1.39 eoexrtnt@protonmail.com
- 1.40 xrlondoncommunityevents@gmail.com
- 1.41 xrmidlandstraining@protonmail.com
- 1.42 XRNE.training@protonmail.com
- 1.43 xrnw.training@gmail.com
- 1.44 xryorkshire.training@gmail.com
- 1.45 xrni.tt@rebellion.earth
- 1.46 talksandtrainings.scotland@extinctionrebellion.uk
- 1.47 xrttse@gmail.com
- 1.48 xrsw.trainings@gmail.com
- 2. **JUST STOP OIL**
- 2.1 Ring2021@protonmail.com
- 2.2 juststopoil@protonmail.com
- 2.3 youthclimateswarm@protonmail.com
- 3. **YOUTH CLIMATE SWARM**
- 3.1 youthclimateswarm@protonmail.com

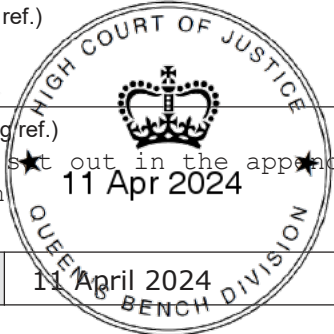
N244

Application notice

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

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

Name of court High Court Of Justice King's Bench Division		Claim no. QB-2022-001241
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)	
	H W F - [] [] [] - [] [] []	
Warrant no. (if applicable)		
Claimant's name (including ref.) Shell U.K. Limited OLDFIEA/SHELL		
Defendant's name (including ref.) Persons unknown as set out in the appendix to this application		
Date	11 April 2024	



1. What is your name or, if you are a legal representative, the name of your firm? QB-2022-001241

Sub Event ID: 53

2. Are you a Claimant Defendant Legal Representative

Other (please specify)

If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?

1. Pursuant to CPR 6.15 and 6.27, in circumstances where it has been identified that attachments can be too large to attach to an email and that an interested party may no longer live at the last known address provided to the Claimant:

- a. an order the steps already taken by the Claimant in the proceedings QB-2022-001241 to bring the 2024 Documents to the attention of an interested party known as Jessica Branch, shall be good service:
- b. an order to vary the requirements for alternative service of future documents in QB-2022-001241 to effect service on the Defendants and any interested parties by sending an email providing a link to the Claimants' website where copies are available and by sending copies to an interested party's solicitor.

2. For this application to be heard at the review hearing listed on 17 April 2024 in accordance with paragraph 17 of the Soole J Order.

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

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

at a remote hearing

6. How long do you think the hearing will last? Hours Minutes

Is this time estimate agreed by all parties? Yes No

7. Give details of any fixed trial date or period

Review Hearing listed on 17 April 2024.
Claimant considers this application can be heard
at the same time without impacting the time
estimate

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

Claimant will arrange service on the
Defendants

9a. Please give the service address, (other than details
of the claimant or defendant) of any party named in
question 9.

Claimant will arrange service on
interested parties

10. What information will you be relying on, in support of your application?

- the attached witness statement
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

The attached Eighth Witness Statement of Alison Oldfield dated 11 April 2024

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

No

Statement of Truth

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

I believe that the facts stated in section 10 (and any continuation sheets) are true.

The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature



Applicant

Litigation friend (where applicant is a child or a Protected Party)

Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

11th

Month

April

Year

2024

Full name

Alison Oldfield

Name of applicant's legal representative's firm

Eversheds Sutherland (Intl) LLP

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

Partner

Applicant's address to which documents should be sent.

Building and street

Bridgewater Place, Water Lane

Second line of address

Town or city

Leeds

County (optional)

Postcode

L S 1 1 5 D R

If applicable

Phone number

020 7497 9797

Fax phone number

020 7919 4919

DX number

DX 12027 Leeds - 27

Your Ref.

Email

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

SHELL U.K. LIMITED

Claimant

- and -

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

DRAFT ORDER

RECITALS

UPON the Claimants' application dated 12 February 2024 and the review hearing being listed pursuant to paragraph 17 of the Order of Soole J dated 15 March 2024 (the "**Soole J Order**")

UPON the Claimants' further application dated 11 April 2024 to vary paragraph 4.1.3 of the Order of Hill J dated 28th April 2023 (the "**SH Hill J Order**"), relating to the provision of future documents to interested parties.

UPON hearing from Leading Counsel for the Claimants

IT IS ORDERED:

1. The Soole J Order, the second witness statement of Christopher Pritchard Gamble, the fourth witness statement of Benjamin Austin, the sixth, seventh, eighth and ninth witness statements of Alison Oldfield, the application notice dated April 2024 and draft order in support, notice of hearing dated 2024 and the Claimants' Skeleton argument dated 2024 shall together be referred to as the "**2024 Documents**".

PROVISION OF THE 2024 DOCUMENTS TO INTERESTED PARTIES

2. Pursuant to CPR 6.15 and 6.27 the following steps already taken by the Claimant to bring the 2024 Documents to the attention of Jessica Branch, an individual who has previously requested copies of documents in these proceedings, shall constitute compliance with paragraph 4.1.3 of the SH Hill J Order :
 - a. By leaving the 2024 Documents at the last known place of abode of Jessica Branch and;
 - b. by hand delivering and by sending copies of the 2024 Documents by email to Jessica Branch's solicitors Bindmans LLP.

VARIATION OF ST SWEETING J ORDER RELATING TO SERVICE OF FUTURE DOCUMENTS

3. Paragraph 4.1.3 of the SH Hill J Order is replaced with paragraph 4 below.
4. Pursuant to CPR 6.15 and 6.27, service of any further document (including service of this Order in these Proceedings, shall be validly effected by:
 - a. Sending an email to each of the addresses listed in Schedule 1 to this Order and providing a link to notifying them that copies of such documents are available at <https://www.noticespublic.com/>
 - b. Uploading it to <https://www.noticespublic.com/>
 - c. sending a link to the documents on the www.noticespublic.com data site to any person or their solicitor 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).

LIBERTY TO APPLY

5. Any person affected by this Order may apply to the Court at any time to vary or discharge it or any part (including in relation to the methods of alternative service) but if they wish to do so they must inform the Claimants' solicitors by email to the address specified below 48 hours before making such application of the nature of such application and the basis for it. Any such person who is not a Named Defendant must provide their full name and address, and address for service to the Claimants' solicitors on the details below and to the Court and must, if appropriate, also apply to be joined as a Defendant to these proceedings at the same time.
6. The Parties have liberty to apply to extend this Order or to seek further directions.

COSTS

7. Costs in the case

COMMUNICATION WITH THE CLAIMANT

The Claimants' solicitors contact details are as follows:

Eversheds Sutherland (International) LLP
Bridgewater Place, Water Lane, Leeds LS11 5DR
Reference: OLDFIEA/SHELL
Shell.service@eversheds-sutherland.com

Schedule 1
(list of email addresses)

1. **EXTINCTION REBELLION UK**
- 1.1 enquiries@extinctionrebellion.uk
- 1.2 press@extinctionrebellion.uk
- 1.3 xrvideo@protonmail.com
- 1.4 xr-action@protonmail.com
- 1.5 xraffinitysupport@protonmail.com
- 1.6 xr-arrestwelfare@protonmail.com
- 1.7 artsxr@gmail.com
- 1.8 xr-CitizensAssembly@protonmail.com
- 1.9 xr.connectingcommunities@gmail.com
- 1.10 xrdemocracy@protonmail.com
- 1.11 xrnotables@gmail.com
- 1.12 integration@rebellion.earth
- 1.13 xr-legal@riseup.net
- 1.14 press@extinctionrebellion.uk
- 1.15 xr-newsletter@protonmail.com
- 1.16 xr-peoplesassembly@protonmail.com
- 1.17 xrpoliceliaison@protonmail.com
- 1.18 rebelringers@rebellion.earth
- 1.19 xr.regenerativeculture@gmail.com
- 1.20 xr-regionaldevelopment@protonmail.com
- 1.21 RelationshipsXRUK@protonmail.com
- 1.22 xr.mandates@gmail.com
- 1.23 socialmedia@extinctionrebellion.uk
- 1.24 xrsocialmediaevents@gmail.com
- 1.25 eventsxr@gmail.com
- 1.26 xrbristol.regional@protonmail.com
- 1.27 xrcymru@protonmail.com
- 1.28 xr.eastengland@protonmail.com

- 1.29 xrlondoncoord@gmail.com
- 1.30 XRMidlands@protonmail.com
- 1.31 xrne@protonmail.com
- 1.32 support@xrnorth.org
- 1.33 xrni@rebellion.earth
- 1.34 xrscotland@gmail.com
- 1.35 XR-SouthEastRegionalTeam@protonmail.com
- 1.36 xr.regional.sw@protonmail.com
- 1.37 talksandtraining.xrbristol@protonmail.com
- 1.38 xrcymrutalksandtraining@gmail.com
- 1.39 eoexrtnt@protonmail.com
- 1.40 xrlondoncommunityevents@gmail.com
- 1.41 xrmidlandstraining@protonmail.com
- 1.42 XRNE.training@protonmail.com
- 1.43 xrnw.training@gmail.com
- 1.44 xryorkshire.training@gmail.com
- 1.45 xrni.tt@rebellion.earth
- 1.46 talksandtrainings.scotland@extinctionrebellion.uk
- 1.47 xrttse@gmail.com
- 1.48 xrsw.trainings@gmail.com
- 2. **JUST STOP OIL**
- 2.1 Ring2021@protonmail.com
- 2.2 juststopoil@protonmail.com
- 2.3 youthclimateswarm@protonmail.com
- 3. **YOUTH CLIMATE SWARM**
- 3.1 youthclimateswarm@protonmail.com

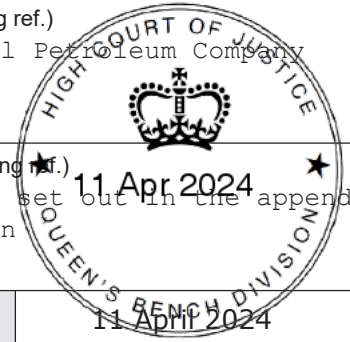
N244

Application notice

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

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

Name of court High Court Of Justice King's Bench Division		Claim no. QB-2022-001259
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable) H W F - [] [] [] - [] [] []	
Warrant no. (if applicable)		
Claimant's name (including ref.) Shell International Petroleum Company Limited OLDFIEA/SHELL		
Defendant's name (including ref.) Persons unknown as set out in the appendix to this application		
Date	11 April 2024	



QB-2022-001259

Sub Event ID: 53

1. What is your name or, if you are a legal representative, the name of your firm?

Eversheds Sutherland (International) LLP

2. Are you a Claimant Defendant Legal Representative

Other (please specify) []

If you are a legal representative whom do you represent?

Claimant

3. What order are you asking the court to make and why?

1. Pursuant to CPR 6.15 and 6.27, in circumstances where it has been identified that attachments can be too large to attach to an email and that an interested party may no longer live at the last known address provided to the Claimant:

- a. an order the steps already taken by the Claimant in the proceedings QB-2022-001259 to bring the 2024 Documents to the attention of an interested party known as Jessica Branch, shall be good service:
- b. an order to vary the requirements for alternative service of future documents in QB-2022-001259 to effect service on the Defendants and any interested parties by sending an email providing a link to the Claimants' website where copies are available and by sending copies to an interested party's solicitor.

2. For this application to be heard at the review hearing listed on 17 April 2024 in accordance with paragraph 17 of the Soole J Order.

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

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

at a remote hearing

6. How long do you think the hearing will last?

Hours

Minutes

Is this time estimate agreed by all parties?

Yes

No

7. Give details of any fixed trial date or period

Review Hearing listed on 17 April 2024.
Claimant considers this application can be heard
at the same time without impacting the time
estimate

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

Claimant will arrange service on the
Defendants

9a. Please give the service address, (other than details
of the claimant or defendant) of any party named in
question 9.

Claimant will arrange service on
interested parties

10. What information will you be relying on, in support of your application?

the attached witness statement

the statement of case

the evidence set out in the box below

If necessary, please continue on a separate sheet.

The attached Eighth Witness Statement of Alison Oldfield dated 11 April 2024

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

No

Statement of Truth

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

- I believe that the facts stated in section 10 (and any continuation sheets) are true.
- The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature



- Applicant
- Litigation friend (where applicant is a child or a Protected Party)
- Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day Month Year

Full name

Name of applicant's legal representative's firm

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

Applicant's address to which documents should be sent.

Building and street

Bridgewater Place, Water Lane

Second line of address

Town or city

Leeds

County (optional)

Postcode

L S 1 1 5 D R

If applicable

Phone number

020 7497 9797

Fax phone number

020 7919 4919

DX number

DX 12027 Leeds - 27

Your Ref.

Email

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

SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED

Claimant

- 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

DRAFT ORDER

RECITALS

UPON the Claimants' application dated 12 February 2024 and the review hearing being listed pursuant to paragraph 17 of the Order of Soole J dated 15 March 2024 (the "**Soole J Order**")

UPON the Claimants' further application dated 11 April 2024 to vary paragraph 4.1.3 of the Order of Hill J dated 28th April 2023 (the "**ST Hill J Order**"), relating to the provision of documents to interested parties.

UPON hearing from Leading Counsel for the Claimants

IT IS ORDERED:

1. The Soole J Order, the second witness statement of Christopher Pritchard Gamble, the fourth witness statement of Benjamin Austin, the sixth, seventh, eighth and ninth witness statements of Alison Oldfield, the application notice dated April 2024 and draft order in support, notice of hearing dated 2024 and the Claimants' Skeleton argument dated 2024 shall together be referred to as the "**2024 Documents**".

PROVISION OF THE 2024 DOCUMENTS TO INTERESTED PARTIES

2. Pursuant to CPR 6.15 and 6.27 the following steps already taken by the Claimant to bring the 2024 Documents to the attention of Jessica Branch, an individual who has previously requested copies of documents in these proceedings, shall constitute compliance with paragraph 10 (iii) of the Hill J Order :
 - a. By leaving the 2024 Documents at the last known place of abode of Jessica Branch and;
 - b. by hand delivering and by sending copies of the 2024 Documents by email to Jessica Branch's solicitors Bindmans LLP.

VARIATION OF ST HILL J ORDER FOR SERVICE OF FUTURE DOCUMENTS

3. Paragraph 4.1.3 of the ST Hill J Order is replaced with paragraph 4 below.
4. Pursuant to CPR 6.15 and 6.27, service of any further document (including service of this Order in these Proceedings, shall be validly effected by:
 - a. Sending an email to each of the addresses listed in Schedule 1 to this Order and providing a link to notifying them that copies of such documents are available at <https://www.noticespublic.com/>
 - b. Uploading it to <https://www.noticespublic.com/>
 - c. sending a link to the documents on the www.noticespublic.com datasite to any person or their solicitor 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).

LIBERTY TO APPLY

5. Any person affected by this Order may apply to the Court at any time to vary or discharge it or any part (including in relation to the methods of alternative service) but if they wish to do so they must inform the Claimants' solicitors by email to the address specified below 48 hours before making such application of the nature of such application and the basis for it. Any such person who is not a Named Defendant must provide their full name and address, and address for service to the Claimants' solicitors on the details below and to the Court and must, if appropriate, also apply to be joined as a Defendant to these proceedings at the same time.
6. The Parties have liberty to apply to extend this Order or to seek further directions.

COSTS

7. Costs in the case

COMMUNICATION WITH THE CLAIMANT

The Claimants' solicitors contact details are as follows:

Eversheds Sutherland (International) LLP
Bridgewater Place, Water Lane, Leeds LS11 5DR
Reference: OLDFIEA/SHELL
Shell.service@eversheds-sutherland.com

Schedule
(list of email addresses)

1. **EXTINCTION REBELLION UK**
- 1.1 enquiries@extinctionrebellion.uk
- 1.2 press@extinctionrebellion.uk
- 1.3 xrvideo@protonmail.com
- 1.4 xr-action@protonmail.com
- 1.5 xraffinitysupport@protonmail.com
- 1.6 xr-arrestwelfare@protonmail.com
- 1.7 artsxr@gmail.com
- 1.8 xr-CitizensAssembly@protonmail.com
- 1.9 xr.connectingcommunities@gmail.com
- 1.10 xrdemocracy@protonmail.com
- 1.11 xrnotables@gmail.com
- 1.12 integration@rebellion.earth
- 1.13 xr-legal@riseup.net
- 1.14 press@extinctionrebellion.uk
- 1.15 xr-newsletter@protonmail.com
- 1.16 xr-peoplesassembly@protonmail.com
- 1.17 xrpoliceliaison@protonmail.com
- 1.18 rebelringers@rebellion.earth
- 1.19 xr.regenerativeculture@gmail.com
- 1.20 xr-regionaldevelopment@protonmail.com
- 1.21 RelationshipsXRUK@protonmail.com
- 1.22 xr.mandates@gmail.com
- 1.23 socialmedia@extinctionrebellion.uk
- 1.24 xrsocialmediaevents@gmail.com
- 1.25 eventsxr@gmail.com
- 1.26 xrbristol.regional@protonmail.com
- 1.27 xrcymru@protonmail.com
- 1.28 xr.eastengland@protonmail.com

- 1.29 xrlondoncoord@gmail.com
- 1.30 XRMidlands@protonmail.com
- 1.31 xrne@protonmail.com
- 1.32 support@xrnorth.org
- 1.33 xrni@rebellion.earth
- 1.34 xrscotland@gmail.com
- 1.35 XR-SouthEastRegionalTeam@protonmail.com
- 1.36 xr.regional.sw@protonmail.com
- 1.37 talksandtraining.xrbristol@protonmail.com
- 1.38 xrcymrutalksandtraining@gmail.com
- 1.39 eoexrtnt@protonmail.com
- 1.40 xrlondoncommunityevents@gmail.com
- 1.41 xrmidlandstraining@protonmail.com
- 1.42 XRNE.training@protonmail.com
- 1.43 xrnw.training@gmail.com
- 1.44 xryorkshire.training@gmail.com
- 1.45 xrni.tt@rebellion.earth
- 1.46 talksandtrainings.scotland@extinctionrebellion.uk
- 1.47 xrttse@gmail.com
- 1.48 xrsw.trainings@gmail.com
- 2. **JUST STOP OIL**
- 2.1 Ring2021@protonmail.com
- 2.2 juststopoil@protonmail.com
- 2.3 youthclimateswarm@protonmail.com
- 3. **YOUTH CLIMATE SWARM**
- 3.1 youthclimateswarm@protonmail.com

Eighth Witness Statement

Party: Claimants

Exhibit: AJ08

Date: 11th April 2024

Claim No: QB-2022-001259

Claim No: QB-2022-001241

Claim No: QB-2022-001420

**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)

Louis McKechnie

Second Defendant(QB-2022-001420)

Louise Harris
Third Defendant (QB-2022-001420)

Callum Goode
Fourth Defendant(QB-2022-001420)

Christopher Ford
Fifth Defendant(QB-2022-001420)

Sean Jordan
(also known as Sean Irish, John Jordan, John Michael Jordan and Sean O'Rourke)
Sixth Defendant(QB-2022-001420)

Emma Ireland
Seventh Defendant(QB-2022-001420)

Charles Philip Laurie
Eight Defendant(QB-2022-001420)

Michael Edward Davies also previously known as Michael Edward Jones
Ninth Defendant(QB-2022-001420)

Tessa-Marie Burns (also known as Tez Burns)
Tenth Defendant(QB-2022-001420)

Simon Reding
Eleventh Defendant(QB-2022-001420)

Kate Bramfit
Twelfth Defendant(QB-2022-001420)

Margaret Reid
Thirteenth Defendant(QB-2022-001420)

David Nixon
Fourteenth Defendant(QB-2022-001420)

Samuel Holland
Fifteenth Defendant(QB-2022-001420)

Eighth 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 AJ08**.
- 1.4 The purpose of this witness statement is to:
 - 1.4.1 confirm the steps taken to serve the various parties to these proceedings with various documents following the Order of Soole J dated 15th March 2024 ("**the 15th March 2024 Order**");
 - 1.4.2 to the extent necessary, to obtain the court's confirmation that those steps amount to good service;
 - 1.4.3 support the application of the Claimant in proceedings numbered QB-2022-1420 ("**the Petrol Station Proceedings**") for a variation of the provisions of the 15th March 2024 Order relating to alternative service of future documents on certain Named Defendants in those proceedings;
- 1.5 To recap, the 15th March 2024 Order provided for the following documents to be served by the Claimants:
 - 1.5.1 any evidence upon which they wish to rely in support of the renewal of the injunction in these proceedings by 4pm on 19th March 2024;
 - 1.5.2 the re-amended Claim Form and Particulars of Claim in proceedings numbered QB-2022-1420 (the Petrol station proceedings) by 4pm on 22nd March 2024;
- 1.6 In addition the 15th March 2024 Order itself needed to be served and also my Seventh Witness Statement dated 14th March 2024 which confirms the steps taken to notify the relevant parties of the timing of the adjourned hearing of our application dated 12th February 2024.

SERVICE OF DOCUMENTS

2. Service upon the Named Defendants in the Petrol Station Proceedings

- 2.1 Paragraph 7 of the 15th March 2024 Order provides that the Named Defendants in the Petrol Station proceedings should be served:
 - 2.1.1 by uploading it to <http://www.noticespublic.com>;

- 2.1.2 by posting to their last known address which was supplied to the Claimant in the Petrol Station proceedings by the relevant police authority by first class post, special delivery and/or by hand delivery; unless any defendant has also confirmed they will accept service by email pursuant to CPR Rule 6A paragraph 4.1.
- 2.2 For completeness I confirm that when I refer to the steps taken to serve those "Named Defendants" I do so in connection with the Named Defendants in the Petrol Station proceedings.
- 2.3 As to that, two of the Named Defendants – Charles Philip Laurie and Emma Ireland - have both confirmed (pursuant to CPR Rule 6A paragraph 4.1) that they consent to the service of documents in relation to these proceedings by email. Copies of those confirmations are at **pages 1-4 of AJ08**.
- 2.4 In addition paragraphs 7.4 and 7.5 of the 15th March 2024 Order make provision for alternative service upon the Third Defendant (Louise Harris) and the Tenth Defendant (Tess Burns) by social media to the extent it is possible to do so in practice.
- 2.5 Finally paragraph 8 of the 15th March 2024 Order permits service on documents upon the Fifteenth Defendant (Samuel Holland) by the same means provided for in respect of the First Defendant and to which I refer further at paragraph 4 below.
- 2.6 I set out below the steps which have been taken to serve each of the documents referred to at paragraphs 1.5 and 1.6 upon the Named Defendants. In case it assists the court I also attach at **pages 5-7 of AJ08** a schedule which summarises the steps which have been taken to serve copies of those various documents upon the Named Defendants. I refer to the source of the information for that schedule (which was obtained from Finlays Legal Ltd process servers) further below.
- 2.7 It can be seen from that schedule that the documents were served in 2 tranches; the witness evidence upon which the Claimants' rely in support of the renewal of the injunctions in each of these proceedings were served in one tranche and, subsequently, the 15th March 2024 Order, the sealed amended Claim Form and the amended Particulars of Claim in the Petrol stations proceedings were served in a second tranche.

Service of the Witness evidence upon which the Claimant relies for renewal of the Injunctions.

- 2.8 The following witness statements were served upon the Named Defendants in support of the Claimants' application for the renewal of the injunction in each proceedings:
- 2.8.1 The Second witness statement of Christopher Prichard-Gamble;
- 2.8.2 The Fourth witness statement of Benjamin Austin;
- 2.8.3 My Sixth witness statement of Alison Oldfield;

- 2.9 In addition my Seventh witness statement has also now been served.
- 2.10 I shall refer to all these witness statements collectively as "**the Witness Evidence**".
- 2.11 Copies of the Witness Evidence were served by hand on all the Named Defendants except for Philip Laurie and Samuel Holland by delivering by hand using a process server, Finlays Legal Limited ("Finlays") in accordance with paragraph 7.3 of the 15th March 2024 Order. (The confirmation from Ms Ireland concerning email service was not received until after the various documents to which I refer in this statement had been served.)
- 2.12 There is now produced and shown to me marked **AJ08 pages 8-14** copies of a series of statements of service prepared by the individuals at Finlays Legal Limited who were responsible for service of the Witness Evidence. The information I have set out in this witness statement is obtained from those statements and I believe it to be true. In summary, those statements confirm that the relevant process server delivered parcels containing the Witness Evidence to the Named Defendants as follows:
- 2.12.1 On 18th March 2024 to the last known addresses for Louis McKechnie, Emma Ireland, Callum Goode, Simon Reding, David Nixon and Margaret Reid;
- 2.12.2 On 19th March 2024 to the last known addresses for Louise Harris, Christopher Ford, Sean Jordan, Michael Davis (also known as Michael Jones), Kate Bramfit, and Tess Burns.
- 2.13 At **page 15 of AJ08** I have exhibited an example of the covering letter which accompanied the Witness Evidence in the case of each Named Defendant. The exact time of delivery in respect of each Named Defendant is recorded in the schedule at **pages 5-7 of AJ08**.
- 2.14 We also sent a copy of the Witness Evidence to Charles Philip Laurie and Emma Ireland by emails dated 18th and 19th March 2024 in the light of their confirmations referred to at paragraph 2.3 above. Given the size of the documents which were being emailed they had to be sent in batches. (A point I will return to below). The emails were sent by my colleague, Alexander Wright from this firm's centralised Shell Service email account – ShellService@eversheds-sutherland.com. Ms Ireland's emails were timed between 13:23 on 18th March 2024 and 08:42 on 19th March 2024. Mr Laurie's emails were timed at various times between 11:50 on 18th March 2024 and 8:41 on 19th March 2024. Copies of the emails to Mr Laurie and Ms Ireland are at **pages 16-27 of AJ08**.
- 2.15 In addition a message was also sent on 18 March 2024 at 11:57 via direct message to the Facebook page of Louise Harris as follows:

Dear Louise Harris

On 13 March 2024 we sent you a message to let you know that the 11 March 2024 hearing to hear our client Shell UK Oil Limited's application to join you as a defendant in its injunction proceedings had been adjourned (part heard) until 3pm on Friday 15th March.

Pursuant to Mr Justice Soole's Order dated 15 March 2024 (and made following the 15 March 2024 hearing) we are required to serve you with copies of the below listed documents. You will find copies of them at: <https://www.noticespublic.com/>

1. Sixth Witness Statement of Alison Oldfield dated 12 March 2024;
2. Exhibits to the Sixth Witness Statement of Alison Oldfield dated 12 March 2024;
3. Second Witness Statement of Christopher Pritchard Gamble dated 14 March 2024;
4. Exhibits to Second witness statement of Christopher Pritchard Gamble dated 14 March 2024;
5. Fourth Witness Statement of Benjamin Austin dated 14 March 2024; and
6. Exhibit to Fourth Witness Statement of Benjamin Austin dated 14 March 2024.

Together the above documents comprise our clients' evidence in support of the continuation of the injunctions in the above proceedings.

You will also find a copy of (for completeness) the Seventh Witness Statement of Alison Oldfield dealing with service of the Order of 13 March 2024 at: www.noticespublic.com.

Yours sincerely

Eversheds Sutherland (International) LLP

A copy of this message can be found at **pages 28-29 of AJ08**.

- 2.16 It has not been possible to upload a similar message to the LinkedIn account of Tessa-Marie (also known as Tez) Burns (as we originally envisaged) because Ms Burns has still not responded to our initial message of 5th March 2024 and it has not therefore been possible to communicate further via this means with Ms Burns. Screenshots of the error message we received when attempting to serve Ms Burns on both 19th March 2024 and 21st March 2024 can be found at **page 30 of AJ08**. Notwithstanding that fact, as I explained at paragraph 3.11 of my fifth witness statement, our initial message to Ms Burns provided her with a link to the <http://www.noticespublic.com/> website. As I explain below, copies of all the Witness Evidence has also been uploaded onto that website.

Service of the amended pleadings and the 15th March 2024 Order on the Named Defendants

- 2.17 We also asked Finlays to arrange for service of copies of the sealed amended Claim Form, amended Particulars of Claim and 15th March 2024 Order to be delivered by hand to the last known address of all the Named Defendants except for Philip Laurie and Samuel Holland in accordance with paragraph 7.3 of the 15th March 2024 Order.
- 2.18 There is now produced and shown to me marked **AJ08 pages 31-38** copies of a series of statements of service prepared by the individuals at Finlays Limited who were responsible for service of amending pleadings and the 15th March 2024 Order. The information I have set out in this witness statement is obtained from those statements and I believe it to be

true. In summary, those statements confirm that the relevant process server delivered parcels containing the amended pleadings and the 15th March 2024 Order as follows:

- 2.18.1 On 21st March 2024 in the case of Emma Ireland, Kate Bramfit and Margaret Reid.
 - 2.18.2 On 22nd March 2024 in the case of Louis McKechnie, Louise Harris, Christopher Ford, Sean Jordan, Michael Davis and Tess Burns.
 - 2.18.3 The statement of Mick Cain dated 25 March 2024 also confirms that, due to the timing of receipt of the sealed amended Claim Form, the unsealed amended Claim Form, amended Particulars of Claim and 15th March 2024 Order were initially served on David Nixon, Simon Reding and Callum Goode on 21 March 2024. As can be seen at **page 36 of AJ08** Mick Cain subsequently served the sealed amended Claim Form on David Nixon, Simon Reding and Callum Goode on 22nd March 2024.
- 2.19 At page 39 **of AJ08** I have exhibited an example of the covering letter which accompanied the amended pleadings and 15th March 2024 Order in the case of each Named Defendant. At page 40 **of AJ08** I have exhibited an example of the covering letter which accompanied the re-service of the sealed amended Claim Form on David Nixon, Simon Reding and Callum Goode. The exact time of delivery in respect of each Named Defendant is recorded in the schedule at **pages 5-7 of AJ08**.
- 2.20 We also sent a copy of the amended pleadings and 15th March 2024 Order to Charles Philip Laurie and Emma Ireland by emails. Service of the 15th March 2024 Order was sent to Messrs Laurie and Ireland under cover of emails timed at 08:31 and 08:32 on 19th March 2024. Service of the amended pleadings were sent to Messrs Laurie and Ireland under cover of emails both timed at 16:18 on 21 March 2024. Copies of the emails to Mr Laurie and Ms Ireland are at pages 41-44 of **Exhibit AJ08**.
- 2.21 In addition a message was also sent on 19 March 2024 at 19:50 via direct message to Louise Harris as follows:
- Dear Louise Harris*
- On 18 March 2024 we sent you a message to let you know that Mr Justice Soole had made an Order pursuant to the hearing which took place on 15 March 2024 to hear our client Shell UK Oil Limited's application to join you as a defendant in its injunction proceedings.*
- You will find a copy of the Sealed Order dated 15 March 2024 at: www.noticespublic.com.*
- Yours sincerely*
- Eversheds Sutherland (International) LLP*
- A copy of this message can be found at **page 45 of AJ08**.
- 2.22 A further message was sent to Louise Harris on 21 March 2024 at 18:20 as follows:

Dear Louise Harris

Pursuant to Mr Justice Soole's Order dated 15 March 2024 (and made following the 15 March 2024 hearing), we are required to serve you with copies of the below listed documents in respect of Claim No: QB-2022-0001420. You will find copies of them at: www.noticespublic.com.

1. Sealed Re-Amended Claim Form; and
2. Re-amended Particulars of Claim.

Yours sincerely

Eversheds Sutherland (International) LLP

A copy of this message can be found at **page 46 of AJ08**.

2.23 Again it has not been possible to upload a similar message to the LinkedIn account of Tessa-Marie (Tez) Burns (as we originally envisaged) because Ms Burns has still not responded to our initial message of 5th March 2024 and it has not therefore been possible to communicate further via this means with Ms Burns. A screenshot of the error message can be found at **page 47 of AJ08**. I repeat the point made above that, notwithstanding that position, our original email to Ms Burns made her aware of the availability of all documents in relation to these proceedings via www.noticespublic.com

3. Information obtained during service of these documents on Named Defendants in the Petrol Stations proceedings

3.1 During the course of undertaking the exercise of service which I describe above, the process servers were told certain information of which I believe the court should be made aware. It has also prompted the Claimant in the Petrol Station Proceedings to make an application to vary the provisions of the 15th March 2024 Order in so far as it makes provision for alternative service of future documents in these proceedings.

3.2 Specifically, it can be seen from the information provided by the process servers at pages **8-14 and 31-38** of **AJ08** that in a few cases they were told by individuals at the properties which they visited that relevant Named Defendant no longer lived there.

3.2.1 Kevin Healey the process server who delivered the 15th March 2024 Order and amended pleadings on the last known address of Louis McKechnie on 22nd March 2024, reported that a woman indicating that she was Louis McKechnie's mother said that he did not live at the address. That individual did however confirm that she would pass the documents to Louis McKechnie;

3.2.2 Michael Rees, the process server who delivered the relevant documents to the last known address of Tessa Burns has confirmed (in his statement dated 22nd March 2024) that, when he served the witness evidence, an individual at the property indicated that Ms Burns no longer lived at that address. They did not have an alternative address for Ms Burns. Given the existing service requirements we instructed Mr Rees to delivery copies of the 15th March 2024

Order and amended pleadings upon the same address because it is the last known address of Ms Burns. In this case also however I wanted to bring to the attention of the court that we have reason to believe that service upon this address will not bring future documents in relation to these proceedings to the attention of Ms Burns.

3.2.3 Nigel Walker, who delivered the relevant documents to the last known address of Louise Harris has confirmed (in his statement dated 22nd March 2024) that an individual who answered the door on a previous visit had indicated that Ms Harris sold the property about 18 months ago.

3.2.4 Finally our enquires have indicated that Callum Goode has been remanded in prison in connection with protestor activity. There is attached to this witness statement at **AJ08** pages **49-53** a copy of press article confirming that position. That said the statements of Mick Cain, the process server who dealt with delivery of documents to Callum Goode confirm that he left the witness evidence in the porch of his property on 18th March 2024 (statement dated 20th March 2024) and that on 21 March 2024 Mr Goode's father accepted service of the 15th March 2024 Order (statement dated 22nd March 2024) as set out at page **35** of **AJ08**.

3.3 As a consequence of the information which Finlays process servers have passed to us, the Claimant in the Petrol Station Proceedings has concluded that documents served upon those Named Defendants at the addresses given to us by the relevant police authority may not in practice come to their attention.

3.4 Given that state of affairs we have made enquiries as to whether these Named Defendants have social media accounts which could be used to try and bring documents in these proceedings to their attention. I am informed by my colleague Bethany Taylor and believe that Louis McKechnie and Callum Goode do indeed have social media accounts. The Claimant in the Petrol Stations Proceedings therefore seeks an order that, to the extent it is possible in practice, service of future documents in these proceedings shall be validly served by sending a message to Louis McKechnie's and Callum Goode's social media accounts.

Variation of the Order relating to service on Named Defendants in the Petrol Station proceedings

3.5 In those circumstances too the Claimant seeks orders in relation to the Named Defendants in the Petrol Station Proceedings that:

3.5.1 the various steps already taken to bring the witness evidence, the 15th March 2024 Order and amended pleadings to the attention of the Named Defendants shall be good service in respect of those documents; and

- 3.5.2 to the extent it is reasonably possible service of future documents may also be effected by sending messages to the social media accounts of the second (McKechnie) and fourth (Goode) Defendants including a link to the documents available on the www.noticespublic.com data site (in addition to the provisions relating to service by social media upon the third (Harris) and tenth (Burns) Defendants which were granted by the 15th March 2024 Order) instead of service on the postal addresses previously used for those second and fourth defendants;
- 3.5.3 to the extent that any Named Defendant confirms they will accept service of documents by email pursuant to CPR Rule 6A paragraph 4.1, such service can be effected by sending a message to the email address of the relevant individual containing a link to www.noticespublic.com where the documents can be found.
- 3.5.4 such methods being in addition to those provided for by paragraphs 7.1 and 7.2 of the 15th March 2024 Order in respect of Persons Unknown. As to that the Claimant also seeks an order that the provisions of paragraph 7.1 be varied so as to permit service of future documents on the email addresses contained in Schedule 2 of that Order be effected by sending a message to the email addresses containing a link to www.noticespublic.com where the documents can be found.

4. Service upon Persons Unknown in each proceedings

- 4.1 In accordance with the provisions of Paragraph 22 of the 15th March 2024 Order the following steps were taken to serve the documents referred to at paragraphs 1.5 and 1.6 above on the First Defendants in each set of proceedings (being Persons Unknown).
- 4.1.1 By sending them to each of the email addresses listed Schedule 2 of the 15th March 2024 Order;
- 4.1.2 By uploading them onto the website <http://www.noticespublic.com/> at various times on 18th, 19th and 21st March 2024;
- 4.1.3 By sending them to any person who has previously requested a copy of the Claim Documents from any of the Claimants in these consolidated proceedings.

Uploading to www.noticespublic.com

- 4.2 Copies of all the documents were uploaded onto the www.noticespublic.com datasite at various times (as they became available) between 18th and 21 March 2024

Service upon the Schedule 2 email addresses

- 4.3 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.

4.4 Pausing however before providing this detail, it will be seen from the information set out in the remainder of this paragraph that it has been necessary to serve a number of the documents in multiple parts because of the size of the electronic files concerned. It is our experience that any electronic file must usually be less than 20mb in size to be successfully transmitted via email. The witness evidence in particular in these proceedings often exceeds that file size. By way of illustration my sixth witness statement had to be split into 3 parts in order to achieve file sizes which could be transmitted through the recipients' firewalls. Had the witness statement of Christopher Prichard-Gamble been sent by conventional email means, it would have had to be split into 20 pdfs to ensure each was less than 20mb in size. For that reason (and given the current service requirements) Mr Prichard-Gamble's statement and exhibit was sent via link to this firm's mimecast large file sending mechanism. That mechanism requires the recipient to click on a link in the email and download the document. A process very similar to clicking on a link to the www.noticespublic.com data site and downloading the documents contained on that site.

4.5 The short point therefore is that the requirement to serve copies of the documents by email is, in practice, resulting in multiple emails. That, in turn, not only increases the complexity of the service task for this firm but also increases the complexity and risk of confusion for the Defendants receiving these emails.

4.6 It is for that reason that we also seek a variation of the service provisions relating to these proceedings so as to permit service of future documents upon the relevant defendant and anyone else who requests copy documents by providing a message and a link to the documents on the www.noticespublic.com data site. A point I return to at paragraph 4.25 below

4.7 I turn now to the detail of the documents which we have served upon the First Defendant.

Item No.	Document(s) Served	Subject	Email date/time (Exhibit Reference)
	15 th March 2024 Order	Shell U.K Oil Products Limited v Persons Unknown (QB-2022-001240), Shell UK Limited v Persons Unknown (QB-0222-001241) Shell International Petroleum Company Limited	19.03.24 timed at 08:30 AJ08 page 54

		(QB-2022-001259)- Court Order dated...	
--	--	--	--

Item No.	Document(s) Served	Subject	Email date/time (Exhibit Reference)
	Sealed Re-Amended Claim Form and Re-Amended Particulars of Claim	Shell U.K Oil Products Limited v Persons Unknown (QB-2022-001240) - Sealed Re-Amended Claim Form and Re-Amended Particulars of Claim	21.03.24 timed at 16:17 AJ08 page 67
Item No.	Document(s) Served	Subject	Email date/time (Exhibit Reference)
	Witness Evidence	Shell U.K Oil Products Limited v Persons Unknown (QB-2022-001240), Shell UK Limited v Persons Unknown (QB-0222-001241) Shell International Petroleum Company Limited (QB-2022-001259)	Sent in 6 parts between 18.03.2024 at 13:32 and 19.03.2024 at 08:52 AJ08 pages 81, 100, 113, 126, 139 and 152

The Order dated 15th March 2024

4.8 11 automatic responses were received in response to the above emails. Having reviewed the timings of the automated responses, I believe that:

4.8.1 2 automatic responses were received on 19 March 2024 from press@extinctionrebellion.uk and xr-action@protonmail.com, and which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at pages 55-57 of **Exhibit AJ08**.

- 4.8.2 8 further automatic responses were received on 19 March 2024 from eoexrtnt@protonmail.com; xrmidlandstraining@protonmail.com; xrpoliceliaison@protonmail.com xrpeopleassembly@protonmail.com xrdemocracy@protonmail.com youthclimateswarm@protonmail.com xr-regionaldevelopment@protonmail.com and xrne.training@protonmail.com noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages 58-61 and 63-66 of Exhibit AJ08**). 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.
- 4.8.3 1 further automatic response was received on 19 March 2024 from support@xrnorth.org which advised that the email could not be delivered as the "recipient's email address is possibly incorrect". A copy of the relevant email is exhibited at **page 62 of Exhibit AJ08**.

The Sealed Re-Amended Claim Form and Re-Amended Particulars of Claim

- 4.9 12 automatic responses were received in response to the above email. Having reviewed the timings of the automated responses, I believe that:
- 4.9.1 3 automatic responses were received on 21 March 2024 from press@extinctionrebellion.uk, xr-action@protonmail.com, and xr-legal@riseup.net which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at pages **68-71 of Exhibit AJ08**.
- 4.9.2 On 21 March 2024 automatic responses were received from the same 8 email addresses as I refer to in paragraph 4.8.2 above eoexrtnt@protonmail.com; xrmidlandstraining@protonmail.com; xrpoliceliaison@protonmail.com xrpeopleassembly@protonmail.com xrdemocracy@protonmail.com youthclimateswarm@protonmail.com xr-regionaldevelopment@protonmail.com and xrne.training@protonmail.com noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages 72-79 of Exhibit AJ08**). 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.
- 4.9.3 1 further automatic response was received on 21 March 2024 from support@xrnorth.org which advised that the email could not be delivered as the "recipient's email address is possibly incorrect". A copy of the relevant email is exhibited at **page 80 of Exhibit AJ08**.

Sixth Witness Statement of Alison Oldfield

- 4.10 Given the file size of the exhibit to my Sixth Witness statement it had to be served in 3 parts. I will deal with each part which was served in turn.

Part 1

4.11 17 automatic responses were received in response to this email. Having reviewed the timings of the automated responses, I believe that:

4.11.1 9 automatic responses were received on 18 March 2024 from press@extinctionrebellion.uk, xr-action@protonmail.com, xrsw.trainings@gmail.com, artsxr@gmail.com, xrlondoncoord@gmail.com, xr.connectingcommunities@gmail.com, xrlondoncommunityevents@gmail.com, xrsocialmediaevents@gmail.com and xr-legal@riseup.net which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at pages 82-91 of **Exhibit AJ08**

4.11.2 7 further automatic responses were received on 18 March 2024 from eoexrtnt@protonmail.com; xrmidlandstraining@protonmail.com; xrpoliceliaison@protonmail.com xrpeopleassembly@protonmail.com xrdemocracy@protonmail.com youthclimateswarm@protonmail.com and xr-regionaldevelopment@protonmail.com noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages** 92-93 and 95-99 of **Exhibit AJ08**). 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.

4.11.3 1 further automatic response was received on 18 March 2024 from support@xrnorth.org which advised that the email could not be delivered as the "recipient's email address is possibly incorrect". A copy of the relevant email is exhibited at page 94 of **Exhibit AJ08**.

Part 2

4.12 11 automatic responses were received in response to this email. Having reviewed the timings of the automated responses, I believe that:

4.12.1 2 automatic responses were received on 18 March 2024 from press@extinctionrebellion.uk and xr-action@protonmail.com, which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at pages **101-103** of **Exhibit AJ08**

4.12.2 8 further automatic responses were received on 18 March 2024 from eoexrtnt@protonmail.com; xrne.training@protonmail.com; xrmidlandstraining@protonmail.com; xrpoliceliaison@protonmail.com xrpeopleassembly@protonmail.com xrdemocracy@protonmail.com youthclimateswarm@protonmail.com and xr-regionaldevelopment@protonmail.com noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages** **104-109** and **111-112** of **Exhibit AJ08**). 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.

- 4.12.3 1 further automatic response was received on 18 March 2024 from support@xrnorth.org which advised that the email could not be delivered as the "recipient's email address is possibly incorrect". A copy of the relevant email is exhibited at **page 110 of Exhibit AJ08**.

Part 3

- 4.13 11 automatic responses were received in response to this email. Having reviewed the timings of the automated responses, I believe that:

- 4.13.1 2 automatic responses were received on 18 March 2024 from press@extinctionrebellion.uk and xr-action@protonmail.com, which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at pages **114-116 of Exhibit AJ08**

- 4.13.2 8 further automatic responses were received on 18 March 2024 from eoexrtnt@protonmail.com; xrne.training@protonmail.com; xrmidlandstraining@protonmail.com; xrpoliceliason@protonmail.com; xrpeopleassembly@protonmail.com xrdemocracy@protonmail.com youthclimateswarm@protonmail.com and xr-regionaldevelopment@protonmail.com noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages 117-118 and 120-125 of Exhibit AJ08**). 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.

- 4.13.3 1 further automatic response was received on 18 March 2024 from support@xrnorth.org which advised that the email could not be delivered as the "recipient's email address is possibly incorrect". A copy of the relevant email is exhibited at **page 119 of Exhibit AJ08**.

Seventh Witness Statement of Alison Oldfield

- 4.14 11 automatic responses were received in response to this email. Having reviewed the timings of the automated responses, I believe that:

- 4.14.1 2 automatic responses were received on 18 March 2024 from press@extinctionrebellion.uk and xr-action@protonmail.com, which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at pages **127-129 of Exhibit AJ08**

4.14.2 8 further automatic responses were received on 18 March 2024 from eoextnt@protonmail.com; xrne.training@protonmail.com; xrmidlandstraining@protonmail.com; xrpoliceliaison@protonmail.com; xrpeopleassembly@protonmail.com xrdemocracy@protonmail.com youthclimateswarm@protonmail.com and xr-regionaldevelopment@protonmail.com noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages 130-133 and 135-138 of Exhibit AJ08**). 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.

4.14.3 1 further automatic response was received on 18 March 2024 from support@xrnorth.org which advised that the email could not be delivered as the "recipient's email address is possibly incorrect". A copy of the relevant email is exhibited at **page 134 of Exhibit AJ08**.

Fourth witness statement of Benjamin Austin.

4.15 11 automatic responses were received in response to this email. Having reviewed the timings of the automated responses, I believe that:

4.15.1 2 automatic responses were received on 18 March 2024 from press@extinctionrebellion.uk, and xr-action@protonmail.com, which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at **pages 140-142 of Exhibit AJ08**.

4.15.2 8 further automatic responses were received on 18 March 2024 from eoextnt@protonmail.com; xrmidlandstraining@protonmail.com; xrpoliceliaison@protonmail.com xrpeopleassembly@protonmail.com xrdemocracy@protonmail.com youthclimateswarm@protonmail.com xr-regionaldevelopment@protonmail.com and xrne.training@protonmail.com noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages 143 and 145-151 of Exhibit AJ08**). 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.

4.15.3 1 further automatic response was received on 18 March 2024 from support@xrnorth.org which advised that the email could not be delivered as the "recipient's email address is possibly incorrect". A copy of the relevant email is exhibited at **page 144 of Exhibit AJ08**.

Second Witness statement of Christopher Pritchard Gamble

4.16 11 automatic responses were also received in response to this email. Having reviewed the timings of the automated responses, I believe that:

- 4.16.1 2 automatic responses were received on 19 March 2024 from press@extinctionrebellion.uk, and xr-action@protonmail.com, which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at **pages 153-155** of **Exhibit AJ08**
- 4.16.2 8 further automatic responses were received on 19 March 2024 from eoexrtnt@protonmail.com; xrmidlandstraining@protonmail.com; xrpoliceliaison@protonmail.com xrpeopleassembly@protonmail.com xrdemocracy@protonmail.com youthclimateswarm@protonmail.com xr-regionaldevelopment@protonmail.com and xrne.training@protonmail.com noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages 156-157 and 159-164 Exhibit AJ08**). 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.
- 4.16.3 1 further automatic response was received on 18 March 2024 from support@xrnorth.org which advised that the email could not be delivered as the "recipient's email address is possibly incorrect". A copy of the relevant email is exhibited at **page 158** of **Exhibit AJ08**.
- 4.17 Apart from the automated response referred to above no responses from any of the other email addresses were received. I have no reason to believe that the emails sent to the other email addresses to which the above emails were sent were not delivered or received, and no other 'bounce back' or delivery failure notifications in this regard were received.
- 4.18 I therefore consider that the remaining emails sent to the email addresses linked to Extinction Rebellion and Just Stop Oil (being those from whom no bounce back was received) were delivered.

Service upon other addresses

- 4.19 Finally, copies of all the documents referred to at paragraphs 1.5 and 1.6 above were sent to the following other addresses either by hand delivery (via process servers) or by email as follows:
- 4.19.1 Bindmans LLP solicitors. That firm had previously indicated it was instructed on behalf of Jessica Branch who applied to be heard as an interested party in the proceedings at the hearing of the Claimant's previous application to extend the injunction in April 2023. As Nigel Walker's witness statements enclosed at **pages 13 and 37 of AJ08** confirm, copies of the Witness Evidence were served by hand at 16:50 on 18th March 2024 and copies of the Order dated 15th March 2024 and the amended pleadings were served by hand at 18:20 on 21 March 2024;

- 4.19.2 Ms Jessica Branch. Again as the witness statements enclosed at **pages 8 and 31-32 of AJO 8** also confirm copies of the Witness Evidence were served by hand at 10:30am on 19th March 2024 and copies of the Order dated 15th March 2024 and the amended pleadings were served by hand at 14:06 on 22nd March 2024;
- 4.19.3 Michael Gibson. Again Nigel Walker's witness statements enclosed at **pages 13 and 37-38 of AJ08** confirm copies of the witness evidence were served by hand at 18:15 on 18th March 2024 and copies of the 15th March 2024 Order and the amended pleadings were served by hand at 5:30am on 22nd March 2024;
- 4.20 Copies of those letters of service are at pages 165-167 of **Exhibit AJ08**.
- 4.21 I should add that I am informed by Kevin Healey, the process server who delivered the relevant documents to the last known address of Jessica Branch that a Ms Smalligan answered the door and stated that Ms Branch now longer lived at the address. Ms Branch has also instructed Bindmans LLP to represent her in relation to these proceedings however and, as I explain in paragraphs 4.19.1 and 4.24.1, that firm was also served with all the papers referred to in paragraphs 1.5 and 1.6 above. Ms Branch is of course not a Defendant but rather an individual who has asked to be sent copies of documents relating to the proceedings.
- 4.22 Various orders in these proceedings have made provision for service on the First Defendant (persons unknown) to include the sending of documents to anyone who requests them by the Claimants or their solicitors. Specifically, paragraph 11 (iii) of the Order of McGowan J dated 5 May 2022; paragraph 4.1.3 of Hill J dated 28th April 2023; and paragraph 22.3 of the 15th March 2024 Order in the Petrol Station proceedings. Likewise Paragraph 4.1.3 of the Orders of Hill J dated 28th April 2023 in the Haven and Tower Proceedings.
- 4.23 In all cases however those paragraphs provide for the sending of documents to those individuals direct rather than to their solicitors. It is for that reason that the Claimant in the all three proceedings seeks orders to permit the service of documents on solicitors as when as the individuals themselves (see paragraph 4.25 below).
- 4.24 Finally the following individuals, who had previously also indicated a wish to receive documents in the proceedings, were served with a copies of the relevant documents by email as follows;
- 4.24.1 Alice Hardy at Bindmans LLP. Copies of the Witness Evidence were also served upon Bindmans LLP by email in various tranches (because of the size of the electronic files containing the exhibits) at various times between 12:44pm and 2:09pm on 18th March 2024 (**pp168-174 of Exhibit AJ08**) and copies of the Order dated 15th March 2024 and the amended pleadings were served by email

at 8:30am on 19th March 2024 and 16:20pm on 21st March 2024 respectively
(pp175-176 of Exhibit AJ08);

- 4.24.2 Nick Hoffman. Copies of the Witness Evidence were also served at various times between 12:55pm on 18th March 2024 and 08:42am on 19th March 2024 and copies of the 15th March 2024 Order and the amended pleadings were served by email at 8:31am on 19th March 2024 and 16:19pm on 21st March 2024 respectively; **(pp177-184 of Exhibit AJ08)**
- 4.24.3 Michaela Marc. Copies of the Witness Evidence were also served at various times between 13:16pm on 18th March 2024 and 08:42am on 19th March 2024 and copies of the 15th March 2024 Order and the amended pleadings were served by email at 8:31am on 19th March 2024 and 16:21 pm on 21st March 2024 respectively; **(pp185-192 of Exhibit AJ08)**and
- 4.24.4 Raphael Dalzell. Mr Dalzell has only asked to receive copies of documents in relation to proceedings numbered QB-2022-1259 (the Shell Centre Tower proceedings). We did not therefore send him copies of the fourth witness statement of Benjamin Austin - which relates only to the Petrol Station Proceedings. Neither did we send him copies of the amended Claim form and amended particulars of claim which again, relate only to the Petrol Station proceedings. With that caveat we sent Raphael Dalzell copies of the Witness Evidence at various times between 13:07pm on 18th March 2024 and 08:42am on 19th March 2024. A copy of the 15th March 2024 Order was served by email at 8:32am on 19th March 2024. Copies of those emails are at **pages 193-198 of AJ08.**

Variation of the Order relating to service upon Persons Unknown in each Proceedings

4.25 In the circumstances I have described above the Claimant also seeks a variation of the orders in relation to the service of Persons Unknown in relation to each set of proceedings as follows:

- 4.25.1 so as to permit service of future documents upon the relevant defendant and anyone else who requests copy documents by providing a message concerning the additional documents and a link to the www.noticespublic.com data site;

4.25.2 so as to permit the sending of a message and a link to the documents on the www.noticespublic.com Data Site to individuals who have requested copies of documents at their last known address or to their email address or to their retained solicitors.

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: 11 April 2024

Eighth Witness Statement

Party: Claimants

Exhibit: AJ08

Date: 11 April 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

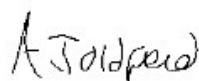
Defendant (QB-2022-001420)

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)

EXHIBIT AJ08

This is the exhibit referred to in the Eighth Witness Statement of Alison Judith Oldfield dated 11 April 2024



Signed:

Name: Alison Judith Oldfield

Dated: 11 April 2024

Milner, Flo

From:
Sent: 22 March 2024 09:36
To: Shell Service
Subject: Re: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Re-Amended Claim Form and Re-amended Particulars of Claim [ES-CLOUD_UK.FID10845365]
Attachments: CEF5C09B-4D39-4EDE-9BE6-4E339053DE50.jpeg

Dear Eversheds-Sutherland,

I hope this email finds you well.

I write to you for 2 reasons:

- Attached (at the bottom) is a signed form to give my consent for all further communications to occur via email instead of the big folders of paper being sent to my home. I am truly grateful that this will be possible.

- On reading through the 'Re-Amended Claim Form and Re-amended Particulars of Claim in respect of Claim No: QB-2022-0001420'

I find myself unclear as to whether you are referring to me as dependent 6 or 7?

The list view on page 1 of 'Re-amended particulars of claim...' makes it look like you are referring to me as defendant 6. However, in the 'Re-amended Claim form' annex 1, it looks like you are referring to me as defendant 7.

Could you tell me which you are declaring me as. I ask this as the particulars of defendant 6 and 7's alleged activities relating to the claimant are different.

I look forward to hearing from you at your convenience.

Sending love, light, courage and gratitude.

Emma Ireland

On Thursday, 21 March 2024, 16:18:03 GMT, Shell Service <shell.service@eversheds-sutherland.com> wrote:

Dear Ms Ireland,

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

We enclose by way of service in the above proceedings the sealed Re-Amended Claim Form and Re-amended Particulars of Claim in respect of Claim No: QB-2022-0001420.

Please note that a copy of the attached document has also been made available via the following website: www.noticespublic.com

Eversheds Sutherland (International) LLP

This email is sent for and on behalf of Eversheds Sutherland (International) LLP

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www.eversheds-sutherland.com

Milner, Flo

From:
Sent: 13 March 2024 21:13
To: Shell Service
Subject: Re: Shell Injunction

I confirm my agreement to receive communication by email only.

C. P. Laurie

On Tue, 12 Mar 2024, 16:13 Shell Service, <shell.service@eversheds-sutherland.com> wrote:

Dear Charles Philip Laurie

Shell U.K Oil Products Limited v Persons Unknown (Claim No: QB-2022-0001420); Shell U.K. Limited v Persons Unknown (Claim No: QB-2022-001241); and Shell International Petroleum Company Limited v Persons Unknown (Claim No: (QB-2022-001259) (together “the Proceedings”)

Thank you for your verbal agreement at the hearing yesterday to accept service of documents in the Proceedings via email.

The Civil Procedure Rules (CPR Practice Direction 6A Rule 4.1), require us to obtain your written confirmation that you are willing to accept service of documents in the Proceedings at _____ (or such other email address that you provide us with).

Please could you therefore confirm in response to this email that you are willing to accept service of documents in the Proceedings at _____ (or such other email address that you provide us with) in accordance with CPR Practice Direction 6A Rule 4.1.

Yours faithfully

Eversheds Sutherland (International) LLP

From: Taylor, Bethany **On Behalf Of** Shell Service
Sent: Tuesday, March 12, 2024 3:31 PM
To: Phil Laurie
Cc: Shell Service <shell.service@eversheds-sutherland.com>
Subject: RE: Shell Injunction

Dear Charles Philip Laurie

Shell U.K Oil Products Limited v Persons Unknown (Claim No: QB-2022-0001420); Shell U.K. Limited v Persons Unknown (Claim No: QB-2022-001241); and Shell International Petroleum Company Limited v Persons Unknown (Claim No: (QB-2022-001259) (together “the Proceedings”)

Thank you for your verbal agreement at the hearing yesterday to accept service of documents in the Proceedings via email.

The Civil Procedure Rules (CPR Practice Direction 6A Rule 4.1), require us to obtain your written confirmation that you are willing to accept service of documents in the Proceedings at _____ (or such other email address that you provide us with).

Please could you therefore confirm in response to this email that you are willing to accept service of documents in the Proceedings at _____ or such other email address that you provide us with) in accordance with CPR Practice Direction 6A Rule 4.1.

Yours faithfully

Eversheds Sutherland (International) LLP

From: Shell Service <shell.service@eversheds-sutherland.com>
Sent: Friday, March 8, 2024 3:08 PM
To: Phil Laurie
Subject: RE: Shell Injunction

Dear Sir,

Further to the below email, we note that the following details are provided online for the Hearing at <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list>

- Judge: Mr Justice Soole
- Time: 10:30am
- Venue: Court 15

Eversheds Sutherland (International) LLP

		15 March 2024 Soole J Order							
		Schedule 1 to be redacted for parties other than the Court		Amended CF (PS)	Amended PoC (PS)	AJO6 and exhibits	AJO7 and exhibits	BA4 and exhibits	CG2 and exhibits
1	Court					19.03.24	19.03.24	19.03.24	19.03.24
2	Upload to noticespublic.com					18.03.2024	18.03.2024	18.03.2024	18.03.2024
3	Louise Harris (Social Media)	(Social Media)	19.03.2024	21.03.2024	21.03.2024	18.03.2024	18.03.2024	18.03.2024	18.03.2024
4	Tez Burns (Social Media)	(Social Media)	19.03.24 email sent at 08:30	Unable to - evidence saved	Unable to - evidence saved	Unable to - evidence saved	Unable to - evidence saved	Unable to - evidence saved	Unable to - evidence saved
5	Schedule Emails		19.03.24 email sent at 08:30	21.03.24 email sent at 16:17	21.03.24 email sent at 16:17	18.03.24 emails sent at 13:32, 13:46, 14:01	18.03.24 emails sent at 14:16	18.03.24 emails sent at 14:30	19.03.24 email sent at 08:52
6	Alice Hardy, Bindmans (email)		19.03.24 email sent at 08:30	21.03.24 email sent at 16:20	21.03.24 email sent at 16:20	18.03.24 emails sent at 11:50, 11:51 and 12:47	18.03.24 emails sent at 12:50	18.03.24 emails sent at 12:52	18.03.24 emails sent at 14:04 and 14:09
7	Charles Laurie (email)		19.03.24 email sent at 08:32	21.03.24 email sent at 16:18	21.03.24 email sent at 16:18	18.03.24 emails sent at 13:16, 13:17 and 13:19	18.03.24 emails sent at 13:23	18.03.24 emails sent at 13:20	19.03.24 email sent at 08:42
8	Michaela Marc (email)		19.03.24 email sent at 08:31	21.03.24 email sent at 16:21	21.03.24 email sent at 16:21	18.03.24 emails sent at 13:24, 13:25 and 13:26	18.03.24 emails sent at 13:28	18.03.24 emails sent at 13:33	19.03.24 email sent at 08:42
9	Ms Ireland (email)		19.03.24 email sent at 08:32	N/A - RD (ST Only)	N/A - RD (ST Only)	18.03.24 emails sent at 13:07, 13:08 and 13:11	18.03.24 emails sent at 13:13	N/A - RD (ST Only)	19.03.24 email sent at 08:42
10	Raphael Dalzell (email)		19.03.24 email sent at 08:31	21.03.24 email sent at 16:19	21.03.24 email sent at 16:19	18.03.24 emails sent at 12:55, 12:55 and 12:58	18.03.24 emails sent at 13:01	18.03.24 emails sent at 13:03	19.03.24 email sent at 08:42
11	Nick Hofman		Authority received 22.03.2024	Authority received 22.03.2024	Authority received 22.03.2024	Served by hand 18.03.2024, 08:35am - left with an adult female at number 21 who confirmed she would pass them to Emma Ireland when she returned	Served by hand 18.03.2024, 08:35am - left with an adult female at number 21 who confirmed she would pass them to Emma Ireland when she returned	Served by hand 18.03.2024, 08:35am - left with an adult female at number 21 who confirmed she would pass them to Emma Ireland when she returned	Served by hand 18.03.2024, 08:35am - left with an adult female at number 21 who confirmed she would pass them to Emma Ireland when she returned
	Emma Ireland	emmaireland84@yahoo.com							
12	Jessica Branch		Served by hand 22.03.2024 at 14:06 by leaving it with Miss Smalligan who undertook to pass it on to Jessica Branch	Served by hand 22.03.2024 at 14:06 by leaving it with Miss Smalligan who undertook to pass it on to Jessica Branch	Served by hand 22.03.2024 at 14:06 by leaving it with Miss Smalligan who undertook to pass it on to Jessica Branch	Served by hand 19.03, 10:30am - to Ms Smalligan who confirmed she would pass on the information to Jessica Branch and confirmed that Ms Branch no longer lives at the address and would not be attending to collect the documents.	Served by hand 19.03, 10:30am - to Ms Smalligan who confirmed she would pass on the information to Jessica Branch and confirmed that Ms Branch no longer lives at the address and would not be attending to collect the documents.	Served by hand 19.03, 10:30am - to Ms Smalligan who confirmed she would pass on the information to Jessica Branch and confirmed that Ms Branch no longer lives at the address and would not be attending to collect the documents.	Served by hand 19.03, 10:30am - to Ms Smalligan who confirmed she would pass on the information to Jessica Branch and confirmed that Ms Branch no longer lives at the address and would not be attending to collect the documents.
13	Michael Gibson	F	Served by hand 22.03.2024 at 5:30 by posting same through the letterbox	Served by hand 22.03.2024 at 5:30 by posting same through the letterbox	Served by hand 22.03.2024 at 5:30 by posting same through the letterbox	Served by hand 18.03.24, 6:15pm - served personally	Served by hand 18.03.24, 6:15pm - served personally	Served by hand 18.03.24, 6:15pm - served personally	Served by hand 18.03.24, 6:15pm - served personally
14	Louis McKechnie		Served by hand 22.03.2024	Served by hand 22.03.2024	Served by hand 22.03.2024	Served by hand 18.03.24, 6:40pm - no answer, served to Louis's mother who confirmed Louis would be made aware of the documents and proceedings.	Served by hand 18.03.24, 6:40pm - no answer, served to Louis's mother who confirmed Louis would be made aware of the documents and proceedings.	Served by hand 18.03.24, 6:40pm - no answer, served to Louis's mother who confirmed Louis would be made aware of the documents and proceedings.	Served by hand 18.03.24, 6:40pm - no answer, served to Louis's mother who confirmed Louis would be made aware of the documents and proceedings.

15	Louise Harris		Served by hand 22.03.2024 7:05 - no reply so documents left at property	Served by hand 22.03.2024 7:05 - no reply so documents left at property	Served by hand 22.03.2024 7:05 - no reply so documents left at property	Served by hand delivery 19.03.24, 10:15am - no answer, documents left at the door.	Served by hand delivery 19.03.24, 10:15am - no answer, documents left at the door.	Served by hand delivery 19.03.24, 10:15am - no answer, documents left at the door.	Served by hand delivery 19.03.24, 10:15am - no answer, documents left at the door.
16	Callum Goode		Unsealed CF - Callum in Wandsworth prison, served on his father 21.03.2024 at 14:20 Sealed CF served 22.03.2024 at 15:59	Unsealed CF - Callum in Wandsworth prison, served on his father 21.03.2024 at 14:20 Sealed CF served 22.03.2024 at 15:59	Unsealed CF - Callum in Wandsworth prison, served on his father 21.03.2024 at 14:20 Sealed CF served 22.03.2024 at 15:59	Served by hand 18.03.24, 13:06pm documents left in porch	Served by hand 18.03.24, 13:06pm documents left in porch	Served by hand 18.03.24, 13:06pm documents left in porch	Served by hand 18.03.24, 13:06pm documents left in porch
17	Christopher Ford		Served by hand 22.03.2024 8:40 - no reply so documents left at property	Served by hand 22.03.2024 8:40 - no reply so documents left at property	Served by hand 22.03.2024 8:40 - no reply so documents left at property	Served by hand 19.03.24, 8:45am - documents left where post is left for residents	Served by hand 19.03.24, 8:45am - documents left where post is left for residents	Served by hand 19.03.24, 8:45am - documents left where post is left for residents	Served by hand 19.03.24, 8:45am - documents left where post is left for residents
18	Sean Jordan (also known as Sean Irish, John Jordan, John Michael Jordan and Sean O'Rourke)		Served by hand 22.03.2024 at 11:58 by posting same through the letterbox	Served by hand 22.03.2024 at 11:58 by posting same through the letterbox	Served by hand 22.03.2024 at 11:58 by posting same through the letterbox	Served by hand 19.03.24, 8:40am - no answer, documents left outside the door	Served by hand 19.03.24, 8:40am - no answer, documents left outside the door	Served by hand 19.03.24, 8:40am - no answer, documents left outside the door	Served by hand 19.03.24, 8:40am - no answer, documents left outside the door
19	Emma Ireland		Served by hand 21.03.2024 at 19:57 by posting same through the letterbox	Served by hand 21.03.2024 at 19:57 by posting same through the letterbox	Served by hand 21.03.2024 at 19:57 by posting same through the letterbox	Served by hand 18.03.24, 8:35pm - no answer, served to neighbour at 21 Hanover Street, Redfield, Bristol, BS5 9QW who said she would pass the packages on ASAP.	Served by hand 18.03.24, 8:35pm - no answer, served to neighbour at 21 Hanover Street, Redfield, Bristol, BS5 9QW who said she would pass the packages on ASAP.	Served by hand 18.03.24, 8:35pm - no answer, served to neighbour at 21 Hanover Street, Redfield, Bristol, BS5 9QW who said she would pass the packages on ASAP.	Served by hand 18.03.24, 8:35pm - no answer, served to neighbour at 21 Hanover Street, Redfield, Bristol, BS5 9QW who said she would pass the packages on ASAP.
20	Michael Edward Davies		Served by hand 22.03.2024 at 11:20 by posting through the letterbox	Served by hand 22.03.2024 at 11:20 by posting through the letterbox	Served by hand 22.03.2024 at 11:20 by posting through the letterbox	Served by hand 19.03.24, 1:14pm - no answer, documents left outside the address	Served by hand 19.03.24, 1:14pm - no answer, documents left outside the address	Served by hand 19.03.24, 1:14pm - no answer, documents left outside the address	Served by hand 19.03.24, 1:14pm - no answer, documents left outside the address
21	Kate Bramfit		Served personally by hand 21.03.2024	Served personally by hand 21.03.2024	Served personally by hand 21.03.2024	Served by hand 19.03.24, 8:40, documents left at address	Served by hand 19.03.24, 8:40, documents left at address	Served by hand 19.03.24, 8:40, documents left at address	Served by hand 19.03.24, 8:40, documents left at address
22	Simon Reding		Unsealed CF - Served by hand 21.03.2024 at 12:39 by posting through the letterbox Sealed CF - served by hand 22.03.2024 at 14:10 by posting through the letterbox	Unsealed CF - Served by hand 21.03.2024 at 12:39 by posting through the letterbox Sealed CF - served by hand 22.03.2024 at 14:10 by posting through the letterbox	Unsealed CF - Served by hand 21.03.2024 at 12:39 by posting through the letterbox Sealed CF - served by hand 22.03.2024 at 14:10 by posting through the letterbox	Served by hand 18.03.24, 3:20pm - served personally	Served by hand 18.03.24, 3:20pm - served personally	Served by hand 18.03.24, 3:20pm - served personally	Served by hand 18.03.24, 3:20pm - served personally
23	David Nixon		Served personally by hand 21.03.2024 9:35 Re-served with sealed CF personally by hand at 12:00 22.03.2024	Served personally by hand 21.03.2024 9:35 Re-served with sealed CF personally by hand at 12:00 22.03.2024	Served personally by hand 21.03.2024 9:35 Re-served with sealed CF personally by hand at 12:00 22.03.2024	Served by hand 18.03.24, 11:29am - personally served	Served by hand 18.03.24, 11:29am - personally served	Served by hand 18.03.24, 11:29am - personally served	Served by hand 18.03.24, 11:29am - personally served
24	Margaret Reid		Served by hand 21.03.2024 at 19:55 by posting through the letterbox	Served by hand 21.03.2024 at 19:55 by posting through the letterbox	Served by hand 21.03.2024 at 19:55 by posting through the letterbox	Served by hand 18.03.24, 6:00pm - served personally	Served by hand 18.03.24, 6:00pm - served personally	Served by hand 18.03.24, 6:00pm - served personally	Served by hand 18.03.24, 6:00pm - served personally

25	Tessa-Marie Burns		Served by hand 22.03.2024 at 10:30 by posting through the letterbox	Served by hand 22.03.2024 at 10:30 by posting through the letterbox	Served by hand 22.03.2024 at 10:30 by posting through the letterbox	Served by hand 19.03.24, 12:14pm - documents left at this address. New tenant recently moved in.	Served by hand 19.03.24, 12:14pm - documents left at this address. New tenant recently moved in.	Served by hand 19.03.24, 12:14pm - documents left at this address. New tenant recently moved in.	Served by hand 19.03.24, 12:14pm - documents left at this address. New tenant recently moved in.
26	Bindmans LLP	236 Gray's Inn Road London WC1X 8HB	Served by hand 21.03.2024	Served by hand 21.03.2024	Served by hand 21.03.2024	Served by hand delivery 18.03.24, 4:40pm, documentation left with Yvonee Bryan	Served by hand delivery 18.03.24, 4:40pm, documentation left with Yvonee Bryan	Served by hand delivery 18.03.24, 4:40pm, documentation left with Yvonee Bryan	Served by hand delivery 18.03.24, 4:40pm, documentation left with Yvonee Bryan

NB - Samuel Holland removed from above and treated as PU

CERTIFICATE OF SERVICE

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BETWEEN:

SHELL U.K. OIL PRODUCTS LIMITED
Claimant (QB-2022-001420)
SHELL U.K. LIMITED
Claimant (QB-2022-991241)
SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED
Claimant (QB-2022-001259)

-AND-

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

I **KEVIN JOHN HEALEY of Finlays Legal Ltd** of PO Box 74837, London SE19 2EB Process Server acting under the direction of Eversheds Sutherland, Bridgewater Place, Water Lane, Leeds LS11 5DR, Solicitors acting on behalf of the Claimant Will Say:-

1. THAT being instructed to serve various Occupants each with a Covering Letter dated 18 March 2024 together with Sixth Witness Statement of Alison Oldfield dated 12 March 2024; Exhibits to Sixth Witness Statement of Allison Oldfield dated 12 March 2024; Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024; Exhibits to Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024; Fourth Witness Statement of Benjamin Austin dated 14 March 2024; Exhibits to Fourth Witness Statement of Benjamin Austin dated 14 March 2024. Together the above documents comprise clients' evidence in support of the continuation of the injunctions in the above proceedings and the Seventh Witness Statement of Alison Oldfield dealing with service of the Order of 13 March 2024 I did for that purpose on Tuesday 19 March 2024 attend at

where, having received no reply at the door, I served Sean Jordan with the documentation by leaving it on the doorstep at 08:40 hours.

2. THAT on Tuesday 19 March 2024 I attended at : where I met with Ms Smalligan at 10:30 hours who confirmed she would pass on the contents of the documentation to Jessica Branch.

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

Dated this 20 day of March 2024

Signed 

Kevin John Healey
Process Server
PO Box 74837
London
SE19 2EB

CERTIFICATE OF SERVICE

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

B E T W E E N:

SHELL U.K. OIL PRODUCTS LIMITED
Claimant (QB-2022-001420)
SHELL U.K. LIMITED
Claimant (QB-2022-991241)
SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED
Claimant (QB-2022-001259)

-AND-

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

I **MICHAEL REES of Finlays Legal Ltd** of PO Box 74837, London SE19 2EB Process Server acting under the direction of Eversheds Sutherland, Bridgewater Place, Water Lane, Leeds LS11 5DR, Solicitors acting on behalf of the Claimant Will Say:-

1. THAT being instructed to serve various Occupants each with a Covering Letter dated 18 March 2024 together with Sixth Witness Statement of Alison Oldfield dated 12 March 2024; Exhibits to Sixth Witness Statement of Allison Oldfield dated 12 March 2024; Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024; Exhibits to Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024; Fourth Witness Statement of Benjamin Austin dated 14 March 2024; Exhibits to Fourth Witness Statement of Benjamin Austin dated 14 March 2024. Together the above documents comprise clients' evidence in support of the continuation of the injunctions in the above proceedings and the Seventh Witness Statement of Alison Oldfield dealing with service of the Order of 13 March 2024 I did for that purpose on Monday 18 March 2024 attend at

where at 18:40 hours I served Louis McKechnie with the documentation by leaving them in the green post box, there being no reply at the door. That, as I was leaving the address, I noticed two ladies entering the driveway to and I approached them on the driveway. One lady identified herself to me as the mother of Louis McKechnie and confirmed that the bundles I had left in the green box would be passed onto him and that she had passed on previous correspondence to him.

2. THAT on Monday 18 March 2024 I attended at where at 08:35 hours I served Emma Ireland with the documentation by leaving them with an adult female at number 21 who confirmed she would pass them on to Emma Ireland when she returned to her address.

3. THAT on Tuesday 19 March 2024 I attended at I could not meet with Tessa-Marie Burns and I therefore served the documentation by leaving the documents there at 12:14 hours.

4. THAT on Tuesday 19 March 2024 I attended at
where at 13:14 hours, having received no reply at the door I served
Edward Davies also previously known as Michael Edward Jones with the documentation by leaving
them on the doorstep.

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

Dated this 20 day of March 2024

Signed 

Michael Rees
Process Server
PO Box 74837
London
SE19 2EB

CERTIFICATE OF SERVICE

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

B E T W E E N:

SHELL U.K. OIL PRODUCTS LIMITED
Claimant (QB-2022-001420)
SHELL U.K. LIMITED
Claimant (QB-2022-991241)
SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED
Claimant (QB-2022-001259)

-AND-

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

**I MICK CAIN of Finlays Legal Ltd of PO Box 74837, London SE19 2EB Process Server acting
under the direction of Eversheds Sutherland, Bridgewater Place, Water Lane, Leeds LS11 5DR,
Solicitors acting on behalf of the Claimant Will Say:-**

1. THAT being instructed to serve various Occupants each with a Covering Letter dated 18 March 2024 together with Sixth Witness Statement of Alison Oldfield dated 12 March 2024; Exhibits to Sixth Witness Statement of Allison Oldfield dated 12 March 2024; Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024; Exhibits to Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024; Fourth Witness Statement of Benjamin Austin dated 14 March 2024; Exhibits to Fourth Witness Statement of Benjamin Austin dated 14 March 2024. Together the above documents comprise clients' evidence in support of the continuation of the injunctions in the above proceedings and the Seventh Witness Statement of Alison Oldfield dealing with service of the Order of 13 March 2024 I did for that purpose on Monday 18 March 2024 attend at
where at 11:29 hours I met with and personally served David Nixon with the documentation.

2. THAT on Monday 18 March 2024 I attended at
where at 13:06 hours I served Callum Goode with the documentation by leaving it inside the porch door, having received no reply.

3. THAT on Monday 18 March 2024 I served Simon Reading at
by handing the documentation to him personally at 15:20 hours.

4. THAT on Monday 18 March 2024 I served Margaret Reid at
by handing the documentation to her personally at 18:00 hours.

5. THAT on Tuesday 19 March 2024 I served Kate Bramfit at
by leaving the documentation on the doorstep at 08:40 hours, there being no reply at the door.

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

Dated this 20 day of March 2024

Signed 

Mick Cain
Process Server
PO Box 74837
London
SE19 2EB

CERTIFICATE OF SERVICE

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BETWEEN:

SHELL U.K. OIL PRODUCTS LIMITED
Claimant (QB-2022-001420)
SHELL U.K. LIMITED
Claimant (QB-2022-991241)
SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED
Claimant (QB-2022-001259)

-AND-

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


I **NIGEL WALKER of Finlays Legal Ltd** of PO Box 74837, London SE19 2EB Process Server acting
under the direction of Eversheds Sutherland, Bridgewater Place, Water Lane, Leeds LS11 5DR,
Solicitors acting on behalf of the Claimant Will Say:-

1. THAT being instructed to serve various Occupants each with a Covering Letter dated 18 March 2024 together with Sixth Witness Statement of Alison Oldfield dated 12 March 2024; Exhibits to Sixth Witness Statement of Allison Oldfield dated 12 March 2024; Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024; Exhibits to Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024; Fourth Witness Statement of Benjamin Austin dated 14 March 2024; Exhibits to Fourth Witness Statement of Benjamin Austin dated 14 March 2024. Together the above documents comprise clients' evidence in support of the continuation of the injunctions in the above proceedings and the Seventh Witness Statement of Alison Oldfield dealing with service of the Order of 13 March 2024 I did for that purpose on Monday 18 March 2024 attend at 236 Gray's Inn Road, London WC1X 8HB where at 16:50 hours I served Bindmans LLP by handing the documents to the receptionist,
2. THAT on Monday 18 March 2024 I attended at _____ where I met with and personally served the documents upon Michael Gibson at 18:15 hours
3. THAT on Tuesday 19 March 2024 I attended at _____ where I served Christopher Ford at 08:45 hours by leaving the documents where post is left for residents, there being no answer from Flat 13.

4. THAT on 19 March 2024 I attended at _____ where I served Louise Harris by leaving the documents at the door, there being no answer at 10:15 hours.

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

Dated this 20 day of March 2024

Signed

Nigel Walker
Process Server
PO Box 74837
London
SE19 2EB

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

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

eversheds-sutherland.com

Date: 18 March 2024
Our Ref: LINDBERR\356009.000001
Email: Shell.service@eversheds-sutherland.com

By Hand

Dear Mr McKechnie

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

Shell U.K. Limited v Persons Unknown (Claim No: QB-2022-001241)

**Shell International Petroleum Company Limited v Persons Unknown (Claim No:
(QB-2022-001259)**

(together "the Proceedings")

Pursuant to the Order made by Mr Justice Soole on 15 March 2024 in the above Proceedings, please see enclosed by way of service the following documents

1. Sixth Witness Statement of Alison Oldfield dated 12 March 2024;
2. Exhibits to Sixth Witness Statement of Allison Oldfield dated 12 March 2024;
3. Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024;
4. Exhibits to Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024;
5. Fourth Witness Statement of Benjamin Austin dated 14 March 2024; and
6. Exhibits to Fourth Witness Statement of Benjamin Austin dated 14 March 2024.

Together the above documents comprise our clients' evidence in support of the continuation of the injunctions in the above proceedings.

We also enclose by way of service (for completeness) the Seventh Witness Statement of Alison Oldfield dealing with service of the Order of 13 March 2024.

Please note that electronic copies of these documents have also been made available via the following website: www.noticespublic.com.

Yours sincerely

Eversheds Sutherland (International) LLP

Eversheds Sutherland (International) LLP

cloud_uk\225545415\1\mortonsx

Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales (number OC304065), registered office One Wood Street, London EC2V 7WS. Authorised and regulated by the Solicitors Regulation Authority (SRA number 383181). A list of the members' names and their professional qualifications is available for inspection at the above office.

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

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:23
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: SIGNED AJO6 - AJO Sixth Witness Statement - 2024 - Service (REDACTED) (225393649.1).pdf; AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 1 of 3).pdf

Dear Ms Ireland,

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

We enclose by way of service in the above proceedings the Sixth Witness Statement of Alison Oldfield and part 1 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Parts 2 and 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:24
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 2 of 3).pdf

Dear Ms Ireland,

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

We enclose by way of service in the above proceedings part 2 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Part 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:26
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) -Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 3 of 3).pdf

Dear Ms Ireland,

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

We enclose by way of service in the above proceedings part 3 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:28
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Seventh Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: Exhibit AJO7 - Exhibits to AJO Seventh Witness Statement - 2024 - Service.pdf; SIGNED AJO7 - AJO Seventh Witness Statement - 2024 - Service.pdf

Dear Ms Ireland,

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

We enclose by way of service in the above proceedings the Seventh Witness Statement of Alison Oldfield the Exhibit to the Seventh Witness Statement of Alison Oldfield.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:33
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) -Fourth Witness Statement of Benjamin Austin [ES-CLOUD_UK.FID10845365]
Attachments: Exhibits to BA4 Benjamin Austin Fourth Witness Statement - 14.03.24(225507713.1).pdf; BA4 Benjamin Austin Fourth Witness Statement - 14.03.24(225507686.1).pdf

Dear Ms Ireland,

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

We enclose by way of service in the above proceedings the Fourth Witness Statement of Benjamin Austin and the Exhibit to the Fourth Witness Statement of Benjamin Austin.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 19 March 2024 08:42
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Second Witness Statement of Christopher Prichard-Gamble [ES-CLOUD_UK.FID10845365]
Attachments: CPG2 Second Witness Statement of Christopher Prichard-Gamble - 14 March 2024(225525621.1).pdf; You've been sent large files

Dear Ms Ireland,

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

We enclose by way of service in the above proceedings the Second Witness Statement of Christopher Prichard-Gamble and the Exhibit to the Second Witness Statement of Christopher Prichard-Gamble.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 11:50
To: 'Phil Laurie'
Subject: Shell Injunction Proceedings - Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: SIGNED AJO6 - AJO Sixth Witness Statement - 2024 - Service (REDACTED) (225393649.1).pdf; AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 1 of 3).pdf

Dear Sir,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Sixth Witness Statement of Alison Oldfield and part 1 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Parts 2 and 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

Please note that a copy of the attached documents have also been made available via the following website: www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 11:51
To: 'Phil Laurie'
Subject: Shell Injunction Proceedings - Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 2 of 3).pdf

Dear Sir,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings part 2 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Part 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

Please note that a copy of the attached documents have also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 11:56
To: 'Phil Laurie'
Subject: Shell Injunction Proceedings - Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 3 of 3).pdf

Dear Sir,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings part 3 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Please note that a copy of the attached documents have also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 12:01
To: 'Phil Laurie'
Subject: Shell Injunction Proceedings - Seventh Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: Exhibit AJO7 - Exhibits to AJO Seventh Witness Statement - 2024 - Service.pdf; SIGNED AJO7 - AJO Seventh Witness Statement - 2024 - Service.pdf

Dear Sir,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Seventh Witness Statement of Alison Oldfield the Exhibit to the Seventh Witness Statement of Alison Oldfield.

Please note that a copy of the attached documents have also been made available via the following website: www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 12:06
To: 'Phil Laurie'
Subject: Shell Injunction Proceedings - Fourth Witness Statement of Benjamin Austin [ES-CLOUD_UK.FID10845365]
Attachments: Exhibits to BA4 Benjamin Austin Fourth Witness Statement - 14.03.24(225507713.1).pdf; BA4 Benjamin Austin Fourth Witness Statement - 14.03.24(225507686.1).pdf

Dear Sir,

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

We enclose by way of service in the above proceedings the Fourth Witness Statement of Benjamin Austin and the Exhibit to the Fourth Witness Statement of Benjamin Austin.

Please note that a copy of the attached documents have also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 19 March 2024 08:41
To: 'Phil Laurie'
Subject: Shell Injunction Proceedings - Second Witness Statement of Christopher Prichard-Gamble [ES-CLOUD_UK.FID10845365]
Attachments: CPG2 Second Witness Statement of Christopher Prichard-Gamble - 14 March 2024(225525621.1).pdf; You've been sent large files

Dear Sir,

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

We enclose by way of service in the above proceedings the Second Witness Statement of Christopher Prichard-Gamble and the Exhibit to the Second Witness Statement of Christopher Prichard-Gamble.

Please note that a copy of the attached documents have also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP



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ouise Harris



Search Messenger

18 Mar 2024, 11:57

Louise Harris

You: Dear Louise Harris Pursuant t... 2 w

Dear Louise Harris

On 13 March 2024 we sent you a message to let you know that the 11 March 2024 hearing to hear our client Shell UK Oil Limited's application to join you as a defendant in its injunction proceedings had been adjourned (part heard) until 3pm on Friday 15 March.

Pursuant to Mr Justice Soole's Order dated 15 March 2024 (and made following the 15 March 2024 hearing), we are required to serve you with copies of the below listed documents. You will find copies of them at: www.noticespublic.com.

1. Sixth Witness Statement of Alison Oldfield dated 12 March 2024;
2. Exhibits to Sixth Witness Statement of Allison Oldfield dated 12 March 2024;
3. Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024;
4. Exhibits to Second Witness Statement of Christopher Prichard-

Louise Harris



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Louise Harris

You: Dear Louise Harris Pursuant t... 2 w

Louise Harris



4. Exhibits to Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024;
 5. Fourth Witness Statement of Benjamin Austin dated 14 March 2024; and
 6. Exhibits to Fourth Witness Statement of Benjamin Austin dated 14 March 2024.

Together the above documents comprise our clients' evidence in support of the continuation of the injunctions in the above proceedings.

You will also find a copy of (for completeness) the Seventh Witness Statement of Alison Oldfield dealing with service of the Order of 13 March 2024 at: www.noticespublic.com.

Yours sincerely
Eversheds Sutherland (International) LLP



Louise Harris



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Aa





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- CFOs: The new CEO pipeline?

Messaging

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Tez Burns Mar 5

InMail You: Dear Tessa-Marie Burns We act on behalf of Shell U.K Oil...

Tez Burns

documents below and you will find copies of them:
<https://www.noticespublic.com/>

- 2024 Application Documents
 - 1.1 Sealed Application Notice dated 13 February 2024;
 - 1.2 Fourth Witness Statement of Alison Oldfield dated 12 February 2024;
 - 1.3 Exhibits to Fourth Witness Statement of Alison Oldfield dated 12 February 2024; and
 - 1.4 Draft Order in support of the Claimants' Application dated 12 February 2024.
- 2024 Orders
 - 2.1 Sealed Court Order dated 15 February 2024.
 - 2.2 Notice of Hearing dated 29 February 2024.
- 2024 Pleadings
 - 3.1 Hearing Bundle for Hearing on 11 March 2024

Please note that further documentation, including the Claimant's skeleton for the Hearing and a chronology of events leading up to the Hearing, will be uploaded to [noticespublic.com](https://www.noticespublic.com/) the above website in due course (and in any event in advance of the Hearing). However, We will also notify you of the same once this has been done.

Yours sincerely
 Eversheds Sutherland (International) LLP

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CERTIFICATE OF SERVICE

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BETWEEN:

SHELL U.K. OIL PRODUCTS LIMITED
Claimant (QB-2022-001420)
SHELL U.K. LIMITED
Claimant (QB-2022-991241)
SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED
Claimant (QB-2022-001259)

Claimants

-AND-

- (1) 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
- (2) LOUIS MCKECHNIE
(3) LOUISE HARRIS
(4) CALLUM GOODE
(5) CHRISTOPHER FORD
- (6) SEAN JORDAN (ALSO KNOWN AS SEAN IRISH, JOHN JORDAN, JOHN MICHAEL JORDAN AND SEAN O'ROURKE)
(7) EMMA IRELAND
(8) CHARLES PHILIP LAURIE
- (9) MICHAEL EDWARD DAVIES (ALSO PREVIOUSLY KNOWN AS MICHAEL EDWARD JONES)
(10) TESSA-MARIE BURNS (ALSO KNOWN AS TEZ BURNS)
(11) SIMON REDING
(12) KATE BRAMFIT
(13) MARGARET REID
(14) DAVID NIXON
(15) SAMUEL HOLLAND

q

Defendants


I **KEVIN JOHN HEALEY of Finlays Legal Ltd** of PO Box 74837, London SE19 2EB Process Server acting under the direction of Eversheds Sutherland, Bridgewater Place, Water Lane, Leeds LS11 5DR, Solicitors acting on behalf of the Claimant Will Say:-

1. THAT being instructed to serve various Occupants each with a Covering Letter dated 21 March 2024 together with a Sealed Order made by Mr Justice Soole on 15 March 2024; Re-amended Sealed Claim Form in respect of Claim No QB-2022-000QRW0 and Re-Amended Particulars of Claim in respect of Claim No: QB-2022-0001420, I did for that purpose attend at _____ where I effected service of the documents upon Louis McKechnie by handing the documents to the mother of the Defendant at 08:50 hours on Friday 22 March 2024. She said that Louis didn't live at the address but undertook to pass them to him.
2. THAT on Friday 22 March 2024 I attended at _____ where I served Sean Jordan with the documentation by posting it through the letterbox at 11:58 hours, having received no reply at the door. On this occasion I noted there was a different vehicle parked on the drive to when I attended previously.
3. THAT on Friday 22 March 2024 I attended at _____

where I met with Ms Smalligan at 14.06 hours who confirmed she would pass on the contents of the documentation to Jessica Branch.

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

Dated this 22 day of March 2024

Signed 

Kevin John Healey
Process Server
PO Box 74837
London
SE19 2EB

CERTIFICATE OF SERVICE

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

B E T W E E N:

SHELL U.K. OIL PRODUCTS LIMITED
Claimant (QB-2022-001420)
SHELL U.K. LIMITED
Claimant (QB-2022-991241)
SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED
Claimant (QB-2022-001259)

Claimants

-AND-

- (1) 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
- (2) LOUIS MCKECHNIE
- (3) LOUISE HARRIS
- (4) CALLUM GOODE
- (5) CHRISTOPHER FORD
- (6) SEAN JORDAN (ALSO KNOWN AS SEAN IRISH, JOHN JORDAN, JOHN MICHAEL JORDAN AND SEAN O'ROURKE)
- (7) EMMA IRELAND
- (8) CHARLES PHILIP LAURIE
- (9) MICHAEL EDWARD DAVIES (ALSO PREVIOUSLY KNOWN AS MICHAEL EDWARD JONES)
- (10) TESSA-MARIE BURNS (ALSO KNOWN AS TEZ BURNS)
- (11) SIMON REDING
- (12) KATE BRAMFIT
- (13) MARGARET REID
- (14) DAVID NIXON
- (15) SAMUEL HOLLAND

Defendants

I **MICHAEL REES of Finlays Legal Ltd** of PO Box 74837, London SE19 2EB Process Server acting under the direction of Eversheds Sutherland, Bridgewater Place, Water Lane, Leeds LS11 5DR, Solicitors acting on behalf of the Claimant Will Say:-

1. THAT being instructed to serve various Occupants each with a Covering Letter dated 21 March 2024 together with a Sealed Order made by Mr Justice Soole on 15 March 2024; Re-amended Sealed Claim Form in respect of Claim No QB-2022-000QRW0 and Re-Amended Particulars of Claim in respect of Claim No: QB-2022-0001420, I did for that purpose attend at _____ where I could obtain no reply at the door. I therefore posted the envelope containing the aforementioned documents through the letterbox at 19:57 hours on Thursday 21 March 2024 4 by way of service upon Emma Ireland.

2. THAT on Friday 22 March 2024 I attended

An

adult female came to the door and informed me that Ms Burns no longer lived at the address and she did not have an alternative address for Ms Burns. Therefore, at 10:30 hours I served the documentation by posting it through the letterbox.

4. THAT on Friday 22 March 2024 I attended at
where at 11:20 hours, having received no reply at the door I served Edward Davies also previously known as Michael Edward Jones with the documentation by posting them through the letterbox.

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

Dated this 22 day of March 2024

Signed

Michael Rees
Process Server
PO Box 74837
London
SE19 2EB

CERTIFICATE OF SERVICE

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BETWEEN:

SHELL U.K. OIL PRODUCTS LIMITED
Claimant (QB-2022-001420)
SHELL U.K. LIMITED
Claimant (QB-2022-991241)
SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED
Claimant (QB-2022-001259)

Claimants

-AND-

- (1) 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
- (2) LOUIS MCKECHNIE
(3) LOUISE HARRIS
(4) CALLUM GOODE
(5) CHRISTOPHER FORD
- (6) SEAN JORDAN (ALSO KNOWN AS SEAN IRISH, JOHN JORDAN, JOHN MICHAEL JORDAN AND SEAN O'ROURKE)
(7) EMMA IRELAND
(8) CHARLES PHILIP LAURIE
- (9) MICHAEL EDWARD DAVIES (ALSO PREVIOUSLY KNOWN AS MICHAEL EDWARD JONES)
(10) TESSA-MARIE BURNS (ALSO KNOWN AS TEZ BURNS)
(11) SIMON REDING
(12) KATE BRAMFIT
(13) MARGARET REID
(14) DAVID NIXON
(15) SAMUEL HOLLAND

Defendants

I MICK CAIN of Finlays Legal Ltd of PO Box 74837, London SE19 2EB Process Server acting under the direction of Eversheds Sutherland, Bridgewater Place, Water Lane, Leeds LS11 5DR, Solicitors acting on behalf of the Claimant Will Say:-

1. THAT being instructed to serve various Occupants each with a Covering Letter dated 21 March 2024 together with a Sealed Order made by Mr Justice Soole on 15 March 2024; Re-amended Un-Sealed Claim Form in respect of Claim No QB-2022-000QRW0 and Re-Amended Particulars of Claim in respect of Claim No: QB-2022-0001420, I did for that purpose on Thursday 21 March 2024 attend at _____ where at 12:39 hours I served David Nixon with the documentation by posting it through the letterbox.
2. THAT on Thursday 21 March 2024 I attended at _____ where at 14:25 hours I served Callum Goode with the above mentioned documentation by handing it to his father.
3. THAT on Thursday 21 March 2024 I served Simon Reading with the above mentioned

documentation at :
at 15:50 hours.

by posting it through the letterbox

4. THAT on Thursday 21 March 2024 I served Margaret Reid at
with a Covering Letter dated 21 March 2024 together with an Order made by Mr Justice Soole on 15 March 2024; Re-amended Sealed Claim Form in respect of Claim No QB-2022-000QRW0 and Re-Amended Particulars of Claim in respect of Claim No: QB-2022-0001420 by posting them through the letterbox at 19:57 hours.
5. THAT on Thursday 21 March 2024 I served Kate Bramfit at
with a Covering Letter dated 21 March 2024 together with a Sealed Order made by Mr Justice Soole on 15 March 2024; Re-amended Sealed Claim Form in respect of Claim No QB-2022-000QRW0 and Re-Amended Particulars of Claim in respect of Claim No: QB-2022-0001420 by handing the same to her personally at 21:40 hours.
6. THAT on Friday 22 March 2024 having been instructed to re-attend at
to serve David Nixon with an amended Covering Letter and Sealed Re-Amended Claim Form I re-attended the address where at 12:00 hours I met with and personally served him.
7. THAT being instructed to serve an amended Covering Letter and Sealed Re-Amended Claim Form upon Simon Reding I re-attended at
and having received no reply at the door I posted the documents through the letterbox at 14:00 hours on Friday 22 March 2024.
8. THAT being instructed to serve an amended Covering Letter and Sealed Re-Amended Claim Form upon Callum Goode I did on Friday 22 March 2024 re-attend at
where at 16:00 hours I left the documentation with his father.
9. THAT I believe the facts stated in this Certificate of two pages are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Dated this 25 day of March 2024

Signed 

Mick Cain
Process Server
PO Box 74837
London
SE19 2EB

CERTIFICATE OF SERVICE

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BETWEEN:

SHELL U.K. OIL PRODUCTS LIMITED
Claimant (QB-2022-001420)
SHELL U.K. LIMITED
Claimant (QB-2022-991241)
SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED
Claimant (QB-2022-001259)

Claimants

-AND-

- (1) 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
- (2) LOUIS MCKECHNIE
(3) LOUISE HARRIS
(4) CALLUM GOODE
(5) CHRISTOPHER FORD
- (6) SEAN JORDAN (ALSO KNOWN AS SEAN IRISH, JOHN JORDAN, JOHN MICHAEL JORDAN AND SEAN O'ROURKE)
(7) EMMA IRELAND
(8) CHARLES PHILIP LAURIE
- (9) MICHAEL EDWARD DAVIES (ALSO PREVIOUSLY KNOWN AS MICHAEL EDWARD JONES)
(10) TESSA-MARIE BURNS (ALSO KNOWN AS TEZ BURNS)
(11) SIMON REDING
(12) KATE BRAMFIT
(13) MARGARET REID
(14) DAVID NIXON
(15) SAMUEL HOLLAND

Defendants

I **NIGEL WALKER of Finlays Legal Ltd** of PO Box 74837, London SE19 2EB Process Server acting under the direction of Eversheds Sutherland, Bridgewater Place, Water Lane, Leeds LS11 5DR, Solicitors acting on behalf of the Claimant Will Say:-

1. THAT being instructed to serve various Occupants each with a Covering Letter dated 21 March 2024 together with a Sealed Order made by Mr Justice Soole on 15 March 2024; Re-amended Sealed Claim Form in respect of Claim No QB-2022-000QRW0 and Re-Amended Particulars of Claim in respect of Claim No: QB-2022-0001420, I did for that purpose attend at 236 Gray's Inn Road, London WC1X 8HB where at 18:20 hours I served Bindmans LLP by leaving the documents with security on Thursday 21 March 2024.

2. THAT on Friday 22 March 2024 I attended at _____ where I

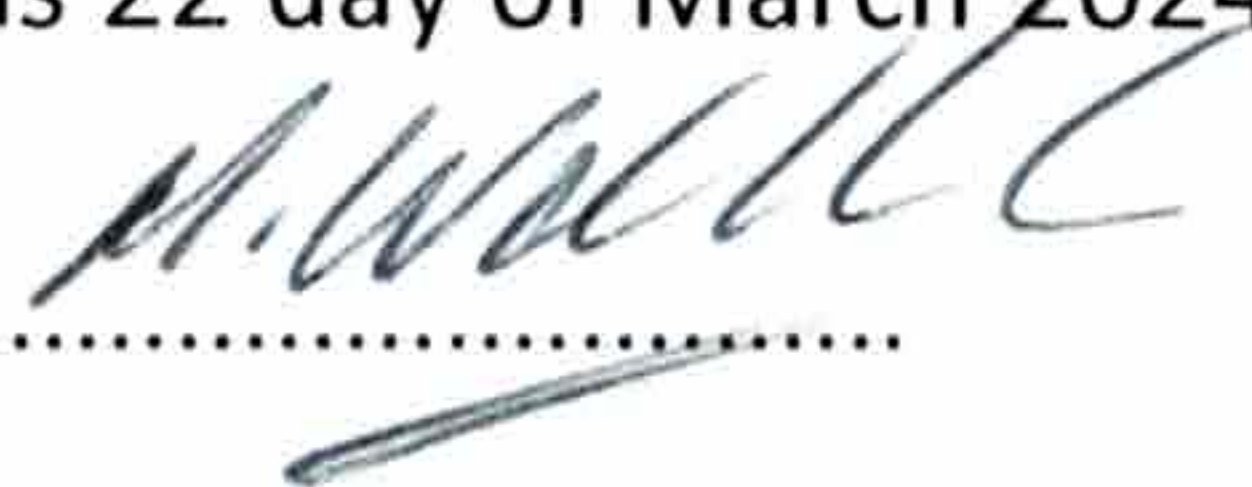
posted the documents through the letterbox 05:30 hours by way of service upon Michael Gibson. Mr Gibson had previously told me that he was going to Scotland.

3. THAT on Friday 22 March 2024 I attended at where I served Louise Harris by posting the documents through the letterbox at 07:05 hours having received no reply at the door. The current occupant had advised me on a previous visit that Louise Harris had sold the property about 18 months ago and therefore no longer lived there.

4. THAT on Friday 22 March 2024 I attended at 1 where I served Christopher Ford at 08:40 hours by leaving the documents where post is left for residents, there being no answer from Flat 13.

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

Dated this 22 day of March 2024

Signed 

Nigel Walker
Process Server
PO Box 74837
London
SE19 2EB

Callum Goode

Date: 21 March 2024
Our Ref: LINDBERR\356009.000001
Email: Shell.service@eversheds-sutherland.com

By Hand

Dear Mr Goode

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

Shell U.K. Limited v Persons Unknown (Claim No: QB-2022-001241)

Shell International Petroleum Company Limited v Persons Unknown (Claim No: QB-2022-001259)

(together "the Proceedings")

Pursuant to the Order made by Mr Justice Soole on 15 March 2024 in the above Proceedings, please see enclosed by way of service the following documents:

1. Sealed Order made by Mr Justice Soole on 15 March 2024;
2. Re-amended Claim Form in respect of Claim No: QB-2022-0001420; and
3. Re-amended Particulars of Claim in respect of Claim No: QB-2022-0001420.

If, in the future, you would prefer to receive service of documents in these Proceedings by email only (instead of hard copies) please confirm the details of the email address upon which documents may be served by completing the below slip and return to us by post or email on the details at the top of this letter. Please note that electronic copies of these documents have also been made available via the following website: www.noticespublic.com.

Yours sincerely

Eversheds Sutherland (International) LLP

Eversheds Sutherland (International) LLP

Confirmation of service by email

I/We confirm that I/We am/are willing to accept service of documents in these Proceedings at the following email address in accordance with CPR Practice Direction 6A Rule 4.1

Email address:

cloud_uk\225627354\1\lindber

Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales (number OC304065), registered office One Wood Street, London EC2V 7WS. Authorised and regulated by the Solicitors Regulation Authority (SRA number 383181). A list of the members' names and their professional qualifications is available for inspection at the above office.

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

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

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

eversheds-sutherland.com

Date: 22 March 2024
Our Ref: LINDBERR\356009.000001
Email: Shell.service@eversheds-sutherland.com

By Hand

Dear Mr Goode

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

Shell U.K. Limited v Persons Unknown (Claim No: QB-2022-001241)

**Shell International Petroleum Company Limited v Persons Unknown (Claim No:
(QB-2022-001259)**

(together "the Proceedings")

We write further to our letter dated 21 March 2024 and service of the documents contained in that letter. We have now received a sealed Re-Amended Claim Form back from the Court and therefore we now enclose, by way of further service:

1. Sealed re-amended Claim Form in respect of Claim No: QB-2022-0001420

If, in the future, you would prefer to receive service of documents in these Proceedings by email only (instead of hard copies) please confirm the details of the email address upon which documents may be served by completing the below slip and return to us by post or email on the details at the top of this letter. Please note that electronic copies of these documents have also been made available via the following website: www.noticespublic.com.

Yours sincerely

Eversheds Sutherland (International) LLP

Eversheds Sutherland (International) LLP

Confirmation of service by email

I/We confirm that I/We am/are willing to accept service of documents in these Proceedings at the following email address in accordance with CPR Practice Direction 6A Rule 4.1

Email address:

cloud_uk\225627354\1\lindber

Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales (number OC304065), registered office One Wood Street, London EC2V 7WS. Authorised and regulated by the Solicitors Regulation Authority (SRA number 383181). A list of the members' names and their professional qualifications is available for inspection at the above office.

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

Taylor, Bethany

From: Shell Service
Sent: 19 March 2024 08:31
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Court Order dated 15 March 2024 [ES-CLOUD_UK.FID10845365]
Attachments: King's Bench Associate's Order - 15.03.2024 - redacted_redacted(225607697.1).pdf

Dear Ms Ireland,

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

We enclose by way of service the Order of Mr Justice Soole dated 15 March 2024 in the above proceedings.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Taylor, Bethany

From: Shell Service
Sent: 19 March 2024 08:32
To: 'Phil Laurie'
Subject: Shell Injunction Proceedings - Court Order dated 15 March 2024 [ES-CLOUD_UK.FID10845365]
Attachments: King's Bench Associate's Order - 15.03.2024 - redacted_redacted(225607697.1).pdf

Dear Sir,

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

We enclose by way of service the Order of Mr Justice Soole dated 15 March 2024 in the above proceedings.

Please note that a copy of the attached documents have also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Taylor, Bethany

From: Shell Service
Sent: 21 March 2024 16:18
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Re-Amended Claim Form and Re-amended Particulars of Claim [ES-CLOUD_UK.FID10845365]
Attachments: Sealed Re-Amended Claim Form - QB-2022-001420.pdf; Re-Amended Particulars of Claim (QB-2022-001420).pdf

Dear Ms Ireland,

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

We enclose by way of service in the above proceedings the sealed Re-Amended Claim Form and Re-amended Particulars of Claim in respect of Claim No: QB-2022-0001420.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Taylor, Bethany

From: Shell Service
Sent: 21 March 2024 16:18
To: 'Phil Laurie'
Subject: Shell Injunction Proceedings - Sealed Re-Amended Claim Form and Re-amended Particulars of Claim [ES-CLOUD_UK.FID10845365]
Attachments: Sealed Re-Amended Claim Form - QB-2022-001420.pdf; Re-Amended Particulars of Claim (QB-2022-001420).pdf

Dear Sir,

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

We enclose by way of service in the above proceedings the sealed Re-Amended Claim Form and Re-amended Particulars of Claim in respect of Claim No: QB-2022-0001420.

Please note that a copy of the attached documents have also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP



Chats



Louise Harris



Search Messenger

19 Mar 2024, 19:50

Louise Harris

You: Dear Louise Harris Pursuant t... 2 w

Dear Louise Harris

On 18 March 2024 we sent you a message to let you know that Mr Justice Soole had made an Order pursuant to the hearing which took place on 15 March 2024 to hear our client Shell UK Oil Limited's application to join you as a defendant in its injunction proceedings.

You will find a copy of the Sealed Order dated 15 March 2024 at: www.noticespublic.com.

Yours sincerely
Eversheds Sutherland (International) LLP



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Louise Harris



Profile



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Aa



Chats sidebar with search bar and a chat entry for Louise Harris.

Main chat window for Louise Harris showing a legal notice message and a photo of a document.

Profile sidebar for Louise Harris with profile, search, and media links.



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Premium Career Group

Joshua Koeller • 3rd+

11h • 11

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Tez Burns

documents below and you will find copies of them:

<https://www.noticespublic.com/>

- 2024 Application Documents
 - 1.1 Sealed Application Notice dated 13 February 2024;
 - 1.2 Fourth Witness Statement of Alison Oldfield dated 12 February 2024;
 - 1.3 Exhibits to Fourth Witness Statement of Alison Oldfield dated 12 February 2024; and
 - 1.4 Draft Order in support of the Claimants' Application dated 12 February 2024.
- 2024 Orders
 - 2.1 Sealed Court Order dated 15 February 2024.
 - 2.2 Notice of Hearing dated 29 February 2024.
- 2024 Pleadings
 - 3.1 Hearing Bundle for Hearing on 11 March 2024

Please note that further documentation, including the Claimant's skeleton for the Hearing and a chronology of events leading up to the Hearing, will be uploaded to [noticespublic.com](https://www.noticespublic.com) the above website in due course (and in any event in advance of the Hearing). However, We will also notify you of the same once this has been done.

Yours sincerely
Eversheds Sutherland (International) LLP

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Messaging


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Tez Burns

Mar 5

You: Dear Tessa-Marie Burns We act on behalf of Shell U.K Oil Products...

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LinkedIn News

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6h ago
- BoE holds rates, for now

Messaging

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Tez Burns Mar 5

You: Dear Tessa-Marie Burns We act on behalf of Shell U.K Oil Products...

Tez Burns

documents below and you will find copies of them: <https://www.noticespublic.com/>

- 2024 Application Documents
 - 1.1 Sealed Application Notice dated 13 February 2024;
 - 1.2 Fourth Witness Statement of Alison Oldfield dated 12 February 2024;
 - 1.3 Exhibits to Fourth Witness Statement of Alison Oldfield dated 12 February 2024; and
 - 1.4 Draft Order in support of the Claimants' Application dated 12 February 2024.
- 2024 Orders
 - 2.1 Sealed Court Order dated 15 February 2024.
 - 2.2 Notice of Hearing dated 29 February 2024.
- 2024 Pleadings
 - 3.1 Hearing Bundle for Hearing on 11 March 2024

Please note that further documentation, including the Claimant's skeleton for the Hearing and a chronology of events leading up to the Hearing, will be uploaded to [noticespublic.com](https://www.noticespublic.com/) the above website in due course (and in any event in advance of the Hearing). However, We will also notify you of the same once this has been done.

Yours sincerely
Eversheds Sutherland (International) LLP

You haven't received a response yet. [Learn more](#)

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Muhammad Anas • 3rd+
3h • 

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News

State scraps legal defence for climate and Palestine protests

Don't let the Tories stop us from calling out their crimes

Tuesday 19 March 2024

Issue 2897



Climate protesters outside GB News (Picture: Extinction Rebellion)

Encouraged by the government, judges have ripped away **one of the defences** used by climate and Palestine protesters. It's yet another Tory attempt to stop activists resisting their murderous policies. The court of appeal decided this week that the "beliefs and motivation" of a defendant do not constitute a lawful excuse for causing damage to a property.

Some protesters have successfully used the defence that they honestly believe the owner of a property would have consented had they known the full circumstances of climate change. Extinction Rebellion co-founder Clare Farrell, one of nine people acquitted in November of breaking windows at bank HSBC's London headquarters, said the ruling would "criminalise" protesters.

Tory attorney general Victoria Prentis, who asked the court of appeal to clarify the law after the acquittal of environmental activists last year, welcomed the decision. During the hearing barrister Henry Blaxland argued against restricting the defences that protesters could put forward.

"This is a matter for the jury," he said. He told the court that to stop a defendant presenting the defence to jurors "would be a slippery slope to the erosion of the constitutional right to trial by jury". But the court found against protesters. Sue Carr, the most senior judge in England and Wales, said, "Evidence from the defendant about the facts or effects of climate change would be inadmissible."



Tim Crosland of campaign group Plan B said the decision was further proof that the state backs the corporations who are destroying the planet. "It must be obvious to every serious observer that British law is being instrumentalised, on behalf of the fossil fuel industry, to silence and

repress those taking action to confront the extreme danger from climate breakdown,” he said.

This latest decision follows a series of instructions to juries **by judge Silas Reid**. On 28 February he told jurors, “The circumstances of the damage do not include any climate crisis which may or may not exist in the world at the moment nor does it include whether nonviolent direct action can prompt change.”

An earlier attack by Prentis’s predecessor as attorney general, Suella Braverman, removed the right to protest under the European Convention on Human Rights as a defence to criminal damage. Braverman went to the court of appeal after Tory MPs demanded action when a jury acquitted four people for toppling a statue of slave trader Edward Colston in Bristol.

It’s not just environmental protesters who will be caught by the ruling. In December a jury acquitted Palestine Action protesters who defaced a statue of imperialist, antisemite and supporter of Zionism Arthur Balfour in the House of Commons.

One of their defences was that the public would consent to their protest if they were aware of the history and legacy of the 1917 Balfour Declaration. It’s important to stand up for **everyone’s protest rights**—and to not let the Tories or state scare us from calling out their crimes.

MPs find cash for pay rise

Feeling the squeeze from rising prices? MPs won’t be. They’re cheering a £100 a week pay rise. Their basic pay is to go up from £86,584 to £91,346. The pay rise comes as the average working day for MPs in the House of Commons is the shortest in 27 years. “There’s very little going on day to day,” a Tory minister said recently.

Yet workers who strike are dubbed as “lazy”—and MPs who do little rake in pay rises, as well as subsidised fine dining, expenses and ministerial

bungs. It's also a higher pay rise than what the government offered most public sector workers last year.

Politicians always seems to find money to line their own pockets, but not enough to support ordinary people. In contrast, the funding for the NHS in England is set to decrease. When adjusted for changes to the population and inflation the NHS England budget will be 1 percent lower in 2024-2025, according to The Health Foundation.

It's right to fight climate catastrophe while world leaders do nothing

As climate chaos worsens, the state wants to stop anyone fighting back. Temperatures must be limited to at least 1.5 degrees Celsius above pre-industrial levels to avoid catastrophic climate damage. But for the first time, global warming exceeded 1.5 degrees Celsius across an entire year in the period from February 2023 to January 2024. Rather than saving the planet, the state keeps Just Stop Oil (JSO) protesters locked up.

Callum Goode remains remanded in prison after blocking the entrance to the Royal Courts of Justice earlier this month. They took action to demand the government halts all licensing and consents for new **oil, gas and coal projects**. The courts denied them bail on Thursday last week and have imprisoned Callum since 6 March.

Another JSO supporter Marcus Decker is one of two men imprisoned for scaling the Dartford Crossing in October 2022. He was released on bail last month, but now faces deportation to Germany. But climate activists aren't backing down from the fight to defend the environment. On Monday Extinction Rebellion (XR) activists targeted GB News.

Protesters hurled fake oil outside its main studio's entrance in London. Another masked activist sat on top of a tripod dangling a Pinocchio-like



Cop28's message is that fossil fuels are here to stay

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puppet. Activists branded GB News a “puppet TV station” for the fossil fuel industry.

Action against the Tories and their backers couldn't come at a more crucial time. Fifty eight people die in freezing homes every day in winter—and Tory cuts to insulation funding are to blame. Greenpeace placed hundreds of headstones outside parliament to mark the “needless and shocking loss of life” on Wednesday last week.

This marked **the charity's new report** into winter deaths between 2013 and 2023. The report found that since 2013, when then prime minister and now foreign secretary David Cameron began to cut green policies, there have been 70,000 excess winter deaths.

The Tories slashed subsidies for loft and wall insulation. Government-funded home energy efficiency projects fell by almost 90 percent, from 2.3 million in 2012 to only 300,000 in 2013. The figures underline that direct action protesters Insulate Britain are right about the deadly cost of abandoning environmental policies.

TOPICS **Climate change, Environment, protest, Tories**

Taylor, Bethany

From: Shell Service
Sent: 19 March 2024 08:30
To: 'enquiries@extinctionrebellion.uk'; 'press@extinctionrebellion.uk'; 'xrvideo@protonmail.com'; 'xr-action@protonmail.com'; 'xraffinitysupport@protonmail.com'; 'xr-arrestwelfare@protonmail.com'; 'artsxr@gmail.com'; 'xr-CitizensAssembly@protonmail.com'; 'xr.connectingcommunities@gmail.com'; 'xrdemocracy@protonmail.com'; 'xrnotables@gmail.com'; 'integration@rebellion.earth'; 'xr-legal@riseup.net'; 'press@extinctionrebellion.uk'; 'xr-newsletter@protonmail.com'; 'xr-peoplesassembly@protonmail.com'; 'xrpoliceliaison@protonmail.com'; 'rebelringers@rebellion.earth'; 'xr.regenerativeculture@gmail.com'; 'xr-regionaldevelopment@protonmail.com'; 'RelationshipsXRUK@protonmail.com'; 'xr.mandates@gmail.com'; 'socialmedia@extinctionrebellion.uk'; 'xrsocialmediaevents@gmail.com'; 'eventsxr@gmail.com'; 'xrbristol.regional@protonmail.com'; 'xrcymru@protonmail.com'; 'xr.eastengland@protonmail.com'; 'xrlondoncoord@gmail.com'; 'XRMidlands@protonmail.com'; 'xrne@protonmail.com'; 'support@xrnorth.org'; 'xrni@rebellion.earth'; 'xrscotland@gmail.com'; 'XR-SouthEastRegionalTeam@protonmail.com'; 'xr.regional.sw@protonmail.com'; 'talksandtraining.xrbristol@protonmail.com'; 'xrcymrutalksandtraining@gmail.com'; 'eoexrtnt@protonmail.com'; 'xrlondoncommunityevents@gmail.com'; 'xrmidlandstraining@protonmail.com'; 'XRNE.training@protonmail.com'; 'xrnw.training@gmail.com'; 'xryorkshire.training@gmail.com'; 'xrni.tt@rebellion.earth'; 'talksandtrainings.scotland@extinctionrebellion.uk'; 'xrttse@gmail.com'; 'xrsw.trainings@gmail.com'; 'Ring2021@protonmail.com'; 'juststopoil@protonmail.com'; 'youthclimateswarm@protonmail.com'; 'youthclimateswarm@protonmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Court Order dated... [ES-CLOUD_UK.FID10845365]
Attachments: King's Bench Associate's Order - 15.03.2024 - redacted_redacted(225607697.1).pdf

Dear Recipient,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service the Order of Mr Justice Soole dated 15 March 2024 in the above proceedings.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: XR UK Action Circle <XR-action@protonmail.com>
Sent: 19 March 2024 08:38
To: Shell Service
Subject: Re: 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) - Court Order dated... [ES-CLOUD_UK.FID108...]

Thank you for contacting Extinction Rebellion UK Actions Circle

We apologise that our team is low on capacity at the moment so it may take some time for us to get back to you.

If you have not heard back from us within 2 weeks or if you require an immediate response, then please send us a reminder email or even better tag one of the coordinators on our MatterMost Reception Channel which can be found here

<https://xrb.link/DD45i9c>

If your email is regarding any of the following topics we will aim to respond ASAP

How to take action.

Proposals or suggestions for UK-Wide actions.

The XRUK Actions Strategy.

Feedback from UK-Wide actions.

If your email is regarding a topic not listed above then please consider the contact list below.

For on the ground Actions Support enquires please email
actionsupport@extinctionrebellion.uk

For Media & Messaging support enquires please email
media@rebellion.earth

Or complete the comms request form

<https://xrb.link/E9RA14kN>

If you are part of another organisation and would like to collaborate with us on an action or event please email
RelationshipsXRUK@protonmail.com

For legal advice, information or enquiries please email
xr-legal@riseup.net

For all other enquires please check out our website to find information, resources and contact details.

<https://xrb.link/E91ixZ6B>

In Love & Rebellion
- XRUK Actions Team

On 19 Mar 2024, at 08:29, Shell Service <shell.service@eversheds-sutherland.com> wrote:

> Dear Recipient,

>

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

- >
- > Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) (“the Shell Haven Proceedings”)
- >
- > Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) (“the Shell Centre Tower Proceedings”)
- >
- > We enclose by way of service the Order of Mr Justice Soole dated 15 March 2024 in the above proceedings.
- >
- > Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com
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- > Eversheds Sutherland (International) LLP
- >
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- > www.eversheds-sutherland.com

Milner, Flo

From: Extinction Rebellion UK press team <press@extinctionrebellion.uk>
Sent: 19 March 2024 08:32
To: Shell Service
Subject: Thank you for contacting the Extinction Rebellion UK press team.

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

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

Find images from our latest actions here: <https://show.pics.io/xr-global-media-breaking-news/search>

(please credit Extinction Rebellion or the photographer named in the file)

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

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

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

In love and rage,

XR UK press team

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- support@xrnorth.org

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

Additional information follows :
-- 5.7.1 <support@xrnorth.org>: Recipient address rejected: Recipient not available

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:31
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:31
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Taylor, Bethany

From: Shell Service
Sent: 21 March 2024 16:17
To: 'enquiries@extinctionrebellion.uk'; 'press@extinctionrebellion.uk'; 'xrvideo@protonmail.com'; 'xr-action@protonmail.com'; 'xraffinitysupport@protonmail.com'; 'xr-arrestwelfare@protonmail.com'; 'artsxr@gmail.com'; 'xr-CitizensAssembly@protonmail.com'; 'xr.connectingcommunities@gmail.com'; 'xrdemocracy@protonmail.com'; 'xrnotables@gmail.com'; 'integration@rebellion.earth'; 'xr-legal@riseup.net'; 'press@extinctionrebellion.uk'; 'xr-newsletter@protonmail.com'; 'xr-peoplesassembly@protonmail.com'; 'xrpoliceliaison@protonmail.com'; 'rebelringers@rebellion.earth'; 'xr.regenerativeculture@gmail.com'; 'xr-regionaldevelopment@protonmail.com'; 'RelationshipsXRUK@protonmail.com'; 'xr.mandates@gmail.com'; 'socialmedia@extinctionrebellion.uk'; 'xrsocialmediaevents@gmail.com'; 'eventsxr@gmail.com'; 'xrbristol.regional@protonmail.com'; 'xrcymru@protonmail.com'; 'xr.eastengland@protonmail.com'; 'xrlondoncoord@gmail.com'; 'XRMidlands@protonmail.com'; 'xrne@protonmail.com'; 'support@xrnorth.org'; 'xrni@rebellion.earth'; 'xrscotland@gmail.com'; 'XR-SouthEastRegionalTeam@protonmail.com'; 'xr.regional.sw@protonmail.com'; 'talksandtraining.xrbristol@protonmail.com'; 'xrcymrutalksandtraining@gmail.com'; 'eoexrtnt@protonmail.com'; 'xrlondoncommunityevents@gmail.com'; 'xrmidlandstraining@protonmail.com'; 'XRNE.training@protonmail.com'; 'xrnw.training@gmail.com'; 'xryorkshire.training@gmail.com'; 'xrni.tt@rebellion.earth'; 'talksandtrainings.scotland@extinctionrebellion.uk'; 'xrttse@gmail.com'; 'xrsw.trainings@gmail.com'; 'Ring2021@protonmail.com'; 'juststopoil@protonmail.com'; 'youthclimateswarm@protonmail.com'; 'youthclimateswarm@protonmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Re-Amended Claim Form Re-amended Particulars of Claim
Attachments: Sealed Re-Amended Claim Form - QB-2022-001420.pdf; Re-Amended Particulars of Claim (QB-2022-001420).pdf

Dear Recipient,

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

We enclose by way of service in the above proceedings the sealed Re-Amended Claim Form and Re-amended Particulars of Claim in respect of Claim No: QB-2022-0001420.

Please note that a copy of these documents have also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: XR UK Action Circle <XR-action@protonmail.com>
Sent: 21 March 2024 16:25
To: Shell Service
Subject: Re: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Re-Amended Claim Form Re-amended Particulars of Claim

Thank you for contacting Extinction Rebellion UK Actions Circle

We apologise that our team is low on capacity at the moment so it may take some time for us to get back to you.

If you have not heard back from us within 2 weeks or if you require an immediate response, then please send us a reminder email or even better tag one of the coordinators on our MatterMost Reception Channel which can be found here

<https://xrb.link/DD45i9c>

If your email is regarding any of the following topics we will aim to respond ASAP

How to take action.

Proposals or suggestions for UK-Wide actions.

The XRUK Actions Strategy.

Feedback from UK-Wide actions.

If your email is regarding a topic not listed above then please consider the contact list below.

For on the ground Actions Support enquires please email
actionsupport@extinctionrebellion.uk

For Media & Messaging support enquires please email
media@rebellion.earth

Or complete the comms request form

<https://xrb.link/E9RA14kN>

If you are part of another organisation and would like to collaborate with us on an action or event please email
RelationshipsXRUK@protonmail.com

For legal advice, information or enquiries please email
xr-legal@riseup.net

For all other enquires please check out our website to find information, resources and contact details.

<https://xrb.link/E91ixZ6B>

In Love & Rebellion
- XRUK Actions Team

On 21 Mar 2024, at 16:16, Shell Service <shell.service@eversheds-sutherland.com> wrote:

> Dear Recipient,

>

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

>

> We enclose by way of service in the above proceedings the sealed Re-Amended Claim Form and Re-amended

Particulars of Claim in respect of Claim No: QB-2022-0001420.

>

> Please note that a copy of these documents have also been made available via the following website:

www.noticespublic.com

>

> Eversheds Sutherland (International) LLP

>

> This email is sent for and on behalf of Eversheds Sutherland (International) LLP

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A list of names of the members (who are referred to as "partners") together with a list of those non-members who are designated as partners and their professional qualifications is available for inspection at the above office.

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<https://www.sra.org.uk/solicitors/standards-regulations>). Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. Each Eversheds Sutherland entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Eversheds Sutherland entity. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.

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> We process your personal data in accordance with our Privacy Notice, www.eversheds-sutherland.com/privacy. If you have any queries or would like to exercise any of your rights in relation to your personal data, please contact dataprotectionoffice@eversheds-sutherland.com.

> Cybercrime notification: Our bank account details will NOT change during the course of a transaction. Please speak to us before transferring any money. We will not take responsibility if you transfer money to an incorrect bank account. If you receive an email from Eversheds Sutherland (International) LLP requesting your bank details or purporting to amend our bank details, please contact us, or your solicitor, as appropriate, by telephone immediately to clarify.

> www.eversheds-sutherland.com

Milner, Flo

From: Extinction Rebellion UK press team <press@extinctionrebellion.uk>
Sent: 21 March 2024 16:20
To: Shell Service
Subject: Thank you for contacting the Extinction Rebellion UK press team.

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

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

Find images from our latest actions here: <https://show.pics.io/xr-global-media-breaking-news/search>

(please credit Extinction Rebellion or the photographer named in the file)

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

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

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

In love and rage,

XR UK press team

Milner, Flo

From: xr-legal@riseup.net
Sent: 21 March 2024 16:19
To: Shell Service
Subject: Autoreply for XR Legal Support

Hi there,

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

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

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

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

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

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

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

In Solidarity,
XR Legal Support Team

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 21 March 2024 16:19
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 21 March 2024 16:19
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 21 March 2024 16:19
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 21 March 2024 16:19
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 21 March 2024 16:19
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 21 March 2024 16:19
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 21 March 2024 16:19
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 21 March 2024 16:19
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 21 March 2024 16:18
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- support@xrnorth.org

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

Additional information follows :
-- 5.7.1 <support@xrnorth.org>: Recipient address rejected: Recipient not available

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

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

Taylor, Bethany

From: Shell Service
Sent: 18 March 2024 13:32
To: 'enquiries@extinctionrebellion.uk'; 'press@extinctionrebellion.uk'; 'xrvideo@protonmail.com'; 'xr-action@protonmail.com'; 'xraffinitysupport@protonmail.com'; 'xr-arrestwelfare@protonmail.com'; 'artsxr@gmail.com'; 'xr-CitizensAssembly@protonmail.com'; 'xr.connectingcommunities@gmail.com'; 'xrdemocracy@protonmail.com'; 'xrnotables@gmail.com'; 'integration@rebellion.earth'; 'xr-legal@riseup.net'; 'press@extinctionrebellion.uk'; 'xr-newsletter@protonmail.com'; 'xr-peoplesassembly@protonmail.com'; 'xrpoliceliaison@protonmail.com'; 'rebelringers@rebellion.earth'; 'xr.regenerativeculture@gmail.com'; 'xr-regionaldevelopment@protonmail.com'; 'RelationshipsXRUK@protonmail.com'; 'xr.mandates@gmail.com'; 'socialmedia@extinctionrebellion.uk'; 'xrsocialmediaevents@gmail.com'; 'eventsxr@gmail.com'; 'xrbristol.regional@protonmail.com'; 'xrcymru@protonmail.com'; 'xr.eastengland@protonmail.com'; 'xrlondoncoord@gmail.com'; 'XRMidlands@protonmail.com'; 'xrne@protonmail.com'; 'support@xrnorth.org'; 'xrni@rebellion.earth'; 'xrscotland@gmail.com'; 'XR-SouthEastRegionalTeam@protonmail.com'; 'xr.regional.sw@protonmail.com'; 'talksandtraining.xrbristol@protonmail.com'; 'xrcymrutalksandtraining@gmail.com'; 'eoexrtnt@protonmail.com'; 'xrlondoncommunityevents@gmail.com'; 'xrmidlandstraining@protonmail.com'; 'XRNE.training@protonmail.com'; 'xrnw.training@gmail.com'; 'xryorkshire.training@gmail.com'; 'xrni.tt@rebellion.earth'; 'talksandtrainings.scotland@extinctionrebellion.uk'; 'xrttse@gmail.com'; 'xrsw.trainings@gmail.com'; 'Ring2021@protonmail.com'; 'juststopoil@protonmail.com'; 'youthclimateswarm@protonmail.com'; 'youthclimateswarm@protonmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sixth Witness Sta... [ES-CLOUD_UK.FID10845365]
Attachments: SIGNED AJO6 - AJO Sixth Witness Statement - 2024 - Service (REDACTED) (225393649.1).pdf; AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 1 of 3).pdf

Dear Recipient,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Sixth Witness Statement of Alison Oldfield and part 1 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Parts 2 and 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

Please note that a copy of the attached document has also been made available via the following website: www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: XR UK Action Circle <XR-action@protonmail.com>
Sent: 18 March 2024 13:38
To: Shell Service
Subject: Re: 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) - Sixth Witness Sta... [ES-CLOUD_UK.FID108...]

Thank you for contacting Extinction Rebellion UK Actions Circle

We apologise that our team is low on capacity at the moment so it may take some time for us to get back to you.

If you have not heard back from us within 2 weeks or if you require an immediate response, then please send us a reminder email or even better tag one of the coordinators on our MatterMost Reception Channel which can be found here

<https://xrb.link/DD45i9c>

If your email is regarding any of the following topics we will aim to respond ASAP

How to take action.

Proposals or suggestions for UK-Wide actions.

The XRUK Actions Strategy.

Feedback from UK-Wide actions.

If your email is regarding a topic not listed above then please consider the contact list below.

For on the ground Actions Support enquires please email
actionsupport@extinctionrebellion.uk

For Media & Messaging support enquires please email
media@rebellion.earth

Or complete the comms request form

<https://xrb.link/E9RA14kN>

If you are part of another organisation and would like to collaborate with us on an action or event please email
RelationshipsXRUK@protonmail.com

For legal advice, information or enquiries please email
xr-legal@riseup.net

For all other enquires please check out our website to find information, resources and contact details.

<https://xrb.link/E91ixZ6B>

In Love & Rebellion
- XRUK Actions Team

On 18 Mar 2024, at 13:31, Shell Service <shell.service@eversheds-sutherland.com> wrote:

> Dear Recipient,

>

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

- >
- > Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) (“the Shell Haven Proceedings”)
- >
- > Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) (“the Shell Centre Tower Proceedings”)
- >
- > We enclose by way of service in the above proceedings the Sixth Witness Statement of Alison Oldfield and part 1 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.
- >
- > Parts 2 and 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.
- >
- > Please note that a copy of the attached document has also been made available via the following website: www.noticespublic.com
- >
- > Eversheds Sutherland (International) LLP
- >
- > This email is sent for and on behalf of Eversheds Sutherland (International) LLP
- > Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales, (number OC304065), registered office One Wood Street, London, EC2V 7WS. Registered VAT number GB820704559. A list of names of the members (who are referred to as "partners") together with a list of those non-members who are designated as partners and their professional qualifications is available for inspection at the above office. Eversheds Sutherland (International) LLP is authorised and regulated by the Solicitors Regulation Authority (SRA number 383181) and governed by the SRA Standards and Regulations (see <https://www.sra.org.uk/solicitors/standards-regulations>). Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. Each Eversheds Sutherland entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Eversheds Sutherland entity. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.
- > Confidentiality: This e-mail and its attachments are intended solely for the person to whom they are addressed, are strictly confidential and may contain privileged information. If they have come to you in error you must not copy or show them to anyone; please reply to this e-mail and highlight the error to the sender and then immediately delete the message. Unless expressly agreed in writing, Eversheds Sutherland (International) LLP accepts no liability to persons other than clients of the firm in respect of the contents of emails or attachments.
- > We process your personal data in accordance with our Privacy Notice, www.eversheds-sutherland.com/privacy. If you have any queries or would like to exercise any of your rights in relation to your personal data, please contact dataprotectionoffice@eversheds-sutherland.com.
- > Cybercrime notification: Our bank account details will NOT change during the course of a transaction. Please speak to us before transferring any money. We will not take responsibility if you transfer money to an incorrect bank account. If you receive an email from Eversheds Sutherland (International) LLP requesting your bank details or purporting to amend our bank details, please contact us, or your solicitor, as appropriate, by telephone immediately to clarify.
- > www.eversheds-sutherland.com

Milner, Flo

From: xr-legal@riseup.net
Sent: 18 March 2024 13:35
To: Shell Service
Subject: Autoreply for XR Legal Support

Hi there,

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

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

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

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

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

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

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

In Solidarity,
XR Legal Support Team

Milner, Flo

From: XR Social Media Events <xrsocialmediaevents@gmail.com>
Sent: 18 March 2024 13:34
To: Shell Service
Subject: Thanks for submitting your event for social media Re: 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-...

Hi there,

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

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

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

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

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

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

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

Thanks,

Lorriane, Ben and the Social Media team

Milner, Flo

From: XR London Talks and Training <xrlondoncommunityevents@gmail.com>
Sent: 18 March 2024 13:34
To: Shell Service
Subject: London Talks and Trainings Re: 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) - Sixth Witness...

Thanks for your email!

This email is run by part time volunteers so bear with us while we get back to you



--

Lauren
XR Talks & Training Coordinator London

Milner, Flo

From: XR Connecting Communities <xr.connectingcommunities@gmail.com>
Sent: 18 March 2024 13:34
To: Shell Service
Subject: Thank you for your email! + Links Re: 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) - Sixth ...

Hi there,

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

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

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

Love and Rage,
The Connecting Communities team xx

These links might help!

1. **New to XR? Check out our onboarding guides and trainings:** <https://uk.rebellion.academy>
2. **XR Toolkit - how to guides!** <https://rebeltoolkit.extinctionrebellion.uk>
3. **Trying to find a local group?** <https://extinctionrebellion.uk/act-now/local-groups>
4. **Community group links:** <https://extinctionrebellion.uk/act-now/resources/communities>
PLEASE NOTE: The community group page is under construction and some groups are more active than others, if you don't get a response, don't be disheartened. Get in touch with us and we can help you.

--

Love & courage,
XR UK Connecting Communities

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

Milner, Flo

From: Extinction Rebellion UK press team <press@extinctionrebellion.uk>
Sent: 18 March 2024 13:34
To: Shell Service
Subject: Thank you for contacting the Extinction Rebellion UK press team.

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

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

Find images from our latest actions here: <https://show.pics.io/xr-global-media-breaking-news/search>

(please credit Extinction Rebellion or the photographer named in the file)

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

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

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

In love and rage,

XR UK press team

Milner, Flo

From: XR London <xrlondoncoord@gmail.com>
Sent: 18 March 2024 13:33
To: Shell Service
Subject: Thank you for your email Re: 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) - Sixth Witness S...

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

Thank you for your patience!

XR London Regional Team

--

London Regional Development

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

Milner, Flo

From: Arts XR <artsxr@gmail.com>
Sent: 18 March 2024 13:33
To: Shell Service
Subject: Resources from XR arts Re: 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) - Sixth Witness Sta...

Hello wonderful rebels!

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

With love, grief, rage and deep gratitude x

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

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

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

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

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

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

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

Milner, Flo

From: XR South West Talks and Trainings <xrsw.trainings@gmail.com>
Sent: 18 March 2024 13:33
To: Shell Service
Subject: Email currently not being monitored Re: 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) - Sixt...

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:34
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:34
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:34
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- support@xrnorth.org

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

Additional information follows :
-- 5.7.1 <support@xrnorth.org>: Recipient address rejected: Recipient not available

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:34
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:34
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:34
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:34
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:34
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Taylor, Bethany

From: Shell Service
Sent: 18 March 2024 13:46
To: 'enquiries@extinctionrebellion.uk'; 'press@extinctionrebellion.uk';
'xrvideo@protonmail.com'; 'xr-action@protonmail.com';
'xraffinitysupport@protonmail.com'; 'xr-arrestwelfare@protonmail.com';
'artsxr@gmail.com'; 'xr-CitizensAssembly@protonmail.com';
'xr.connectingcommunities@gmail.com'; 'xrdemocracy@protonmail.com';
'xrnotables@gmail.com'; 'integration@rebellion.earth'; 'xr-legal@riseup.net';
'press@extinctionrebellion.uk'; 'xr-newsletter@protonmail.com'; 'xr-
peoplesassembly@protonmail.com'; 'xrpoliceliaison@protonmail.com';
'rebelringers@rebellion.earth'; 'xr.regenerativeculture@gmail.com'; 'xr-
regionaldevelopment@protonmail.com'; 'RelationshipsXRUK@protonmail.com';
'xr.mandates@gmail.com'; 'socialmedia@extinctionrebellion.uk';
'xrsocialmediaevents@gmail.com'; 'eventsxr@gmail.com';
'xrbristol.regional@protonmail.com'; 'xrcymru@protonmail.com';
'xr.eastengland@protonmail.com'; 'xrlondoncoord@gmail.com';
'XRMidlands@protonmail.com'; 'xrne@protonmail.com'; 'support@xrnorth.org';
'xrni@rebellion.earth'; 'xrscotland@gmail.com'; 'XR-
SouthEastRegionalTeam@protonmail.com'; 'xr.regional.sw@protonmail.com';
'talksandtraining.xrbristol@protonmail.com'; 'xrcymrutalksandtraining@gmail.com';
'eoexrtnt@protonmail.com'; 'xrlondoncommunityevents@gmail.com';
'xrmidlandstraining@protonmail.com'; 'XRNE.training@protonmail.com';
'xrnw.training@gmail.com'; 'xryorkshire.training@gmail.com';
'xrni.tt@rebellion.earth'; 'talksandtrainings.scotland@extinctionrebellion.uk';
'xrttse@gmail.com'; 'xrsw.trainings@gmail.com'; 'Ring2021@protonmail.com';
'juststopoil@protonmail.com'; 'youthclimateswarm@protonmail.com';
'youthclimateswarm@protonmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K.
Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum
Company Limited v Persons Unknown (QB-2022-001259) - Sixth Witness Sta... [ES-
CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part
2 of 3).pdf

Dear Recipient,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings part 2 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Part 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: XR UK Action Circle <XR-action@protonmail.com>
Sent: 18 March 2024 13:52
To: Shell Service
Subject: Re: 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) - Sixth Witness Sta... [ES-CLOUD_UK.FID108...]

Thank you for contacting Extinction Rebellion UK Actions Circle

We apologise that our team is low on capacity at the moment so it may take some time for us to get back to you.

If you have not heard back from us within 2 weeks or if you require an immediate response, then please send us a reminder email or even better tag one of the coordinators on our MatterMost Reception Channel which can be found here

<https://xrb.link/DD45i9c>

If your email is regarding any of the following topics we will aim to respond ASAP

How to take action.

Proposals or suggestions for UK-Wide actions.

The XRUK Actions Strategy.

Feedback from UK-Wide actions.

If your email is regarding a topic not listed above then please consider the contact list below.

For on the ground Actions Support enquires please email
actionsupport@extinctionrebellion.uk

For Media & Messaging support enquires please email
media@rebellion.earth

Or complete the comms request form

<https://xrb.link/E9RA14kN>

If you are part of another organisation and would like to collaborate with us on an action or event please email
RelationshipsXRUK@protonmail.com

For legal advice, information or enquiries please email
xr-legal@riseup.net

For all other enquires please check out our website to find information, resources and contact details.

<https://xrb.link/E91ixZ6B>

In Love & Rebellion
- XRUK Actions Team

On 18 Mar 2024, at 13:45, Shell Service <shell.service@eversheds-sutherland.com> wrote:

> Dear Recipient,

>

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

- >
- > Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) (“the Shell Haven Proceedings”)
- >
- > Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) (“the Shell Centre Tower Proceedings”)
- >
- > We enclose by way of service in the above proceedings part 2 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.
- >
- > Part 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.
- >
- > Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com
- >
- > Eversheds Sutherland (International) LLP
- >
- > This email is sent for and on behalf of Eversheds Sutherland (International) LLP
- > Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales, (number OC304065), registered office One Wood Street, London, EC2V 7WS. Registered VAT number GB820704559. A list of names of the members (who are referred to as "partners") together with a list of those non-members who are designated as partners and their professional qualifications is available for inspection at the above office. Eversheds Sutherland (International) LLP is authorised and regulated by the Solicitors Regulation Authority (SRA number 383181) and governed by the SRA Standards and Regulations (see <https://www.sra.org.uk/solicitors/standards-regulations>). Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. Each Eversheds Sutherland entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Eversheds Sutherland entity. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.
- > Confidentiality: This e-mail and its attachments are intended solely for the person to whom they are addressed, are strictly confidential and may contain privileged information. If they have come to you in error you must not copy or show them to anyone; please reply to this e-mail and highlight the error to the sender and then immediately delete the message. Unless expressly agreed in writing, Eversheds Sutherland (International) LLP accepts no liability to persons other than clients of the firm in respect of the contents of emails or attachments.
- > We process your personal data in accordance with our Privacy Notice, www.eversheds-sutherland.com/privacy. If you have any queries or would like to exercise any of your rights in relation to your personal data, please contact dataprotectionoffice@eversheds-sutherland.com.
- > Cybercrime notification: Our bank account details will NOT change during the course of a transaction. Please speak to us before transferring any money. We will not take responsibility if you transfer money to an incorrect bank account. If you receive an email from Eversheds Sutherland (International) LLP requesting your bank details or purporting to amend our bank details, please contact us, or your solicitor, as appropriate, by telephone immediately to clarify.
- > www.eversheds-sutherland.com

Milner, Flo

From: Extinction Rebellion UK press team <press@extinctionrebellion.uk>
Sent: 18 March 2024 13:48
To: Shell Service
Subject: Thank you for contacting the Extinction Rebellion UK press team.

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

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

Find images from our latest actions here: <https://show.pics.io/xr-global-media-breaking-news/search>

(please credit Extinction Rebellion or the photographer named in the file)

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

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

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

In love and rage,

XR UK press team

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:48
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:48
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:48
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:48
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:48
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:48
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:48
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- support@xrnorth.org

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

Additional information follows :
-- 5.7.1 <support@xrnorth.org>: Recipient address rejected: Recipient not available

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:48
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 13:47
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Taylor, Bethany

From: Shell Service
Sent: 18 March 2024 14:01
To: 'enquiries@extinctionrebellion.uk'; 'press@extinctionrebellion.uk'; 'xrvideo@protonmail.com'; 'xr-action@protonmail.com'; 'xraffinitysupport@protonmail.com'; 'xr-arrestwelfare@protonmail.com'; 'artsxr@gmail.com'; 'xr-CitizensAssembly@protonmail.com'; 'xr.connectingcommunities@gmail.com'; 'xrdemocracy@protonmail.com'; 'xrnotables@gmail.com'; 'integration@rebellion.earth'; 'xr-legal@riseup.net'; 'press@extinctionrebellion.uk'; 'xr-newsletter@protonmail.com'; 'xr-peoplesassembly@protonmail.com'; 'xrpoliceliaison@protonmail.com'; 'rebelringers@rebellion.earth'; 'xr.regenerativeculture@gmail.com'; 'xr-regionaldevelopment@protonmail.com'; 'RelationshipsXRUK@protonmail.com'; 'xr.mandates@gmail.com'; 'socialmedia@extinctionrebellion.uk'; 'xrsocialmediaevents@gmail.com'; 'eventsxr@gmail.com'; 'xrbristol.regional@protonmail.com'; 'xrcymru@protonmail.com'; 'xr.eastengland@protonmail.com'; 'xrlondoncoord@gmail.com'; 'XRMidlands@protonmail.com'; 'xrne@protonmail.com'; 'support@xrnorth.org'; 'xrni@rebellion.earth'; 'xrscotland@gmail.com'; 'XR-SouthEastRegionalTeam@protonmail.com'; 'xr.regional.sw@protonmail.com'; 'talksandtraining.xbristol@protonmail.com'; 'xrcymrutalksandtraining@gmail.com'; 'eoexrtnt@protonmail.com'; 'xrlondoncommunityevents@gmail.com'; 'xrmidlandstraining@protonmail.com'; 'XRNE.training@protonmail.com'; 'xrnw.training@gmail.com'; 'xryorkshire.training@gmail.com'; 'xrni.tt@rebellion.earth'; 'talksandtrainings.scotland@extinctionrebellion.uk'; 'xrttse@gmail.com'; 'xrsw.trainings@gmail.com'; 'Ring2021@protonmail.com'; 'juststopoil@protonmail.com'; 'youthclimateswarm@protonmail.com'; 'youthclimateswarm@protonmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Sixth Witness Sta... [ES-CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 3 of 3).pdf

Dear Recipient,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings part 3 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: XR UK Action Circle <XR-action@protonmail.com>
Sent: 18 March 2024 14:07
To: Shell Service
Subject: Re: 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) - Sixth Witness Sta... [ES-CLOUD_UK.FID108...]

Thank you for contacting Extinction Rebellion UK Actions Circle

We apologise that our team is low on capacity at the moment so it may take some time for us to get back to you.

If you have not heard back from us within 2 weeks or if you require an immediate response, then please send us a reminder email or even better tag one of the coordinators on our MatterMost Reception Channel which can be found here

<https://xrb.link/DD45i9c>

If your email is regarding any of the following topics we will aim to respond ASAP

How to take action.

Proposals or suggestions for UK-Wide actions.

The XRUK Actions Strategy.

Feedback from UK-Wide actions.

If your email is regarding a topic not listed above then please consider the contact list below.

For on the ground Actions Support enquires please email
actionsupport@extinctionrebellion.uk

For Media & Messaging support enquires please email
media@rebellion.earth

Or complete the comms request form

<https://xrb.link/E9RA14kN>

If you are part of another organisation and would like to collaborate with us on an action or event please email
RelationshipsXRUK@protonmail.com

For legal advice, information or enquiries please email
xr-legal@riseup.net

For all other enquires please check out our website to find information, resources and contact details.

<https://xrb.link/E91ixZ6B>

In Love & Rebellion
- XRUK Actions Team

On 18 Mar 2024, at 14:00, Shell Service <shell.service@eversheds-sutherland.com> wrote:

> Dear Recipient,

>

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

- >
- > Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) (“the Shell Haven Proceedings”)
- >
- > Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) (“the Shell Centre Tower Proceedings”)
- >
- > We enclose by way of service in the above proceedings part 3 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.
- >
- > Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com
- >
- > Eversheds Sutherland (International) LLP
- >
- > This email is sent for and on behalf of Eversheds Sutherland (International) LLP
- > Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales, (number OC304065), registered office One Wood Street, London, EC2V 7WS. Registered VAT number GB820704559. A list of names of the members (who are referred to as "partners") together with a list of those non-members who are designated as partners and their professional qualifications is available for inspection at the above office. Eversheds Sutherland (International) LLP is authorised and regulated by the Solicitors Regulation Authority (SRA number 383181) and governed by the SRA Standards and Regulations (see <https://www.sra.org.uk/solicitors/standards-regulations>). Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. Each Eversheds Sutherland entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Eversheds Sutherland entity. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.
- > Confidentiality: This e-mail and its attachments are intended solely for the person to whom they are addressed, are strictly confidential and may contain privileged information. If they have come to you in error you must not copy or show them to anyone; please reply to this e-mail and highlight the error to the sender and then immediately delete the message. Unless expressly agreed in writing, Eversheds Sutherland (International) LLP accepts no liability to persons other than clients of the firm in respect of the contents of emails or attachments.
- > We process your personal data in accordance with our Privacy Notice, www.eversheds-sutherland.com/privacy. If you have any queries or would like to exercise any of your rights in relation to your personal data, please contact dataprotectionoffice@eversheds-sutherland.com.
- > Cybercrime notification: Our bank account details will NOT change during the course of a transaction. Please speak to us before transferring any money. We will not take responsibility if you transfer money to an incorrect bank account. If you receive an email from Eversheds Sutherland (International) LLP requesting your bank details or purporting to amend our bank details, please contact us, or your solicitor, as appropriate, by telephone immediately to clarify.
- > www.eversheds-sutherland.com

Milner, Flo

From: Extinction Rebellion UK press team <press@extinctionrebellion.uk>
Sent: 18 March 2024 14:03
To: Shell Service
Subject: Thank you for contacting the Extinction Rebellion UK press team.

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

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

Find images from our latest actions here: <https://show.pics.io/xr-global-media-breaking-news/search>

(please credit Extinction Rebellion or the photographer named in the file)

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

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

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

In love and rage,

XR UK press team

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:03
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:03
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:03
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- support@xrnorth.org

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

Additional information follows :
-- 5.7.1 <support@xrnorth.org>: Recipient address rejected: Recipient not available

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:03
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:03
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:03
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:03
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:03
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:02
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Taylor, Bethany

From: Shell Service
Sent: 18 March 2024 14:16
To: 'enquiries@extinctionrebellion.uk'; 'press@extinctionrebellion.uk';
'xrvideo@protonmail.com'; 'xr-action@protonmail.com';
'xraffinitysupport@protonmail.com'; 'xr-arrestwelfare@protonmail.com';
'artsxr@gmail.com'; 'xr-CitizensAssembly@protonmail.com';
'xr.connectingcommunities@gmail.com'; 'xrdemocracy@protonmail.com';
'xrnotables@gmail.com'; 'integration@rebellion.earth'; 'xr-legal@riseup.net';
'press@extinctionrebellion.uk'; 'xr-newsletter@protonmail.com'; 'xr-
peoplesassembly@protonmail.com'; 'xrpoliceliaison@protonmail.com';
'rebelringers@rebellion.earth'; 'xr.regenerativeculture@gmail.com'; 'xr-
regionaldevelopment@protonmail.com'; 'RelationshipsXRUK@protonmail.com';
'xr.mandates@gmail.com'; 'socialmedia@extinctionrebellion.uk';
'xrsocialmediaevents@gmail.com'; 'eventsxr@gmail.com';
'xrbristol.regional@protonmail.com'; 'xrcymru@protonmail.com';
'xr.eastengland@protonmail.com'; 'xrlondoncoord@gmail.com';
'XRMidlands@protonmail.com'; 'xrne@protonmail.com'; 'support@xrnorth.org';
'xrni@rebellion.earth'; 'xrscotland@gmail.com'; 'XR-
SouthEastRegionalTeam@protonmail.com'; 'xr.regional.sw@protonmail.com';
'talksandtraining.xrbristol@protonmail.com'; 'xrcymrutalksandtraining@gmail.com';
'eoexrtnt@protonmail.com'; 'xrlondoncommunityevents@gmail.com';
'xrmidlandstraining@protonmail.com'; 'XRNE.training@protonmail.com';
'xrnw.training@gmail.com'; 'xryorkshire.training@gmail.com';
'xrni.tt@rebellion.earth'; 'talksandtrainings.scotland@extinctionrebellion.uk';
'xrttse@gmail.com'; 'xrsw.trainings@gmail.com'; 'Ring2021@protonmail.com';
'juststopoil@protonmail.com'; 'youthclimateswarm@protonmail.com';
'youthclimateswarm@protonmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K.
Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum
Company Limited v Persons Unknown (QB-2022-001259) - Seventh Witness S... [ES-
CLOUD_UK.FID10845365]
Attachments: Exhibit AJO7 - Exhibits to AJO Seventh Witness Statement - 2024 - Service.pdf;
SIGNED AJO7 - AJO Seventh Witness Statement - 2024 - Service.pdf

Dear Recipient,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Seventh Witness Statement of Alison Oldfield the Exhibit to the Seventh Witness Statement of Alison Oldfield.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: XR UK Action Circle <XR-action@protonmail.com>
Sent: 18 March 2024 14:22
To: Shell Service
Subject: Re: 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) - Seventh Witness S... [ES-CLOUD_UK.FID108...]

Thank you for contacting Extinction Rebellion UK Actions Circle

We apologise that our team is low on capacity at the moment so it may take some time for us to get back to you.

If you have not heard back from us within 2 weeks or if you require an immediate response, then please send us a reminder email or even better tag one of the coordinators on our MatterMost Reception Channel which can be found here

<https://xrb.link/DD45i9c>

If your email is regarding any of the following topics we will aim to respond ASAP

How to take action.

Proposals or suggestions for UK-Wide actions.

The XRUK Actions Strategy.

Feedback from UK-Wide actions.

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For on the ground Actions Support enquires please email
actionsupport@extinctionrebellion.uk

For Media & Messaging support enquires please email
media@rebellion.earth

Or complete the comms request form

<https://xrb.link/E9RA14kN>

If you are part of another organisation and would like to collaborate with us on an action or event please email
RelationshipsXRUK@protonmail.com

For legal advice, information or enquiries please email
xr-legal@riseup.net

For all other enquires please check out our website to find information, resources and contact details.

<https://xrb.link/E91ixZ6B>

In Love & Rebellion
- XRUK Actions Team

On 18 Mar 2024, at 14:15, Shell Service <shell.service@eversheds-sutherland.com> wrote:

> Dear Recipient,

>

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

- >
- > Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) (“the Shell Haven Proceedings”)
- >
- > Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) (“the Shell Centre Tower Proceedings”)
- >
- > We enclose by way of service in the above proceedings the Seventh Witness Statement of Alison Oldfield the Exhibit to the Seventh Witness Statement of Alison Oldfield.
- >
- > Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com
- >
- > Eversheds Sutherland (International) LLP
- >
- > This email is sent for and on behalf of Eversheds Sutherland (International) LLP
- > Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales, (number OC304065), registered office One Wood Street, London, EC2V 7WS. Registered VAT number GB820704559. A list of names of the members (who are referred to as "partners") together with a list of those non-members who are designated as partners and their professional qualifications is available for inspection at the above office. Eversheds Sutherland (International) LLP is authorised and regulated by the Solicitors Regulation Authority (SRA number 383181) and governed by the SRA Standards and Regulations (see <https://www.sra.org.uk/solicitors/standards-regulations>). Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. Each Eversheds Sutherland entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Eversheds Sutherland entity. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.
- > Confidentiality: This e-mail and its attachments are intended solely for the person to whom they are addressed, are strictly confidential and may contain privileged information. If they have come to you in error you must not copy or show them to anyone; please reply to this e-mail and highlight the error to the sender and then immediately delete the message. Unless expressly agreed in writing, Eversheds Sutherland (International) LLP accepts no liability to persons other than clients of the firm in respect of the contents of emails or attachments.
- > We process your personal data in accordance with our Privacy Notice, www.eversheds-sutherland.com/privacy. If you have any queries or would like to exercise any of your rights in relation to your personal data, please contact dataprotectionoffice@eversheds-sutherland.com.
- > Cybercrime notification: Our bank account details will NOT change during the course of a transaction. Please speak to us before transferring any money. We will not take responsibility if you transfer money to an incorrect bank account. If you receive an email from Eversheds Sutherland (International) LLP requesting your bank details or purporting to amend our bank details, please contact us, or your solicitor, as appropriate, by telephone immediately to clarify.
- > www.eversheds-sutherland.com

Milner, Flo

From: Extinction Rebellion UK press team <press@extinctionrebellion.uk>
Sent: 18 March 2024 14:18
To: Shell Service
Subject: Thank you for contacting the Extinction Rebellion UK press team.

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

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

Find images from our latest actions here: <https://show.pics.io/xr-global-media-breaking-news/search>

(please credit Extinction Rebellion or the photographer named in the file)

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

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

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

In love and rage,

XR UK press team

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:19
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:19
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:19
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:19
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:18
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- support@xrnorth.org

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

Additional information follows :
-- 5.7.1 <support@xrnorth.org>: Recipient address rejected: Recipient not available

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:18
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:18
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:18
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:18
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Taylor, Bethany

From: Shell Service
Sent: 18 March 2024 14:30
To: 'enquiries@extinctionrebellion.uk'; 'press@extinctionrebellion.uk'; 'xrvideo@protonmail.com'; 'xr-action@protonmail.com'; 'xraffinitysupport@protonmail.com'; 'xr-arrestwelfare@protonmail.com'; 'artsxr@gmail.com'; 'xr-CitizensAssembly@protonmail.com'; 'xr.connectingcommunities@gmail.com'; 'xrdemocracy@protonmail.com'; 'xrnotables@gmail.com'; 'integration@rebellion.earth'; 'xr-legal@riseup.net'; 'press@extinctionrebellion.uk'; 'xr-newsletter@protonmail.com'; 'xr-peoplesassembly@protonmail.com'; 'xrpoliceliaison@protonmail.com'; 'rebelringers@rebellion.earth'; 'xr.regenerativeculture@gmail.com'; 'xr-regionaldevelopment@protonmail.com'; 'RelationshipsXRUK@protonmail.com'; 'xr.mandates@gmail.com'; 'socialmedia@extinctionrebellion.uk'; 'xrsocialmediaevents@gmail.com'; 'eventsxr@gmail.com'; 'xrbristol.regional@protonmail.com'; 'xrcymru@protonmail.com'; 'xr.eastengland@protonmail.com'; 'xrlondoncoord@gmail.com'; 'XRMidlands@protonmail.com'; 'xrne@protonmail.com'; 'support@xrnorth.org'; 'xrni@rebellion.earth'; 'xrscotland@gmail.com'; 'XR-SouthEastRegionalTeam@protonmail.com'; 'xr.regional.sw@protonmail.com'; 'talksandtraining.xrbristol@protonmail.com'; 'xrcymrutalksandtraining@gmail.com'; 'eoexrtnt@protonmail.com'; 'xrlondoncommunityevents@gmail.com'; 'xrmidlandstraining@protonmail.com'; 'XRNE.training@protonmail.com'; 'xrnw.training@gmail.com'; 'xryorkshire.training@gmail.com'; 'xrni.tt@rebellion.earth'; 'talksandtrainings.scotland@extinctionrebellion.uk'; 'xrttse@gmail.com'; 'xrsw.trainings@gmail.com'; 'Ring2021@protonmail.com'; 'juststopoil@protonmail.com'; 'youthclimateswarm@protonmail.com'; 'youthclimateswarm@protonmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Fourth Witness St... [ES-CLOUD_UK.FID10845365]
Attachments: Exhibits to BA4 Benjamin Austin Fourth Witness Statement - 14.03.24(225507713.1).pdf; BA4 Benjamin Austin Fourth Witness Statement - 14.03.24(225507686.1).pdf

Dear Recipient,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Fourth Witness Statement of Benjamin Austin and the Exhibit to the Fourth Witness Statement of Benjamin Austin.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: XR UK Action Circle <XR-action@protonmail.com>
Sent: 18 March 2024 14:38
To: Shell Service
Subject: Re: 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) - Fourth Witness St... [ES-CLOUD_UK.FID108...]

Thank you for contacting Extinction Rebellion UK Actions Circle

We apologise that our team is low on capacity at the moment so it may take some time for us to get back to you.

If you have not heard back from us within 2 weeks or if you require an immediate response, then please send us a reminder email or even better tag one of the coordinators on our MatterMost Reception Channel which can be found here

<https://xrb.link/DD45i9c>

If your email is regarding any of the following topics we will aim to respond ASAP

How to take action.

Proposals or suggestions for UK-Wide actions.

The XRUK Actions Strategy.

Feedback from UK-Wide actions.

If your email is regarding a topic not listed above then please consider the contact list below.

For on the ground Actions Support enquires please email
actionsupport@extinctionrebellion.uk

For Media & Messaging support enquires please email
media@rebellion.earth

Or complete the comms request form

<https://xrb.link/E9RA14kN>

If you are part of another organisation and would like to collaborate with us on an action or event please email
RelationshipsXRUK@protonmail.com

For legal advice, information or enquiries please email
xr-legal@riseup.net

For all other enquires please check out our website to find information, resources and contact details.

<https://xrb.link/E91ixZ6B>

In Love & Rebellion
- XRUK Actions Team

On 18 Mar 2024, at 14:30, Shell Service <shell.service@eversheds-sutherland.com> wrote:

> Dear Recipient,

>

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

- >
- > Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) (“the Shell Haven Proceedings”)
- >
- > Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) (“the Shell Centre Tower Proceedings”)
- >
- > We enclose by way of service in the above proceedings the Fourth Witness Statement of Benjamin Austin and the Exhibit to the Fourth Witness Statement of Benjamin Austin.
- >
- > Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com
- >
- > Eversheds Sutherland (International) LLP
- >
- > This email is sent for and on behalf of Eversheds Sutherland (International) LLP
- > Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales, (number OC304065), registered office One Wood Street, London, EC2V 7WS. Registered VAT number GB820704559. A list of names of the members (who are referred to as "partners") together with a list of those non-members who are designated as partners and their professional qualifications is available for inspection at the above office. Eversheds Sutherland (International) LLP is authorised and regulated by the Solicitors Regulation Authority (SRA number 383181) and governed by the SRA Standards and Regulations (see <https://www.sra.org.uk/solicitors/standards-regulations>). Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. Each Eversheds Sutherland entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Eversheds Sutherland entity. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.
- > Confidentiality: This e-mail and its attachments are intended solely for the person to whom they are addressed, are strictly confidential and may contain privileged information. If they have come to you in error you must not copy or show them to anyone; please reply to this e-mail and highlight the error to the sender and then immediately delete the message. Unless expressly agreed in writing, Eversheds Sutherland (International) LLP accepts no liability to persons other than clients of the firm in respect of the contents of emails or attachments.
- > We process your personal data in accordance with our Privacy Notice, www.eversheds-sutherland.com/privacy. If you have any queries or would like to exercise any of your rights in relation to your personal data, please contact dataprotectionoffice@eversheds-sutherland.com.
- > Cybercrime notification: Our bank account details will NOT change during the course of a transaction. Please speak to us before transferring any money. We will not take responsibility if you transfer money to an incorrect bank account. If you receive an email from Eversheds Sutherland (International) LLP requesting your bank details or purporting to amend our bank details, please contact us, or your solicitor, as appropriate, by telephone immediately to clarify.
- > www.eversheds-sutherland.com

Milner, Flo

From: Extinction Rebellion UK press team <press@extinctionrebellion.uk>
Sent: 18 March 2024 14:32
To: Shell Service
Subject: Thank you for contacting the Extinction Rebellion UK press team.

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

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

Find images from our latest actions here: <https://show.pics.io/xr-global-media-breaking-news/search>

(please credit Extinction Rebellion or the photographer named in the file)

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

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

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

In love and rage,

XR UK press team

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- support@xrnorth.org

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

Additional information follows :
-- 5.7.1 <support@xrnorth.org>: Recipient address rejected: Recipient not available

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:32
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:31
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:31
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 18 March 2024 14:31
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Taylor, Bethany

From: Shell Service
Sent: 19 March 2024 08:52
To: 'enquiries@extinctionrebellion.uk'; 'press@extinctionrebellion.uk'; 'xrvideo@protonmail.com'; 'xr-action@protonmail.com'; 'xraffinitysupport@protonmail.com'; 'xr-arrestwelfare@protonmail.com'; 'artsxr@gmail.com'; 'xr-CitizensAssembly@protonmail.com'; 'xr.connectingcommunities@gmail.com'; 'xrdemocracy@protonmail.com'; 'xrnotables@gmail.com'; 'integration@rebellion.earth'; 'xr-legal@riseup.net'; 'press@extinctionrebellion.uk'; 'xr-newsletter@protonmail.com'; 'xr-peoplesassembly@protonmail.com'; 'xrpoliceliaison@protonmail.com'; 'rebelringers@rebellion.earth'; 'xr.regenerativeculture@gmail.com'; 'xr-regionaldevelopment@protonmail.com'; 'RelationshipsXRUK@protonmail.com'; 'xr.mandates@gmail.com'; 'socialmedia@extinctionrebellion.uk'; 'xrsocialmediaevents@gmail.com'; 'eventsxr@gmail.com'; 'xrbristol.regional@protonmail.com'; 'xrcymru@protonmail.com'; 'xr.eastengland@protonmail.com'; 'xrlondoncoord@gmail.com'; 'XRMidlands@protonmail.com'; 'xrne@protonmail.com'; 'support@xrnorth.org'; 'xrni@rebellion.earth'; 'xrscotland@gmail.com'; 'XR-SouthEastRegionalTeam@protonmail.com'; 'xr.regional.sw@protonmail.com'; 'talksandtraining.xrbristol@protonmail.com'; 'xrcymrutalksandtraining@gmail.com'; 'eoexrtnt@protonmail.com'; 'xrlondoncommunityevents@gmail.com'; 'xrmidlandstraining@protonmail.com'; 'XRNE.training@protonmail.com'; 'xrnw.training@gmail.com'; 'xryorkshire.training@gmail.com'; 'xrni.tt@rebellion.earth'; 'talksandtrainings.scotland@extinctionrebellion.uk'; 'xrttse@gmail.com'; 'xrsw.trainings@gmail.com'; 'Ring2021@protonmail.com'; 'juststopoil@protonmail.com'; 'youthclimateswarm@protonmail.com'; 'youthclimateswarm@protonmail.com'
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) / Shell U.K. Limited v Persons Unknown (QB-2022-001241) / Shell International Petroleum Company Limited v Persons Unknown (QB-2022-001259) - Second Witness St... [ES-CLOUD_UK.FID10845365]
Attachments: CPG2 Second Witness Statement of Christopher Prichard-Gamble - 14 March 2024(225525621.1).pdf; You've been sent large files

Dear Recipient,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Second Witness Statement of Christopher Prichard-Gamble and the Exhibit to the Second Witness Statement of Christopher Prichard-Gamble.

Please note that a copy of these documents have also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: XR UK Action Circle <XR-action@protonmail.com>
Sent: 19 March 2024 08:58
To: Shell Service
Subject: Re: 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) - Second Witness St... [ES-CLOUD_UK.FID108...]

Thank you for contacting Extinction Rebellion UK Actions Circle

We apologise that our team is low on capacity at the moment so it may take some time for us to get back to you.

If you have not heard back from us within 2 weeks or if you require an immediate response, then please send us a reminder email or even better tag one of the coordinators on our MatterMost Reception Channel which can be found here

<https://xrb.link/DD45i9c>

If your email is regarding any of the following topics we will aim to respond ASAP

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Proposals or suggestions for UK-Wide actions.

The XRUK Actions Strategy.

Feedback from UK-Wide actions.

If your email is regarding a topic not listed above then please consider the contact list below.

For on the ground Actions Support enquires please email
actionsupport@extinctionrebellion.uk

For Media & Messaging support enquires please email
media@rebellion.earth

Or complete the comms request form

<https://xrb.link/E9RA14kN>

If you are part of another organisation and would like to collaborate with us on an action or event please email
RelationshipsXRUK@protonmail.com

For legal advice, information or enquiries please email
xr-legal@riseup.net

For all other enquires please check out our website to find information, resources and contact details.

<https://xrb.link/E91ixZ6B>

In Love & Rebellion
- XRUK Actions Team

On 19 Mar 2024, at 08:52, Shell Service <shell.service@eversheds-sutherland.com> wrote:

> Dear Recipient,

>

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

- >
- > Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) (“the Shell Haven Proceedings”)
- >
- > Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) (“the Shell Centre Tower Proceedings”)
- >
- > We enclose by way of service in the above proceedings the Second Witness Statement of Christopher Prichard-Gamble and the Exhibit to the Second Witness Statement of Christopher Prichard-Gamble.
- >
- > Please note that a copy of these documents have also been made available via the following website:
www.noticespublic.com
- >
- > Eversheds Sutherland (International) LLP
- >
- > This email is sent for and on behalf of Eversheds Sutherland (International) LLP
- > Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales, (number OC304065), registered office One Wood Street, London, EC2V 7WS. Registered VAT number GB820704559. A list of names of the members (who are referred to as "partners") together with a list of those non-members who are designated as partners and their professional qualifications is available for inspection at the above office. Eversheds Sutherland (International) LLP is authorised and regulated by the Solicitors Regulation Authority (SRA number 383181) and governed by the SRA Standards and Regulations (see <https://www.sra.org.uk/solicitors/standards-regulations>). Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. Each Eversheds Sutherland entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Eversheds Sutherland entity. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.
- > Confidentiality: This e-mail and its attachments are intended solely for the person to whom they are addressed, are strictly confidential and may contain privileged information. If they have come to you in error you must not copy or show them to anyone; please reply to this e-mail and highlight the error to the sender and then immediately delete the message. Unless expressly agreed in writing, Eversheds Sutherland (International) LLP accepts no liability to persons other than clients of the firm in respect of the contents of emails or attachments.
- > We process your personal data in accordance with our Privacy Notice, www.eversheds-sutherland.com/privacy. If you have any queries or would like to exercise any of your rights in relation to your personal data, please contact dataprotectionoffice@eversheds-sutherland.com.
- > Cybercrime notification: Our bank account details will NOT change during the course of a transaction. Please speak to us before transferring any money. We will not take responsibility if you transfer money to an incorrect bank account. If you receive an email from Eversheds Sutherland (International) LLP requesting your bank details or purporting to amend our bank details, please contact us, or your solicitor, as appropriate, by telephone immediately to clarify.
- > www.eversheds-sutherland.com

Milner, Flo

From: Extinction Rebellion UK press team <press@extinctionrebellion.uk>
Sent: 19 March 2024 08:53
To: Shell Service
Subject: Thank you for contacting the Extinction Rebellion UK press team.

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

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

Find images from our latest actions here: <https://show.pics.io/xr-global-media-breaking-news/search>

(please credit Extinction Rebellion or the photographer named in the file)

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

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

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

In love and rage,

XR UK press team

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:54
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:54
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:54
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :
-- support@xrnorth.org

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

Additional information follows :
-- 5.7.1 <support@xrnorth.org>: Recipient address rejected: Recipient not available

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:54
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:54
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:54
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:54
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:54
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Milner, Flo

From: Postmaster2 <postmaster@eversheds-sutherland.com>
Sent: 19 March 2024 08:53
To: Shell Service
Subject: [Postmaster] Email Delivery Failure

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

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

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

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

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

Bindmans LLP
236 Gray's Inn Road
London
WC1X 8HB

Date: 18 March 2024
Our Ref: LINDBERR\356009.000001
Email: Shell.service@eversheds-sutherland.com

By Hand

Dear Bindmans LLP

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

Shell U.K. Limited v Persons Unknown (Claim No: QB-2022-001241)

**Shell International Petroleum Company Limited v Persons Unknown (Claim No:
(QB-2022-001259)**

(together "the Proceedings")

Pursuant to the Order made by Mr Justice Soole on 15 March 2024 in the above Proceedings, please see enclosed by way of service the following documents

1. Sixth Witness Statement of Alison Oldfield dated 12 March 2024;
2. Exhibits to Sixth Witness Statement of Allison Oldfield dated 12 March 2024;
3. Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024;
4. Exhibits to Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024;
5. Fourth Witness Statement of Benjamin Austin dated 14 March 2024; and
6. Exhibits to Fourth Witness Statement of Benjamin Austin dated 14 March 2024.

Together the above documents comprise our clients' evidence in support of the continuation of the injunctions in the above proceedings.

We also enclose by way of service (for completeness) the Seventh Witness Statement of Alison Oldfield dealing with service of the Order of 13 March 2024.

Please note that electronic copies of these documents have also been made available via the following website: www.noticespublic.com.

Yours sincerely

Eversheds Sutherland (International) LLP

Eversheds Sutherland (International) LLP

cloud_uk\225550615\1\mortonsx

Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales (number OC304065), registered office One Wood Street, London EC2V 7WS. Authorised and regulated by the Solicitors Regulation Authority (SRA number 383181). A list of the members' names and their professional qualifications is available for inspection at the above office.

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

Jessica Branch

Date: 18 March 2024
Our Ref: LINDBERR\356009.000001
Email: Shell.service@eversheds-sutherland.com**By Hand**

Dear Ms Branch

Shell U.K Oil Products Limited v Persons Unknown (Claim No: QB-2022-0001420)**Shell U.K. Limited v Persons Unknown (Claim No: QB-2022-001241)****Shell International Petroleum Company Limited v Persons Unknown (Claim No:
(QB-2022-001259)****(together "the Proceedings")**

Pursuant to the Order made by Mr Justice Soole on 15 March 2024 in the above Proceedings, please see enclosed by way of service the following documents

1. Sixth Witness Statement of Alison Oldfield dated 12 March 2024;
2. Exhibits to Sixth Witness Statement of Allison Oldfield dated 12 March 2024;
3. Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024;
4. Exhibits to Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024;
5. Fourth Witness Statement of Benjamin Austin dated 14 March 2024; and
6. Exhibits to Fourth Witness Statement of Benjamin Austin dated 14 March 2024.

Together the above documents comprise our clients' evidence in support of the continuation of the injunctions in the above proceedings.

We also enclose by way of service (for completeness) the Seventh Witness Statement of Alison Oldfield dealing with service of the Order of 13 March 2024.

Please note that electronic copies of these documents have also been made available via the following website: www.noticespublic.com.

Yours sincerely

**Eversheds Sutherland (International) LLP**

cloud_uk\225502187\1\mortonsx

Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales (number OC304065), registered office One Wood Street, London EC2V 7WS. Authorised and regulated by the Solicitors Regulation Authority (SRA number 383181). A list of the members' names and their professional qualifications is available for inspection at the above office.

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Michael Gibson

Date: 18 March 2024
Our Ref: LINDBERR\356009.000001
Email: Shell.service@eversheds-sutherland.com**By Hand****Shell U.K Oil Products Limited v Persons Unknown (Claim No: QB-2022-0001420)****Shell U.K. Limited v Persons Unknown (Claim No: QB-2022-001241)****Shell International Petroleum Company Limited v Persons Unknown (Claim No:
QB-2022-001259)****(together "the Proceedings")**

Pursuant to the Order made by Mr Justice Soole on 15 March 2024 in the above Proceedings, please see enclosed by way of service the following documents


1. Sixth Witness Statement of Alison Oldfield dated 12 March 2024;
2. Exhibits to Sixth Witness Statement of Allison Oldfield dated 12 March 2024;
3. Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024;
4. Exhibits to Second Witness Statement of Christopher Prichard-Gamble dated 14 March 2024;
5. Fourth Witness Statement of Benjamin Austin dated 14 March 2024; and
6. Exhibits to Fourth Witness Statement of Benjamin Austin dated 14 March 2024.

Together the above documents comprise our clients' evidence in support of the continuation of the injunctions in the above proceedings.

We also enclose by way of service (for completeness) the Seventh Witness Statement of Alison Oldfield dealing with service of the Order of 13 March 2024.

Please note that electronic copies of these documents have also been made available via the following website: www.noticespublic.com.

Yours sincerely

**Eversheds Sutherland (International) LLP**

cloud_uk\225545197\1\mortonsx

Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales (number OC304065), registered office One Wood Street, London EC2V 7WS. Authorised and regulated by the Solicitors Regulation Authority (SRA number 383181). A list of the members' names and their professional qualifications is available for inspection at the above office.

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Milner, Flo

From: Wright, Alexander
Sent: 18 March 2024 12:44
To: Alice Hardy
Cc: Shell REL
Subject: 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) - Sixth Witness Sta... [ES-CLOUD_UK.FID10845365]
Attachments: SIGNED AJO6 - AJO Sixth Witness Statement - 2024 - Service (REDACTED) (225393649.1).pdf; AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 1 of 3).pdf

Dear Alice,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Sixth Witness Statement of Alison Oldfield and part 1 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Parts 2 and 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

Please note that a copy of the attached document has also been made available via the following website: www.noticespublic.com

Regards

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

T: 44 161 831 8582

M: 44 7500 578 620

www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland

Helping our clients, our people and our communities to thrive

Milner, Flo

From: Wright, Alexander
Sent: 18 March 2024 12:44
To: Alice Hardy
Cc: Shell REL
Subject: 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) - Sixth Witness Sta... [ES-CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 2 of 3).pdf

Dear Alice,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings part 2 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Part 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

Please note that a copy of the attached document has also been made available via the following website: www.noticespublic.com

Regards

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www.eversheds-sutherland.com

Eversheds Sutherland

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Milner, Flo

From: Wright, Alexander
Sent: 18 March 2024 12:46
To: Alice Hardy
Cc: Shell REL
Subject: 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) - Sixth Witness Sta... [ES-CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 3 of 3).pdf

Dear Alice,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings part 3 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Please note that a copy of the attached document has also been made available via the following website: www.noticespublic.com

Regards

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www.eversheds-sutherland.com

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Milner, Flo

From: Wright, Alexander
Sent: 18 March 2024 12:50
To: Alice Hardy
Cc: Shell REL
Subject: RE: 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) - Seventh Witne... [ES-CLOUD_UK.FID10845365]
Attachments: Exhibit AJO7 - Exhibits to AJO Seventh Witness Statement - 2024 - Service.pdf; SIGNED AJO7 - AJO Seventh Witness Statement - 2024 - Service.pdf

Dear Alice,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Seventh Witness Statement of Alison Oldfield and the Exhibit to the Seventh Witness Statement of Alison Oldfield.

Please note that a copy of the attached document has also been made available via the following website: www.noticespublic.com

Regards

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

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www.eversheds-sutherland.com

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Milner, Flo

From: Wright, Alexander
Sent: 18 March 2024 12:52
To: Alice Hardy
Cc: Shell REL
Subject: RE: 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) - Fourth Witness... [ES-CLOUD_UK.FID10845365]
Attachments: Exhibits to BA4 Benjamin Austin Fourth Witness Statement - 14.03.24(225507713.1).pdf; BA4 Benjamin Austin Fourth Witness Statement - 14.03.24(225507686.1).pdf

Dear Alice,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Fourth Witness Statement of Benjamin Austin and the Exhibit to the Fourth Witness Statement of Benjamin Austin.

Please note that a copy of the attached document has also been made available via the following website: www.noticespublic.com

Regards

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

T: 44 161 831 8582
M: 44 7500 578 620
www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland

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Milner, Flo

From: Wright, Alexander
Sent: 18 March 2024 14:04
To: Alice Hardy
Cc: Shell REL
Subject: 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) - Second Witness St... [ES-CLOUD_UK.FID10845365]
Attachments: CPG2 Second Witness Statement of Christopher Prichard-Gamble - 14 March 2024(225525621.1).pdf

Dear Alice,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Second Witness Statement of Christopher Prichard-Gamble.

The Exhibit to the Second Witness Statement of Christopher Prichard-Gamble will be sent to you separately via a link using Mimecast.

Please note that a copy of the Second Witness Statement of Christopher Prichard-Gamble and its Exhibit have also been made available via the following website: www.noticespublic.com

Regards

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

T: 44 161 831 8582
M: 44 7500 578 620
www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

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Milner, Flo

From: Wright, Alexander <alexwright@eversheds-sutherland.com>
Sent: 18 March 2024 14:09
To: Alice Hardy
Cc: Shell REL
Subject: 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) - Exhibit to the Second Witness Statement of C...
Attachments: Mimecast Large File Send Instructions

I'm using Mimecast to share large files with you. Please see the attached instructions.

Dear Alice,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Exhibit to the Second Witness Statement of Christopher Prichard-Gamble.

Please note that a copy has also been made available via the following website: www.noticespublic.com

Regards

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

T: 44 161 831 8582

M: 44 7500 578 620

www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland

Helping our clients, our people and our communities to thrive

This email is sent for and on behalf of Eversheds Sutherland (International) LLP

Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales, (number OC304065), registered office One Wood Street, London, EC2V 7WS. Registered VAT number GB820704559. A list of names of the members (who are referred to as "partners") together with a list of those non-members who are designated as partners and their professional qualifications is available for inspection at the above office. Eversheds Sutherland (International) LLP is authorised and regulated by the Solicitors Regulation Authority (SRA number 383181) and governed by the SRA Standards and Regulations (see <https://www.sra.org.uk/solicitors/standards-regulations>). Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. Each Eversheds Sutherland entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Eversheds Sutherland entity. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.

Milner, Flo

From: Wright, Alexander
Sent: 19 March 2024 08:30
To: Alice Hardy
Cc: Shell REL
Subject: 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) - Court Order dated... [ES-CLOUD_UK.FID10845365]
Attachments: King's Bench Associate's Order - 15.03.2024 - redacted_redacted(225607697.1).pdf

Dear Alice,

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

Shell U.K. Limited v Persons Unknown (Claim Number: QB-2022-001241) ("the Shell Haven Proceedings")

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service the Order of Mr Justice Soole dated 15 March 2024 in the above proceedings.

Please note that a copy has also been made available via the following website: www.noticespublic.com

Regards

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

T: 44 161 831 8582

M: 44 7500 578 620

www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland

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Milner, Flo

From: Wright, Alexander
Sent: 21 March 2024 16:20
To: Alice Hardy
Cc: Shell REL
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Re-Amended Claim Form and Re-amended Particulars of Claim [ES-CLOUD_UK.FID10845365]
Attachments: Sealed Re-Amended Claim Form - QB-2022-001420.pdf; Re-Amended Particulars of Claim (QB-2022-001420).pdf

Dear Alice,

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

We enclose by way of service in the above proceedings the sealed Re-Amended Claim Form and Re-amended Particulars of Claim in respect of Claim No: QB-2022-0001420.

Please note that a copy has also been made available via the following website: www.noticespublic.com

Regards

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

T: 44 161 831 8582

M: 44 7500 578 620

www.linkedin.com/in/alexwrighteversheds

www.eversheds-sutherland.com

Eversheds Sutherland

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Milner, Flo

From: Shell Service
Sent: 18 March 2024 12:55
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: SIGNED AJO6 - AJO Sixth Witness Statement - 2024 - Service (REDACTED) (225393649.1).pdf; AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 1 of 3).pdf

Dear Recipient,

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

We enclose by way of service in the above proceedings the Sixth Witness Statement of Alison Oldfield and part 1 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Parts 2 and 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 12:55
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 2 of 3).pdf

Dear Recipient,

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

We enclose by way of service in the above proceedings part 2 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Part 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 12:58
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 3 of 3).pdf

Dear Recipient,

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

We enclose by way of service in the above proceedings part 3 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:01
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Seventh Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: Exhibit AJO7 - Exhibits to AJO Seventh Witness Statement - 2024 - Service.pdf; SIGNED AJO7 - AJO Seventh Witness Statement - 2024 - Service.pdf

Dear Recipient,

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

We enclose by way of service in the above proceedings the Seventh Witness Statement of Alison Oldfield the Exhibit to the Seventh Witness Statement of Alison Oldfield.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:03
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Fourth Witness Statement of Benjamin Austin [ES-CLOUD_UK.FID10845365]
Attachments: Exhibits to BA4 Benjamin Austin Fourth Witness Statement - 14.03.24(225507713.1).pdf; BA4 Benjamin Austin Fourth Witness Statement - 14.03.24(225507686.1).pdf

Dear Recipient,

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

We enclose by way of service in the above proceedings the Fourth Witness Statement of Benjamin Austin and the Exhibit to the Fourth Witness Statement of Benjamin Austin.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 19 March 2024 08:31
To:
Subject: sons Unknown (QB-2022-001420) - Court Order
dated 15 March 2024 [ES-CLOUD_UK.FID10845365]
Attachments: King's Bench Associate's Order - 15.03.2024 - redacted_redacted(225607697.1).pdf

Dear Recipient,

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

We enclose by way of service the Order of Mr Justice Soole dated 15 March 2024 in the above proceedings.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 19 March 2024 08:42
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Second Witness Statement of Christopher Prichard-Gamble [ES-CLOUD_UK.FID10845365]
Attachments: CPG2 Second Witness Statement of Christopher Prichard-Gamble - 14 March 2024(225525621.1).pdf; You've been sent large files

Dear Recipient,

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

We enclose by way of service in the above proceedings the Second Witness Statement of Christopher Prichard-Gamble and the Exhibit to the Second Witness Statement of Christopher Prichard-Gamble.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 21 March 2024 16:19
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Re-Amended Claim Form and Re-amended Particulars of Claim [ES-CLOUD_UK.FID10845365]
Attachments: Sealed Re-Amended Claim Form - QB-2022-001420.pdf; Re-Amended Particulars of Claim (QB-2022-001420).pdf

Dear Recipient,

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

We enclose by way of service in the above proceedings the sealed Re-Amended Claim Form and Re-amended Particulars of Claim in respect of Claim No: QB-2022-0001420.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:16
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: SIGNED AJO6 - AJO Sixth Witness Statement - 2024 - Service (REDACTED) (225393649.1).pdf; AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 1 of 3).pdf

Dear Recipient,

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

We enclose by way of service in the above proceedings the Sixth Witness Statement of Alison Oldfield and part 1 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Parts 2 and 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

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www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:17
To:
Subject: Persons Unknown (QB-2022-001420) - Sixth
Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part
2 of 3).pdf

Dear Recipient,

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

We enclose by way of service in the above proceedings part 2 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

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From: Shell Service
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To:
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Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 3 of 3).pdf

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Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:23
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Seventh Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: Exhibit AJO7 - Exhibits to AJO Seventh Witness Statement - 2024 - Service.pdf; SIGNED AJO7 - AJO Seventh Witness Statement - 2024 - Service.pdf

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Eversheds Sutherland (International) LLP

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From: Shell Service
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Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Court Order dated 15 March 2024 [ES-CLOUD_UK.FID10845365]
Attachments: King's Bench Associate's Order - 15.03.2024 - redacted_redacted(225607697.1).pdf

Dear Recipient,

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

We enclose by way of service the Order of Mr Justice Soole dated 15 March 2024 in the above proceedings.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 19 March 2024 08:42
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Second Witness Statement of Christopher Prichard-Gamble [ES-CLOUD_UK.FID10845365]
Attachments: CPG2 Second Witness Statement of Christopher Prichard-Gamble - 14 March 2024(225525621.1).pdf; You've been sent large files

Dear Recipient,

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

We enclose by way of service in the above proceedings the Second Witness Statement of Christopher Prichard-Gamble and the Exhibit to the Second Witness Statement of Christopher Prichard-Gamble.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 21 March 2024 16:21
To:
Subject: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-001420) - Sealed Re-Amended Claim Form and Re-amended Particulars of Claim [ES-CLOUD_UK.FID10845365]
Attachments: Sealed Re-Amended Claim Form - QB-2022-001420.pdf; Re-Amended Particulars of Claim (QB-2022-001420).pdf

Dear Recipient,

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

We enclose by way of service in the above proceedings the sealed Re-Amended Claim Form and Re-amended Particulars of Claim in respect of Claim No: QB-2022-0001420.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:07
To:
Subject: Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) - Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: SIGNED AJO6 - AJO Sixth Witness Statement - 2024 - Service (REDACTED) (225393649.1).pdf; AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 1 of 3).pdf

Dear Recipient,

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Sixth Witness Statement of Alison Oldfield and part 1 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Parts 2 and 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:08
To:
Subject: Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) - Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 2 of 3).pdf

Dear Recipient,

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings part 2 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Part 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield will follow by separate email.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:11
To:
Subject: pany Limited v Persons Unknown (Claim Number: QB-2022-001259) - Sixth Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: AJO6 Exhibit to the Sixth Witness Statement of Alison Oldfield 12 March 2024 (Part 3 of 3).pdf

Dear Recipient,

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We enclose by way of service in the above proceedings part 3 of 3 of the Exhibit to the Sixth Witness Statement of Alison Oldfield.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 18 March 2024 13:13
To:
Subject: Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) - Seventh Witness Statement of Alison Oldfield [ES-CLOUD_UK.FID10845365]
Attachments: Exhibit AJO7 - Exhibits to AJO Seventh Witness Statement - 2024 - Service.pdf; SIGNED AJO7 - AJO Seventh Witness Statement - 2024 - Service.pdf

Dear Recipient,

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service in the above proceedings the Seventh Witness Statement of Alison Oldfield the Exhibit to the Seventh Witness Statement of Alison Oldfield.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 19 March 2024 08:42
To:
Subject: Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) - Second Witness Statement of Christopher Prichard-Gamble [ES-CLOUD_UK.FID10845365]
Attachments: CPG2 Second Witness Statement of Christopher Prichard-Gamble - 14 March 2024(225525621.1).pdf; You've been sent large files

Dear Recipient,

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We enclose by way of service in the above proceedings the Second Witness Statement of Christopher Prichard-Gamble and the Exhibit to the Second Witness Statement of Christopher Prichard-Gamble.

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www.noticespublic.com

Eversheds Sutherland (International) LLP

Milner, Flo

From: Shell Service
Sent: 19 March 2024 08:32
To:
Subject: Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) - Court Order dated 15 March 2024 [ES-CLOUD_UK.FID10845365]
Attachments: King's Bench Associate's Order - 15.03.2024 - redacted_redacted(225607697.1).pdf

Dear Recipient,

Shell International Petroleum Company Limited v Persons Unknown (Claim Number: QB-2022-001259) ("the Shell Centre Tower Proceedings")

We enclose by way of service the Order of Mr Justice Soole dated 15 March 2024 in the above proceedings.

Please note that a copy of the attached document has also been made available via the following website:
www.noticespublic.com

Eversheds Sutherland (International) LLP

1 IN THE HIGH COURT OF JUSTICE
2 KING'S BENCH DIVISION

Royal Courts of Justice
Strand, London WC2A 2LL

3 Monday, 11th March 2024

4 Before:
5 MR. JUSTICE SOOLE

- - - - -

BETWEEN:

6 SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED
7 Claimant (QB-2022-001259)

8 SHELL U.K. OIL PRODUCTS LIMITED
9 Claimant (QB-2022-001420)

10 SHELL U.K. LIMITED
11 Claimant (QB-2022-001241)

- and -

12 PERSONS UNKNOWN ENTERING OR REMAINING IN OR ON THE BUILDING
13 KNOWN AS SHELL CENTRE TOWER, BELVEDERE ROAD, LONDON ("SHELL
14 CENTRE TOWER") WITHOUT THE CONSENT OF THE CLAIMANT, OR
15 DAMAGING THE BUILDING OR DAMAGING OR BLOCKING THE ENTRANCES
16 TO THE SAID BUILDING
17 Defendant (QB-2022-001259)

18 PERSONS UNKNOWN ENTERING OR REMAINING AT THE CLAIMANT'S SITE
19 KNOWN AS SHELL HAVEN, STANFORD-LE-HOPE (AND AS FURTHER DEFINED
20 IN THE PARTICULARS OF CLAIM) WITHOUT THE CONSENT OF THE
21 CLAIMANT, OR BLOCKING THE ENTRANCES TO THAT SITE
22 Defendant (QB-2022-001241)

23 PERSONS UNKNOWN DAMAGING, AND/OR BLOCKING THE USE OF OR
24 ACCESS TO ANY SHELL PETROL STATION IN ENGLAND AND WALES, OR TO
25 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)

- - - - -

Transcript of the Stenograph Notes
of Marten Walsh Cherer Ltd.
2nd Floor, Quality House, 6-9 Quality Court,
Chancery Lane, London, WC2A 1HP.
Tel No: 020 7067 2900. DX: 410 LDE
Email: info@martenwalshcherer.com
Website: www.martenwalshcherer.com

- - - - -

1 **MISS MYRIAM STACEY KC** (instructed by **Eversheds Sutherland**
2 **(International) LLP**) for the **Claimants**

3 **THE DEFENDANTS** did not appear and were not represented

4 **MR. CHARLES LAURIE** (a proposed named defendant) appeared **In Person**

5 - - - - -

6 **PROCEEDINGS**

7 *[Transcript prepared without access to Supplemental bundle]*

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1 STACEY KC

2 MR. JUSTICE SOOLE: Yes?

3 MISS STACEY: My Lord, may it please you. I appear on behalf of
4 the claimants in this matter and Mr. Laurie, Mr. Charles
5 Laurie ----

6 MR. JUSTICE SOOLE: Good morning.

7 MISS STACEY: ---- who is not currently a defendant but he is one
8 of the proposed named defendants that form the subject of our
9 application.

10 My Lord, this ----

11 MR. JUSTICE SOOLE: Thank you very much for attending. What
12 I will do is hear from Miss Stacey first of all and you will
13 have every opportunity to say anything you want to; all right?
14 Thank you very much.

15 There is nobody else here who is ----

16 MISS STACEY: There is nobody else here. My Lord, you will have
17 perhaps gathered -- I will come to some housekeeping -- but in
18 a nutshell this application is for three matters: first, for
19 joinder of in addition I say, to persons unknown, an
20 additional 14 named defendants which are set out in a schedule
21 which I will take your Lordship to. That is the first matter.
22 The second matter is an associated application following on
23 from the first, for alternative service.

24 MR. JUSTICE SOOLE: Of this application?

25 MISS STACEY: Of this application, in respect of only two of those

1 STACEY KC

2 individuals for whom social media accounts have been obtained
3 in addition to their personal addresses.

4 MR. JUSTICE SOOLE: Is that not a prior application?

5 MISS STACEY: No, my Lord, because we served them at their last
6 known addresses which were provided to us from the police.
7 The basis of the alternative service is a belt and braces type
8 situation, where we do not have the definitive proof of
9 address but we have been able to identify two social media
10 accounts at which they have been served.

11 MR. JUSTICE SOOLE: Yes. Maybe in my reading I was too hasty,
12 I am not clear: what is the position under the existing
13 orders for the service of applications?

14 MISS STACEY: The applications fall currently under the persons
15 unknown alternative service provision, so they will stand ----

16 MR. JUSTICE SOOLE: Yes, which order are we looking at.

17 MISS STACEY: We are looking at Hill J's order, she is the last
18 word, and she made an order dealing with all ----

19 MR. JUSTICE SOOLE: Can you take me to that order?

20 MISS STACEY: Yes, of course. Do you have a hard copy bundle, my
21 Lord?

22 MR. JUSTICE SOOLE: Yes.

23 MISS STACEY: It is behind tab 4 at page 58. No, that is the
24 order in relation to the police, I am so sorry. The
25 substantive order, just bear with me ----

1 STACEY KC

2 MR. JUSTICE SOOLE: It would be very helpful if the index
3 identified orders and things rather than just exhibits to
4 witness statements. I found that rather unhelpful yesterday
5 afternoon when I was trying to... I know there is a lot of
6 work.

7 MISS STACEY: I apologise to you and I will pass that back. It is
8 at page 78, my Lord. It is an order dated 23rd May and the
9 service provisions are dealt with at paragraph 8 on page 81.
10 You will see there that that deals with the service of that
11 order, so that is paragraph 8(a) to place warning notices up.

12 MR. JUSTICE SOOLE: Yes, that is what I was looking for.

13 MISS STACEY: Is that what your Lordship was looking for?

14 MR. JUSTICE SOOLE: Yes, that is paragraph 10.

15 MISS STACEY: Indeed, paragraph 10 any ancillary documents shall
16 be sent in the manner set out in that paragraph.

17 MR. JUSTICE SOOLE: What are "ancillary documents" for these
18 purposes?

19 MISS STACEY: Ancillary documents have not specifically been
20 defined but the way we have read it has been to serve any
21 further document in the proceedings. That includes, my Lord

22 ----

23 MR. JUSTICE SOOLE: Yes, I see but on one reading it might be said
24 that it was those things connected to an amended claim form or
25 amended particulars of claim.

1 STACEY KC

2 MISS STACEY: That is not how we read it. We have been careful to
3 ensure that any document my Lord, that includes the
4 supplemental bundle, my skeleton argument and the hearing
5 bundle, have all been served in the manner specified in that
6 order. That is in Ms. Oldfield's 5th witness statement where
7 she sets out the steps taken.

8 MR. JUSTICE SOOLE: I see in 10(e) it is effecting service by
9 "sending the Amended Claim Form and any ancillary documents to
10 any person who has previously a copy of documents in these
11 proceedings ----"

12 MISS STACEY: Yes, indeed.

13 MR. JUSTICE SOOLE: "... either by post or e-mail" as was
14 requested."

15 MISS STACEY: Yes, that is in an addition to persons unknown.
16 I can take you through Ms. Oldfield's fifth statement. But
17 what essentially it boils down to is that persons unknown have
18 been served in the manner specified in paragraph 8.

19 MR. JUSTICE SOOLE: Paragraph 8 is serving that order.

20 MISS STACEY: Indeed, but all documents have been served in that
21 manner, so all subsequent documents have also been served in
22 that manner, my Lord. That includes this application. It
23 includes witness statements in this application and it
24 includes the hearing bundle, the skeleton and supplemental
25 bundle.

1 STACEY KC

2 MR. JUSTICE SOOLE: Sorry, when you say "in that manner", do you
3 mean as in 8(a) and (b)?

4 MISS STACEY: 8 is a stand-alone, you fix the warning notice in
5 relation to the order. (b) is what I am talking about. In
6 (b) you have uploaded a link which contains the additional
7 documents, so that they can be accessed. That is (b)(i).

8 MR. JUSTICE SOOLE: 8(b) is only concerned with service of this
9 order.

10 MISS STACEY: Indeed. But, my Lord, what I am saying is
11 additional documents have also been served in accordance with
12 8(b).

13 MR. JUSTICE SOOLE: I do not understand how you say "in accordance
14 with" because 8(b) is only concerned with the order.

15 MISS STACEY: In the manner specified, perhaps not strictly "in
16 accordance with".

17 MR. JUSTICE SOOLE: No.

18 MISS STACEY: In the manner specified in 8(b)(i) which is the
19 upload. So the link which you see there at 8(b)(i) enables
20 persons unknown, if they click on it, to see not only the
21 order but also subsequent documents that are relied on by the
22 claimant in these proceedings.

23 MR. JUSTICE SOOLE: What was the order before The order of Hill J?

24 MISS STACEY: There were three orders. There was Johnson J's
25 order and there was Bennathan J's order.

1 STACEY KC

2 MR. JUSTICE SOOLE: What do they provide in terms of service of
3 documents?

4 MISS STACEY: Essentially the same thing.

5 MR. JUSTICE SOOLE: Can I see those please?

6 MISS STACEY: Yes. Can you just bear with me? *(Pause)* We can
7 get them. I have been told they are not in court, my Lord.
8 I had expected them to be, but we can make ----

9 MR. JUSTICE SOOLE: You are probably right, but I am afraid things
10 do go wrong and I just want to see and trace it through
11 myself.

12 MISS STACEY: I fully recognise and fully understand that, my
13 Lord. All I can say to your Lordship is that we do not have
14 them physically here but we can pull them up and make them
15 available. I do not know whether your Lordship would prefer
16 to look at them in hard copy.

17 MR. JUSTICE SOOLE: I would much prefer to.

18 MISS STACEY: That will take a little time.

19 MR. JUSTICE SOOLE: They can be forwarded to the Court Associate.

20 MISS STACEY: Yes, that can certainly be done if I can be provided
21 with the e-mail contact details.

22 MR. JUSTICE SOOLE (To the Court Associate): Could you provide the
23 contact details and then forward them to my email?

24 MISS STACEY: Just so we are clear, my Lord, you would like the
25 orders that preceded Hill J's order?

1 STACEY KC

2 MR. JUSTICE SOOLE: Yes.

3 MISS STACEY: That can be done, I am told, quite quickly, my Lord.

4 MR. JUSTICE SOOLE: I must say I would have thought "ancillary
5 documents" meant ancillary to the claim form.

6 MISS STACEY: To is substantive document forming the subject of
7 the paragraph; I understand that, my Lord. I should have
8 taken your Lordship to paragraph 10. When I said "in
9 accordance with" it should strictly have been 10. On our
10 reading of "ancillary documents" which is a generous
11 interpretation, namely encompassing all future documents, we
12 have uploaded them to the link set out in 10(c). We have sent
13 them to the e-mail addresses specified in 10(d). I do not
14 know why the paragraph numbers have gone a bit awry, and we
15 have sent them to any persons ----

16 MR. JUSTICE SOOLE: I think they are a consequence of 8(a) and (b)
17 and then 10 has carried on as (c) and (d).

18 MISS STACEY: Yes, I think that is right. We have also sent them
19 to any persons who have requested as per 10(e). All of that
20 is set out in the fifth witness statement of Alison Oldfield
21 which is contained in the supplemental bundle.

22 MR. JUSTICE SOOLE: I will need to be taken to that. I have read
23 that once but I would like to be taken through that.

24 MISS STACEY: My Lord, that is what I meant by "in accordance
25 with". It is a generous interpretation, a cautious approach

1 STACEY KC

2 if you like. We have ensured that all documents we are
3 relying on have been served in those manners.

4 MR. JUSTICE SOOLE: An approach "generous" ----

5 MISS STACEY: On the wording.

6 MR. JUSTICE SOOLE: Generous to whom?

7 MISS STACEY: Well, cautious, in terms of one could have read
8 "ancillary" requiring us simply to... Generous to us
9 I suppose, my Lord.

10 MR. JUSTICE SOOLE: Yes.

11 MISS STACEY: One could see that that is an alternative service
12 provision ----

13 MR. JUSTICE SOOLE: I do not mean anything pejoratively ----

14 MISS STACEY: No, no.

15 MR. JUSTICE SOOLE: ---- but it is not generous to the defendants.

16 MISS STACEY: No. It is simply on the reading of the language we
17 anticipated that we would need to serve by alternative means.
18 Those are the means that the court has endorsed. It may be
19 that that needs to form the subject of any order I am asking
20 ----

21 MR. JUSTICE SOOLE: That is one reason I would like to see the
22 earlier orders. Quite often in these sorts of cases -- and
23 I have done quite a number of these now -- there is some
24 broader provision which says "and other documents". So I was
25 wondering whether that is somewhere in those orders.

1 STACEY KC

2 MISS STACEY: We can look at that my Lord, yes.

3 MR. JUSTICE SOOLE: Because that has to be done in advance. That
4 is why I was wondering whether you were asking for
5 retrospective alternative service.

6 MISS STACEY: My Lord, I am not, on the basis of the current
7 application because of the interpretation we placed on the
8 wording of paragraph 10. Insofar as you are not with me on
9 that wording, I recognise that I would need retrospective
10 endorsement. There is provision in the CPR that entitles the
11 court to order that steps already taken ----

12 MR. JUSTICE SOOLE: Yes.

13 MISS STACEY: ---- are sufficient for the purposes of alternative
14 service and I would lean on that provision of the CPR, if we
15 get there. That is in relation to persons unknown, my Lord,
16 and there are also steps that have been taken in relation to
17 the main defendants, which does form the subject of a specific
18 application if you are with me on the joinder.

19 What we have done there, if I can summarise, is
20 pre-emptively, if you like, we have engaged with all the named
21 persons in the schedule for the purposes of the undertakings
22 that we requested they enter into. That was, obviously, a
23 step we needed to take in order to engage. That is not
24 service strictly speaking; that is engagement. We have served
25 the documents namely this application and documents in the

1 STACEY KC

2 application on each of those individuals at the postal
3 addresses which have been provided to us by the police,
4 pre-emptively.

5 MR. JUSTICE SOOLE: I do not know what "pre-emptively" means.

6 MISS STACEY: We have already done it. I am not saying that is
7 what I propose to do. If you are with me on joinder, we will
8 subsequently serve them. They have already been provided with
9 the documents for the purposes of this application. Again,
10 that is set out in the witness statement of Ms. Oldfield in
11 the supplemental bundle.

12 MR. JUSTICE SOOLE: And each case by First Class Post?

13 MISS STACEY: In each case by Special Delivery, First Class Post,
14 and then by hand in respect of those persons where we could
15 not get a definitive proof of delivery which, my Lord, leaves
16 three individuals who we have not been able to serve by hand
17 as a ----

18 MR. JUSTICE SOOLE: Just before we move on to those three,
19 personal service, what is the provision under which you have
20 made that form of service?

21 MISS STACEY: 6.9. It is in (2) in the first column of the ----

22 MR. JUSTICE SOOLE: I am just looking at (1) this rule applies
23 where 6.5(1), where three things do not apply. So 6.5(1) and
24 (2) is only concerned with personal service of the claim form,
25 as opposed the other documents.

1 STACEY KC

2 MISS STACEY: Yes, my Lord.

3 MR. JUSTICE SOOLE: 6.7 does not arise. Well, wait a moment. So
4 6.9 is to do with service of the claim form so we are applying
5 6.15, are we not, other documents; is that right?

6 MISS STACEY: 6.15.

7 MR. JUSTICE SOOLE: Or 6.27?

8 MISS STACEY: 6.15 is the other documents in relation to the terms
9 of service.

10 MR. JUSTICE SOOLE: Yes, but do you not start at 6.27? Rule 6.15
11 applies to any documents in the proceedings as it applies to
12 the claim form.

13 MISS STACEY: Yes, and that reads into the other documents in
14 addition to the claim form, the provisions of 6.9.

15 MR. JUSTICE SOOLE: And then we go to 6.15.

16 MISS STACEY: Which is the alternative service provision, my Lord.

17 MR. JUSTICE SOOLE: *(Pause)* So it is not 6.9, is it?

18 MISS STACEY: 6.9 is ----

19 MR. JUSTICE SOOLE: Sorry, I just want it absolutely clear.

20 MISS STACEY: My Lord, I am sorry if I am not being clear. 6.9 is
21 the provision which provides for service at the last known
22 address in respect of an individual. We have effectively
23 viewed those provisions. We have been provided with the last
24 known address and therefore in light of the obligation to
25 serve individuals at such an address that is the starting

1 STACEY KC

2 point, if you like. That is how we served the provisions,
3 that is how we served the documents. We have done so by
4 Special Delivery by First Class Post. I recognise that I have
5 not strictly included in the application for alternative
6 service provision that the court endorse that as a means of
7 alternative service. That is perhaps something I need to do.
8 Those are the steps that are taken.

9 MR. JUSTICE SOOLE: 6.9(2), does that apply to documents to other
10 than the claim form?

11 MISS STACEY: It refers to specifically to "the claim form".

12 MR. JUSTICE SOOLE: Yes, but does it apply to documents other than
13 the claim form? And if so, why?

14 MISS STACEY: I do not think I could say it does, my Lord, no.

15 The purpose of this provision is obviously to subject the
16 defendant to the jurisdiction of the court to ensure they are
17 served with the claim form specifically.

18 MR. JUSTICE SOOLE: Yes, so ----

19 MISS STACEY: Then you have 6.15 which is: "Service of the claim
20 form by alternative [means] ..."

21 MR. JUSTICE SOOLE: 6 point?

22 MISS STACEY: 15.

23 MR. JUSTICE SOOLE: Yes.

24 MISS STACEY: And then, my Lord ----

25 MR. JUSTICE SOOLE: For which purpose you have to apply.

1 STACEY KC

2 MISS STACEY: For which purpose, I accept, you have to apply. You
3 then have 6.27, my Lord, which extends 6.15 to other
4 documents.

5 MR. JUSTICE SOOLE: You have to apply under 6.15/27 to serve other
6 documents by alternative means.

7 MISS STACEY: Yes, indeed. Where we are at the moment, my Lord,
8 is that no one has been joined. So the starting point is that
9 there is an application for joinder, and there are no named
10 defendants yet.

11 What we have been seeking to do is, if you like,
12 anticipate what could be required if one were to come before a
13 court in circumstances where the court is with us and it is
14 content to join such persons and to ensure that we have done
15 everything we would need to do in that scenario.

16 MR. JUSTICE SOOLE: Is not the natural place then to go to the
17 order for joining new parties?

18 MISS STACEY: Yes.

19 MR. JUSTICE SOOLE: Which I appreciate is what the earlier orders
20 are requiring and the case law requires.

21 MISS STACEY: Exactly. It is CPR part 19.

22 MR. JUSTICE SOOLE: Yes, 19 point?

23 MISS STACEY: I think it is in my skeleton, the provisions.

24 MR. JUSTICE SOOLE: 4?

25 MISS STACEY: Yes.

1 STACEY KC

2 MR. JUSTICE SOOLE: 19.4(1) "permission is required" once the
3 claim form has been served, which it has been.

4 MISS STACEY: Yes, and must be supported by evidence, must be made
5 under part 23.

6 MR. JUSTICE SOOLE: Under sub-rule (3) "may be made without
7 notice".

8 MISS STACEY: "(a) may be made without notice; and (b) must be
9 supported by evidence", indeed.

10 MR. JUSTICE SOOLE: You have purported to do with it notice.

11 MISS STACEY: We have purported to do it with notice, yes, indeed,
12 which is essentially what I mean by pre-emptively, if you
13 like. We wanted to ensure that they had ample opportunity to
14 see what we were doing in advance in order to give them
15 opportunity to attend.

16 Then you see sub-paragraph (7), my Lord, "... must be
17 served on (a) all parties ..." The parties at the present
18 moment are the persons unknown and we have done that.

19 MR. JUSTICE SOOLE: And any other... It would have to be on all
20 the other defendants.

21 MISS STACEY: And those persons who have asked in the past for
22 copies. We have done that.

23 MR. JUSTICE SOOLE: And those who are named defendants.

24 MISS STACEY: Exactly. We have done that, but it is not service
25 in the sense of being on a party because they are not yet

1 STACEY KC

2 parties. But they are persons "effected by the order".

3 MR. JUSTICE SOOLE: Once an order has been made they are parties.

4 MISS STACEY: They are indeed. It says on "all parties" must be
5 served subsequently, but I am saying not in advance
6 necessarily.

7 MR. JUSTICE SOOLE: It would not be an order in advance.

8 MISS STACEY: No, but it would come within (b) I suggest because
9 "any other person affected by the order"; they are persons who
10 would be affected by the order.

11 MR. JUSTICE SOOLE: No, no, but (7) is "An order for the removal",
12 it is not an application for an order.

13 MISS STACEY: My Lord, you are right, yes. If you were to make
14 the order then it would need to be served on those persons
15 ----

16 MR. JUSTICE SOOLE: Yes.

17 MISS STACEY: ---- once they have become parties which we fully
18 intend to do.

19 MR. JUSTICE SOOLE: You might say sub-rule (9) speaks the other
20 way, consistent with what you said before: "A new defendant
21 does not become a party to the proceedings until the amended
22 claim form has been served on them."

23 MISS STACEY: That is strictly not subjected to the jurisdiction
24 of the court per *Cameron*.

25 MR. JUSTICE SOOLE: Yes.

1 STACEY KC

2 MISS STACEY: But in order to deal with these nuances and
3 technical difficulties, what we have done, as I have been
4 trying to explain to your Lordship, is we are anticipating
5 what we will need to do. But as I stand here today -- and
6 I will take you to the witness statement of Alison Oldfield --
7 we have served on persons unknown pursuant to the orders that
8 previously were made by the court, and we have ----

9 MR. JUSTICE SOOLE: Subject to interpretation of that order, yes.

10 MISS STACEY: Subject to the interpretation, indeed, your
11 Lordship's point. We have also sent to all named individuals
12 at the addresses, by Special Delivery First Class Post and by
13 hand where we have been able to, the documents so that the
14 analogous to personal service pursuant to 6.9. We have not
15 yet made an application for alternative service in relation to
16 those individuals.

17 MR. JUSTICE SOOLE: One way of dealing with that might be, given
18 that the power to add parties without notice, is to join the
19 parties and give them permission to apply to vary if they
20 think fit.

21 MISS STACEY: Precisely my Lord, yes.

22 My Lord, you will have this point I am sure, that we are
23 taking these steps in order predominantly, in order solely to
24 comply with the categories under the *Wolverhampton* Guidance to
25 ensure we are taking all the procedural requirements and can

1 STACEY KC

2 be said to be progressing the claims adequately. There has
3 been some delay but it has taken a great deal of time to
4 obtain all the disclosure from the police to carry out the
5 underlying scrutiny of the underlying evidence and to engage
6 with the named persons so as to ensure that we are properly
7 joining them and we are satisfied per our evidence that that
8 is indeed the case. That has coincided with the application
9 for further broader directions to bring the matter on.

10 If the court were not with me and was not prepared to
11 join any person, we would still, nevertheless, wish to proceed
12 to a final hearing against persons unknown because our primary
13 objective here is to ensure the continuation of this
14 injunction in circumstances where there remains a risk and we
15 are very concerned in relation to all three sides. But it is
16 a procedural step we need to take and that is why the
17 application is being made. It is not so much about committal
18 because these incidents were back in April 2022. It is more
19 about ensuring we are comply with what the Court of Appeal
20 says we need to do when ----

21 MR. JUSTICE SOOLE: When you say "not so much about committal"

22 -----

23 MISS STACEY: Sometimes people want to join specifically because
24 they want to pursue a committal hearing.

25 MR. JUSTICE SOOLE: Oh, I see.

1 STACEY KC

2 MISS STACEY: This is more a we want to progress the case and not
3 be in breach or flouting... in compliance with the duty that
4 the Court of Appeal has said that we specifically need to
5 comply with, namely where we have identified the persons who
6 fall within the category of persons unknown, they need to be
7 joined.

8 MR. JUSTICE SOOLE: Incidentally, these applications should always
9 be made, always require a hearing.

10 MISS STACEY: I ----

11 MR. JUSTICE SOOLE: I would have made exactly the same order as
12 Fordham J.

13 MISS STACEY: My Lord, I accept that it all needs to be properly
14 ventilated.

15 MR. JUSTICE SOOLE: Yes and also you cannot require on paper
16 judges to wade through and decide whether everything has been
17 ticked off, you just have to have a hearing. In other
18 proceedings I have made that clear.

19 MISS STACEY: I think the witness statements said if the court is
20 not content to deal with parts on paper. So, in circumstances
21 where there is not much time left, the hope is that some
22 directions might be given.

23 MR. JUSTICE SOOLE: I am afraid, it is going to be a very rare
24 case indeed where that will be done.

25 MISS STACEY: That is duly noted.

1 STACEY KC

2 Essentially, my Lord, I can take you, I am entirely in
3 your Lordship's hands, but I was going to go through a bit of
4 housekeeping first and explain what you have in terms of
5 paperwork and then take you through the applications one by
6 one, starting with joinder, then alternative service and then
7 the directions because I think, logically, that must come at
8 the end.

9 MR. JUSTICE SOOLE: I think what I might do now is the ask
10 Mr. Laurie if he wants to make any immediate short points that
11 he wants, as it were, to state so we know what we may be
12 having to debate. Then he will have an opportunity to give
13 more detail later on if he wants to do so.

14 MISS STACEY: My Lord, before you do that, it might help
15 Mr. Laurie, can I just explain in a nutshell what our position
16 is (I am not going to take you to the legal principles or the
17 evidence) in relation to why we say joinder is justified?
18 Mr. Laurie will have seen the skeleton, I am sure, but I can
19 give you a very short two-sentence summary ----

20 MR. JUSTICE SOOLE: All right.

21 MISS STACEY: ---- which may assist him.

22 What we say in relation to the joinder of all named
23 individuals, including Mr. Laurie, is they have first of all
24 been identified by the police as persons who have been
25 arrested carrying out the prohibited acts. That is the first

1 STACEY KC

2 point. The second point is we have carried out our own
3 independent analysis of the underlying evidence which was
4 provided.

5 MR. JUSTICE SOOLE: One moment.

6 MISS STACEY: We analysed the police's evidence. We have just not
7 simply taken what the police says at face value. We have
8 analysed it and made sure it tallies to the names of all those
9 persons arrested. We then wrote inviting undertakings to be
10 entered into, a promise, if you like, to the court that they
11 will not engage in the kind of activities that are prohibited
12 by the orders in the future. In relation to Mr. Laurie, no
13 such undertaking has been forthcoming.

14 MR. JUSTICE SOOLE: How many have provided them?

15 MISS STACEY: 14, 15. Actually 14 at the date of the application
16 one subsequent, so 15 in total.

17 MR. JUSTICE SOOLE: Is that Mr. Gingell, who is the extra one?

18 MISS STACEY: Indeed, yes. And there has been recent activity by
19 these very same protest groups. We have the evidence that
20 there is an ongoing threat. In all the circumstances, and
21 specifically in the absence of an undertaking, we cannot be
22 satisfied in relation to Mr. Laurie there is no such threat.

23 MR. JUSTICE SOOLE: Of course today I am not deciding anything
24 about future injunctions ----

25 MISS STACEY: No, no.

1 LAURIE

2 MR. LAURIE: All I can say is if you found it confusing imagine
3 how I found it confusing.

4 MR. JUSTICE SOOLE: I have not found it so much "confusing" as
5 I have an obligation to make sure that the procedures are
6 followed immaculately.

7 MR. LAURIE: I understand.

8 MR. JUSTICE SOOLE: You are right, that does take sometimes take
9 some to sort out.

10 MR. LAURIE: There is such a thing as too much information. I
11 think I have four Lever Arch files now and five e-mails of
12 information, some of which duplicate each other, some are
13 different. When I was working I used to deal with property
14 law and things like that I so I am used to it. But I was
15 confused.

16 MR. JUSTICE SOOLE: What I say in answer to that is that again the
17 supplied information has often been the court and certainly
18 often from me when I have said more information rather than
19 less has to be provided.

20 MR. LAURIE: Okay.

21 MR. JUSTICE SOOLE: So it cuts both ways in that sense. I also
22 appreciate a lot of people (do not like, unlike me, who like
23 physical documents) prefer things electronically. I recall
24 making people serve documents personally and then being told
25 by a number of litigants in person they would much rather have

1 LAURIE

2 it by e-mail. To an extent I have learned a lesson.

3 Yes, please go on.

4 MR. LAURIE: I take what the representative said. I guess it is
5 not the time to talk about it now, but I would just gently say
6 that there is a huge list of 260 different actions provided in
7 the documentation they gave to us.

8 MR. JUSTICE SOOLE: Yes.

9 MR. LAURIE: Approximately none of them relate to any of the
10 things covered by the injunctions, so that would show we have
11 fairly well ----

12 MR. JUSTICE SOOLE: You mean the protests?

13 MR. LAURIE: The protests. We have by the injunctions and the
14 cover, and I do not think there are many in there that are...
15 There are 260, I have not looked at them all. I scanned
16 through it.

17 MR. JUSTICE SOOLE: Yes.

18 MR. LAURIE: But, yes, I have not given ----

19 MR. JUSTICE SOOLE: I think that evidence has been put in to say
20 there is an ongoing general campaign, therefore it may pop up
21 anywhere. You do not look at one place at a time and say,
22 "That is finished there", because the tactics in a campaign
23 are changing all the time. I think that is the argument.

24 MR. LAURIE: Yes, I had understood that. The counter to that is
25 there are lots of protests in here that have taken place and

1 LAURIE

2 the people do not take out injunctions and engage with
3 protestors. I would suggest that Shell need to actually grow
4 up and understand that they are doing very controversial
5 things and they need to engage with protestors rather than
6 using the courts to protect themselves from a proper debate.

7 I will leave it at that for the moment.

8 MR. JUSTICE SOOLE: Those are points that can be taken.

9 I anticipate what is going to be discussed but there will be a
10 further interim injunction application. We are not going to
11 be having a trial by 12th May. I do not see at the moment how
12 that can possibly take place. So these points can be aired by
13 any defendant who wishes to do so.

14 I will have to look at the law closely on these matters.
15 I am doing so; hence my questions. But do you have any
16 general point on objection to being joined as a defendant?

17 MR. LAURIE: Apart from what I just said, I mean, I accept that I
18 was taking part in the protest. I would also gently point out
19 that there has not been a criminal trial for this yet. I have
20 been advised by my lawyer to plead not guilty.

21 MR. JUSTICE SOOLE: Yes, you have been charged.

22 MR. LAURIE: So ----

23 MR. JUSTICE SOOLE: I must also remind you of your right to
24 privilege against self-incrimination; you are not obliged to
25 say anything about that.

1 STACEY KC

2 MR. LAURIE: Okay.

3 MR. JUSTICE SOOLE: It is matter for you if you wish to do so, you
4 have a right to silence on that.

5 MR. LAURIE: I think it is generally accepted I was there.

6 MR. JUSTICE SOOLE: Thank you, that is ----

7 MR. LAURIE: I think that is all I can say.

8 MR. JUSTICE SOOLE: I think that is probably sufficient for the
9 moment, to give, as it were, your headlines on points.

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1 STACEY KC

2 MISS STACEY: My Lord, just an update on service in the previous
3 orders, which I think are being sent through. Apparently they
4 have been sent through. Paragraph 9 of Johnson J's order,
5 which was the one that proceeded May J for the service
6 stations, that did deal, my Lord, with further documents.

7 MR. JUSTICE SOOLE: That does not surprise me.

8 MISS STACEY: No, no, indeed. I thought it was there but I just
9 wanted to check before I said one way or the another.

10 MR. JUSTICE SOOLE: I would like to get hold of those. Have they
11 been sent through to me now?

12 MISS STACEY: They were sent about 20 minutes ago.

13 MR. JUSTICE SOOLE: Direct to me?

14 MISS STACEY: Yes.

15 MR. JUSTICE SOOLE: I am going to rise to get them off my printer
16 so I have them in front of me. Are there lots of attachments
17 or just the orders?

18 MISS STACEY: No, I think it is just the three orders. For these
19 purposes it is the service station order that your Lordship
20 needs.

21 MR. JUSTICE SOOLE: I am going to have them all. It is quickest
22 if I do it myself.

23 MISS STACEY: Indeed.

24 MR. JUSTICE SOOLE: Very well, if you want to discuss any other
25 matters between you in the meantime you can do so. I will be

1 STACEY KC

2 back in about... I will give a knock on the door in about
3 five minutes time, I hope.

4 **(A short break)**

5 MR. JUSTICE SOOLE: So, which one are we looking at?

6 MISS STACEY: We are looking at Johnson J's order.

7 MR. JUSTICE SOOLE: In 1420?

8 MISS STACEY: Yes, paragraph 11 which is, I think, the specific
9 paragraph dealing with other ----

10 MR. JUSTICE SOOLE: This is a petrol station's order?

11 MISS STACEY: Yes. The service starts at paragraph 9, my Lord
12 ----

13 MR. JUSTICE SOOLE: Yes.

14 MISS STACEY: ---- which is the provision that we need to
15 endeavour to put warning notices up by two methods. Paragraph
16 10 relates to service of the order. This is not the document
17 I was just looking at. I am so sorry, my Lord, I do not have
18 a hard copy. I have been given the wrong one. Can I just
19 check this is the one your Lordship has. My Lord, are you
20 looking at the order of ----

21 MR. JUSTICE SOOLE: 17th May 2022.

22 MISS STACEY: No, it is 5th May 2022. It is the order of
23 McGowan J of 5th May 2022, which you have not been sent. I am
24 so sorry, my Lord, this is all a muddle. You should have been
25 provided with these orders. The one you are looking at is

1 STACEY KC

2 Johnson J's dated ----

3 MR. JUSTICE SOOLE: 17th May 2022.

4 MISS STACEY: Yes. There was an order before that by McGowan J
5 which specifically deals with service of future documents,
6 that needs to be sent to your Lordship and we are going to do
7 that now.

8 MR. JUSTICE SOOLE: I have another May 2022 order.

9 MISS STACEY: That will be Bennathan J no doubt.

10 MR. JUSTICE SOOLE: It does not have any name on it.

11 MISS STACEY: Is that in relation to Haven and Tower?

12 MR. JUSTICE SOOLE: That is the Tower order.

13 MISS STACEY: That would be Bennathan J.

14 MR. JUSTICE SOOLE: Right. Then I have the Haven order of... Who
15 is that?

16 MISS STACEY: It is the same date, Bennathan J. He dealt with
17 those two together.

18 MR. JUSTICE SOOLE: Yes.

19 MISS STACEY: The one you want is the one, my Lord, which you do
20 not have.

21 MR. JUSTICE SOOLE: I would like to see that.

22 MISS STACEY: I can hand it up to you electronically.

23 MR. JUSTICE SOOLE: All right. *(Pause)* That was the order of
24 Johnson J. That was a continuation order ----

25 MISS STACEY: A continuation, indeed.

1 STACEY KC

2 MR. JUSTICE SOOLE: ---- hence it refers to petrol stations.

3 MISS STACEY: Hers is petrol stations, yes.

4 MR. JUSTICE SOOLE: Hers is paragraph 9.

5 MISS STACEY: Hers is paragraph 9.

6 MR. JUSTICE SOOLE: "Documents" with a capital "D".

7 MISS STACEY: "The claimants" which we are specifically defined as
8 per the first schedule. Those are specific documents but
9 then, my Lord, you have an additional provision ----

10 MR. JUSTICE SOOLE: I am looking at paragraph 9. Service of this
11 order of the "claim documents" they are called.

12 MISS STACEY: Those are the documents in Schedule 1. But my Lord
13 can I ask you, before you look at Schedule 1, to look at
14 paragraph 11, "any further documents in these proceedings".

15 MR. JUSTICE SOOLE: Ah.

16 MISS STACEY: You will note that those are the same methods,
17 e-mail, uploading with the link ----

18 MR. JUSTICE SOOLE: Brackets "(other than any defendant who
19 subsequently is named in the proceedings"?

20 MISS STACEY: Indeed, yes. This is in relation to persons
21 unknown.

22 MR. JUSTICE SOOLE: Yes. So that is all to do with persons
23 unknown.

24 MISS STACEY: Yes.

25 MR. JUSTICE SOOLE: What about anybody else?

1 STACEY KC

2 MISS STACEY: There is no provision for anybody else, my Lord,
3 because at this point in time there is no person identified or
4 sought to be named. But what we have done about that is we
5 are applying for joinder ----

6 MR. JUSTICE SOOLE: Yes, just to pause there. As far as persons
7 unknown for today's application, you can rely on paragraph 11
8 of the order of McGowan J.

9 MISS STACEY: And we have complied with that order: see
10 Ms. Oldfield's fifth witness statement which I can take your
11 Lordship to.

12 MR. JUSTICE SOOLE: Sorry, you are dropping your voice.

13 MISS STACEY: Sorry, the fifth witness statement of
14 Alison Oldfield I can take your Lordship to that.

15 MR. JUSTICE SOOLE: Yes.

16 MISS STACEY: We rely on that ----

17 MR. JUSTICE SOOLE: For today's application you are relying on
18 paragraph 11 of McGowan J's order.

19 MISS STACEY: And page 195 of the bundle is the relevant part of
20 Ms. Oldfield's witness statement which I can take your
21 Lordship to either now or at a convenient moment.

22 MR. JUSTICE SOOLE: Let me write it down. Including ----

23 MISS STACEY: 195 ----

24 MR. JUSTICE SOOLE: No, no, I am just looking at paragraph 11,
25 "... sending it by e-mail to each of the addresses in the

1 STACEY KC

2 Third Schedule or to any person who has previously requested a
3 copy of the claim form."

4 MISS STACEY: My Lord, if I can take you to the relevant evidence

5 ----

6 MR. JUSTICE SOOLE: Not until I have got to the Third Schedule.

7 MISS STACEY: Okay.

8 MR. JUSTICE SOOLE: That is a ----

9 MISS STACEY: It is a long list of e-mail addresses.

10 MR. JUSTICE SOOLE: ---- long list of, as it were, broadly
11 speaking, protestor organisations.

12 MISS STACEY: Indeed. All the e-mail addresses that we have
13 managed to find for all the organisations we have identified.

14 MR. JUSTICE SOOLE: Yes.

15 MISS STACEY: I am in your Lordship's hands but it might be a
16 convenient moment to take you to the relevant evidence.

17 MR. JUSTICE SOOLE: Yes.

18 MISS STACEY: It is the supplemental bundle, my Lord, the witness
19 statement of Alison Oldfield.

20 MR. JUSTICE SOOLE: At page 5 is this?

21 MISS STACEY: Yes, page 195. It starts at 191.

22 MR. JUSTICE SOOLE: Yes.

23 MISS STACEY: Page 192 we can skip over and we will come back to,
24 "Service on named individuals", but we are dealing with
25 persons unknown at the present moment. So if we skip over

1 STACEY KC

2 that and come back to it. Please turn to 195 and the heading:
3 "Service on persons unknown". It refers to paragraph 4 of the
4 order of Hill J setting out the various methods. As we have
5 identified the relevant paragraph, in fact is paragraph 11 of
6 the order of McGowan J.

7 MR. JUSTICE SOOLE: Paragraph 3.16 refers to Hill J 28/4/23
8 paragraph 4, but in fact it is McGowan J.

9 MISS STACEY: Paragraph 11, 5th May 2022.

10 MR. JUSTICE SOOLE: 5/5/22 paragraph 11.

11 MISS STACEY: The methods are listed there.

12 MR. JUSTICE SOOLE: Are those three: (1); (2); and (3) all the
13 same ----

14 MISS STACEY: All the same.

15 MR. JUSTICE SOOLE: ---- as in the McGowan order?

16 MISS STACEY: Indeed, yes.

17 MR. JUSTICE SOOLE: Yes.

18 MISS STACEY: Then 3.17: "In accordance with" -- so paragraph 11
19 -- "the following steps were taken." Then ----

20 MR. JUSTICE SOOLE: Where are you reading from now?

21 MISS STACEY: I am reading at paragraph 3.17 which introduces the
22 evidence.

23 MR. JUSTICE SOOLE: Right.

24 MISS STACEY: 3.18 refers to uploading. 3.19 refers to sending
25 under cover of an e-mail to each of the addresses and there is

1 STACEY KC

2 a table set out on the next page which refers to, in the
3 second column, "Application documents" and the e-mail in the
4 final column having been sent on the 1st May 2024 at 17:21.

5 MR. JUSTICE SOOLE: 1st March.

6 MISS STACEY: Sorry, 1st March.

7 Then at 3.20 there is an analysis of what came back. So
8 here you have the evidence that 16 automatic responses were
9 received in total, seven from the e-mail addresses set out at
10 3.20.1, which are automatic messages, and seven in the next
11 paragraph from listed e-mails because the mailboxes were full.

12 You have an automatic response at 3.23 that the message
13 was too big and one on the last sub-paragraph of that page
14 possibly incorrect. Then over the page, my Lord, apart from
15 those no responses from any other e-mail addresses, no reason
16 to believe that e-mails sent to any of the other 35 e-mail
17 addresses were not delivered, no other bounce back or delivery
18 failure.

19 She concludes at 3.22: "The remaining 35 received the
20 e-mail."

21 MR. JUSTICE SOOLE: Yes.

22 MISS STACEY: At 3.23: "In respect of Youth Climate Swarm ----"

23 MR. JUSTICE SOOLE: That was an address in the McGowan order, was
24 it?

25 MISS STACEY: Yes, it was.

1 STACEY KC

2 MR. JUSTICE SOOLE: Schedule 3?

3 MISS STACEY: Yes, it was. I am just checking it was exactly the
4 same e-mail. (Pause) Yes, it was. That is said at 3.23:
5 "The only e-mail addresses provided and it is within the
6 addresses listed. Do not consider any further steps could
7 have been taken."

8 MR. JUSTICE SOOLE: How should the court approach things like
9 "Mailbox quota exceeded"? Has it still been served, you say?

10 MISS STACEY: It has been served. It has been served in
11 accordance... One has to recognise, of course, there needs to
12 be strict compliance with the methods specified in the order.
13 The question for the court is whether or not the order has
14 been complied with. I suppose, conceivably, it might come to
15 court's attention if there were change in circumstances or
16 other addresses then you might amend an existing order to
17 account for that. We do not have any other addresses, as set
18 out in paragraph 3.23.

19 MR. JUSTICE SOOLE: You say it has been in substance on persons
20 unknown served in accordance with McGowan J's order ----

21 MISS STACEY: Yes.

22 MR. JUSTICE SOOLE: ---- but in any event any order would include
23 an application for permission to vary.

24 MISS STACEY: Indeed. In my skeleton I recognise that the current
25 draft does not include the express provision to vary. We

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2 propose that that should be introduced into the draft order.

3 MR. JUSTICE SOOLE: Right.

4 MISS STACEY: As far as service on named persons is concerned,
5 I need not take you to any existing order because there have
6 been no persons yet named. But if we can stick with Ms.
7 Oldfield's statement and turn back to page 192, where she sets
8 out the steps that have been taken.

9 I am getting ahead of myself slightly, my Lord, because
10 I have not told you who the named persons are. It may be
11 first more logical to identify them and then to deal with
12 service on them, which would require me to go back to the
13 joinder application. There is a schedule my Lord in the main
14 hearing bundle behind tab 2 at page 16. Do you have that?

15 MR. JUSTICE SOOLE: Yes.

16 MISS STACEY: You will see that the numbers start at number (2).
17 That is because the first defendant is "Persons Unknown". If
18 you go to the bottom, two pages on ----

19 MR. JUSTICE SOOLE: The two areas are Cobham and Acton; is that
20 right?

21 MISS STACEY: Exactly, yes. You have the Surrey Police and then
22 you have the Met Police.

23 MR. JUSTICE SOOLE: Yes.

24 MISS STACEY: Acton obviously being Met Police and Cobham being
25 Surrey. On this schedule there are 16 numbers but in fact

1 STACEY KC

2 that is 15 people because it starts from number (2).

3 MR. JUSTICE SOOLE: 15 names.

4 MISS STACEY: Then if I could ask you then to turn to page 52
5 behind tab 4.

6 MR. JUSTICE SOOLE: We notice Mr. Gingell there.

7 MISS STACEY: Yes, I will explain to you. At page 52 behind tab 4
8 you will see a coloured schedule. What that does, my Lord, is
9 set out those who have provided undertakings and those who
10 have not. Those who provided undertakings we are not
11 proposing to join, for obvious reasons. They are referred to
12 in the witness evidence and in my skeleton, I think, as "the
13 excluded persons". Those are in green. In relation to the
14 now 14 individuals who have not provided undertakings you will
15 see them there in yellow. What this schedule also does is
16 explain the offence for which those persons were arrested and
17 gives a bit of detail and the date.

18 MR. JUSTICE SOOLE: Alleged offence for which arrested.

19 MISS STACEY: The alleged offence for which they were arrested,
20 quite right. My Lord, if you go back to page 25, which is the
21 third. My Lord, if you go back to page 25 which is the fourth
22 witness statement of Ms. Oldfield, it puts this into context.

23 MR. JUSTICE SOOLE: Just moving on, on page 54 having dealt with
24 various alleged offences, criminal damage and so on, we get to
25 item 23 and thereafter, and they are something called

1 STACEY KC

2 "suspicion of criminal damage".

3 MISS STACEY: Yes, they were arrested, that is the offence for
4 which they are ----

5 MR. JUSTICE SOOLE: Why does the schedule say for some, "Criminal
6 damage to property valued under £5,000" i.e. the language of
7 an offence whereas the later ones, by contrast, say "Suspicion
8 of criminal damage" and "Suspicion of public nuisance"?

9 MISS STACEY: I think the answer to that my Lord is simple. I am
10 told that is how it was characterised by the police. Those
11 who have the detailed, the criminal damage, there was more
12 detail given by the police, whereas the others that level of
13 detail, it was just effectively two different labels that the
14 police provided.

15 If one goes back to Ms. Oldfield's fourth witness
16 statement, she sets out how that schedule was compiled, so
17 back to page 25 if you would, or page 24 is where it starts.
18 3.1: "Pursuant to orders" -- so those are the two orders,
19 13th March and 28th April, those are the third party
20 disclosure orders, my Lord -- "the PS Claimant has undertaken
21 a disclosure exercise ...".

22 Then she summarises at 3.2, the disclosures provided by
23 Surrey on 29th March. At 3.2.3 there is further disclosure on
24 the 31st May. Then you will see the sentence starting,
25 "Access to certain files". There was a problem with the

1 STACEY KC

2 missing information, finally provided on 6th September.

3 Then 3.2.4, third party disclosure in relation to the
4 Met was 28th. Disclosure provided on 31st May, that is 3.2.5.
5 There was clarification over the page sought in relation to
6 status and photographs. That information was provided on the
7 31st August.

8 3.2.6 my Lord: "... 30 individuals identified as having
9 been arrested ..." and then it is the second sentence:

10 "Having reviewed the evidence available, the Claimant reached
11 the conclusion that it would be appropriate to join those
12 individuals ... (save for one individual ... is deceased)."

13 MR. JUSTICE SOOLE: Yes.

14 MISS STACEY: 3.2.7, "reached that conclusion on the basis that"
15 they are persons. They tallied the names against the details
16 given to make sure they were the correct individuals who have
17 been disclosed in the course of the incidents and subsequently
18 to the investigations.

19 That schedule at 3.2.8 is said to have been drawn up by
20 solicitors and includes details of the arrests.

21 So the claimants were keen to ensure they were not
22 simply making an application for the names and addresses on
23 the back of what the police told them. They wanted to carry
24 out their own independent review, to ensure no mistakes in
25 terms of the identification which can happen.

1 STACEY KC

2 MR. JUSTICE SOOLE: You mean there is a review of evidence and
3 then what we see in the box is the result of that, is it?

4 MISS STACEY: Indeed.

5 MR. JUSTICE SOOLE: So from that 30 we subtract one deceased, and
6 14 who have given undertakings?

7 MISS STACEY: 15 sign undertakings, 14 initially and then one from
8 Mr. Gingell which leaves 14. Of those 14 there has been one
9 refusal, my Lord, and you see that at page 107 behind tab 4,
10 from a Ms. Ireland.

11 MR. JUSTICE SOOLE: Page?

12 MISS STACEY: Page 107, Emma Ireland. I should perhaps show your
13 Lordship the undertaking that was proposed, which is at page
14 55.

15 MR. JUSTICE SOOLE: Page 55 is a letter?

16 MISS STACEY: It is the letter. An example is at page 93, this is
17 one example of a signed undertaking. 93.

18 MR. JUSTICE SOOLE: Yes, I got 92 in fact, yes.

19 MISS STACEY: They are all the same. This is consistent with the
20 undertaking in the *National Highways* case that was considered
21 and endorsed by Cotter J, which my Lord you can see in the
22 authorities bundle, it is appended to his judgment.

23 MR. JUSTICE SOOLE: Yes, but what has happened to those
24 undertakings? In the *NHL* case were they embodied in an order?

25 MISS STACEY: They were. It was slightly different in the *NHL*

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2 case because they were already parties. What happened in the
3 *NHL* case is ----

4 MR. JUSTICE SOOLE: They were removed.

5 MISS STACEY: Indeed. There was a continuation hearing and one of
6 the issues in the course of that continuation hearing was
7 whether or not one of certain defendants should be moved on
8 the basis of a change in circumstances.

9 MR. JUSTICE SOOLE: Was it attached to an order with a penal
10 notice?

11 MISS STACEY: It was attached to an order with a penal notice.

12 When undertakings were given, my Lord, no. The undertakings
13 were given to the judge in court.

14 MR. JUSTICE SOOLE: All I have ever seen, in either ----

15 MISS STACEY: They were formally recorded.

16 MR. JUSTICE SOOLE: I think I have heard cases in this litigation.
17 I certainly have in *NHL* a number of times. All I have ever
18 seen is something akin to the signed undertakings saying,
19 "I promise to the court".

20 MISS STACEY: Yes.

21 MR. JUSTICE SOOLE: What I have not ever seen is anything embodied
22 in a court order with a penal notice. There may be, I just do
23 not know.

24 MISS STACEY: My Lord, can I get back to you on that? I do not
25 know the answer. I do not think so, but I would need to see

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2 an underlying order.

3 MR. JUSTICE SOOLE: I ask it only because it may be relevant today

4 ----

5 MISS STACEY: Indeed.

6 MR. JUSTICE SOOLE: ---- as to what happens to the 14 people in
7 question: in a sense in one sense nothing because you are not
8 asking to join them, but ----

9 MISS STACEY: That is right. In Cotter J's judgment is in an
10 annex and there is a signature and a date so that forms part
11 of his judgment. The undertakings given are referred to
12 rather by way of an example. A signed undertaking would need
13 to be given.

14 MR. JUSTICE SOOLE: How is that enforced?

15 MISS STACEY: My Lord, exactly. That would not in and of itself
16 be enforceable. What I am wondering is whether that
17 subsequently made its way into an order. I do not think so
18 but I need to check the position. I do not think so for two
19 reasons: (i) there is nothing in the judgment to suggest that;
20 and (ii) they were being dropped as defendants on the basis
21 that they provided a promise to the court.

22 MR. JUSTICE SOOLE: I do not have any draft order in the moment on
23 those terms.

24 MISS STACEY: No, and I am not seeking that you make any reference
25 to those excluded persons today. We are content with the

1 STACEY KC

2 undertakings that have be provided.

3 MR. JUSTICE SOOLE: Yes.

4 MISS STACEY: The named individuals who are set out in the
5 schedule in green, my Lord, are those who have not provided
6 undertakings. I referred you to you Ms. Ireland who refused
7 positively. In relation to the other 13, no responses have
8 been received.

9 That brings me, I think, back to service, just to
10 satisfy your Lordship that they have been properly served, all
11 documents have been sent to them.

12 MR. JUSTICE SOOLE: Service of the application.

13 MISS STACEY: Indeed, yes. Back to Ms. Oldfield's fifth witness
14 statement in the supplemental bundle if you would.

15 MR. JUSTICE SOOLE: Yes.

16 MISS STACEY: At page 192, she attaches a spreadsheet setting out
17 the names of 15 individuals. That includes Mr. Gingell, but
18 he has subsequently given an undertaking ----

19 MR. JUSTICE SOOLE: Are we looking at page ----

20 MISS STACEY: 19, my Lord.

21 MR. JUSTICE SOOLE: No, the spreadsheet at page 205?

22 MISS STACEY: Yes. The names, I note, have come off on the left-
23 hand column. I have some hard copies, just so we are clear
24 who we are dealing with. (*Same handed*)

25 MR. JUSTICE SOOLE: Thank you.

1 STACEY KC

2 MISS STACEY: They are paginated so my Lord you can simply
3 substitute those for the existing version.

4 MR. LAURIE: Is it possible I can see this? I do not think I have
5 this.

6 MR. JUSTICE SOOLE: Yes, make sure Mr. Laurie has this.

7 MISS STACEY: Of course.

8 That schedule, my Lord, is the... No, that is not the
9 schedule we are talking about. 205, my Lord, is the page
10 number.

11 MR. JUSTICE SOOLE: The schedule I think starts Louis McKechnie.

12 MISS STACEY: Indeed. That is at page 205. So if I can ask you
13 to keep a finger in that and go back to Ms. Oldfield's witness
14 statement. She describes that as a "spreadsheet" setting out
15 the names of the 15 then individuals in respect of whom form
16 the subject of the application. Then she at 3.2 refers to the
17 fact that on 2nd March, Saturday, copies of the following
18 documents were sent by First Class Post and Special Delivery.
19 There is a list of documents there which are defined as the
20 "application documents".

21 MR. JUSTICE SOOLE: Because nothing had been sent at the time when
22 the application was lodged on 13th February ----

23 MISS STACEY: No.

24 MR. JUSTICE SOOLE: ---- which resulted in the order of Fordham J
25 on 14th, which was all without notice.

1 STACEY KC

2 MISS STACEY: Indeed, that was all without notice, yes. The
3 reason for that, my Lord, is we were waiting to hear back, so
4 we did not really know what the current status was in relation
5 to certain individuals. We wanted to have a copy of the order
6 that noticed the hearing so that could then be sent as part of
7 the package of documents to the individuals.

8 MR. JUSTICE SOOLE: There is a notice of hearing the 29th
9 February.

10 MISS STACEY: Yes, and on the 2nd March then the application
11 documents were sent by First Class Post and Special Delivery.

12 MR. JUSTICE SOOLE: What happened thereafter, there was a change
13 in the hearing date?

14 MISS STACEY: No. *(Pause while instructions were received)* I am
15 told that the notice of hearing consists of an e-mail from the
16 court telling us of the date of this particular hearing,
17 today's hearing.

18 MR. JUSTICE SOOLE: Yes. I am just saying that on paragraph 3.2
19 the documents that are sent to the named defendants include a
20 notice of hearing, sorry, dated the 9th. Forgive me.

21 MISS STACEY: Yes. That in fact, my Lord, was an e-mail telling
22 us that the hearing ----

23 MR. JUSTICE SOOLE: Which includes today's date, yes, of course.

24 MISS STACEY: Yes.

25 MR. JUSTICE SOOLE: I understand with today's date, yes.

1 STACEY KC

2 MISS STACEY: Yes, I see. There was no hearing on 29th ----

3 MR. JUSTICE SOOLE: No, no, I thought that was one of those things
4 where a date had been given and it had to be changed for some
5 court reason. I understand it says "dated", it means the
6 notice is dated.

7 MISS STACEY: Yes. Those are the application documents. At 3.3
8 they were sent to the named individuals using the addresses
9 provided by Surrey and the Met.

10 In her fourth witness statement she sets out in detail
11 the process. We have gone over that in terms of how that
12 information was provided by the Met and then analysed. She
13 then says at 3.4 that she was informed by a colleague when
14 ----

15 MR. JUSTICE SOOLE: Pause a moment, while I will go back to that.
16 Yes. I am just reminding myself the McGowan order said in
17 paragraph 11 "not to extend to named defendants".

18 MISS STACEY: "Not to extend" which is self-explanatory, I think,
19 my Lord, because at the time... One does not anticipate.
20 When one seeks to join named defendants one has to make an
21 application for joinder and deal with service at that point in
22 time.

23 MR. JUSTICE SOOLE: I suppose you might have an order saying in
24 the event that someone wishes to join a named defendant, a
25 defendant shall be named and you serve the application notice

1 STACEY KC

2 on the last address.

3 MISS STACEY: That would be a way of dealing with it, yes. It
4 would accelerate things no doubt. That did not happen in this
5 case.

6 3.4, if you still have the statement open, "Colleague
7 Bethany (*indistinct*) Taylor visited the Post Office and left
8 packages. That is her doing the act of service. At 3.5 she
9 was informed by Taylor and believed on 2nd March she completed
10 the necessary paperwork and submitted them, Special Delivery.
11 That is 3.4 is the First Class Post, 3.5 is Special Delivery.
12 3.6 refers to a Special Delivery Postal Tracker, which my Lord
13 you will see at page 8. It is a schedule on its side with a
14 column, on the right-hand side with green ----

15 MR. JUSTICE SOOLE: Page 208.

16 MISS STACEY: 208.

17 MR. JUSTICE SOOLE: That is one which has, "Louis McKechnie:
18 Yes"?

19 MISS STACEY: Yes.

20 MR. JUSTICE SOOLE: "Louise Harris: No. Return to sender".

21 MISS STACEY: Yes. This is the postal tracker which confirms
22 whether or not they were successfully delivered and signed
23 for. The green are "Yes" and the pink are "No". The "No"
24 totals eight individuals. I am sorry, eight individuals were
25 indeed successfully served, that is green.

1 STACEY KC

2 MR. JUSTICE SOOLE: We see over the page, Mr. Laurie.

3 MISS STACEY: That includes Mr. Laurie.

4 Then at 3.8 my Lord, she goes on in her witness
5 statement to say: "In respect of the seven named individuals
6 where we have not received confirmation, further hard copies
7 of the application documents were sent by hand" and there ----

8 MR. JUSTICE SOOLE: What does "sent by hand" mean?

9 MISS STACEY: Sent by process server who delivered the documents
10 by hand.

11 MR. JUSTICE SOOLE: What, to a person or to an address?

12 MISS STACEY: To an address at the last known address provided by
13 the police.

14 MR. JUSTICE SOOLE: Were not postal service, a process... Let us
15 ----

16 MISS STACEY: You see an example of a photograph at 2.10.

17 MR. JUSTICE SOOLE: No, no, before we get there. Is that in
18 respect of "No: Return to sender" or "No"? Because "No:
19 Return to sender" rather implies someone is at the property.

20 MISS STACEY: It is in relation to all the pinks.

21 MR. JUSTICE SOOLE: All the pinks.

22 MISS STACEY: Yes.

23 MR. JUSTICE SOOLE: So ----

24 MISS STACEY: We go on: "In relation to 'No: Return to sender'
25 ..." My Lord, I am going to come on to those. They are the

1 STACEY KC

2 ones who form the subject of the alternative service
3 application that is before your Lordship today.

4 Louise Harris, you will see, is one of those.

5 MR. JUSTICE SOOLE: Louise Harris.

6 MISS STACEY: And then Tessa-Marie Burns is the other. Those are
7 the two individuals for whom we have been able to get social
8 media accounts and we have served them. Later in the
9 statement Ms. Oldfield deals with this at a Facebook account
10 and a LinkedIn account. I will come on to that in a moment.

11 My Lord, while we are on this schedule with the green
12 and the pink ----

13 MR. JUSTICE SOOLE: Tez Burns was in this court last week in
14 respect of ----

15 MISS STACEY: Right. She is one of the one whose stuck herself
16 outside the Royal Courts of Justice.

17 MR. JUSTICE SOOLE: Yes.

18 MISS STACEY: My Lord, while we have this schedule open at page
19 208 I should (and I will come on this) draw your attention to
20 the fact that the second one down, Samuel Holland, in respect
21 of which it is said "Yes", we have subsequently discovered
22 that he was living in a student accommodation and he no longer
23 resides at that address. So the "Yes" in fact should be a
24 "No" or at least it was delivered to the address but it has
25 come to our attention that he no longer resides there. On

1 STACEY KC

2 that basis it would not have come to his attention. That is
3 all explained in the statement. If I could ask you to refer
4 back to 193, so back at 3.6 that was the postal tracker we
5 have just been looking at, the schedule with the pink and the
6 green. At 3.8 it says: "In the case of the seven named who
7 were in the pink, documents were sent by hand, by a process
8 server delivered by hand."

9 MR. JUSTICE SOOLE: Sorry, I just want to go back a bit. *(Pause)*

10 MISS STACEY: My Lord, I think that is in relation to personal
11 service.

12 MR. JUSTICE SOOLE: 3.7 makes a reference to 6.2.6.

13 MISS STACEY: Yes. My Lord, I think that is the debate we were
14 having earlier.

15 MR. JUSTICE SOOLE: I think that was a misunderstanding. If there
16 has been permission to serve by those, that gives the dates of
17 deemed service. It does not provide if you do it by post it
18 is deemed service.

19 MISS STACEY: Which is why I skipped over to that.

20 MR. JUSTICE SOOLE: I need to know; not relied on.

21 MISS STACEY: No. So in relation to the seven who were a "No", if
22 you like, there was an additional step taken, namely, service
23 by hands. My Lord you see some photographs at page 210
24 onwards in the bundles.

25 MR. JUSTICE SOOLE: It says: "Hand delivered to all the named

1 STACEY KC

2 individuals"; but it is the addresses, is it not?

3 MISS STACEY: To all the addresses, indeed, yes.

4 MR. JUSTICE SOOLE: Sent by hand.

5 MISS STACEY: "Served by hand" I think more accurately.

6 MR. JUSTICE SOOLE: 3.9?

7 MISS STACEY: 3.9. The only individuals it was not possible to
8 verify service, either by Special Delivery or by hand, in the
9 sense that the documents were taken in, were Louise Harris and
10 Samuel Holland. As regards Samuel Holland you will see there
11 the explanation, "We have been informed by the process server
12 that he has moved." We do not have any social media or
13 alternative means of serving him. We say that the alternative
14 service that would be applicable to persons unknown covers him
15 and documents have, as you will have seen, been served in that
16 manner. It is difficult to see what else we could do in
17 circumstances where we have got an address and carried out
18 some searches of social media and we have not been able to
19 find anything else for him.

20 In relation to over the page at ----

21 MR. JUSTICE SOOLE: Then you are asking the court to deem service
22 by First Class Post as good service?

23 MISS STACEY: I think, my Lord, I am asking you in fact to endorse
24 the methods of service that have been undertaken, which
25 includes those on persons unknown and the attempts to made to

1 STACEY KC

2 serve at his last known address as good service.

3 MR. JUSTICE SOOLE: I do not think it... We are looking at 6...

4 (Pause) In his case, you are not asking to rely on that postal
5 address any more?

6 MISS STACEY: No.

7 MR. JUSTICE SOOLE: Because it could not be said that it would be
8 reasonably expected to come to his attention.

9 MISS STACEY: Indeed, but the pre-existing methods of service that
10 were endorsed by McGowan J have been complied with, we say are
11 steps which, given the history of this protest, can be
12 reasonably likely to bring the documents to his attention.
13 There are no other steps that we can identify that we could
14 take in order to do so.

15 MR. JUSTICE SOOLE: Because in the circumstance there is no
16 different reason to put him in a different category from
17 persons unknown?

18 MISS STACEY: In these circumstances, yes. He falls within the
19 description of persons unknown. He is being joined on that
20 basis. We say it is to joinder and there is no reason to put
21 him in a different category to general persons unknown.

22 MR. JUSTICE SOOLE: Right.

23 MISS STACEY: The basis for the alternative service in respect of
24 persons unknown is precisely because we identify the methods
25 by which it can be said to be likely to bring the documents to

1 STACEY KC

2 their attention. That applies equally to Mr. Holland.

3 Ordinarily we accept in an ideal world we will be serving him
4 at an address.

5 MR. JUSTICE SOOLE: The point is that has already been done.

6 MISS STACEY: That has been done, yes. We have made the efforts.

7 We have also, as you will see from ----

8 MR. JUSTICE SOOLE: Has it been done in the sense of referring...

9 Is it because it has included his name?

10 MISS STACEY: Absolutely. All the letters included the names and

11 were sent specifically to the individuals so the packages had

12 the names of the individuals on them.

13 MR. JUSTICE SOOLE: No, but that which has been sent to the

14 generic e-mail addresses will include his name amongst others?

15 MISS STACEY: Will include his ----

16 MR. JUSTICE SOOLE: Will have included?

17 MISS STACEY: May I just turn my back? *(Pause while instructions*

18 *were received)* To date, no, because up until now we have not

19 included persons names because of data protection. *(Pause*

20 *while instructions were received)* It would have included his

21 name.

22 MR. JUSTICE SOOLE: So the application is unredacted?

23 MISS STACEY: The addresses are redacted but the names are not.

24 MR. JUSTICE SOOLE: The names are not. So the application sent to

25 the addresses permitted by McGowan J paragraph 11 includes the

1 STACEY KC

2 names but not the addresses ----

3 MISS STACEY: Yes.

4 MR. JUSTICE SOOLE: Of those for which the application is to join.

5 MISS STACEY: Yes.

6 MR. JUSTICE SOOLE: And therefore Mr. Holland?

7 MISS STACEY: And therefore Mr. Holland.

8 MR. JUSTICE SOOLE: Right.

9 MISS STACEY: Ms. Oldfield explains in her fourth witness

10 statement that she has no other contact details for him. That
11 is page 27 of the hearing bundle. That is Mr. Holland, my
12 Lord.

13 In relation to 3.11 on page 194 in relation to

14 Louise Harris and Tez Burns ----

15 MR. JUSTICE SOOLE: There are three people who ----

16 MISS STACEY: There are three people. There were initially two,
17 but the problem came to light in relation to Mr. Holland. So
18 Louise Harris and Tez Burns, Ms. Oldfield explains that they
19 have managed to identify a number of social media accounts.
20 In paragraph 3.11 on the 5th March a message was sent to both
21 of them which read, and you will see the extract there at
22 3.11, referring to the fact they had not received an
23 undertaking and that the application had been made and so
24 forth, then enclosing application documents, orders and the
25 hearing bundle.

1 STACEY KC

2 Then at 3.12, my Lord, it is said that the message was
3 sent to Ms. Harris via her Facebook account, and Ms. Burns via
4 her LinkedIn account. I am told that we subsequently tried to
5 serve Ms. Burns with the supplemental bundle at the LinkedIn
6 account but that has not proven possible because apparently,
7 my Lord, they sent the first message by a link but in order to
8 get subsequent messages Ms. Burns has specifically to connect.
9 You can send one but you cannot follow up unless there is
10 active engagement on the part of the person who holds the
11 account. She had all the documents that are listed there at
12 3.11, she has not had the supplemental bundle.

13 So far as Ms. Harris is concerned, at the moment the
14 Facebook account works. Our concern is that insofar as the
15 court is prepared to endorse this, we can use reasonable
16 endeavors but we can not guarantee that those methods are
17 going to work because they could always block the messages.
18 We might when we get to it, if we get to it, tweak the draft
19 order to reflect that.

20 MR. JUSTICE SOOLE: Yes.

21 MISS STACEY: Then 3.13 therefore we say we have taken the service
22 using the Facebook account and the LinkedIn account
23 constitutes valid service in respect of the application
24 documents that have been served to date. I suppose that this
25 is back to my point about tweaking the order if we get there,

1 STACEY KC

2 but it may be that insofar as further documents are going to
3 be served we use reasonable efforts or we endeavour to serve
4 at those accounts.

5 I should also say, my Lord, the draft order -- and I do
6 not want to get ahead of myself -- in this section of the
7 draft order we list three different social accounts for
8 Ms. Harris, being the three that we managed to identify. We
9 are not proposing that we have to serve all three because I am
10 told that in order to serve at LinkedIn you have to pay a
11 monthly fee. We have managed with Facebook and that should be
12 sufficient for these purposes. Again we might have to tweak
13 the order, if we get there, to make it clear that it is the
14 specific account which we attempted to serve out and we
15 imagined to have some success with.

16 MR. JUSTICE SOOLE: We will need to come back to that. I am not
17 sure I entirely followed that.

18 MISS STACEY: Yes, we will come back to that, it is a point of
19 detail.

20 Then my Lord at 197 just to complete the picture,
21 I skipped over "persons unknown" because we have dealt with
22 that. Can I ask you to go forward two pages to page 197?

23 MR. JUSTICE SOOLE: Yes, I am there.

24 MISS STACEY: Which here is the service of the hearing bundle on
25 both named individuals and on persons unknown. 3.2.6 that was

1 STACEY KC

2 served on 5th March as part of the package of documents, if
3 you like, that we have already covered.

4 MR. JUSTICE SOOLE: I think that sounds as if that should read
5 "paragraph 11 of the McGowan order".

6 MISS STACEY: Yes. Then 3.2.9 over the page, my Lord, for
7 completeness, in accordance with the order, they are also sent
8 to the following other addresses.

9 MR. JUSTICE SOOLE: You say in accordance with ----

10 MISS STACEY: The reason it says "for completeness" in fact, it is
11 not strictly, is because some of these firms have indicated it
12 was not clear whether they still wished to be served with
13 documents, but it has been done regardless and all those
14 persons who have expressed an interest in the past of
15 receiving documents have indeed been served.

16 You then have Mr. Gingell at 4.1. He has signed an
17 undertaking now. There is a section about ongoing risk, but
18 that is simply to alert the court to the fact that this has
19 not gone away and we will need to pursue it. It is just
20 simply to alert the court to the fact that I do not expect you
21 to do anything with ongoing risks today; it simply forms part,
22 we say, of the relevant factual ----

23 MR. JUSTICE SOOLE: You say there is an ongoing risk that would
24 justify bot a continuing interim precautionary injunction and
25 a final precautionary injunction.

1 STACEY KC

2 MISS STACEY: My Lord, yes. We will come on to directions.

3 I noted your indication that you do not conceive of a scenario
4 where we can get our final hearing in before the 12th May.

5 MR. JUSTICE SOOLE: It just seemed to me... Have the particulars
6 of claim been served?

7 MISS STACEY: Yes.

8 MR. JUSTICE SOOLE: The particulars?

9 MISS STACEY: The particulars of claim have been ----

10 MR. JUSTICE SOOLE: Served in respect of named defendants?

11 MISS STACEY: In respect of named defendants, no. That would need
12 to be an additional step. You are quite right, my Lord, they
13 have not, no.

14 MR. JUSTICE SOOLE: That would have to be served setting out the
15 ----

16 MISS STACEY: Yes, there would need to be a step for defences.

17 MR. JUSTICE SOOLE: Acknowledgment of service and defences.

18 MISS STACEY: And defences. Then, fairly rapidly thereafter we
19 say... We are mindful of what the Supreme Court said in
20 *Wolverhampton* which is that claims of this nature, there is
21 rarely a trial in the strict formulation of ----

22 MR. JUSTICE SOOLE: One can read perhaps too much into that.

23 I looked at paragraph 137: "... there is scarcely ever a
24 trial in proceedings of the present kind, or even
25 adversarial argument ..."

1 STACEY KC

2 MISS STACEY: That is right.

3 MR. JUSTICE SOOLE: It does mean that that therefore one can just

4 ----

5 MISS STACEY: No, no it does not simply mean one can simply

6 shoehorn it into every ----

7 MR. JUSTICE SOOLE: ---- shoehorn it into a very short period of

8 time, for any trial up to -- I do not know how -- let us say

9 it was a trial up to three days.

10 MISS STACEY: It is one and a half at the moment, that is what

11 Hill J ----

12 MR. JUSTICE SOOLE: If we are looking at the published trial

13 windows, the next trial window is 13th January to 16th April

14 2025.

15 MISS STACEY: My Lord, we are where we are. The court has

16 confirmed there is not much difference between entering the

17 final in any event. What we are concerned about doing is

18 giving the court the impression that we are simply seeking a

19 series of renewed interim injunctions.

20 MR. JUSTICE SOOLE: I understand that, that was against the

21 concern, that there was ever bringing anything to trial.

22 MISS STACEY: Indeed, and facing criticism on that basis. Whilst

23 I recognise that we are tight on time, I am trying to square

24 that with the obligations we had to go through, the fact that

25 it is taking rather longer, the fact that *Wolverhampton* was

1 STACEY KC

2 outstanding. We did not get judgment ----

3 MR. JUSTICE SOOLE: Until the end of November.

4 MISS STACEY: We have the 12th May as the deadline. What I do not
5 want to do is to go before a judge and get a refusal on the
6 basis that we have not progressed things and therefore,
7 seeking an interim injunction in circumstances where we ought
8 to have brought the matter to a final hearing more rapidly.

9 It is open to us to bring an application for summary
10 judgment, but in order to do that we still need the defences
11 to come through before we can take a view about that, because
12 we cannot pre-empt ----

13 MR. JUSTICE SOOLE: People sometimes do, do they not, but you know
14 ----

15 MISS STACEY: On the back of the point I was making about there
16 rarely being any adversarial argument and the court has
17 already subjected this order to ----

18 MR. JUSTICE SOOLE: You cannot do that until you have
19 acknowledgment of service ----

20 MISS STACEY: Yes, indeed.

21 MR. JUSTICE SOOLE: ---- under Part 24; is that right?

22 MISS STACEY: We need the court's permission to do so when there
23 has been no defence. What happens is it is only persons
24 unknown who need the court's permission in circumstances where
25 there has been no defence, so that would apply equally.

1 STACEY KC

2 MR. JUSTICE SOOLE: We are getting deep into procedure and I am
3 conscious of Mr. Laurie's presumed unfamiliarity with these
4 things, but we have to talk, I am afraid, in these rather
5 procedural details, Mr. Laurie. You will have a chance to
6 talk on ----

7 MR. LAURIE: You live and learn. I am living and learning at the
8 moment.

9 MR. JUSTICE SOOLE: ---- the substantial matters as we move along.

10 MISS STACEY: The point, my Lord, will be clear: when we get to
11 directions you obviously have to come up with a timetable that
12 makes sense.

13 MR. JUSTICE SOOLE: Yes.

14 MISS STACEY: But at the same time ----

15 MR. JUSTICE SOOLE: I thought that my own view was that I
16 cannot... I did not think I had seen anything about service
17 of particulars of claim.

18 MISS STACEY: Your Lordship is quite right, that needs to be
19 inserted.

20 MR. JUSTICE SOOLE: It seems to me the prospect of getting... and
21 why should there be a final hearing so soon.

22 MISS STACEY: It is simply for that reason. It is simply in order
23 to... I suppose there are two options. We either seek a
24 short continuation in circumstances where we are getting
25 summary judgment application up to speed, I think that is what

1 STACEY KC

2 happened in *National Highways*, where there was a short
3 continuation granted by Johnson J; or we simply have a one
4 year renewal and take... There are different ways of dealing
5 with this. We were rather hoping when we issued the
6 application that we could squeeze in but it may be that is
7 overly-ambitious.

8 MR. JUSTICE SOOLE: I am thinking of the defendants. You have 14
9 on your application, 14 new defendants -- do I mean 14;
10 anyhow I think it is 14 -- to be joined and they are supposed
11 to get everything ready in shape within six weeks or something
12 for a trial. I mean, it is one thing to say there are seldom
13 trials but sometimes people have points they want to raise and
14 they are entitled to proper time to do that. I understand you
15 are saying you are doing it to avoid criticism that it has not
16 been done.

17 MISS STACEY: And also in anticipation that if they are given say,
18 a 14-day or a 28-day period to put the defences in, we look at
19 those and we can get up to speed pretty rapidly. The onus is
20 on us to do so. Your point about service, I would take on
21 board, my Lord, and that would extend the timetable further.
22 It is tight, I recognise that.

23 MR. JUSTICE SOOLE: It seems to me my provisional view on reading
24 the papers was that you needed to have another hearing in
25 April for an interim injunction ----

1 STACEY KC

2 MISS STACEY: Yes.

3 MR. JUSTICE SOOLE: ---- at which point there would be directions
4 for trial. When I say "directions for trial", I mean there
5 might potentially be some directions today but there would be
6 probably supplementary directions at that stage.

7 MISS STACEY: That would do it. We just simply want to keep the
8 matter moving forward but against the concerns that I have
9 identified.

10 The only other point, I candidly have to mention this,
11 but it may not make any difference, is that every time there
12 is another hearing and another order we have to serve at all
13 stations nationwide, replace the warning notices and that is a
14 process that is not straightforward. Therefore the hope was
15 that we would have one final hearing with one further order
16 and therefore only one further rounds of such activity.

17 MR. JUSTICE SOOLE: I mean, one always bears in mind
18 practicalities, but this is litigation against a large number
19 of people and I think, as I have said in other cases like
20 this, the consequence of that is that the claimants have a lot
21 of work to do. It does not necessarily mean one can just cut
22 out steps that would otherwise be taken if there was only, as
23 it were, if it were a Travellers case with just one site.

24 MISS STACEY: Indeed.

25 MR. JUSTICE SOOLE: That is one of the consequences of taking

1 STACEY KC

2 litigation on a wide scale. I understand why it is done, but

3 I do not think one can give too much account to ----

4 MISS STACEY: Which is why I say it may not make much difference.

5 MR. JUSTICE SOOLE: You make it in passing.

6 MISS STACEY: I have followed the application in the order that I
7 was planning on taking.

8 MR. JUSTICE SOOLE: No, because I have interrupted you.

9 MISS STACEY: In terms of directions I can get to those when we
10 get to it. We can go ----

11 MR. JUSTICE SOOLE: In some ways going through directions is quite
12 a good way of, as it were, arguing the points and seeing how
13 they fit into make sure who has complied with what.

14 MISS STACEY: Yes. I think, my Lord, what I need from you is a
15 ruling on the joinder point because then we know whether we
16 are dealing with directions on the basis of joinder or no
17 joinder. You can see from my skeleton argument that if you
18 were against me on joinder then I would be asking for a set of
19 directions proceeding against persons unknown.

20 MR. JUSTICE SOOLE: Yes, I think the best thing is to look at the
21 whole thing in the round and go through it.

22 MISS STACEY: Yes.

23 MR. JUSTICE SOOLE: Yes.

24 MISS STACEY: Shall I take you to the order?

25 MR. JUSTICE SOOLE: I think that would be the right court to case.

1 STACEY KC

2 MISS STACEY: It is behind tab 2.

3 MR. JUSTICE SOOLE: Do you want to say something Mr. Laurie?

4 MR. LAURIE: Can I go to the loo please?

5 MR. JUSTICE SOOLE: Yes, of course. I will rise for five minutes.

6 **(A short break)**

7 MISS STACEY: The draft order is behind tab 2 on page 10 of the
8 hearing bundle. Page 9 is the front sheet and you will see
9 there it lists the proposed named defendants. Turning to the
10 substantive order ----

11 MR. JUSTICE SOOLE: That is the front of the order, is it not?

12 MISS STACEY: It is the front of the order.

13 MR. JUSTICE SOOLE: So we would cross out "proposed", would we
14 not, if they were joined?

15 MISS STACEY: We would. You have the recitals on page 10.

16 MR. JUSTICE SOOLE: Where it says Stephen Gingell that would come
17 out?

18 MISS STACEY: He would need to come out.

19 MR. JUSTICE SOOLE: So Margaret Reid would become the 13th?

20 MISS STACEY: Yes.

21 MR. JUSTICE SOOLE: Nixon the 14th.

22 MISS STACEY: 14th and 15th.

23 MR. JUSTICE SOOLE: "Proposed" would come out, "draft" would come
24 out.

25 MISS STACEY: Yes.

1 STACEY KC

2 MR. JUSTICE SOOLE: The recital would need to include at least the
3 order of ----

4 MISS STACEY: McGowan J, yes. But it could actually include the
5 subsequent order. I suggest it should just refer to McGowan J
6 when that order preceded Johnson J's or perhaps all three,
7 McGowan J, Johnson J, not the Bennathan J one because they are
8 not relevant to any point I am asking you. It is only in
9 relation to stations; so McGowan J and Johnson J.

10 MR. JUSTICE SOOLE: Yes. The Hill J orders are then divided
11 between the different ----

12 MISS STACEY: My Lord, you have been given all four orders now,
13 you have seen them. We could include in the recital a
14 reference to all four and ----

15 MR. JUSTICE SOOLE: Which all four?

16 MISS STACEY: The two Bennathan J orders.

17 MR. JUSTICE SOOLE: No, just the present recital takes the Hill
18 orders and divide them into descriptions as "Shell Petrol
19 Stations Injunction Order".

20 MISS STACEY: It does.

21 MR. JUSTICE SOOLE: That is going to need revision, is it not, if
22 it is going to refer to the orders of McGowan J and Johnson J?

23 MISS STACEY: It could simply say, "The order", singular, "of
24 Hill J dated 23rd May", but the definitions can stay because
25 they are the three claims together. You can take out the

1 STACEY KC

2 words "together" and just say the "Hill J order".

3 MR. JUSTICE SOOLE: How many orders are there?

4 MISS STACEY: There is one order dated 23rd May. There is simply
5 one order, which deals with ----

6 MR. JUSTICE SOOLE: So when it says "orders", that is wrong, is
7 it?

8 MISS STACEY: No, there are. Sorry, I am just getting mixed up.
9 There are three orders, yes.

10 MR. JUSTICE SOOLE: Yes.

11 MISS STACEY: There are. We can just break it down into the
12 different orders for the different claims, my Lord.

13 MR. JUSTICE SOOLE: At the moment we need to have, it seems to me,
14 I mean we cannot draft and commit it ----

15 MISS STACEY: No, no.

16 MR. JUSTICE SOOLE: ---- but you need to have the McGowan order
17 because of the provision in paragraph 11.

18 MISS STACEY: Yes.

19 MR. JUSTICE SOOLE: It makes sense to have the Johnson order as
20 well because that followed on from it.

21 MISS STACEY: Indeed.

22 MR. JUSTICE SOOLE: How you describe those orders I will leave to
23 you, but that will have to be changed the whole way through.

24 MISS STACEY: That is fine. So McGowan, Johnson and the three
25 Hills. I will amend the drafting to reflect that and change

1 STACEY KC

2 the definition to make sure it tracks through.

3 I think the second recital can stand.

4 MR. JUSTICE SOOLE: You are wanting a trial just in the petrol
5 stations; is that right?

6 MISS STACEY: No, we are wanting a trial... They have been
7 consolidated, all three claims, and it makes sense to keep
8 them such, because there is a great degree of overlap between
9 the evidence.

10 MR. JUSTICE SOOLE: Yes, fine.

11 MISS STACEY: So, no, we are proposing to keep all three running
12 together.

13 MR. JUSTICE SOOLE: Why does it have, "... of QB-2022 ----"

14 MISS STACEY: Because the joinder relates only to petrol stations,
15 so that is ----

16 MR. JUSTICE SOOLE: Yes, that is...

17 MISS STACEY: The purpose of that recital is to alert the court to
18 the fact that we have identified persons in relation to that
19 particular claim.

20 MR. JUSTICE SOOLE: Yes, I see.

21 MISS STACEY: It might be unnecessary as a recital because the
22 directions speak for themselves.

23 MR. JUSTICE SOOLE: You refer to the "application documents".
24 They are referred to below, are they? Yes.

25 MISS STACEY: It may be, my Lord, that you think Recital 2 can

1 STACEY KC

2 come out or simply read: "Upon the Claimant having identified
3 persons who should be ----"

4 MR. JUSTICE SOOLE: I prefer not to have too much narrative in
5 recitals.

6 MISS STACEY: Yes.

7 MR. JUSTICE SOOLE: All one needs to have, "Upon" ----

8 MISS STACEY: "Upon".

9 MR. JUSTICE SOOLE: ---- I do not think one needs the word

10 "reading", "Upon the Claimants application dated 12th February
11 2024 for ----"

12 MISS STACEY: Fine.

13 MR. JUSTICE SOOLE: Service of the application, pursuant to CPR
14 ----

15 MISS STACEY: That goes.

16 MR. JUSTICE SOOLE: What are you asking for in there now?

17 MISS STACEY: I do not think, my Lord, I am asking for anything
18 specifically. We need joinder. I suppose I am asking under
19 6.15(2) an order that the steps already taken to serve the
20 persons who are to be joined as named defendants are
21 sufficient steps.

22 6.15 relates obviously to the claim form, my Lord, but
23 6.27 makes that rule applicable in relation to other
24 documents.

25 MR. JUSTICE SOOLE: Yes.

1 STACEY KC

2 MISS STACEY: I am asking the court to endorse the steps that have
3 been taken to serve the application documents, the hearing
4 bundle, supplemental bundle hearing bundle on the named
5 defendants as set out in Ms. Oldfield's fifth witness
6 statement.

7 MR. JUSTICE SOOLE: Sorry, can you repeat that?

8 MISS STACEY: I am asking the court to order that the steps taken
9 as set out in Ms. Oldfield's fifth witness statement ----

10 MR. JUSTICE SOOLE: Are good service of the application?

11 MISS STACEY: ---- are good service of the application documents
12 on the named defendants. Obviously the claim form, the
13 particulars of claim, will need to be served separately.

14 MR. JUSTICE SOOLE: And in respect of Mr. Holland ----

15 MISS STACEY: In respect of Mr. Holland, I am asking the court to
16 order that service pursuant to paragraph 11 of McGowan J's
17 order is good service.

18 MR. JUSTICE SOOLE: Right.

19 MISS STACEY: The same, my Lord, might apply to Ms. Holland and
20 Ms. Burns. We are simply trying to add social media accounts
21 in order to maximise the prospects.

22 MR. JUSTICE SOOLE: The reason I am pausing on this recital is
23 because what you are seeking is not reflected in the order.

24 MISS STACEY: No, I recognise that.

25 MR. JUSTICE SOOLE: I think it may be simpler to say: "And upon

1 STACEY KC

2 the claimants' application dated 12th February 2024" and stop
3 there.

4 MISS STACEY: Full stop. Right. Paragraph 1 deals with the
5 joinder.

6 MR. JUSTICE SOOLE: Is it not logical to have the question of
7 service dealt with before you have the joinder?

8 MISS STACEY: Yes, but it is simply because once one knows who was
9 being joined... For example, my Lord, if you were against us
10 on joinder, if there were no named defendants ----

11 MR. JUSTICE SOOLE: One might be against them on joinder because
12 they had not been served.

13 MISS STACEY: That is true. But if no one is going to be joined
14 we would not need necessarily to change any service
15 provisions. That is why it has been dealt with the way it
16 has, but, my Lord, I am in your hands.

17 MR. JUSTICE SOOLE: Let us leave it there for the moment.

18 You need to amend that, do you not, you say the persons
19 named in Schedule 1.

20 MISS STACEY: Yes, so Schedule 1 needs to be amended to remove
21 Mr. Gingell, number 13.

22 MR. JUSTICE SOOLE: So you would put in a new Schedule 1; yes.

23 MISS STACEY: Yes.

24 MR. JUSTICE SOOLE: "... to be added as the 2nd to 15th
25 Defendants."

1 STACEY KC

2 MISS STACEY: Yes, exactly.

3 Paragraph 2 just defines the application documents.

4 MR. JUSTICE SOOLE: Was there not an amended claim form?

5 I thought I saw reference to it in an earlier ----

6 MISS STACEY: Yes, there is an amended claim form, in the petrol
7 stations claim.

8 MR. JUSTICE SOOLE: Should that not ----

9 MISS STACEY: Particulars of claim including amended ----

10 MR. JUSTICE SOOLE: No, the particulars of claim is separate from
11 the claim form. There is an amended claim form; is that
12 right?

13 MISS STACEY: Yes. The claim form and particulars of claim and we
14 can just insert "amended" in front of "claim form", amended
15 particulars of claim.

16 MR. JUSTICE SOOLE: Yes, but sorry, we do not have particulars of
17 claim.

18 MISS STACEY: We do.

19 MR. JUSTICE SOOLE: They do not need to be amended?

20 MISS STACEY: They have been because they were served on persons
21 unknown, so we have an amended claim form.

22 MR. JUSTICE SOOLE: No, no. Do we have particulars of claim which
23 refer to the named defendants?

24 MISS STACEY: No, no they would need to be amended first.

25 MR. JUSTICE SOOLE: What are the... Do we have the particulars of

1 STACEY KC

2 claim here?

3 MISS STACEY: No, but I have them in court.

4 MR. JUSTICE SOOLE: For future reference, more documents: I just
5 do not have time to go around trying to dig them out. I knew
6 there were some missing ones.

7 MISS STACEY: Yes, the particulars of claim in the petrol stations
8 claim do not, obviously, include any named defendants so they
9 are particulars of claim based on conspiracy to cause economic
10 torts and they list the activities taken out on the forecourts
11 of a service station as the basis of the entitlement to the
12 final injunction. That is the cause of action. They were
13 amended pursuant to Hill J's hearing in order to clarify
14 further the steps we say are unlawful. So it was an amendment
15 to deal with ----

16 MR. JUSTICE SOOLE: They have been amended?

17 MISS STACEY: Yes, they have, yes.

18 MR. JUSTICE SOOLE: I would like to see them.

19 MISS STACEY: My Lord, I can give you the front sheet but I do not
20 think you need the rest because it is just ----

21 MR. JUSTICE SOOLE: That is the claim form.

22 MISS STACEY: That is the amended particulars of claim. (*Same*
23 *handed*)

24 MR. JUSTICE SOOLE: Thank you. What is the amendment to the claim
25 form pursuant to the order of Hill J? Was it crossing out the

1 STACEY KC

2 word "environmental"?

3 MISS STACEY: Yes. There was an amendment to the reference to
4 persons unknown, the description, because the evidence before
5 Hill J was it was not simply environmental protest because
6 there were spin-off movements and she was satisfied that ----

7 MR. JUSTICE SOOLE: Yes, I see. Now we have this definition of
8 "application document", what is going to be done with them?

9 MISS STACEY: That is dealt with in paragraph 3, my Lord, the
10 different methods of service propose. You can take out
11 reference to CPR 6.9 that can be struck through, paragraph 3.
12 The proposal is that such documents be served on the named
13 defendants by posting them ----

14 MR. JUSTICE SOOLE: Just looking ahead, we do not need to include
15 things like "re-amended particulars of claim" and other things
16 in the definition; is that right?

17 MISS STACEY: My Lord, in order to ensure that it covers all
18 future documents, I think we probably should. So can
19 I propose a form of wording. In paragraph 2 if we can say,
20 "... amended claim form, amended particulars of claim, any
21 subsequent amendment."

22 MR. JUSTICE SOOLE: Yes, we need to distinguish do we not, between
23 retrospective approval of modes of service of that which have
24 been supplied and future service.

25 MISS STACEY: Yes. Paragraph 2 deals with those documents that

1 STACEY KC

2 have already been served. My understanding is that the
3 amended claim form when it refers to "claim form" and
4 "particulars of claim" it was intended to read "amended claim
5 form" and "amended particulars of claim".

6 MR. JUSTICE SOOLE: I suggest it may be simpler if we divided it
7 up between... if we do keep it as application documents and
8 then have some further order to deal with future documents.

9 MISS STACEY: Yes, future documents per paragraph 11 of McGowan J.

10 MR. JUSTICE SOOLE: Yes.

11 MISS STACEY: We still need to insert the words "amended" before
12 "claim form" and "particulars of claim".

13 MR. JUSTICE SOOLE: Yes.

14 MISS STACEY: At paragraph 3 ----

15 MR. JUSTICE SOOLE: What is the "Shell Petrol Stations Injunction
16 Order"?

17 MISS STACEY: That is the ----

18 MR. JUSTICE SOOLE: The Hill J order.

19 MISS STACEY: That is the Hill J order which is defined in the
20 first recital.

21 MR. JUSTICE SOOLE: Yes, you need ----

22 MISS STACEY: I will track through the reference, yes.

23 MR. JUSTICE SOOLE: I am thinking of in the context of when you
24 were going to be adding the McGowan order.

25 MISS STACEY: Yes. Okay.

1 STACEY KC

2 Are we on paragraph 3 ----

3 MR. JUSTICE SOOLE: Mr. Laurie, I am going through the drafting.

4 I will come back to you on any points of principle that arise
5 that you want to make.

6 Actually, if you want to have the order as this order as

7 ----

8 MISS STACEY: In paragraph 3.

9 MR. JUSTICE SOOLE: Yes. In paragraph 3 you are asking under
10 6.15(2) brought in by 6.27.

11 MISS STACEY: Yes, the order would not come into my Lord, yes. It
12 is all the documents, as you say, retrospectively being
13 sanctioned.

14 MR. JUSTICE SOOLE: Yes.

15 MISS STACEY: "... shall serve the Application Documents" then.

16 In fact what I think I need to say there, my Lord, is "the
17 Application Documents and the various documents that are
18 referred to in Ms. Oldfield's witness statement that have
19 already been served." That would be (it is page 194 of the
20 bundle) the application documents, the 2024 orders and the
21 2024 pleadings which she refers to in paragraph 3.11 of her
22 statement.

23 MR. JUSTICE SOOLE: I am finding it hard to follow at the moment.

24 MISS STACEY: My Lord, paragraph 3 is intended to cover all of
25 those documents that have already been served on those

1 STACEY KC

2 individuals. They are identified ----

3 MR. JUSTICE SOOLE: If you are going to get retrospective approval
4 of the mode of service, does it not need to include the
5 supporting documents for the application?

6 MISS STACEY: And ancillary documents.

7 MR. JUSTICE SOOLE: I do not know about "ancillary".

8 MISS STACEY: It says: "... and any other documents in the
9 proceedings". That could be read at currently existing.

10 I was trying to get away from the notion that it might extend
11 to future documents.

12 MR. JUSTICE SOOLE: Sorry, where is the application dated 12th
13 February?

14 MISS STACEY: Where are you reading from, my Lord?

15 MR. JUSTICE SOOLE: Paragraph 2.

16 MISS STACEY: Paragraph 2.

17 MR. JUSTICE SOOLE: Do the application documents not include the
18 application itself?

19 MISS STACEY: The application documents are defined. They ought
20 to include the application, yes. The paragraph as currently
21 drafted does not refer specifically to the application.

22 MR. JUSTICE SOOLE: Which is not helpful when we are trying to
23 get... when your application is to ----

24 MISS STACEY: But the evidence does support my submission that the
25 application documents, including the application, have in fact

1 STACEY KC

2 been served in that manner. It is just a question of
3 rewording, I suggest, paragraph 2 to ensure that one knows
4 what we are talking about.

5 My Lord, I am told that the claim form and the
6 particulars of claim which have been served are not the
7 amended versions. Just so we are clear ----

8 MR. JUSTICE SOOLE: I am not at all clear, I am completely
9 confused.

10 MISS STACEY: My Lord, we have not served the claim form or the
11 particulars of claim on the named defendants because they have
12 not yet been joined.

13 MR. JUSTICE SOOLE: Yes, that does not surprise me.

14 MISS STACEY: What has been served is the application documents
15 which were referred to in Ms. Oldfield's fifth witness
16 statement.

17 MR. JUSTICE SOOLE: The amended claim form and the amended
18 particulars of claim have been served on the persons unknown
19 by the means sanctioned by the order of McGowan J.

20 MISS STACEY: Exactly, paragraph 11. That is not what I am asking
21 your Lordship to endorse.

22 MR. JUSTICE SOOLE: Yes. I am trying to draw a distinction
23 between things that are being approved or you are seeking a
24 court's approval retrospectively and things which are for the
25 future.

1 STACEY KC

2 MISS STACEY: This section of the order is retrospective insofar
3 as it is referring to paragraph 3. My Lord, if I can ask you
4 to look at the substance of paragraph 3 and perhaps it might
5 become clearer. "Pursuant to 6.15(2)" -- if we can make that
6 amendment -- "the Claimant in the proceedings for service of
7 the Application Documents by the following method is good
8 service:" That is essentially what I am asking you to...
9 That is dealing with stuff that has already happened.

10 MR. JUSTICE SOOLE: The claim form and particulars of claim have
11 not been ----

12 MISS STACEY: No, no, that we need to tweak. My Lord, you are
13 right, the application documents, I fully recognise, needs to
14 be amended to reflect the fact that those documents have not
15 been served. I am seeking to gain retrospective endorsement
16 of the steps that have already been taken, namely the sealed
17 application notice, the fourth witness statement of Alison
18 Oldfield and exhibits, the draft order to the application, the
19 fifth witness statement, and the various hearing bundles.

20 MR. JUSTICE SOOLE: Yes.

21 MISS STACEY: Those are the documents which ought to be within the
22 definition of "application documents". I recognise it is not
23 drafted in that way but that is what it should say. That is
24 what we are dealing with. Pursuant to paragraph 3, my Lord,
25 what I am asking your Lordship to do is, pursuant to CPR

1 STACEY KC

2 6.15(2) endorse and 6.27, order that the service of those
3 application documents pursuant to the amended definition in
4 the manner set out in 3.1 is good service. Now, I fully
5 recognise my Lord I have to do some amending in order to get
6 there, but that what I am after.

7 MR. JUSTICE SOOLE: Yes.

8 MISS STACEY: The methods which are set out in 3.1, 3.1.1 is
9 postage at the last known addresses, taking your Lordship
10 through the evidence in relation to that. 3.1.2 needs a
11 tweak, my Lord, because this is the social media accounts in
12 relation to two individuals and we have only managed to do it
13 in relation to Facebook for Ms. Harris.

14 MR. JUSTICE SOOLE: 3.1.2 is only one individual.

15 MISS STACEY: Exactly 3.1.2 relates to Ms. Harris.

16 MR. JUSTICE SOOLE: Yes.

17 MISS STACEY: And 3.1.2.1 is Facebook. We have managed to do that
18 so they can stay. But 3.1.2.2 and 3.1.2.3 can come out. My
19 Lord you may recall that I said to you we served using the
20 Facebook social media account, but there are problems with
21 Twitter and LinkedIn that we have identified since drafting
22 this order.

23 MR. JUSTICE SOOLE: Because the second bundle could not go
24 through?

25 MISS STACEY: That is in relation to the next individual, no. The

1 STACEY KC

2 problems are that... Well, we could. The Instagram, I am
3 told, which is the bottom one, rejected half of the message,
4 it was too big so that we cannot serve there. Twitter, I am
5 also told, there are practical issues with serving at Twitter
6 but we have managed to do Facebook.

7 MR. JUSTICE SOOLE: So 3.1.2.2 and 3.1.2.3 come out?

8 MISS STACEY: Yes.

9 MR. JUSTICE SOOLE: So the only social media account is 3.1.2.1;
10 is that right?

11 MISS STACEY: That is right. Because it is only dealing with
12 documents we have already served I do not need to ----

13 MR. JUSTICE SOOLE: Including the fifth witness statement?

14 MISS STACEY: Including the fifth witness statement in relation to
15 Ms. Harris, yes.

16 MR. JUSTICE SOOLE: 3.1.1 does not include those where the
17 document was not posted but was hand delivered to ay the
18 address or by hand at the end?

19 MISS STACEY: It does say "or by hand", yes, or "service by hand".
20 I suppose we could say, "as set out in the witness statement
21 above."

22 MR. JUSTICE SOOLE: Or... well ----

23 MISS STACEY: You could include ----

24 MR. JUSTICE SOOLE: I do not like referring to "evidence" in ----

25 MISS STACEY: I see. That was intended to cover the hand

1 STACEY KC

2 delivery, which was then attempted as a ----

3 MR. JUSTICE SOOLE: It has to be clear it is hand delivery to the
4 address not to the person.

5 MISS STACEY: Or by hand delivery to the addresses.

6 MR. JUSTICE SOOLE: I will leave you to draft it.

7 MISS STACEY: I have the point.

8 MR. JUSTICE SOOLE: It has to be made clear.

9 MISS STACEY: Yes. So I will insert that wording at the end of
10 3.1.1. 3.1.2, my Lord, deals with Louise Harris. The last
11 two sub-paragraphs come out. In relation to, over the page,
12 Ms. Burns, that can stay because we have managed to serve to
13 LinkedIn.

14 MR. JUSTICE SOOLE: This is all addressed in the future by
15 sending.

16 MISS STACEY: No, no ----

17 MR. JUSTICE SOOLE: It needs to be made clear by "the sending of";
18 you need to make clear it is retrospective.

19 MISS STACEY: It is all retrospective, yes. We can amend that to
20 make it clear that it did not include the supplemental bundle.

21 MR. JUSTICE SOOLE: Paragraph 4 again merges the two.

22 MISS STACEY: Yes, it does.

23 MR. JUSTICE SOOLE: That needs to be unscrambled.

24 MISS STACEY: I suggest that in paragraph 4 we need a new
25 provision dealing with future documents, my Lord.

1 STACEY KC

2 MR. JUSTICE SOOLE: Yes.

3 MISS STACEY: Future documents. I suggest, if I may ----

4 MR. JUSTICE SOOLE: Before we end on section 3, what is the
5 position, there is no provision here I think you mentioned
6 before, on any party applying to set aside?

7 MISS STACEY: That is going to come in at the end, my Lord.

8 Hill J's order did. I suggest we insert that at the end at as
9 a new paragraph 21, "Any person who wishes to vary or
10 discharge the order", it is a general liberty to apply
11 provision. That can come in at the end.

12 MR. JUSTICE SOOLE: There is no way in which ----

13 MISS STACEY: Sorry, my Lord, it could cover the direction. The
14 reason I suggest it comes in at the end is it does not simply
15 relate to service, it might deal with directions too. It
16 ought to be liberty to apply in relation to everything.

17 MR. JUSTICE SOOLE: Saying it to be good service, that will not be
18 conclusive, will it?

19 MISS STACEY: No, that is in relation to the past.

20 MR. JUSTICE SOOLE: No, but as to the past, that will not be
21 conclusive, will it, an order that it is good service?

22 MISS STACEY: No, no, in relation for example, it is good service
23 for the purposes of CPR Part 6, but it does not prove that the
24 documents have come to the attention of the individuals for
25 any other purpose. It means there is ----

1 STACEY KC

2 MR. JUSTICE SOOLE: What I am saying is in the circumstances I do
3 not want to have any order which prevents a defendant saying
4 that that order should not have been made.

5 MISS STACEY: No. The liberty to apply provision can be framed so
6 as to ensure that that would not be its effect. But I think,
7 is it not, more about not wanting to close off the possibility
8 of a defendant turning up and saying, "I actually did not see
9 these documents"?

10 MR. JUSTICE SOOLE: The way it works on terms of notice and
11 knowledge is that *prima facie* if an order has been served,
12 either personally or by one of the approved methods of
13 alternative service, then effectively knowledge is deemed.
14 But a defendant then has two protections: one, it can seek to
15 set aside the order for alternative service on the basis that
16 that could not reasonably be expected to come to their
17 attention, or which may amount to the same thing to say, and
18 the burden is on them on the civil standard, "I did not know
19 about this".

20 MISS STACEY: My Lord, my proposed liberty to apply provision was
21 intended to cover both.

22 MR. JUSTICE SOOLE: I am very clear, those protective provisions
23 must be provided.

24 MISS STACEY: I understand that. It may be that if we simply put
25 in the liberty to apply provision and put in brackets

1 STACEY KC

2 "(including the order for alternative service)" just to make
3 it absolutely clear that is what it relates to; hopefully that
4 addresses your Lordship's concern.

5 Paragraph 4, my Lord, I propose to put in effectively
6 what McGowan J has at paragraph 11, dealing with future
7 documents.

8 MR. JUSTICE SOOLE: You mean applying that... but she was only
9 applying it to ----

10 MISS STACEY: Persons unknown.

11 MR. JUSTICE SOOLE: ---- persons unknown.

12 MISS STACEY: She was. I suggest that we list those methods of
13 service and then go back to 3.1.1, make it forward looking so
14 that is posting at addresses that we have and then 3.1.2 and
15 3.1.3 in relation to those two social media accounts. My
16 Lord, in relation to the social media, I am not wanting to
17 overcomplicate it, I think we need to qualify the obligation
18 as a reasonable endeavors one, because my concern is that we
19 find ourselves unable to join those two individuals via those
20 accounts because we have been blocked. So it has to be
21 qualified to reflect that possibility.

22 MR. JUSTICE SOOLE: What happens if you then cannot achieve that?

23 MISS STACEY: Then you are back to Mr. Holland's situation. The
24 only reason we are offering those two social media accounts is
25 because we identified ----

1 STACEY KC

2 MR. JUSTICE SOOLE: Something better than that which is provided
3 or more immediate than something which is provided to persons
4 unknown?

5 MISS STACEY: Quite. We could take the view it is unnecessarily
6 overcomplicating things and have all three individuals in the
7 same category as persons unknown, but we are seeking to do
8 more.

9 I propose, my Lord, at paragraph 4, I insert a "future
10 documents" provision which lists the existing methods against
11 persons unknown and, in addition to that, postal addresses and
12 the two social media links for those two individuals, with a
13 qualified obligation. Then you have the certificate of
14 service provision, which applies to that future looking
15 exercise.

16 MR. JUSTICE SOOLE: All right.

17 MISS STACEY: Then 4.2 then, I think, stays, in relation to named
18 defendants "be deemed effective as at the latest date".

19 MR. JUSTICE SOOLE: I have just seen the time.

20 MISS STACEY: Yes. My Lord, I am so sorry it has taken so much
21 longer.

22 MR. JUSTICE SOOLE: There is quite a lot more to do as well.

23 MISS STACEY: I am in your hands.

24 MR. JUSTICE SOOLE: I will rise now until five past two.

25 MISS STACEY: Okay.

1 STACEY KC

2 MR. JUSTICE SOOLE: Whatever the final order is that is being
3 proposed I will need to see it in court. I am not going to
4 deal with it by way of e-mails, for example.

5 MISS STACEY: No, no. My Lord, I do not anticipate anything.
6 I am not going to, unless you would like me to, spend the
7 lunchtime adjournment drawing anything up. What I could do is
8 once we have gone through everything circulate a draft that
9 reflects a position that your Lordship is indicated you are
10 content to land at and then we can come back. Would you
11 rather me deal with it in a different way? I want to be as
12 helpful as I possibly can.

13 MR. JUSTICE SOOLE: Whatever happens, it happens in court.

14 MISS STACEY: Understood.

15 MR. JUSTICE SOOLE: That is the point. You need to think about
16 when that can be dealt with.

17 MISS STACEY: Yes.

18 MR. JUSTICE SOOLE: And also a note if there is going to be an
19 adjournment, for example, a notice of that and so on.

20 MISS STACEY: Understood.

21 MR. JUSTICE SOOLE: Absent particular litigants in person and
22 unknown and so on, but also even if everybody was represented,
23 I just cannot deal with such a thing by e-mails back and forth
24 and drafts and things ----

25 MISS STACEY: No, no, I understand.

1 STACEY KC

2 MR. JUSTICE SOOLE: ---- we have to go through it. It is
3 particularly important that I am not the draftsman.

4 MISS STACEY: No, no, I was not proposing you should be. It is
5 just a question of when I start drafting. I do not want to
6 draft until we have gone through everything.

7 MR. JUSTICE SOOLE: Then it may be we have to adjourn to a further
8 day.

9 MISS STACEY: Yes, indeed.

10 MR. JUSTICE SOOLE: I cannot sit tomorrow; I am away.

11 MISS STACEY: Perhaps we can do the best we can and re-list it for
12 a hearing to finalise everything and deal with further
13 service. But we are where we are. I am sorry that I have not
14 been able to provide you with an order that we do not need to
15 amend.

16 MR. JUSTICE SOOLE: Yes. Very well. We will resume at ten past
17 two.

18 ***(Adjourned for a short time)***

19 MR. JUSTICE SOOLE: I am sorry, I had to deal with an urgent thing
20 that blew up.

21 MISS STACEY: Not at all. My Lord, I have handed you a copy of
22 the document that we have prepared over lunch trying to amend
23 so we reflected changes that you and I were discussing.

24 MR. JUSTICE SOOLE: Has Mr. Laurie ----

25 MISS STACEY: Mr. Laurie been provided with a copy, yes.

1 STACEY KC

2 Hopefully this will help your Lordship in terms of clarifying
3 where we have got to. Shall I give you a moment to read it?

4 MR. JUSTICE SOOLE: No, take me through it.

5 MISS STACEY: You are will see on the third page I have removed
6 "proposed" on the front sheet.

7 MR. JUSTICE SOOLE: Yes.

8 MISS STACEY: Then the recitals had been amended to include the
9 orders of McGowan J, Johnson J, relating to the Petrol
10 Stations claim, Bennathan J in relation to the Tower and Haven
11 claims and then a reference to the orders of Hill J
12 separately.

13 MR. JUSTICE SOOLE: Bennathan J is the Tower claim?

14 MISS STACEY: That is the Tower and Haven, Bennathan J dated 5th
15 May relating to claim Tower and claim Haven ----

16 MR. JUSTICE SOOLE: Yes.

17 MISS STACEY: ---- and the order of Hill J dated 28th April and
18 23rd May, which are defined.

19 MR. JUSTICE SOOLE: Yes, one of them is the police disclosure
20 order.

21 MISS STACEY: We have taken out Recital 2.

22 MR. JUSTICE SOOLE: Yes.

23 MISS STACEY: Recital 3 has been truncated so it just deals with
24 "Upon the application".

25 MR. JUSTICE SOOLE: Paragraph 1 of the order removes ----

1 STACEY KC

2 MISS STACEY: I have not inserted that yet, but that is just
3 delling you what we are going to do. We are going to amend
4 the Schedule 1 to remove Mr. Gingell, yes. That is why that
5 is in square brackets. Obviously that will not appear in the
6 final version.

7 MR. JUSTICE SOOLE: No, but Schedule 1 will exclude that.

8 MISS STACEY: It will be replaced, yes, and amended it to say 2nd
9 to 15th rather than 16th defendants.

10 Paragraph 2, my Lord, has been amended. The bit in
11 square bracket is to identify all those documents that we say
12 should be within the definition of the "application documents"
13 the backward-looking documents that we served the named
14 persons with.

15 MR. JUSTICE SOOLE: Yes.

16 MISS STACEY: Those shall be referred to as the application
17 documents.

18 At paragraph 3, my Lord you will see, I have taken out
19 the reference to 6.9 and I have amended that to read "Pursuant
20 to CPR 6.15 and 6.27 the service by the Claimant in the
21 proceedings at Stations of the application documents shall be"
22 ---- I do not know if there are two references to... we can
23 take out the second reference to the proceedings I think ----
24 "good service", then 3.1 "on the Named Defendants by the
25 following methods".

1 STACEY KC

2 MR. JUSTICE SOOLE: Yes, I think you cross out the second "in the
3 proceedings".

4 MISS STACEY: Indeed I have taken that out. I can probably merge
5 3.1 into 3, "by the following methods". Then I have set out
6 the methods and made sure it is backward looking by saying "by
7 the posting between dates of".

8 MR. JUSTICE SOOLE: Yes.

9 MISS STACEY: I have included Special Delivery because that is
10 what the evidence covers ----

11 MR. JUSTICE SOOLE: Yes.

12 MISS STACEY: ---- and hand delivery to the addresses supplied to
13 meet your Lordship's point.

14 3.1.2 is the messaging to "the Third Defendant's social
15 media account" on the date specified. I have taken out the
16 two sub-paragraphs dealing with the other two social media
17 accounts in respect of which we are not able so easily to ----

18 MR. JUSTICE SOOLE: Yes, and you can probably remove that gap
19 before 12th February.

20 MISS STACEY: I can remove the gap indeed.

21 3.1.3 in relation to Ms. Burns, again by the sending of
22 a message on the 5th March and you will note the bit in
23 parenthesis after "application documents" which says, "save
24 for the supplemental bundle which was not possible to upload".
25 That is to deal with the point that I made to your Lordship

1 STACEY KC

2 about the first method went through but the second will not.

3 MR. JUSTICE SOOLE: Yes.

4 MISS STACEY: Something has gone wrong with the font in 4, but
5 this deals with future documents and it essentially replicates
6 McGowan J's order ----

7 MR. JUSTICE SOOLE: Yes.

8 MISS STACEY: ---- so "shall be validly effected by". The first
9 three, my Lord, are McGowan J's order, so you have e-mail,
10 uploading and sending to any person who requested.

11 MR. JUSTICE SOOLE: Yes, that is the generic e-mail, there is no
12 personal e-mail addresses.

13 MISS STACEY: No. In fact it may be sensible to pull out 4.3
14 because that actually is not upon the main defendants. That
15 is in relation to other persons. That probably should be in a
16 separate provision, that is 4.3.

17 MR. JUSTICE SOOLE: Yes.

18 MISS STACEY: That does not really strictly come under names, so
19 I can pull that out.

20 Then current 4.4 ----

21 MR. JUSTICE SOOLE: Becomes 4.3.

22 MISS STACEY: ---- becomes 4.3, that is posting.

23 Then you have got 4.4. 5 becomes 4.4 in addition, in
24 relation to third and I have inserted the words "to the extent
25 that it is possible to do so in practice" to deal with the

1 STACEY KC

2 qualification that I suggested we needed just in case we are
3 blocked.

4 MR. JUSTICE SOOLE: Yes, it is a slightly odd thing whereby
5 something is ----

6 MISS STACEY: That was my ----

7 MR. JUSTICE SOOLE: The qualification means that if you cannot do
8 it you cannot do it.

9 MISS STACEY: Indeed, it is to cover that scenario. It is a bit
10 like when we put the warning notice up we are under an
11 obligation to use best endeavors to do at least a certain
12 number. We do not to fall short because of inability in
13 practice to comply.

14 4.6 becomes 4.5 and the same point applies in relation
15 to a different social media account.

16 Then paragraph 5, my Lord, relates to the verification
17 process, but only in relation to future documents; so
18 certificate of service in relation to the service of future
19 documents in accordance with the methods set out above.

20 MR. JUSTICE SOOLE: That is because you need to have that ----

21 MISS STACEY: That is a requirement ----

22 MR. JUSTICE SOOLE: Of 6.15(4).

23 MISS STACEY: Indeed. That ticks those boxes so you have
24 verification by certificate of service, that is 5.1. 5.2 is
25 the date on which such service is deemed effective and then

1 STACEY KC

2 5.3 shall be given sufficient service because the order is
3 being made by the court for alternative service.

4 Then 6, my Lord, is another requirement 6.15(1) which is
5 the date for the acknowledgment of service or the defence.

6 What we have done there ----

7 MR. JUSTICE SOOLE: I am still on paragraph 7.

8 MISS STACEY: Paragraph 7?

9 MR. JUSTICE SOOLE: Where are you on?

10 MISS STACEY: I am on 6.

11 MR. JUSTICE SOOLE: You are on 6?

12 MISS STACEY: If you look at 6, my Lord, this is a requirement
13 specifically at 6.15(4) where you have to specify the date for
14 the acknowledgment.

15 MR. JUSTICE SOOLE: Yes.

16 MISS STACEY: What we have not done there is set out the date in
17 that paragraph. We have cross-referred down to the date on
18 which ----

19 MR. JUSTICE SOOLE: Yes, something has gone wrong there, "power in
20 relation to ..." Should that be in relation to paragraph 4?

21 MISS STACEY: In relation to paragraph 4, yes, that is right.

22 MR. JUSTICE SOOLE: You cross out para, do you?

23 MISS STACEY: Yes, cross out "para", sorry, I did not see that,
24 yes, paragraph 4. That cross-refers to 8 and 9 which are ----

25 MR. JUSTICE SOOLE: Should it be "where alternative methods is

1 STACEY KC

2 permitted"?

3 MISS STACEY: It is permitted, yes.

4 Paragraph 8 we will come on to but that is the date for
5 acknowledgment of service. Then 9 is the date for the
6 defence.

7 MR. JUSTICE SOOLE: Right.

8 MISS STACEY: Then I have inserted, my Lord, you will see a new
9 paragraph 7 which deals with the service of the amended claim
10 form and particulars of claim on the named defendants. I put
11 in brackets "(sealed copies)" because this is a point I wanted
12 to clarify with your Lordship. We need to be clear as to
13 whether we need to serve sealed copies and whether sealed
14 copies are going to be provided by the court or whether it
15 will be sufficient for us to serve amended copies.

16 MR. JUSTICE SOOLE: What is the position under the rules?

17 MISS STACEY: There is no clear position as far as I can could
18 find. I could not find it over the lunch adjournment. It is
19 matter of practice, I think. It has to be served, the claim
20 form that is.

21 MR. JUSTICE SOOLE: Well, is the claim form resealed? I do not
22 think it is?

23 MISS STACEY: It has been there for ----

24 MR. JUSTICE SOOLE: I am looking here at the one of Hill J.

25 MISS STACEY: Yes.

1 STACEY KC

2 MR. JUSTICE SOOLE: I am just trying to picture it. I am looking
3 at amended claim forms in my sleep virtually. I am trying to
4 remember whether they get sealed or not.

5 MISS STACEY: On each occasion they are amended?

6 MR. JUSTICE SOOLE: I do not think so.

7 MISS STACEY: No, I thought not but I wanted to flag it.

8 MR. JUSTICE SOOLE: This one here is sealed on 24th October. Hang
9 on. That predates the ----

10 MISS STACEY: That was sealed on the amendment, my Lord. We
11 applied on paper ----

12 MR. JUSTICE SOOLE: Was there an original claim form?

13 MISS STACEY: There was and she sealed that when we applied on
14 paper for permission to amend.

15 MR. JUSTICE SOOLE: When you say "she", I am sure Hill J did not
16 apply the seal.

17 MISS STACEY: No, but she gave permission or the claim form to be
18 amended in the manner suggested and a seal was applied.

19 MR. JUSTICE SOOLE: Right.

20 MISS STACEY: We are not asking for permission to amend, you see.
21 That is where it is slightly different here. We are simply
22 amending in consequence of what I anticipate will be an order
23 for joinder. In those circumstances I suggest ----

24 MR. JUSTICE SOOLE: You are going to be re-amending, are you not,
25 to add all the names.

1 STACEY KC

2 MISS STACEY: Indeed. The point I am seeking to make it is not an
3 application for permission to amend that needs to necessarily
4 be sealed.

5 MR. JUSTICE SOOLE: Sorry?

6 MISS STACEY: My Lord, the bit in square brackets in paragraph 7
7 is therefore out of an abundance of caution but I suggest we
8 do not need those words.

9 MR. JUSTICE SOOLE: Yes, but are you applying to amend, to
10 re-amend the claim form?

11 MISS STACEY: No, my Lord, I am applying for joinder and upon the
12 joinder we will add the names of the named persons. It is a
13 consequence of the application for joinder. I am not applying
14 to amend. Those persons ----

15 MR. JUSTICE SOOLE: Is that not what happens? Do you not amend
16 the claim form when you add names to it?

17 MISS STACEY: It is the practical consequence, yes, but I have not
18 made an application for permission to amend because I am
19 applying for defendants to be joined; that is my substantive
20 application.

21 MR. JUSTICE SOOLE: Right.

22 MISS STACEY: If you grant me my application for joinder I will
23 add the names of those defendants to the claim form and to the
24 particulars of claim.

25 MR. JUSTICE SOOLE: How?

1 STACEY KC

2 MISS STACEY: It may be that I need permission. My Lord, I do not
3 have an application for permission before you. It forms part
4 and parcel of the application for joinder, if I may, and
5 I would urge the court to deal with that on an informal basis
6 and treat the application for joinder as encompassing an
7 application for amendment of the current pleadings.

8 MR. JUSTICE SOOLE: There is no amended particulars of claim.

9 MISS STACEY: No, the only amendment will be the addition of the
10 names on the front sheet and you see have seen that my Lord
11 already. On the order, the draft order contains the names, if
12 you go to the first page of the order you have before you.

13 MR. JUSTICE SOOLE: Does the claim not form not to include all the
14 defendants to an action?

15 MISS STACEY: Yes. You have not got that document before you.
16 But the front page of the claim form would need to be amended
17 to add the names which the court is prepared to order the
18 joinder of. Once that happens we have to insert the names on
19 the claim form. It is that document, that is the amendment
20 I have in mind. What I am acknowledging is that I do not have
21 a formal application before you to amend the claim form in
22 order to ----

23 MR. JUSTICE SOOLE: I think that probably is implicit. What I do
24 not have is a document.

25 MISS STACEY: You do not have a document, no. The front page

1 STACEY KC

2 would look exactly as it does on this order, it is simply the
3 addition of those names which you there see.

4 MR. JUSTICE SOOLE: You will need to insert, "The claimant has
5 permission to re-amend the claim form."

6 MISS STACEY: I can put that in the recital.

7 MR. JUSTICE SOOLE: No.

8 MISS STACEY: It would follow the joinder, I think, my Lord, new
9 paragraph 2?

10 MR. JUSTICE SOOLE: Yes, I think that would be the place to have
11 it.

12 MISS STACEY: Permission to amend the claim form to add the 2nd to
13 15th defendants full stop and the particulars of claim.

14 MR. JUSTICE SOOLE: Well, the particulars of claim will have to do
15 more than that, will they not? The particulars of claim will
16 have to deal with the case which has been made against the
17 individual defendants.

18 MISS STACEY: No, my Lord, because this is a conspiracy to cause
19 economic harm case, it is an economic tort case. There is no
20 specific case pleaded in relation to individuals. That forms
21 the subject of... I have to look at the particulars of claim

22 ----

23 MR. JUSTICE SOOLE: If you are saying that the 2nd to 15th
24 defendants are members who have conspired with people you need
25 to allege that.

1 STACEY KC

2 MISS STACEY: Yes, we have alleged that my Lord. At the moment we
3 have alleged that persons unknown have conspired by committing
4 these acts and we have listed the acts out. I suppose my Lord
5 is right, we might have to identify in relation to ----

6 MR. JUSTICE SOOLE: Of course you have to.

7 MISS STACEY: ---- each of the individuals what specific acts they
8 carried out.

9 MR. JUSTICE SOOLE: Just to refer to them otherwise there is no
10 reference to them in the whole of the body of the pleadings by
11 definition because they were not defendants.

12 MISS STACEY: Yes. I do not have that document, so it might have
13 to be the subject of a separate application because unless...
14 We could provide that document to you if you were prepared to
15 deal with it as an implicit application which follows on from
16 joinder. But we is have not prepared the document because we
17 did not know who would be joined. So I do not have that to
18 put before you today.

19 MR. JUSTICE SOOLE: Sorry, one never knows the result of every
20 application, but you need to have all the documents which are
21 necessary for taking the next step. You are asking for a
22 trial to be heard by the 12th May when we do not even have
23 particulars of claim to deal with the individual defendants.

24 MISS STACEY: Indeed. Once individuals are joined we have to look
25 at the pleadings and adapt them accordingly. I do not have an

1 STACEY KC

2 application to deal with that today. I suggest we can deal
3 with it by inserting a new paragraph 2, the permission to
4 amend the claim form, and then making a direction for the
5 service of an amended particulars of claim, which would need
6 to be then served.

7 MR. JUSTICE SOOLE: What, re-amended?

8 MISS STACEY: Re-amended particulars of claim, yes.

9 MR. JUSTICE SOOLE: But normally one does not give permission to
10 amend particulars of claim, indeed normally not even a claim
11 form without seeing a draft.

12 MISS STACEY: No.

13 MR. JUSTICE SOOLE: One does not normally give a general
14 permission to amend.

15 MISS STACEY: It may be that that is a further step. Once you
16 join the persons we then have to go and see how we can plead
17 in relation to the individual persons, produce the draft and
18 then come back, my Lord. That has to be factored into the
19 directions. Alternatively, we can push back finalisation of
20 this order pending us preparing that document and put it
21 before your Lordship.

22 MR. JUSTICE SOOLE: Hmm?

23 MISS STACEY: We can produce such a document and put it before
24 your Lordship so it can be dealt with ----

25 MR. JUSTICE SOOLE: When?

1 STACEY KC

2 MISS STACEY: That can be done relatively quickly. I am sure we

3 ----

4 MR. JUSTICE SOOLE: Again administrative, without a hearing?

5 MISS STACEY: No, not without a hearing. Your Lordship before the
6 luncheon adjournment said any order would need to be finalised
7 in court.

8 MR. JUSTICE SOOLE: Yes, quite.

9 MISS STACEY: That what I have in mind.

10 MR. JUSTICE SOOLE: Yes, go on.

11 MISS STACEY: It may be, as an alternative, given that essentially
12 the application for amendment follows on with the consequence
13 of joinder ----

14 MR. JUSTICE SOOLE: These are all things of which the other
15 parties have had no prior notice.

16 MISS STACEY: No, my Lord, but they have had notice of the
17 application for joinder. It is a consequence of the joinder
18 that they are being added to. It is not a new cause of action
19 that I am suggesting, it is simply particularising their role
20 in the current cause of action which forms the subject of the
21 claim. I am not suggesting it is a small thing, but it is not
22 as though the nature of the claim has been changed in any way.

23 So depending on when your Lordship would wish to re-sit
24 in order for this order to be finalised, it may be that we
25 could produce that document for your Lordship to consider.

1 STACEY KC

2 MR. JUSTICE SOOLE: It will not be done this afternoon.

3 MISS STACEY: No, no. My Lord, the practical reality is whilst
4 I fully recognise we cannot always anticipate what orders are
5 going to be made, we could not have carried out the pleading
6 until we know which individuals are going to be joined. The
7 way in which it is going to be pleaded in relation to them
8 could depend ----

9 MR. JUSTICE SOOLE: You could set it all out and if someone was
10 not joined you could strike them through. You need quite a
11 lot of time to prepare for this.

12 MISS STACEY: I propose, I insert in paragraph 2 permission to
13 amend the claim form simply to add the names, that is a new
14 paragraph 2.

15 MR. JUSTICE SOOLE: Yes.

16 MISS STACEY: Then if I can ask your Lordship to go back to
17 paragraph 7, under "Directions", 6 I think ----

18 MR. JUSTICE SOOLE: Power to amend claim form by addition. Yes.

19 MISS STACEY: New 6(a) under the heading "Directions" I think
20 provision therefore needs to be made for amendment to the
21 particulars of claim in relation to the named defendants.

22 MR. JUSTICE SOOLE: Under what?

23 MISS STACEY: Under the heading "Directions". It is logically the
24 first direction.

25 MR. JUSTICE SOOLE: Should you not be serving the... if you are

wanting the ----

MISS STACEY: Claim form, yes.

MR. JUSTICE SOOLE: Should you not first serve the re-amended claim form?

MISS STACEY: Yes.

MR. JUSTICE SOOLE: And the existing amended particulars of claim?

MISS STACEY: Yes, and the existing particulars of claim, amended particulars of claim. That can be done within a matter of days.

MR. JUSTICE SOOLE: It is getting quite confusing then, is it not?

MISS STACEY: I wonder whether we leave it at "claim form" ----

MR. JUSTICE SOOLE: Yes.

MISS STACEY: ---- leave out "the particulars of claim" in circumstances where they are going to need to be more specific, put a full stop after claim, "the claims on the named defendant by" ----

MR. JUSTICE SOOLE: The way I am going in my mind at the moment is that there is no way in which this is going to be having trial by 12th May. We are not in a position, particularly when we have not got re-amended particulars of claim, to be making consequential directions at the trial.

MISS STACEY: Yes.

MR. JUSTICE SOOLE: What is needed is a date for the interim injunction to be reviewed.

1 STACEY KC

2 MISS STACEY: Yes.

3 MR. JUSTICE SOOLE: On that occasion the judge hearing the interim
4 application can give further directions for trial.

5 MISS STACEY: Yes, although my Lord it would be, if I could urge
6 this upon you, it would be open for you... Permission to
7 amend the particulars of claim I suggest might be capable of
8 being dealt with and a date for the defence between now and
9 that hearing on the basis that there is time between now and
10 then for some of the timetable to be put in place, for us to
11 tidy up the particulars of claim. That can form the subject
12 of a direction, service of that on the named defendants and
13 them to acknowledge service. Those are steps that ought to be
14 capable of being inserted between now and the next hearing.
15 I am not asking for you to do anything more than provide that
16 kind of a limited timetable.

17 MR. JUSTICE SOOLE: If they acknowledge service then they have to
18 serve a defence within a certain number of days thereafter, do
19 they not.

20 MISS STACEY: They do, yes. So ideally what we would be after
21 would be a set of directions from your Lordship taking us to
22 the date by which they need to serve the defence and then you
23 have a hearing. The question of whether or not they are going
24 to be serving the defences is, one might think, somewhat
25 relevant to... what I had in mind is a summary judgment

1 STACEY KC

2 application. I do not think we are going to be in that
3 territory between now and then so, no.

4 But in order to use the time available between now and
5 the next hearing my Lord, we would wish to have some
6 directions put in place, namely permission to re-amend the
7 claim form, permission to re-amend the particulars of claim
8 though I recognise I do not have a document before you, and a
9 date for the acknowledgment of service potentially a date for
10 a defence.

11 MR. JUSTICE SOOLE: The rule requires there to be dates given ----

12 MISS STACEY: Yes.

13 MR. JUSTICE SOOLE: ---- for acknowledgment of service.

14 MISS STACEY: It does. It needs to specify a date which requires
15 to me to produce my amended particulars of claim. My Lord,
16 what I was thinking is if you were, for example, able to sit
17 towards the later end of this week, we could do that by then
18 and finalise the this ----

19 MR. JUSTICE SOOLE: Do what by then?

20 MISS STACEY: Produce the proposed re-amended particulars of claim
21 and at that point put in place a set of directions which would
22 include permission, the acknowledgment and the date for the
23 defence.

24 MR. JUSTICE SOOLE: I must say I do not find it a very
25 satisfactory way of going forward. A directions hearing is

1 STACEY KC

2 supposed to deal with directions and everything is available
3 so one can make the directions that are sought rather than
4 putting it off for another day.

5 MISS STACEY: I recognise that, my Lord. I suppose I am piggy-
6 backing on your Lordship's suggestion that we might have
7 another hearing.

8 MR. JUSTICE SOOLE: It was only because I was not being given a
9 satisfactory document. A lot of this has been done on the
10 hoof and I do not find that very satisfactory. One thing
11 there is going to be is a further hearing review of the
12 existing interim injunction, but in time for that to be
13 decided before the 12th May.

14 MISS STACEY: Yes. Well, my Lord, that may be sufficient for our
15 purposes and we could then make the applications. What is in
16 my mind is that we need to have the permission to amend the
17 particulars of claim and I am trying to secure either it is a
18 hearing before your Lordship by trying to maximise what I can
19 do and I understand that I might be pushing things a little,
20 or we use the subsequent hearing or the continuation hearing
21 for the hearing of that application.

22 MR. JUSTICE SOOLE: Again, an order could be made permitting --
23 I am thinking hypothetically at the moment, although no one
24 had any notice of this -- amended particulars of claim,
25 providing with permission to apply to set it aside on the

1 STACEY KC

2 basis that there has been no notice.

3 MISS STACEY: My Lord, yes, I reiterate what I said before which
4 is whilst it, obviously, would have been preferable for this
5 to have been done before with a schedule redacting according
6 to the order that your Lordship is going to make, it simply is
7 a consequence of the joinder application. We have pleaded a
8 course of action. We have identified persons falling within
9 the category of persons unknown who we say have committed the
10 prohibited act and fall within that cause of action. What we
11 do is particularise their specific involvement. It is not a
12 change to the underlying cause of action that is currently
13 before the court. In those circumstances, I would ----

14 MR. JUSTICE SOOLE: I am making the point this has not been
15 flagged up in any document to the court or the other parties.

16 MISS STACEY: To the court certainly not and not to the other
17 parties either. But we have flagged that we wish to join and
18 it follows from the joinder that they are specifically going
19 to be brought into the ----

20 MR. JUSTICE SOOLE: You are saying that is what these orders
21 provide for.

22 MISS STACEY: Yes.

23 MR. JUSTICE SOOLE: And the Supreme Court endorses that as soon as
24 you possibly do know names in respect of the pleaded alleged
25 conduct ----

2 MISS STACEY: Indeed.

3 MR. JUSTICE SOOLE: ---- then you should apply to the court to
4 join them.

5 MISS STACEY: If you need to perfect it later down the line by re-
6 particularising, then you do that. It should not hold
7 everything up.

8 So on that basis, my Lord, I would ask you for
9 permission to amend today, to re-amend rather, the current
10 particulars of claim and we can include provision for that to
11 be set aside or discharged. You will see in this current
12 order at paragraph 22 I have included a form of wording for
13 discharge and variation. That can be expanded to encompass
14 any permission to amend the particulars of claim.

15 Also I ask your Lordship to bear in mind the purpose of
16 this joinder pursuant to the obligations, the *Canada Goose*
17 guidelines and *Wolverhampton*: it is to facilitate natural
18 justice in the sense that it is to enable parties to come
19 before the court and take part in the proceedings. The
20 document, the re-amended particulars of claim, will be served
21 upon them. If there is provision in the order for them to
22 apply to court to vary and discharge them, they can avail
23 themselves of that. Therefore in those circumstances no
24 prejudice would be caused, as long as there is a sufficiently
25 generous variation and discharge provision.

1 STACEY KC

2 MR. JUSTICE SOOLE: It may be best to work backwards from a date
3 for a date for a further hearing.

4 MISS STACEY: Yes. The expiry date is 12th May. I am sure those
5 behind me are going to tell me there is further time that we
6 need for placing a warning notice up. *(Pause while*
7 *instructions were received)* I am told it is 14 days from 12th
8 May to place warning notice up on all the sites.

9 MR. JUSTICE SOOLE: Sorry?

10 MISS STACEY: 12th May is the expiry date.

11 MR. JUSTICE SOOLE: Yes.

12 MISS STACEY: I am told it takes two weeks to do the rounds to
13 replace all the notices.

14 MR. JUSTICE SOOLE: Yes, I can imagine.

15 MISS STACEY: One would need to have a hearing to accommodate that
16 period of time before expiry.

17 MR. JUSTICE SOOLE: Yes. The next term starts on Tuesday 9th
18 April. So if it were in the week starting the 15th April, but
19 not a Monday ----

20 MISS STACEY: Yes.

21 MR. JUSTICE SOOLE: ---- I say "not a Monday" because you need to
22 have reading time for whoever is doing it.

23 MISS STACEY: Yes. That would work. Currently it is listed for a
24 day and a half, that is pursuant to Hill J's order. No,
25 sorry, our directions suggest a day and a half rather for the

1
2 final hearing.

3 MR. JUSTICE SOOLE: It needs a date for the interim injunction,
4 does it not?

5 MISS STACEY: Yes, I would have thought. Currently we suggested
6 one and a half days.

7 MR. JUSTICE SOOLE: It has taken us nearly a day to do directions.

8 MISS STACEY: A substantive hearing a day, possibly plus a bit of
9 reading time, a day and a half in total.

10 MR. JUSTICE SOOLE: No, we do not include reading time in the
11 estimate, the estimate is from counsel getting up and the
12 final defendant sitting down. In this case there might be a
13 reserved judgment, I suppose.

14 MISS STACEY: I would have thought a day then, my Lord. Yes.

15 MR. JUSTICE SOOLE: In which case would it be sufficient to have a
16 date for acknowledgment of service some time not necessarily
17 long before then.

18 MISS STACEY: Yes. That is five weeks between now and then I am
19 told. That gives us a window of five weeks for any directions
20 your Lordship is proposing to make, acknowledgment of service.

21 MR. JUSTICE SOOLE: I would not propose a date of defence before
22 the hearing.

23 MISS STACEY: A date for the acknowledgment of service, yes, my
24 Lord. That would be on the basis that permission is given,
25 obviously subject to the variation or discharge in relation to

1 STACEY KC

2 the reamendment of the particulars of claim.

3 MR. JUSTICE SOOLE: What reason, the acknowledgment of service is
4 of the claim form not the particulars of claim.

5 MISS STACEY: Indeed, I was wondering what your Lordship was
6 thinking in relation to the permission to amend the
7 particulars of claim.

8 MR. JUSTICE SOOLE: Well, drawn in for litigation, it is the...
9 What are you proposing?

10 MISS STACEY: I am proposing that you give me permission as a
11 consequence of the joinder. I am assuming here that we are
12 going to have an order for joinder of these individuals,
13 following such order for joinder we have permission to amend,
14 because we have to, the particulars of claim to particularise
15 the cause of action in relation to each of the named
16 defendants. Any such named defendant has permission to apply
17 to vary or discharge. The one my Lord follows, I fully
18 recognise ----

19 MR. JUSTICE SOOLE: When are you suggesting acknowledgment of
20 services and defence so on?

21 MISS STACEY: The acknowledgment of service can follow from the
22 date I will give you in relation to the service of the claim
23 form which can be done in matter of days. Paragraph 7 shall
24 serve copies of the amended claim form on the named defendants
25 by end of the week, which would be 15th March.

1 STACEY KC

2 MR. JUSTICE SOOLE: I think it is best to say seven days whatever
3 it is.

4 MISS STACEY: Yes, so acknowledgment of ----

5 MR. JUSTICE SOOLE: By 4 p.m. on?

6 MISS STACEY: 18th March. I was going to invite your Lordship to
7 make an order in relation to permission to amend the
8 particulars of claim in the next paragraph. If we skip over
9 that ----

10 MR. JUSTICE SOOLE: What is the wording you would have for that?

11 MISS STACEY: The claimant shall have permission to re-amend the
12 particulars of claim to plead its cause of action against the
13 individual, the named defendants, and shall file such
14 re-amended particulars of claim with the court by and specify
15 a date.

16 MR. JUSTICE SOOLE: No, I want to see that before I give any
17 permission.

18 MISS STACEY: Can we include provision for that ----

19 MR. JUSTICE SOOLE: Maybe we can do that if, it is not convenient,
20 if I can adjourn the hearing to some time later this week, for
21 example Friday p.m.

22 MISS STACEY: Yes. My Lord, then we can produce a document.

23 MR. JUSTICE SOOLE: Actually Friday p.m. is not good, I have a
24 late hearing on Monday morning with people in America so we
25 are starting later than normal to accommodate them. I am

1 STACEY KC

2 completely away tomorrow, I cannot Wednesday afternoon, I am
3 in court Wednesday morning.

4 MISS STACEY: Monday the 18th, my Lord?

5 MR. JUSTICE SOOLE: If you wish to attend does that cause you any
6 particular difficulties Monday, the 18th, I am hoping I can
7 hear all I need to from you today, you have every right to
8 attend of course, they still have not go their... While they
9 are sorting out their order.

10 MR. LAURIE: It is not more difficult than any other day.

11 MR. JUSTICE SOOLE: How far do you have to come?

12 MR. LAURIE: I come from Faversham in Kent. I can make 10.30 on
13 tube trains, if that is okay.

14 MR. JUSTICE SOOLE: How are you going to notify the parties of
15 that?

16 MISS STACEY: We can serve in accordance with paragraph 4 my Lord
17 of this order.

18 MR. JUSTICE SOOLE: Which order?

19 MISS STACEY: This draft order, there is provision for service on
20 the named ----

21 MR. JUSTICE SOOLE: No, no, no the adjournment of this hearing,
22 how will that be notified?

23 MISS STACEY: We can send to the e-mail addresses, we can upload
24 the link that is existing, the McGowan J order, and on the
25 website link. In relation to the named individuals we can

1 STACEY KC

2 send by First Class Post and Special Delivery. So using the
3 methods of service that are set out in paragraph 4 of this
4 draft order. We can do that today.

5 MR. JUSTICE SOOLE: I think you would need to draw up an order
6 adjourning this hearing part heard.

7 MISS STACEY: As soon as we have the order.

8 MR. JUSTICE SOOLE: When you say the order?

9 MISS STACEY: We need to draw up a note setting out... Your
10 Lordship was asking me how I would notify in relation to the
11 notice of hearing for Monday.

12 MR. JUSTICE SOOLE: There would need to be an order for that
13 purpose.

14 MISS STACEY: Exactly, there would need to be an order for that
15 and that would then be served.

16 MR. JUSTICE SOOLE: Yes, a separate order.

17 MISS STACEY: In accordance with paragraph 4 of this draft, those
18 various steps.

19 MR. JUSTICE SOOLE: No, there will not be any order, this draft
20 will not be ----

21 MISS STACEY: I know but it is the methods. My Lord, sorry for
22 not being clear, you were asking me by what method I was
23 proposing to notify. My answer to you was that we would use
24 the very same methods as are set out in paragraph 4 of this
25 draft, albeit that is not yet made, so the methods of those

1 STACEY KC

2 which we would, well, they would stand.

3 MR. JUSTICE SOOLE: Right. Just for the purpose of preparing your
4 orders, what I am proposing is that you have... That affects
5 the date of service of the amended claim form.

6 MISS STACEY: Well, the amended claim form ----

7 MR. JUSTICE SOOLE: They could be done by the end, your order to
8 provide it to be done by 4 p.m. on the following Friday.

9 MISS STACEY: Yes, quite, we can just tweak the date.

10 MR. JUSTICE SOOLE: On the 22nd March.

11 MISS STACEY: On the 22nd of March. So my Lord it would be an
12 order adjourning ----

13 MR. JUSTICE SOOLE: Acknowledgment of service.

14 MISS STACEY: We calculated 21 days from the date of this order.

15 MR. JUSTICE SOOLE: You mean from the 18th?

16 MISS STACEY: From the 18th, well, you see the explanatory note,
17 the reference of 21 days is intended to reflect seven days for
18 the service to perfected then a 14-day period.

19 MR. JUSTICE SOOLE: I am not sure where the seven days came from.

20 MISS STACEY: The date, it is just the period of time we
21 calculated on the broad brush basis it would take us.

22 Actually it is too generous, we do not need that long.

23 MR. JUSTICE SOOLE: There is Easter as well, so?

24 MISS STACEY: As we say in the note, we are content for the date
25 to be calculated 21 days from the date of the order.

1 STACEY KC

2 MR. JUSTICE SOOLE: At the moment I would suggest you have
3 acknowledgment of service by 4 p.m. on 15th April.

4 MISS STACEY: Yes. Then 9 would come out then. The wording in 10
5 my Lord reflects the order of Hill J where she provided that
6 any person who was interested and wished to be heard pursuant
7 to rule 40.9 should notify the claimant in advance and give 48
8 hours' notice. Because otherwise the court is bounced into a
9 position which it might not be prepared to deal with and that
10 is what paragraph 10 is intended to...

11 Paragraph 11 is the updating evidence that my clients
12 can serve.

13 MR. JUSTICE SOOLE: That is not for a final injunction.

14 MISS STACEY: That is not for a final injunction so that can
15 probably go. 12 also goes on the basis that we have not got to
16 that yet. 13 is the list, you will see what I ----

17 MR. JUSTICE SOOLE: Well, do we not need a provision to the effect
18 that matter shall be listed for a review of the interim
19 injunction?

20 MISS STACEY: That is what 13 is trying to do.

21 MR. JUSTICE SOOLE: No, 13 was to do with a final hearing.

22 MISS STACEY: I know. If you scratch out the word "final", which
23 I put in square brackets in anticipation that that would have
24 to go, "listed for a hearing on the first available date in",
25 we can put in the day with a time estimate for a continuation

1 STACEY KC

2 of the order ----

3 MR. JUSTICE SOOLE: I do not want to give a specific day, I am not
4 going to give a specific day.

5 MISS STACEY: No, with a time estimate of one day.

6 MR. JUSTICE SOOLE: The hearing has to say what it is, it is for a
7 hearing of?

8 MISS STACEY: I put in brackets as just a suggestion for a
9 continuation of the orders or a review as to whether the ----

10 MR. JUSTICE SOOLE: Is not review, a review of the interim
11 injunction?

12 MISS STACEY: It is a review of the interim injunction and
13 directions for a final hearing.

14 MR. JUSTICE SOOLE: Review of the interim injunction expiring
15 12th May.

16 MISS STACEY: Yes, and directions.

17 MR. JUSTICE SOOLE: And directions for trial.

18 MISS STACEY: Yes. We can take out the words "if possible prior
19 to 12th May" at the end of that paragraph.

20 MR. JUSTICE SOOLE: I wonder if it might be sensible to say a day
21 and a half.

22 MISS STACEY: Yes.

23 MR. JUSTICE SOOLE: Do you think?

24 MISS STACEY: I do. We have not therefore included any date for a
25 defence which I know the rule requires.

1 STACEY KC

2 MR. JUSTICE SOOLE: I would rather leave that until directions,
3 can we do that without it ----

4 MISS STACEY: It invalidates arguably the order for alternative
5 service.

6 MR. JUSTICE SOOLE: In that case the defence, what we can do is
7 give a date for the defence which post dates the interim
8 injunction. It could then be reviewed.

9 MISS STACEY: Yes, it simply said that you must specify the period
10 for an admission, filing the defence, the period.

11 MR. JUSTICE SOOLE: I think I would suggest defence by ----

12 MISS STACEY: After the hearing, the continuation hearing, the
13 review hearing. Two weeks after that.

14 MR. JUSTICE SOOLE: What about a date in May?

15 MISS STACEY: Yes. If the continuation hearing is going to be
16 potentially in the week of 15th April you take two weeks from
17 any, well, the 6th May, the Monday?

18 MR. JUSTICE SOOLE: If it was the week after April how would that
19 fit in with your service? It is getting close is what it
20 comes to.

21 MISS STACEY: Yes, it is.

22 MR. JUSTICE SOOLE: That interim should be in the week commencing
23 ----

24 MISS STACEY: Yes.

25 MR. JUSTICE SOOLE: ---- 15 April.

1 STACEY KC

2 MISS STACEY: So far as the defence is concerned ----

3 MR. JUSTICE SOOLE: I would say by 4 p.m. on 15th May subject to
4 any further order of the court.

5 MISS STACEY: Yes.

6 MR. JUSTICE SOOLE: At the directions hearing.

7 MISS STACEY: Yes.

8 MR. JUSTICE SOOLE: That complies with the rule, and always 4 p.m.
9 subject to ----

10 MISS STACEY: Any further order of the court at the directions
11 hearing.

12 MR. JUSTICE SOOLE: At the hearing.

13 MISS STACEY: Paragraph 14 can go.

14 MR. JUSTICE SOOLE: What about provision for defendants put in
15 evidence for the ----

16 MISS STACEY: We have that here. So, paragraph 14 can go, it is
17 in paragraph 12.

18 MR. JUSTICE SOOLE: I would suggest they go in after the order
19 that there is going to be an interim hearing. You have put in
20 your evidence, have you not?

21 MISS STACEY: We have not updated it yet but we are about to, we
22 are poised to file it.

23 MR. JUSTICE SOOLE: Right.

24 MISS STACEY: Because we are having to... The joinder, we are
25 poised as I said in my skeleton argument, I think in

1 STACEY KC

2 Ms. Oldfield's witness statement it is in the process of being
3 finalised.

4 MR. JUSTICE SOOLE: When can that be?

5 MISS STACEY: That can be done in the next day or so.

6 MR. JUSTICE SOOLE: This is in support of the continuation of the
7 interim.

8 MISS STACEY: Yes, paragraph 11 of this draft order envisages that
9 should be done, re to file an update, serve any updating
10 evidence by 4 p.m., in fact we can do that in the next couple
11 of days.

12 MR. JUSTICE SOOLE: If that can be done by Friday 4 p.m. on
13 Friday 15th.

14 MISS STACEY: Thereafter ----

15 MR. JUSTICE SOOLE: March.

16 MISS STACEY: Yes, paragraph 12 is the defendants who may wish to
17 file any evidence.

18 MR. JUSTICE SOOLE: I will give longer than two weeks,
19 particularly allowing for Easter.

20 MISS STACEY: 5th April, which is three weeks.

21 MR. JUSTICE SOOLE: 5th April is Good Friday, is it not, no,
22 sorry, it is not. I think I will be minded to say 4 p.m. on
23 Monday the 8th, that gives enough time to be reviewed.

24 MISS STACEY: Then you have the listing.

25 MR. JUSTICE SOOLE: Cross out the reference to summary judgement.

1 STACEY KC

2 MISS STACEY: Yes, just so I am clear, in terms of the provision
3 for defence, you were anticipating that follows the hearing,
4 the review hearing, yes.

5 MR. JUSTICE SOOLE: Not before certainly.

6 MISS STACEY: That would go in at paragraph 14, or thereabouts.

7 MR. JUSTICE SOOLE: I do not mind ----

8 MISS STACEY: It is simply for the purposes of ensuring that the
9 alternative order is valid, yes, I follow that. Summary
10 judgement can go, that is 15. Skeleton arguments can probably
11 stay as is. Paragraph 16.

12 MR. JUSTICE SOOLE: What about bundles?

13 MISS STACEY: We have that at 17.

14 MR. JUSTICE SOOLE: For the other side.

15 MISS STACEY: Yes. Bundles would fall into the category of future
16 documents that need to be served. We could put file and serve
17 in paragraph 17.

18 MR. JUSTICE SOOLE: You are not going to be serving hard copies
19 I expect.

20 MISS STACEY: No. We can include an additional provision.

21 MR. JUSTICE SOOLE: I think what I say, "are to file (in
22 electronic and hard copy form) and serve (in electronic
23 form)".

24 MISS STACEY: Yes. I am grateful.

25 MR. JUSTICE SOOLE: We do not need two hard copies. One hard copy

1 STACEY KC

2 will be enough.

3 MISS STACEY: Yes. Then 18 is the requirement for any person who
4 has not complied to apply. Then you have 19-21 actually these
5 are just the repetition of the service against persons unknown
6 provisions.

7 Then 22 my Lord is the discharging variation provision.
8 Then costs. I just wonder in relation to 22, my Lord,
9 Mr. Laurie will no doubt address you on this, he, for example,
10 suggested that he would wish no not receive anything by post.

11 MR. JUSTICE SOOLE: Yes, I know most people ----

12 MISS STACEY: Indeed, that might be an additional, some words can
13 insert in paragraph 22, we can say "may apply to vary and
14 discharge including in relation to alternative service and"
15 for example if they wish to receive the documents by e-mail or
16 post in the brackets in order to accommodate that. That is
17 certainly a point that Mr. Laurie may wish to mention to your
18 Lordship.

19 MR. JUSTICE SOOLE: I think I will re-list this for 3 o'clock on
20 Friday, but I cannot do it as my morning case may go over
21 because one of the parties is in America, as I say.

22 MISS STACEY: When would you want the amended particulars of claim
23 by?

24 MR. JUSTICE SOOLE: Including that as part of the, well,
25 10 o'clock on Friday.

1 STACEY KC

2 MISS STACEY: I am grateful. The notice of hearing, that would go
3 back to the point about there would need to be another order
4 so we can notify.

5 MR. JUSTICE SOOLE: I think what you need to have is a title of
6 the action as it is now.

7 MISS STACEY: Meaning with the, no, without joinder.

8 MR. JUSTICE SOOLE: The order has not been made. Literally:
9 "Upon the claimant's application dated 12 February 2024 and
10 upon hearing leading counsel for the claimant and the proposed
11 defendant Mr. Charles Philip Laurie in person, it is ordered
12 (1) the application is adjourned part heard to Friday,
13 15th March at 3 p.m. in the Royal Courts of Justice".
14 Paragraph (2) costs reserved.

15 MISS STACEY: Yes.

16 MR. JUSTICE SOOLE: The amended particulars of claim can simply be
17 sent to your clerk via the e-mail address we were provided
18 with. Could you send it to my clerk actually who is Mr. John
19 Lloyd L-L-O-Y-D and his e-mail address is
20 John.Lloyd@justice.gov.uk. He works from home on a Friday, it
21 would help me if you could send it by 4 o'clock on Thursday,
22 would that cause great difficulty?

23 MISS STACEY: We will have to make it work, you are being very
24 patient with us. 4 o'clock on Thursday.

25 MR. JUSTICE SOOLE: Mr. Laurie, subject to anything you want to

1 STACEY KC

2 say I am satisfied that the named defendants should be added
3 to the action. I do not think I should be making orders now
4 for a full trial. What is needed is a review hearing of the
5 interim injunction and as you have heard the date which I am
6 going to be ordering is the week commencing the -- remind me
7 of the week.

8 MR. LAURIE: 15th April.

9 MISS STACEY: Yes, 15th April.

10 MR. JUSTICE SOOLE: The week commencing 15th April for one and a
11 half days. I am making orders whereby any defendant who is
12 served has to acknowledge service by 4 p.m. on the 15th. It
13 is getting very close, is it not?

14 MISS STACEY: Yes, it is close to the hearing.

15 MR. JUSTICE SOOLE: 4 p.m. on the 12th might be a better date.

16 Anyhow, the important thing is you will be getting these
17 orders because you have e-mail addresses, you will be able to
18 see what those dates are.

19 MISS STACEY: Tuesday the 12th.

20 MR. LAURIE: That is the 12th.

21 MR. JUSTICE SOOLE: No, Friday 12th.

22 MR. LAURIE: Then the trial date will be set at the interim.

23 MR. JUSTICE SOOLE: The date will not be set at the interim, no,
24 but the directions will be given going towards a trial. It is
25 possible it would be. I cannot guarantee that I will do the

1 STACEY KC

2 April hearing but I will try to do so because of my
3 involvement in this hearing. I am adjourning this until
4 Friday 3 p.m. because I am not satisfied as to the form of the
5 final order. I think we are almost there. That is the first
6 thing but I want to see it in a full document so that I can go
7 through and be satisfied with it.

8 I also am going to consider whether to give the
9 claimants permission to re-amend their particulars of claim,
10 of which they are going to supply a draft. No doubt they will
11 supply you with a draft as well.

12 MR. LAURIE: I have got written down that we have to supply our
13 defence by 4 p.m. on 8th April, I do not quite ----

14 MR. JUSTICE SOOLE: No, 4 p.m. on 15th May.

15 MR. LAURIE: 15th May.

16 MR. JUSTICE SOOLE: I deliberately make that date as long as I can
17 so that it can be reviewed by the judge who hears the interim
18 notice application. So it has to be done before then. We
19 have said, your reference to the ----

20 MR. LAURIE: That is just outline defence, it is not detail.

21 MR. JUSTICE SOOLE: What the order will provide, this is what you
22 are referring to. The hearing in the week of 15th April is
23 about continuing the interim injunction.

24 MR. LAURIE: Yes.

25 MR. JUSTICE SOOLE: So you will not be serving a defence for that,

1
2 but you have the opportunity to file and serve any evidence
3 you want to by the 8th April.

4 MR. LAURIE: Okay.

5 MR. JUSTICE SOOLE: To say anything you want to in evidence.

6 MR. LAURIE: That is not evidence for the final trial. That is
7 just evidence for the ----

8 MR. JUSTICE SOOLE: Yes.

9 MR. LAURIE: ----- interim hearing.

10 MR. JUSTICE SOOLE: Yes.

11 MR. LAURIE: It is just for the interim hearing.

12 MR. JUSTICE SOOLE: Yes.

13 MR. LAURIE: Okay, got you.

14 MR. JUSTICE SOOLE: It is not straightforward, is it? So, I am
15 joining the defendants, the named defendants. I am allowing
16 the claimants to amend their claim form in consequence so as
17 to add the named defendants. They then have to serve
18 re-amended particulars of claim. I am no going to allow that
19 until I have seen a draft and I am satisfied with it. That is
20 what I am going to consider again on Friday.

21 I am not ordering it to go straight to a trial in all
22 the circumstances, not least because of the timing involved.
23 There is going to be a review hearing in the week commencing
24 15th April. They have a date at which they have to put any
25 updating evidence in, any further evidence they want to, by

1 STACEY KC

2 this Friday, 15th March. The defendants have until Monday 8th
3 April 4 p.m. All timings are at 4 p.m.

4 The hearing will be in the week of the 15th April for a
5 day and a half. I am going to continue the injunction and the
6 judge then will make any further directions for trial, which
7 will include reviewing, if necessary, the date for the service
8 of the defence by anybody.

9 Can we do better than that at the moment?

10 MISS STACEY: No. The only question is whether I expressly
11 provide in the order that it may be reserved to your Lordship
12 if possible.

13 MR. JUSTICE SOOLE: Since I do the list, I will ----

14 MISS STACEY: Oh, I see.

15 MR. JUSTICE SOOLE: It is more helpful to me if I can just leave
16 it open but each week I get the next week's cases on a
17 Wednesday.

18 MISS STACEY: Right.

19 MR. JUSTICE SOOLE: I read them through and I have a list of
20 judges and I allocate. So I know exactly what is coming up.
21 I will not have forgotten this one.

22 MISS STACEY: No, no, I am sure. My Lord you have been extremely
23 patient.

24 MR. JUSTICE SOOLE: Not at all. I am sorry if I have perhaps had
25 moments of animation but simply I was wanting to be sure

1 STACEY KC

2 I knew what was ----

3 MISS STACEY: No, no, absolutely.

4 MR. JUSTICE SOOLE: Forgive me if I at any stage spoken in a way
5 that might be rather tart. These things are difficult to deal
6 with and they are complicated for claimants as well as
7 defendants.

8 MISS STACEY: They are.

9 MR. JUSTICE SOOLE: I am very conscious from doing a number of
10 these cases all the work that has to go into it. Whilst, on
11 the one hand I have to keep on remembering and protecting the
12 interest of unrepresented defendants, I am very conscious of
13 the work that goes in. I have seen this in the *National*
14 *Highways* case. I have seen it in *Balero*. I have seen it in
15 this one and others. So my anxiety has been to make sure that
16 we comply with rules, do not make things too complicated.

17 On the other hand we do not, I am afraid, make
18 concessions for the fact that it involves a large number of
19 people otherwise it end up in jeopardizing the interest of
20 individuals who ultimately are individuals facing these
21 claims. So I am very grateful for your work on this.

22 Very well, you will now draw up that order?

23 MISS STACEY: I will send it to the e-mail you provided me with.
24 I think, my Lord, you are going to provide me with another
25 one. I have John Lloyd. Is that sufficient?

1 STACEY KC

2 MR. JUSTICE SOOLE: John.lloyd@justice.gov.uk.

3 MISS STACEY: I have that.

4 MR. JUSTICE SOOLE: Can you also link... The Associate will give
5 you an address.

6 MISS STACEY: I will provide you with the amended draft by 4 p.m.
7 on Thursday.

8 MR. JUSTICE SOOLE: The quickest way of any document getting to me
9 is to go to my clerk.

10 MISS STACEY: Thank you.

11 MR. JUSTICE SOOLE: Fridays are more difficult because he has to
12 travel. Can I keep ----

13 MISS STACEY: The amended claim form?

14 MR. JUSTICE SOOLE: No, you need that.

15 MISS STACEY: No, no, you can keep that, my Lord. We have plenty.

16 MR. JUSTICE SOOLE: The amended particulars of claim.

17 MISS STACEY: You do not have the full amended claim form. Would
18 you like the whole pack? The rest of it is ----

19 MR. JUSTICE SOOLE: I think it is sufficient that I have for the
20 moment. That will be on the CE-File. I am not going to spend
21 too much time looking at them.

22 As you are here, do take the opportunity if there is
23 anything procedural you need to discuss between you.

24 MISS STACEY: Yes, before you rise my Lord, I think it is
25 important for me to say that, Mr. Laurie, you made a point you

1 STACEY KC

2 wanted to draw to his Lordship's attention. Is that something

3 ----

4 MR. LAURIE: Yes, it is just it would be much easier if we can get
5 stuff by e-mail and a lot more accurate, I would suggest, in
6 this day and age for people. If you do send a letter out,
7 just put something saying, "Are you prepared to get it by
8 e-mail and provide an address for it". Then I would certainly
9 prefer to get everything by e-mail because I will get it and
10 right now I have a stack of documents about *that* big and I can
11 search e-mail and I can search through a document and do
12 things like that. It is just more ----

13 MR. JUSTICE SOOLE: I am sure the claimant would prefer it.

14 MISS STACEY: We would prefer that. Currently as it stands,
15 I have not drawn it up yet, in relation to named persons they
16 will be served by post or hand delivery. I think Mr. Laurie
17 is saying he would rather that did not happen in relation to
18 him.

19 MR. LAURIE: Yes.

20 MISS STACEY: We do have an e-mail address for him. We could
21 tweak the order to reflect his position.

22 MR. LAURIE: I am ----

23 MR. JUSTICE SOOLE: Do you have other e-mail addresses you could
24 use?

25 MISS STACEY: No.

1 STACEY KC

2 MR. JUSTICE SOOLE: I have made orders where everyone has been
3 served by e-mail. Indeed, I remember (having been rather keen
4 on personal service) having been told by one litigant in
5 person just like you, he interrupted me to say, "I am sorry,
6 we much rather have e-mails for all sorts of reasons including
7 ecological reasons". It is, as it were, those of us from
8 another age, I like preparing from hard copies, but that is
9 not the way of the world.

10 MISS STACEY: We have an e-mail address for Mr. Laurie but in
11 relation to the others we do not. I have included in
12 paragraph 22 and I suggest I include the wording which they
13 can apply to vary or discharge including if they wish to
14 receive by different means.

15 MR. JUSTICE SOOLE: Rather than varying or discharge, could there
16 not just be a provision to notify?

17 MISS STACEY: A provision to notify.

18 MR. JUSTICE SOOLE: There is no need to come back to court, I
19 would have thought, for that, if they are happy with that
20 form. It is a universal form of communication.

21 MISS STACEY: My Lord, I think I would have to come back to the
22 court as it is an alternative. It sounds silly, but at the
23 moment we are asking the court to endorse a specific method of
24 service. The method of service I am asking for is by post
25 because we do not have e-mail addresses for everyone. If we

1 STACEY KC

2 were notified by them subsequently that they wanted that ----

3 MR. JUSTICE SOOLE: Can I not endorse alternative service by
4 e-mail address if a defendant gives permission in writing to
5 the claimant?

6 MISS STACEY: Yes, by each ----

7 MR. JUSTICE SOOLE: There must have been some order in the past
8 made like that, is there not?

9 MISS STACEY: By posting copies to the last known address or if
10 notified.

11 MR. JUSTICE SOOLE: If previously so notified in writing.

12 MISS STACEY: To the e-mail address.

13 MR. JUSTICE SOOLE: It needs to be that they consent, the
14 defendant in question consents to being served by e-mail. The
15 mere fact they have given the e-mail address does not invoke
16 consent.

17 MISS STACEY: No, no, "and so notified and consented to, to the
18 e-mail address supplied by any individual named defendant".
19 Okay.

20 MR. JUSTICE SOOLE: If you can come on Friday so much the better.

21 MR. LAURIE: I will try to be here.

22 MR. JUSTICE SOOLE: Simply because you have taken an interest and
23 to have another point of view is very helpful for the court.

24 MISS STACEY: I am going to circulate an amended version of this,
25 the tracked changed documents so that we can work with it on

1 STACEY KC

2 Friday.

3 MR. JUSTICE SOOLE: Right. I would much rather have a clean
4 document.

5 MISS STACEY: Very well.

6 MR. JUSTICE SOOLE: If you want to send them in both forms, but I
7 must say I find working from a tracked document ----

8 MISS STACEY: Yes.

9 MR. JUSTICE SOOLE: Very well, three o'clock Friday in this court

10 ***(Adjourned till Friday 15th March at 3 p.m.)***

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Royal Courts of Justice
Strand
London WC2A 2LL

Friday, 15 March 2024

BEFORE:

MR JUSTICE SOOLE

BETWEEN:

SHELL UK OIL PRODUCTS LIMITED

Claimant

- and -

PERSONS UNKNOWN

Defendants

MS M STACEY KC appeared on behalf of the Claimant
MR LAURIE and MS RUMBELOW appeared in person
The other defendants did not attend and were not represented

PROCEEDINGS

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A (15.05 pm)

MR JUSTICE SOOLE: Yes?

MS STACEY: My Lord, I hope that you will have received some documents from us?

B MR JUSTICE SOOLE: Yes. I have received them. I am bound to say because of everything else I have been doing in court most of today and I could not yesterday after about 4 o'clock, I have not yet finished reading the draft order. So I thought the better course would be to walk through it.

MS STACEY: I can walk you through it.

C MR JUSTICE SOOLE: But I also know that Mr Laurie, who is here again today, would like to raise some points.

MS STACEY: Would you be prepared to hear from me, first, my Lord, or Mr Laurie?

MR JUSTICE SOOLE: I think I would like to hear what the points are and then I will decide in what order I hear things, yes.

D MR LAURIE: Thank you. I am sorry, I meant to bring it up on Monday, but I did not so I am bringing it up now. I thought it was a bit odd that, when you were asked to take out the word "environmental" from the document, I still think it is a bit odd. I would like to ask to have the -- because of these were environmental protestors and it is a bit hard to see why we should not have that term in the document. It does not seem to be too much to me, but I think we would like to be named as environmental protestors within the documentation if you do not mind.

E MR JUSTICE SOOLE: I am afraid I am now forgetting where that point was. I remember something being said about that, I have now forgotten.

F MS STACEY: If I can help. It was when we were looking at the claim form, my Lord, and we described it as a re-amended claim form. The first amendment was to take out the word "environmental" from the description of the persons unknown, and I explained to your Lordship that this was something that Hill J considered as part of the evidence before her and she dealt with it in her judgment. She was satisfied that on the evidence, whilst persons unknown protestors were environmental in the main, there was evidence that did not necessarily -- it was not limited to environmental protestors strictly speaking and extended to other spin-off protest groups and it is on that basis that she removed the limitation.

H MR JUSTICE SOOLE: She wanted to enlarge the category that might --

MS STACEY: Indeed.

A MR LAURIE: Could we put "environmental and others" then or something like that, but we would like to keep the term environmental in there please.

MS STACEY: My Lord, this was considered expressly by Hill J. There was a KC and a junior before her at the time and it was debated before her. She was satisfied that it was appropriate to make the amendment.

B MR JUSTICE SOOLE: I think in fact the amendment has already been made, has it not actually?

MS STACEY: It has. That is not the amendment I am seeking. I am simply removing --

C MR JUSTICE SOOLE: That was already made in the last order.

MS STACEY: Indeed.

MR JUSTICE SOOLE: It just says "with protest campaigns", so it incorporates environmental and anybody who is not environmental.

D MR LAURIE: Okay. Well, there is a general move to try and take our motivations away from us and I think it is important, it is very important to me personally but I think it is important to all of us that we have that in. As I say, if you put "environmental and others" it would incorporate others and it would be the same thing, but it would enable us to be accurately identified, because that is our key motivation, that is why we do this.

E MR JUSTICE SOOLE: Yes.

F MR LAURIE: And it is kind of anonymising us to take it out. As I say, I was not here when the other debate was had, but now I think, and I cannot really see the reason why ... and I say, if it said "environment and others" it would broaden it out to include other spin-off groups. I am not quite sure what that might be. But it would do the same and it would enable us to be accurately identified within the document.

MR JUSTICE SOOLE: Yes. That is the first point and the second point --

G MR LAURIE: No, that was the point.

MR JUSTICE SOOLE: I see. I am not going to take any further steps. That was decided by Hill J. Your point is very much noted. I think that has been dealt with by the decision of Hill J on the last occasion.

H

A MR LAURIE: There is now way we can just -- I mean, it does not seem to be a big thing and it seems to be within the power, you know, surely it is within the power of the court to put that in if we want to.

B MR JUSTICE SOOLE: It means me effectively putting it back in something that a judge at the same level has taken out after further argument. I understand the point you raise, but I am going to leave things as they are. But thank you for raising it.

MS RUMBELOW: Your Honour, could I ask some questions about the injunction?

MR JUSTICE SOOLE: Sorry, who are you?

C MS RUMBELOW: I am persons unknown I suppose, because this injunction applies to everybody in this whole country who has some problem with the criminal activity of Shell Limited.

MR JUSTICE SOOLE: Mr Laurie, if you would like to take a seat. Your name is?

D MS RUMBELOW: My name is Indigo Rumbelow and I am here on behalf of all persons unknown, which is you, your Honour, it is your family. It is everybody in this courtroom who has a problem with the way that Shell is acting here in this country and around the world, putting millions if not billions of lives at risk. I am asking you, your Honour, to show us that this really is a court of justice, because right now it is clear there are five people being paid above the odds to penalise people who are trying to stand up at this really crucial moment in time. You have a position where you could show that you can call this out for the criminal activity that it is.

E MR JUSTICE SOOLE: I am here deciding various directions for the future conduct of the trial. I am not deciding substantive questions today and on the hearing which began on Monday and had to be adjourned to today. I am simply making orders for the next stages of the case.

F MS RUMBELOW: You are simply making orders.

MR JUSTICE SOOLE: Which is my job.

G MS RUMBELOW: Which is your job. And it is your duty to really consider what you are doing and whether you want to be on the side of big oil or if you want to be on the side ordinary people standing up for the future of humanity.

H MR JUSTICE SOOLE: Thank you for making your points and making them, if I may say so, eloquently. I am simply here as the judge seeking to do my best to apply

A the law as I understand it at every stage. But your point, and the strength of your feeling is noted, but all I can do today is conclude the questions of directions for the future conduct of this action. Thank you very much indeed and for putting it with courtesy as well.

MS RUMBELOW: Thank you.

B MS STACEY: My Lord, may I, having heard that, just put on the record it seems that there may be a misconception. Persons unknown from our side is not everyone who has an issue with Shell, it is those persons falling within the category and carrying out the unlawful acts which are prohibited by the order. I just wanted to put that on the record.

C MR JUSTICE SOOLE: I understand, and in a sense I was conscious of that point, but I was not going to, in the circumstances of litigation against persons unknown, albeit defined by a certain category, I was not going to stop Ms Rumbelow saying something if she wished to do so.

D MS STACEY: No, no.

MR JUSTICE SOOLE: But I understand the point that you make.

MS STACEY: Yes, and my clients would wish me to make it. My Lord, unless there are any other points from the defendants, I suggest that we take the order first and I walk you through the order and we pick up points as we go along.

E MR JUSTICE SOOLE: Yes. As I indicated on the last occasion, I consider that you are entitled to add the named defendants you wish to add to the claim. I told you that I was not with you on the basis of there being an early full trial of the actions because that did not give enough time for people to prepare themselves.

F MS STACEY: Yes.

MR JUSTICE SOOLE: What the next stage was needed with the present injunction expiring on, I think, 12 May --

MS STACEY: 12 May, my Lord, yes.

G MR JUSTICE SOOLE: -- was to have a further interim hearing to consider, in the language of the law, to review the continuance of that injunction.

MS STACEY: Yes.

MR JUSTICE SOOLE: And then to give some directions at this stage towards a final trial, but any further directions to be given at the conclusion of that hearing.

H MS STACEY: Yes, my Lord, and that is what this order provides for.

MR JUSTICE SOOLE: That is what I am dealing with now, this afternoon.

MS STACEY: Yes. Do you have the draft order?

MR JUSTICE SOOLE: Yes. What I am doing is I am holding up the second draft you provided for me in the light of discussions on the last occasion and the --

MS STACEY: Which has been served on all the named defendants.

MR JUSTICE SOOLE: No, no, I do not mean the order I made adjourning the application, I mean when you came to court on Monday, you had a draft order. I raised a number of questions about the form of the order. You then, by 2 o'clock, had produced a proposed revised version, which I then raised further questions about, and then we had to adjourn. Then yesterday as requested, you supplied, before 4 o'clock, which was the time I requested, a yet further version of the draft order. I now have in front of me, because I find it the simplest way to deal with it. The draft order you supplied yesterday and the one that you supplied to me on Monday afternoon.

MS STACEY: I see, yes.

MR JUSTICE SOOLE: So that I can see what changes have been made.

MS STACEY: The changes, I see.

MR JUSTICE SOOLE: And how they have been incorporated.

MS STACEY: I did not provide your Lordship with a tracked version because it was getting rather messy and you expressed a preference for a clean copy.

MR JUSTICE SOOLE: Yes, exactly. That is what I wanted and I am grateful.

MS STACEY: Shall I take your Lordship through it from the top.

MR LAURIE: Excuse me, I do not have a copy.

MS STACEY: It was sent.

MR LAURIE: I did get it but I do not have it with me.

MS STACEY: We have a hard copy that we can hand to Mr Laurie. **(Handed)**

My Lord, if you see on the front sheet we have added the names of 15 defendants and we have taken out the word "proposed".

MR JUSTICE SOOLE: Is that what your front sheet looks like?

MS STACEY: It does, yes.

MR JUSTICE SOOLE: So top left, underneath King's Bench Division, could you put Mr Justice Soole?

MS STACEY: Yes.

MR JUSTICE SOOLE: You then have three sets of persons unknown and the third one has something called "Proposed first defendant".

A MS STACEY: That needs to come out, quite right. Sorry, I did not spot that.

MR JUSTICE SOOLE: That should say "First defendant". The word "proposed" should come out there.

B MS STACEY: It should simply be first defendant, yes. Then the second defendant through to 15th --

MR JUSTICE SOOLE: Can you remove the various little words on the bottom left.

MS STACEY: Yes, I am sure that can be done.

MR JUSTICE SOOLE: Cloud UK, sort of thing. That is not meant to be on that.

C MS STACEY: We have removed Mr Gingell.

MR JUSTICE SOOLE: You have removed Mr Gingell who gave the undertaking.

MS STACEY: Yes.

MR JUSTICE SOOLE: Could you move "Upon the claimant's application dated 12 February" as the first recital.

D MS STACEY: Yes.

MR JUSTICE SOOLE: Do we actually need to have a recital of all those orders?

MS STACEY: Not necessarily, my Lord.

MR JUSTICE SOOLE: Can you cross that out and just put "and upon hearing leading E counsel for the claimant and the proposed ..."

MS STACEY: Eighth.

MR JUSTICE SOOLE: Well, "and the proposed defendant Mr Charles Phillip Laurie in person".

F MS STACEY: Yes.

MR JUSTICE SOOLE: "It is ordered", cross out "that". Now, I would like you to walk me through the order.

MS STACEY: I will do that. So paragraph 1, my Lord, is the schedule of named G defendants. That has been amended. It is right at the back you should have an appendix. Or I think it is actually sent in a separate attachment.

MR JUSTICE SOOLE: I have Schedule 1 here.

MS STACEY: Yes, and it should have the deemed defendants on it with Mr Gingell removed.

H MR JUSTICE SOOLE: Yes.

A MS STACEY: That is paragraph 1. Paragraph 2 is the Reamended Claim Form and Particulars of Claim, which is a consequence of the joinder, so my Lord, you were sent two attachments. If we can deal with the claim form first.

MR JUSTICE SOOLE: Does Mr Laurie have a copy of that?

B MS STACEY: I do not know whether he needs hard copies. If he does, we can provide them to him. The reamendment to the claim form contains reference to, at the top you will see "Reamended pursuant to order", because you made that -- well, you have not made any order yet, but it is dated 15 March.

MR JUSTICE SOOLE: Yes.

MS STACEY: Then the amendments in green.

C MR JUSTICE SOOLE: So you will remove the square brackets?

MS STACEY: Yes.

MR JUSTICE SOOLE: And then the amendments in green, I do not have colours here, but add a number 1 before "Persons unknown", and then 2, Louis McKechnie and 13 others as set out in the attached schedule 1.

D MS STACEY: Exactly.

MR JUSTICE SOOLE: And that is the same schedule again with names.

MS STACEY: With the 15 defendants, yes.

MR JUSTICE SOOLE: I see it in a separate document there, yes.

E MS STACEY: Then the second part of paragraph 2 deals with the proposed reamended particulars of claim, which pleads the case or the cause of action in relation to the individual defendants. You have been sent a draft of that proposed re-amended particulars of claim, with the amendments again shown in green. I do not know whether yours is coloured.

F MR JUSTICE SOOLE: Not on my printout, but anyhow.

MS STACEY: I can tell you what they are. So on the front page you see the word "first" inserted before defendant, after the descript of persons unknown.

MR JUSTICE SOOLE: Yes, yes.

G MS STACEY: Then you have the new defendants inserted there. We then in the heading have reference to "Reamended Particulars of Claim by order of Soole J dated ...", and we need to insert the date.

H MR JUSTICE SOOLE: Yes.

A MS STACEY: The next amendment is paragraph 1.4, second line down, after "restrained by this court", you will see the words "the defendants", deleted "persons unknown".

MR JUSTICE SOOLE: Because defendants includes persons unknown within the identified category.

B MS STACEY: Exactly. Then after "by agreement with others" we have inserted the words "which involve the interference with rights to the site, goods and/or equipment used for the dispensing of the claimant's fuel", just to make it clear what the conspiracy is alleged to be.

Paragraph 2.1, after the words "groups of protestors", we have added the words "which include the 2nd to 6th defendants". This is the incident on 28 April.

C MR JUSTICE SOOLE: All right.

MS STACEY: And then we have added the words after "protest campaign", acting collectively in a coordinated campaign.

MR JUSTICE SOOLE: Yes.

D MS STACEY: At 2.2, after the words "actions of the", we have added "1st to 6th defendants" and deleted "protestors".

MR JUSTICE SOOLE: Yes.

E MS STACEY: Then at 2.2.3, because of the information we have from the police, we have added the word "wilful" in front of "blocking", "access of the highway". Then after the word "to", we have put in "persons engaged in lawful activities", and then the words "and causing a public nuisance".

MR JUSTICE SOOLE: Yes.

F MS STACEY: At 2.3, we have inserted reference to the 1st and the 2nd to 6th defendants, and that paragraph sets out what we say happened on that day. 2.4, my Lord, is a new paragraph that is in its entirety, so it is all green, and it sets out in relation to each of these --

G MR JUSTICE SOOLE: I am glad I asked for a document because this is much more substantial than you were suggesting on the last occasion.

MS STACEY: My Lord, yes. We have particularised, in as much detail as possible, based on the information we have been provided, the individual allegations against each of the 15 defendants. So 2.4 is the Cobham incident on 28 April.

H

MR JUSTICE SOOLE: So you have there set out what you say are the individual allegations against the 2nd to 6th defendants.

MS STACEY: Yes, what the unlawful acts are said to be, yes.

MR JUSTICE SOOLE: Yes.

MS STACEY: 2.5 deals with the incident on 24 August, which is concerned with the 7th to 10th defendants and the individual acts are set out at 2.6.

MR LAURIE: Well --

MR JUSTICE SOOLE: I think it is easier -- if it is a short point?

MR LAURIE: There is a factual inaccuracy.

MR JUSTICE SOOLE: That will be a matter for a defence to put in. But do you want to make the point now.

MR LAURIE: So the charges -- I am the 8th defendant and the charges they put in there are not the charges that I have been charged with.

MR JUSTICE SOOLE: Which paragraph are you looking at?

MS STACEY: 2.6.2, my Lord. It is "arrested".

MR JUSTICE SOOLE: That says "was arrested for", not what the charges are.

MR LAURIE: Okay.

MS STACEY: We have prefaced it with "according to information provided to us by Surrey Police". So 2.6, my Lord, sets out --

MR JUSTICE SOOLE: This is what they, the claimant, are saying. If they have something wrong you will have every opportunity in due course to --

MR LAURIE: It is not where it stands at the moment. That is what I am saying.

MR JUSTICE SOOLE: I do understand that. Yes?

MS STACEY: And 2.7 perhaps pre-empts Mr Laurie's point, because it refers to the current position. It is a new paragraph, "were arrested, were granted conditional bail pending further investigation, were released under investigation, further understand a trial date has been set". This is all based on our understanding, my Lord, setting out what we believe to be the current position in relation to those particular defendants.

MR JUSTICE SOOLE: Yes.

MS STACEY: 2.8 is the third incident at Acton which relates to the 11th to 15th defendants. So we have inserted reference to them specifically. The last five lines are new, starting "The 1st defendant and the 11th, 12th, 13th, 14th and 15th",

A down to "loss and damage" is an insertion. 2.9 is a new paragraph which again sets out the specific allegations against each of those particular defendants. We do not have the information to enable us to -- and we include in brackets "no further action was taken in circumstances where operators of the site failed to supply details of the cost of damage caused" at the end of 2.9.

B 2.10, my Lord, there are some cross-references. We have added references to the new paragraphs on the first line, 2.4, 2.6, 2.9, and refer to it being a coordinated action by a group of people which included the 2nd to 15th defendants specifically, four lines from the bottom.

C The next amendment is at 3.1, the second line down, we deleted the "persons unknown" and replaced it with defendants. Then 3.6 we have pleaded why we anticipate or why we say there remains --

MR JUSTICE SOOLE: There is no amendment between 3.1 and 3.6?

D MS STACEY: No. 3.1 and 3.6, no amendments because that deals with the position vis-à-vis the first defendant. 3.6 pleads the basis upon which we say there remains a real and imminent risk in relation to the named defendants. What that is essentially doing is pleading the undertaking, or them having been identified, the undertaking having been offered and no undertaking having been given. At 3.7 we draw the threads together.

E MR JUSTICE SOOLE: As the basis of a claim for a final precautionary injunction?

MS STACEY: Exactly. The only other amendment is at 3.9, my Lord, the insertion --

MR JUSTICE SOOLE: The document I have has not been signed or dated?

F MS STACEY: No, because we have not yet -- I can refer you to the order. We have made provision for that to happen.

MR JUSTICE SOOLE: Right, okay.

G MS STACEY: So 3.9, I just need to draw your attention to the only other amendment, which is just before the subparagraph you see the words "carrying out" before "any of the following acts", that has simply been inserted because it did not scan properly. Those words were missing.

MR JUSTICE SOOLE: Yes, it is grammatical.

H MS STACEY: Grammatically inaccurate. Then the statement in truth inserts "re" in front of "amended" in green.

A My Lord, the way we deal with this in the order is, if I can ask you to turn back to paragraph 2, paragraph 2 is the provision giving permission. Paragraph 3 sets out that the amendments shall be, and in a sense this might be superfluous given that you have already been shown the document, but we set out there what it should look like in accordance with the practice direction, and then 4, is your Lordship's point about it being verified by a statement of truth and copies being

B filed and served in accordance with paragraphs which then follow.

MR JUSTICE SOOLE: What is the position about the sealing of a reamended claim form as opposed to -- one does not seal a particulars of claim.

MS STACEY: No.

C MR JUSTICE SOOLE: But what about the claim form?

MS STACEY: My Lord, we could not find anything in relation to that. If it is going to be sealed, then we will wait for it to be sealed before serving. It may be that your Lordship can --

D MR JUSTICE SOOLE: We discussed this before. What is the position?

MS STACEY: The reason we have made provision for it to be unsealed is that we need to serve it before the 22nd and we do not want to be held up by judicial administration. If it can be sealed quickly, then that is not a problem. But obviously we need to serve it as soon as we possibly can.

E MR JUSTICE SOOLE: What is the requirement? A claim form is sealed, but does an amended -- I think your amended claim form was --

MS STACEY: It was.

MR JUSTICE SOOLE: -- sealed, was it not?

F MS STACEY: It was, yes.

MR JUSTICE SOOLE: So on what basis is that? **(Pause)** Is it CPR 2.6, page 42?

MS STACEY: "... must seal the following documents ..."

G MR JUSTICE SOOLE: "The court must seal the following documents on issue - (a) the claim form; and (b) any other document which a rule or practice direction requires it to seal."

MS STACEY: I suppose the question, my Lord, is whether we need to await the sealing of it before serving.

H MR JUSTICE SOOLE: No, but does an amended claim form need to be sealed?

A MS STACEY: According to 2.6, I think that would encompass an amended claim form, my Lord, yes, because it is still a claim form. So it would need to be sealed, but it has been issued already. My Lord, I would suggest that it is not entirely clear.

MR JUSTICE SOOLE: When you say it has been issued ...

MS STACEY: The claim form itself has been issued and the claim has been issued. It is an amendment of the existing claim form which has already been sealed.

B MR JUSTICE SOOLE: That is my question. What is the requirement if it has been issued, and if you add a new defendant or an additional cause of action --

C MS STACEY: Whether it needs to be resealed. That is what I am afraid, my Lord, could not find. I could not find any provision that says if you amend a claim form it has to be reissued on each occasion that it is amended. This claim form has been sealed obviously once ... twice.

MR JUSTICE SOOLE: Twice.

MS STACEY: Yes.

D MR JUSTICE SOOLE: What happened on the occasion that it was --

MS STACEY: It was sealed by the court.

MR JUSTICE SOOLE: Did you ask for it to be sealed.

E MS STACEY: We certainly did not ask for it to be resealed. It came out from the court in that way. We found authority that apparently it does not need to be resealed prior to service.

MR JUSTICE SOOLE: What is the authority for that?

MS STACEY: *Denton v White* [2014]. My Lord, it is *Hills Contractors & Construction v Struth* [2013] EWHC 1693 (TCC).

F MR JUSTICE SOOLE: Is it referred to in the White Book?

MS STACEY: My solicitor just pulled it up.

MR JUSTICE SOOLE: I would like to see it if it is a decision that is going to be relied on.

MS STACEY: Yes, 6.23.

G MR JUSTICE SOOLE: The paragraph of the White Book?

MS STACEY: Of the CPR, 6.23, my Lord, it does not specifically refer to the point. 6.32 it was also --

H MR JUSTICE SOOLE: I cannot see where it says --

MS STACEY: No, I agree. It is 6.32, "Service of original seal claim form generally required ...", 6.32. **(Pause)**

A MR JUSTICE SOOLE: These are all to do with service of documents.

MS STACEY: They are.

MR JUSTICE SOOLE: Where have you got this *Denton* from? Is that *the Denton*?

B MS STACEY: Yes. *Denton* is not the accurate authority, my Lord. It is not the right authority. Can I ask you to just turn to 7.5.1 just to see if it helps. It again refers to service of a claim form. **(Pause)** Which does not specifically deal with the point about amendment.

C MR JUSTICE SOOLE: If one looks at 7.5.1, talking about the original claim form, it says halfway down on page 369, "It should be noted that what must be served is a sealed claim form not an unsealed one, re-emphasised in *Ideal Shopping*."

MS STACEY: Yes.

D MR JUSTICE SOOLE: Now, if you are adding a new party, it is as if you had a fresh claim form against that person, is it not? I cannot see the difference in substance between ... in the absence of an authority to show that it does not --

MS STACEY: No, I understand that, my Lord.

E MR JUSTICE SOOLE: -- need to be sealed, I am afraid my approach at the moment is that the word "claim form" in 2.6 is, as I think as you, as it were, initially acknowledged, to include --

MS STACEY: Does your Lordship have any sense of how quickly that can happen?

MR JUSTICE SOOLE: No.

F MS STACEY: It is much the same to us. We obviously want to do it properly, but it is just the timing --

G MR JUSTICE SOOLE: Documents are sealed remarkably quickly and I have sometimes had to correct documents when I had realised I had made a mistake and they have already been sealed, even though they only went out from me minutes before and I have had to amend them under the slip rule. But again, as I have said in this and other litigation, rules have to be complied with and if it is the rule that an amended claim form has to be ... unless there is some sort of dire emergency which might allow the court -- I cannot see what it would be, but I think it is a matter of substantive procedural law -- I do not think the matter of
H time, there does not seem to be any urgency.

MS STACEY: No, it is simply to meet the dates. We will go to the directions. You will see which dates we have in mind.

MR JUSTICE SOOLE: Well, the dates may have to be postponed.

MS STACEY: My Lord, we are not trying --

MR JUSTICE SOOLE: For all I know there is an authority somewhere saying if it is amended, I am a bit surprised, certainly one where you are adding defendants, I suppose, if you are just adding a slightly different cause of action and you were putting a breach of contract as well as tort, for example, one might, but how one makes those distinctions I do not know. It is no more than instinct, but if you are adding a new defendant, I would expect it to be a sealed document.

MS STACEY: My Lord, as a matter of principle I have to say I am with you. I just could not find an answer just by having looked for one.

MR JUSTICE SOOLE: No. Well, yes, there has been the time so I think for that purpose then, which draft am I looking at now?

MS STACEY: So we were at paragraph 4.

MR JUSTICE SOOLE: It is the previous draft order.

MS STACEY: Paragraph 4.

MR JUSTICE SOOLE: I am going to cross out in paragraph 4 "(which need not be sealed)", for two different reasons, one because of what we have just been discussing, but also re-amended particulars of claim do not need to be sealed.

MS STACEY: No, no, quite.

MR JUSTICE SOOLE: Right.

MS STACEY: In paragraph 4, my Lord, we are inserting the word "sealed" are we?

MR JUSTICE SOOLE: No, I am just crossing out "(which need not be sealed copies)".

MS STACEY: Yes, so we will keep it --

MR JUSTICE SOOLE: And if you want to serve something ...

MS STACEY: Yes, fine, my Lord, thank you. Paragraph 5 then is the definition of application documents which we discussed last time around.

MR JUSTICE SOOLE: This is serving the application for today's matters, sorry, for Monday's and today's. Well, Monday's, yes.

MS STACEY: Yes.

MR JUSTICE SOOLE: Today is just an adjournment.

A MS STACEY: We have dealt with today in "future documents" category, we will come on to that in a moment, just so it covers everything. Paragraph 6, if there are steps already taken, so the retrospective endorsement --

MR JUSTICE SOOLE: Let me just go through 5 again. That is unchanged.

B MS STACEY: That is unchanged. Well, it is unchanged ... I think the word "which together comprise the hearing bundle" have been added, but it is substantively unchanged.

MR JUSTICE SOOLE: Yes.

C MS STACEY: So then paragraph 6 is the good service retrospective endorsement of the steps already taken, which again is unchanged. So the copies that were post ... you were taken to the evidence on Monday, my Lord.

MR JUSTICE SOOLE: Yes.

D MS STACEY: The Facebook account for the third defendant. I do not know why 6.3 has gone out of sequence but I will bring that back in, and that is the 10th defendant's social media account.

MR JUSTICE SOOLE: What has gone out of sequence?

MS STACEY: 6 on my version, 6.3 is just out of line. So I will bring that in so it is in line.

MR JUSTICE SOOLE: I see, it goes in, yes.

E MS STACEY: It needs to be indented.

MR JUSTICE SOOLE: So indent 6.3.

F MS STACEY: Yes, indent 6.3. Then paragraph 7 is dealing with future documents, my Lord. So, we had specifically listed this order, the reamended claim form, the reamended particulars of claim and the seventh witness statement of Ms Oldfield, which I think was sent to you last night. What that does is confirm service of the documents since Monday.

MR JUSTICE SOOLE: Yes. I have read that.

G MS STACEY: So "those documents and any further document in these proceedings upon the named defendants, save for 15 to whom paragraph 8 applies." I will come to him. That was, you will recall, Mr Holland, Samuel Holland.

MR JUSTICE SOOLE: Yes.

H MS STACEY: "... shall be validly effected by ..." and what this does is replicate the McGowan order, so we have the email address, the notices, plus you have copies

posted to the last known addresses supplied by the police. That is 7.3. Then you have in 7.4 and 7.5 --

A MR JUSTICE SOOLE: 7.3 was "and as set out in Schedule 1".

MS STACEY: Yes.

MR JUSTICE SOOLE: What is that about? That is a list of names?

MS STACEY: That is the list of addresses, my Lord, Schedule 1.

B MR JUSTICE SOOLE: But the addresses will not be in the order, will they?

MS STACEY: We wanted you to see them for the purpose ... but we are going to be serving redacted versions.

MR JUSTICE SOOLE: Does the order provide for that?

C MS STACEY: I can insert "redacted", "any copies set out in the redacted copy of Schedule 1"?

MR JUSTICE SOOLE: What is the language you have used in previous successful applications?

D MS STACEY: The names and addresses will be redacted on the version which is to be served -- sorry, not the names, the addresses will be redacted. But this is simply specifying the method of service as opposed to identifying what is to be served.

MR JUSTICE SOOLE: We do not have any provision for a redaction, have we?

MS STACEY: No, we have not included a provision for redaction.

E MR JUSTICE SOOLE: But it has always been the case that they have been redacted, the addresses?

MS STACEY: Yes, for data protection reasons.

MR JUSTICE SOOLE: Yes, and generally.

F MS STACEY: But we have not included express provision for redaction. But the only place we are going to have ... I suppose if this order is going to be served as part of the future documents, we could provide that "This order and this Schedule (the addresses on which are to be redacted)", I could include that in paragraph 7, where it says, "Service of this order ..."

G MR JUSTICE SOOLE: What are the words?

MS STACEY: "Service of this order and the accompanying schedule ..."

MR JUSTICE SOOLE: I am on 7.3.

H MS STACEY: Go back to 7, my Lord, which tells you which documents we are talking about. You will see the words "this order".

MR JUSTICE SOOLE: Yes.

A MS STACEY: I suggest we put in brackets after "this order", "(and the accompanying schedule)" --

MR JUSTICE SOOLE: The order includes the schedule.

MS STACEY: Okay, "This order (with the addresses redacted)"?

MR JUSTICE SOOLE: Paragraph 7 is how it shall be effected.

B MS STACEY: Yes, but that is what is needing to be served. So we are going to serve a redacted version of the order.

MR JUSTICE SOOLE: What is going to happen to the words in brackets in 7.3?

MS STACEY: That does not matter, my Lord, because the addresses will not be there.

C Where the order has a schedule showing black, those are redactions and that is consistent with the order. If anything, it explains why there are blackened out bits in the schedule.

MR JUSTICE SOOLE: Right, start again. What words do you want?

D MS STACEY: I suggest at the top of 7, "Pursuant to CPR 6.15 and 6.27, service of this order (with the addresses redacted), the reamended claim form" --

MR JUSTICE SOOLE: "(with the ...)" --

MS STACEY: "... in the schedule redacted)".

MR JUSTICE SOOLE: With the addresses in Schedule 1.

E MS STACEY: "... in Schedule 1 redacted)". Then back to 7.3, we post those.

MR JUSTICE SOOLE: Then I think you could say "and as set out in the unredacted schedule".

MS STACEY: Yes, okay. And 7.4 and 7.5 are the social media links.

F MR JUSTICE SOOLE: Yes.

G MS STACEY: So paragraph 8 is Mr Holland's position. You will recall that I took you to Ms Oldfield's fifth witness statement which dealt with his position, namely that it has come to our attention he no longer resides at the address given to us by the police. We have no social media account for him. Therefore, we suggested to your Lordship that he should be placed in the same category as persons unknown. What this paragraph does is provide in relation to him that this order may include the same wording about "redaction, the claim form, particulars of claim, and a witness statement, and any further document on the 15th defendant shall be validly effected by ..." --

H

MR JUSTICE SOOLE: Wait a minute, I am just writing "with the addresses in Schedule 1 redacted" --

A MS STACEY: "shall be validly effected by service in accordance with paragraph ..." --

MR JUSTICE SOOLE: Upon *the* 15th defendant.

MS STACEY: "Upon *the* 15th defendant in accordance with 7.1 and 7.2, unless and until we are notified of an address, whereupon service on him shall be effected in accordance with all three paragraphs.

B MR JUSTICE SOOLE: Just going back to sealing in paragraph 7, the order will be sealed, will it not?

MS STACEY: The order will be sealed, yes.

C MR JUSTICE SOOLE: And the reamended claim form will be sealed.

MS STACEY: Yes.

MR JUSTICE SOOLE: One does not need to spell out the sealing provisions in an order.

MS STACEY: No, no.

D MR JUSTICE SOOLE: You just have to comply with them.

MS STACEY: While we are at it, my Lord, sorry, I should have drawn your attention, at 7.3 there is a bit in brackets to deal with email addresses. You will recall that we had an exchange right at the end of Monday's hearing about the possibility of serving by email.

E MR JUSTICE SOOLE: Yes.

MS STACEY: And we had inserted the words you see there in brackets at the end of 7.3 to deal with that.

F MR JUSTICE SOOLE: "Or by sending copies to the email address which has previously been supplied to the claimant by any named defendant for the purpose of electronic service and at which the named defendant has notified the claimant in writing that they wish to be served." Yes, that is because, I think, Mr Laurie, as other predecessors in these actions have said, they would much rather have it by email than by personal service at their property or elsewhere.

G MS STACEY: Indeed. So I think that caters for that.

MR JUSTICE SOOLE: Yes.

H

A MS STACEY: Paragraph 8 then I have taken you to. Paragraph 9 then are the specific requirements of 6.15. 9.1 deals with the verification by a certificate of service or by a witness statement verified by a statement of truth.

MR JUSTICE SOOLE: Yes.

MS STACEY: 9.2 is the date on which it should be deemed effective.

MR JUSTICE SOOLE: Yes.

B MS STACEY: 9.3 provides that it should be done in accordance with the order be good and sufficient service. Then 10 deals with the requirements for specifying the date by which an acknowledgement of service, admission or defence should be filed. That is cross-referred to the directions below, which are paragraph 15 is the acknowledgement of service.

C MR JUSTICE SOOLE: And 16, yes.

MS STACEY: And 16 is the defence date. 11, we then come into the directions. The first direction was that we file updated evidence. Permission is at the top.

D MR JUSTICE SOOLE: Where are the dates for service of the reamended claim form and so on?

MS STACEY: That is coming.

MR JUSTICE SOOLE: That is coming, all right.

MS STACEY: I have done it in chronological order.

E MR JUSTICE SOOLE: No, I see.

MS STACEY: So 11 is we update our evidence by the 19th. I did say we would do it by today, but my comment, I think you will have seen, you will have had a version with a comment on it. My comment was --

F MR JUSTICE SOOLE: Tell me, I do not think I have seen it.

G MS STACEY: Did you not. My comment was, my Lord, that we had not accounted for the photocopying required and therefore we needed that extra time. So we are asking for the 19th. When I rather optimistically said it would be done by the end of this week, we had not accounted for the fact that we would need to physically photocopy all the documents because at the moment we need to serve by post. We do not have the email addresses for the vast majority of these named defendants. So that is why the date is not the 15th it is the 19th.

H MR JUSTICE SOOLE: Very well. So remove the square brackets, yes.

MS STACEY: We can remove the square brackets if you are content. Service copies of the amended claim form by 4 pm on 22 March.

A

MR JUSTICE SOOLE: Which is next Friday.

MS STACEY: Which is next Friday. Paragraph 13, reamended particulars of claim by 28 March and that is because I think the 29th is a bank holiday.

MR JUSTICE SOOLE: Why not the same time as the reamended claim form?

B

MS STACEY: They can be. So we could actually merge 12 and 13.

MR JUSTICE SOOLE: Can you merge 12 and 13.

MS STACEY: Yes. Then the defendants at paragraph 14, evidence by 8 April. So they would have had our evidence on 19 March and the reamended particulars of claim by 22 March.

C

MR JUSTICE SOOLE: We went through these dates, did we not?

MS STACEY: We did.

MR JUSTICE SOOLE: Because it is all tied in with getting a hearing before the present injunction expires.

D

MS STACEY: We have adopted the dates we discussed, yes; 12 April is the date that we have landed on on Monday.

MR JUSTICE SOOLE: Yes, but that was -- you said the 19th for your evidence. As there is going to be a bit of a delay in yours, two or three days should we not reflect that also in the time for a response.

E

MS STACEY: Save that you will recall that the hearing was going to be listed, look at paragraph 17, in the week commencing 15 April. So we are butting up against it.

MR JUSTICE SOOLE: I am conscious though of Easter and so on. Why do we have it as early as that? Why did we have it as early as 18 April? Obviously we have 12 May date in our minds.

F

MS STACEY: Yes.

MR JUSTICE SOOLE: Which is a Sunday actually.

MS STACEY: Sorry, what was your Lordship's question? Why do we have ...?

G

MR JUSTICE SOOLE: Why did we have it as early as the week of the 15th?

MS STACEY: Because of, you will recall, the service -- all the petrol stations, it takes two weeks to repost all the notices, nationwide, because we rely on third party contractors in order to do that for us and it takes time.

H

MR JUSTICE SOOLE: That would take you from ... depending on where it was, it could take you to the 3rd.

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MS RUMBELOW: It is against the order to sticker the petrol stations now.

MR JUSTICE SOOLE: I am sorry?

MS RUMBELOW: I think it actually against the order to be stickering on petrol stations.

B

MS STACEY: Not for the claimant to do so.

MR JUSTICE SOOLE: If we put it to 10 April rather than the 8th, that would be by the Wednesday.

MS STACEY: Yes.

C

MR JUSTICE SOOLE: You can make the 10th.

MS STACEY: Yes, thank you. Then 16 it is the defence --

MR JUSTICE SOOLE: What about 15?

MS STACEY: Sorry, 15, then that is 12 April.

MR JUSTICE SOOLE: Acknowledgement of service.

D

MS STACEY: Acknowledgement of service, and then 16 is the defence and the only reason 16 is in there, it is going to be after the review hearing.

MR JUSTICE SOOLE: That is right until 15 May.

MS STACEY: Yes. And the reason that is there is in order to make sure this order is compliant with a 6.15.4.

E

MR JUSTICE SOOLE: Yes.

MS STACEY: So that is the purpose of this provision. 17 is listing for a hearing in the week commencing 15 April with a time estimate of one-and-a-half days. I have included in that paragraph, my Lord, the purpose of the hearing.

F

MR JUSTICE SOOLE: "In the week commencing 15 April 2024 (but not Monday, 15 April)." That is in order to give reading time.

MS STACEY: Yes. I have said "for a review of the interim injunctions (at which the court will consider whether the interim injunction is granted ... or should be continued pending trial." Just so it is clear. And for directions.

G

MR JUSTICE SOOLE: I know we discussed this last time, it went from a day to a day-and-a-half. These things --

MS STACEY: There are three claims. The possibility that -- this is a directions hearing. It is more likely --

H

MR JUSTICE SOOLE: I think that is the right course. I think that is the right course.

A MS STACEY: My Lord, can I flag one point in relation to this paragraph. We are proceeding on the basis --

MR JUSTICE SOOLE: Sorry, can you have any conversations outside. Thank you.

B MS STACEY: We obviously were seeking directions as well. We have not issued an application notice for an extension of the existing injunctions. Obviously, we are going to be listed for a review. That is the purpose of the hearing. We are proceeding on the basis that we do not need to issue a separate application for an order.

MR JUSTICE SOOLE: Do not look to me for advice.

C MS STACEY: No, no, my Lord, no, but given that this hearing has been listed, if we need to do that, my Lord, we can undertake and make provision in the directions for that, but we have not done so.

MR JUSTICE SOOLE: I thought your application --

D MS STACEY: It is for directions. The joinder directions for trial.

MR JUSTICE SOOLE: I thought you had it in the alternative.

MS STACEY: Page 4. Certainly in our evidence we flagged the possibility of a continuation being required, it is paragraph 6.7 of Ms Oldfield's statement she said that we might need a short continuation. What I suggest, my Lord --

E MR JUSTICE SOOLE: I take the view that --

MS STACEY: It is --

MR JUSTICE SOOLE: -- it is -- subject to anyone who wanted to argue otherwise -- but my view is that if the court considers it is appropriate to have a review and so orders, that is what is going to happen next.

F MS STACEY: It is part of the directions. That is the view I take, so I do not know whether we need to expressly dispense with any need to serve any further application in relation to that hearing or we can just proceed on the basis that that is what has happened. I was rather taking the latter view, but I just want to be as cautious as I --

G MR JUSTICE SOOLE: Again, I am being drawn into the advisory position.

H MS STACEY: Can I say for which purpose any further application in relation to such a review is dispensed with, or for which purpose no further application shall be required? **(Pause)**

MR JUSTICE SOOLE: I am going to leave it as it is.

MS STACEY: Fine. 18, skeleton arguments.

MR JUSTICE SOOLE: Yes.

MS STACEY: 19, the bundles being filed. We have adopted your Lordship's wording in parenthesis. Then 20, my Lord, is the provision which one saw in Hill J's order, just regularising how applications should be made. So 20 deals with named defendants, if they fail to comply with 14 or 15, those are the paragraphs dealing with evidence and acknowledgement, they need to apply.

MR JUSTICE SOOLE: Yes.

MS STACEY: And 20 is any other person. So that includes the first defendant or any interested person. It is substantively the same, except that it provides at the bottom that any such person should provide their full name and address and apply to be joined if appropriate.

MR JUSTICE SOOLE: Yes.

MS STACEY: 22 is then replicating the service, alternative service provisions against persons unknown. I will insert the wording about redactions after "this order" at paragraph 22.

MR JUSTICE SOOLE: Yes. You may have to check on the numbering, when you are referring back to any --

MS STACEY: Because I have merged some paragraphs, you are quite right.

MR JUSTICE SOOLE: You merged paragraphs 12 and 13. Sometimes it is easier not to merge them frankly.

MS STACEY: It would be easier not to merge them. In fact, would you be content if I did, I just simply have 12 and 13 separately but have the same dates.

MR JUSTICE SOOLE: Yes. I think it saves -- because it is almost guaranteed that one does not then spot some other number that needs to be varied.

MS STACEY: Exactly, and we have been very careful in going through this. So let us keep 13 and 12 separately but have the same date. Back to 22 then, that is future documents and the documents that are created since Monday. We have just simply repeated McGowan's method of service in 22.1, 2 and 3.

Paragraph 23 is the provision that such steps should be good and sufficient, and 24 is the date on which those documents are deemed served.

MR JUSTICE SOOLE: Can you, where it says paragraph 22.2, can you put "Schedule 2" not second schedule.

A

MS STACEY: Yes, Schedule 2.

MR JUSTICE SOOLE: "In Schedule 2".

MS STACEY: Yes. 22.3 is the sending of the document to anyone who has asked. Then 23 and 24 should be self-explanatory.

B

MR JUSTICE SOOLE: Yes.

MS STACEY: Paragraph 25, my Lord, is the general liberty to apply provision.

MR JUSTICE SOOLE: Yes.

MS STACEY: What we have done there is said "may apply at any time to discharge it or any part" that has been added, and we have put in "including in relation to methods of alternative service".

C

MR JUSTICE SOOLE: Yes.

MS STACEY: Then costs in the case. Then we have reference in 27 to sealed copies of this order being provided. We might want to take out the word "sealed" just for completeness or for consistency's sake, because we took the view that we did not need to specify, but that is what we are planning on.

D

MR JUSTICE SOOLE: I think that is a standard wording.

MS STACEY: Okay.

E

MR JUSTICE SOOLE: Anything else you want to say at this stage?

MS STACEY: That is it, my Lord.

MR JUSTICE SOOLE: Mr Laurie, anything you want to say at this stage? What you see is, as I have explained before, the mechanism is to join defendants, to have a review hearing in April and then -- I have not accepted the application that it should proceed to trial on a very early timetable.

F

MR LAURIE: Yes, but the 15th will be the date you set a trial though?

MR JUSTICE SOOLE: Sorry?

MR LAURIE: The 15th will be -- you will set a trial date on the 15th?

G

MR JUSTICE SOOLE: No, I will not set a trial date. That will be later on.

MR LAURIE: Okay.

MR JUSTICE SOOLE: The most that would happen is there would be what is called a trial window and it would say "The trial will be ..." It is possible we might in a case where ... normally we do not. Normally we say it will be held

H

in a certain period, and then it gets fixed later on, but it might be that it was thought appropriate to --

A

MS STACEY: Fix it for a hearing. Well in cases such as this often you have an accelerated timetable and early dates, so yes it is possible.

MR JUSTICE SOOLE: Yes. When you have a claim in conspiracy, it is not as simple as a claim in trespass to land, being on M25 gantries and so on.

B

MS STACEY: No, no.

MR JUSTICE SOOLE: It may not ...

MS STACEY: It rather depends.

MR JUSTICE SOOLE: I have in mind what you pointed out to me the Supreme Court said. That is a matter of practicality rather than law, they were making that point.

C

MS STACEY: Yes.

MR JUSTICE SOOLE: It does not mean one ... but --

MS STACEY: And it also may depend on how many defences we get and how much engagement there is and the --

D

MR JUSTICE SOOLE: Exactly. All sorts of things.

MS STACEY: Yes.

MR JUSTICE SOOLE: Very well.

(4.09 pm)

E

(Judgment given)

(4.15 pm)

MR JUSTICE SOOLE: Is it amend the particulars of claim?

MS STACEY: Re-amend.

F

MR JUSTICE SOOLE: Is it reamend?

MS STACEY: Yes, because we changed the description.

MR JUSTICE SOOLE: And just because of that.

MS STACEY: There were a few other amendments. There was some detail of the conspiracy against the first defendant.

G

MR JUSTICE SOOLE: In the amended.

MS STACEY: Just to clarify the position.

MR JUSTICE SOOLE: It is reamended.

MS STACEY: It is reamended.

H

MR JUSTICE SOOLE: Very well, thank you. I will keep these papers.

MS STACEY: Thank you very much for your patience.

MR JUSTICE SOOLE: Not at all. Thank you for your assistance and thank you

Mr Laurie for your assistance. You will now then supply me with your --

MS STACEY: With an amended version. It will not --

MR JUSTICE SOOLE: There is no chance of my doing it today. Like many other

people, I have many other things to do before the end of the day. Please to the

associate, copy to my clerk, Mr John Lloyd.

MS STACEY: I will do that.

(4.16 pm)

(Hearing concluded)

Epiq Europe Ltd hereby certify that the above is an accurate and complete record of the proceedings or part thereof.

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Lower Ground, 46 Chancery Lane, London WC2A 1JE

Email: civil@epiqglobal.co.uk

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To: Eversheds-Sutherland
From: KB Judges Listing Office
Date: 12 April 2024
Subject: QB-202-001420 Shell UK Ltd v Persons Unknown

Dear Sir/Madam

This case has been listed in the Royal Courts of Judge on Wednesday 17th April 2024 with a time estimate of 1.5 days.

The court number, name of Judge and starting time will all be confirmed after 2pm on the 16th April 2024 and can be found on our website. The link is below.

<https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list#kings-bench-judges-daily-cause-list>

Kind regards

Claim No: QB-2022-001241 (“Haven Claim”)

Claim No: QB-2022-001259 (“Tower Claim”)

Claim No: QB-2022-001420 (“Petrol Stations Claim”)

IN THE HIGH COURT OF JUSTICE

KINGS BENCH DIVISION

B E T W E E N :

(1) SHELL U.K. LIMITED

Claimant: (QB-2022-001241)

(2) SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED

Claimant (QB-2022-001259)

(3) SHELL U.K. OIL PRODUCTS LIMITED

Claimant (QB-2022-001420)

- and -

PERSONS UNKNOWN AND ORS

[more fully described in the Relevant Claim Form]

Defendants

CLAIMANTS’ SKELETON ARGUMENT

Hearing: 17-18 April 2024 (1.5 days)

References in this Skeleton Argument:

- e.g. “[C/50]” are references to tabs/page numbers in the Core Bundle.
- E.g. “[SB/50]” are references to tabs/page numbers in the Supplemental Bundle.
- e.g. “[AB/1/2]” are references to the tabs/ page numbers of the Authorities Bundle.

Suggested Pre-Reading: (Time Estimate: 3 hours) -

- Judgment of Hill J in *Shell UK v PU* [2023] EWHC 1229 (the “*Hill Judgment*”)
[AB/1]
- Application Notice dated 12 February 2024 [C/15/1078]
- Order of Soole J dated 15 March 2023 [C/1/14] (“the Soole J Order”)
- Shell Petrol Stations Claim Draft Order [SB/1/4]

- Second Witness Statement of Christopher Prichard-Gamble (“**Prichard-Gamble 2**”) [AB/6/227]
- Overall Chronology CPG2 [C/256]
- Fourth Witness Statement of Benjamin Austin (Petrol Stations) (“**Austin 4**”) [C/50]
- Eighth Witness Statement of Alison Oldfield (“**Oldfield 8**”) [SB/10/68]
- Order of Hill J dated 23 May 2023 (Petrol Stations Claim) [C/1042]
- Application Notices for Variation of Alternative Service Provisions dated 11 April 2024 [SB/4-8]

A. INTRODUCTION

1. This is the Claimants’ skeleton argument in relation to the continuation of the orders of Hill J dated 23 May 2023 (“**the Hill J Orders**”) [C/1020; 1031; 1042] granted in respect of the three claims identified above (“**the Claims**”) and the Claimants’ application dated 12 February 2024 (the “**Directions Application**”). On 15 March 2024, the Court acceded to the application to add defendants to the QB-2022-001420 proceedings, the Petrol Stations Claim. The Claimants now seek a continuation of the Hill J Orders pending trial with a backstop of 12 November 2024 and propose directions for trial in respect of all the proceedings.
2. The First and Second Claimants are, respectively, the freehold owners of (i) the Shell Haven Oil Refinery (“**Haven**”), a substantial fuel storage and distribution installation; and (ii) the Shell Centre Tower (“**Tower**”), a large office building. The Third Claimant is Shell UK Oil Products Limited. It markets and sells fuels to retail customers in England and Wales through a network of Shell-branded petrol stations, and in some cases has an interest in the land where the Shell petrol station is located (“**Shell Petrol Stations**”).
3. References to “**Shell**” in this Skeleton Argument should be read as a reference to the relevant Claimant(s).
4. By the Claims, Shell have sought interim and final injunctions to restrain unlawful protest activity at Shell Haven, Shell Centre Tower and the Shell Petrol Stations (together “**the Sites**”).
5. The Claims have been managed together (though not consolidated) and are for interim and final injunctions to restrain unlawful protests by activists. There have been a number

of interim injunctions granted in these proceedings following applications in the Claims, most recently by the Hill J Orders.

6. Interim injunctions were granted against Persons Unknown restraining unlawful protests at Haven and Tower on 5 May 2022 (Bennathan J). An interim injunction was granted on 5 May 2022 (McGowan J) further interim injunction was granted on 20 May 2022 in the Petrol Stations Claim against Persons Unknown restraining unlawful protests by Persons Unknown at Shell petrol stations (Johnson J) (“**the Original Orders**”).
7. The background is set out in the judgment of Johnson J in *Shell UK v PU* [2022] EWHC 1215 (the “*Johnson Judgment*”) at [10] – [19] [AB/5/138-140] and in the *Hill Judgment* at [10] – [21] [AB/1/6/-8].
8. The threat which provoked the Claims in April / May 2022 and the applications for the interim injunctions was disruptive protest under the banners of Just Stop Oil, Youth Climate Swarm Movement, Extinction Rebellion and Scientist Rebellion which are associated with, and have grown out of, other climate protest movements (“**the Protest Groups**”). Johnson J described the groups at [9] [AB/4/138]:

“Insulate Britain, Just Stop Oil and Extinction Rebellion are environmental protest groups that seek to influence government policy in respect of the fossil fuel industry, so as to mitigate climate change. These groups say that they are not violent. I was not shown any evidence to suggest that they have resorted to physical violence against others. They are, however, committed to protesting in ways that are unlawful, short of physical violence to the person. Their public websites demonstrate this, with references to “civil disobedience”, “direct action”, and a willingness to risk “arrest” and “jail time”.
9. The Orders do not to stop protestors from undertaking peaceful protests whether near the Sites or otherwise. The Claimants’ concern has been to enforce its property rights and mitigate health and safety and other risks posed by unlawful activities which prompted the injunctive relief. The Hill J Orders have been carefully drawn and only prohibit activity which is clearly unlawful. For example, in relation to Haven and Tower, the Hill J Orders prohibit acts constituting trespass, private nuisance and damage to private land. In relation to the Petrol Stations, the Order does not seek to prohibit protestors from entering the Petrol Stations but simply seeks to control what they do within the Petrol Stations by prohibiting a campaign of protests which is intended to harm the Claimant economically and raises significant health and safety concerns: see Prichard-Gamble 2 at §2.3.

10. The Original Orders were continued by order of Hill J dated 23 May 2023 until 12 May 2024. In this hearing, the Claimants seek:
- a. a continuation of the Hill J Orders pending trial with a backstop of 12 November 2024;
 - b. directions for trial;
 - c. orders for alternative service, including variations to the existing alternative service provisions pursuant to separate applications for variation to such provisions.

B. SERVICE

11. All documents in these proceedings (including the application notices¹, evidence and the Soole J Order) have been served on the relevant parties (including non-parties) as provided for in the alternative service provisions of the Hill J Orders and most recently the Soole J Order: see section 2 of Oldfield 8 [SB/10/68].
12. The same process has been adopted to serve relevant parties with notification of this hearing and this skeleton argument.

C. CONTINUATION OF THE HILL J ORDERS

13. The relief sought by Shell in the continuation of the injunctions is, save for the determination on duration, materially identical to the relief obtained in the Hill J Orders. For ease of reference, this skeleton argument addresses the Claims together on the basis that the issues and legal principles applicable to each Order are identical and the evidential foundation for the continuation is materially similar. Where there are specific issues relating to individual Orders, those are identified below.

(i) The Original Threat

14. The factual allegations and the basis on which the original Petrol Stations Claim Order was sought, as they stood on 13 May 2022, are fully set out in the *Johnson Judgment* at [10] – [17] [AB/4].
15. In respect of the original Tower Claim Order and Haven Claim Order, the basis of Shell’s view that there was a real and imminent risk of unlawful activity directed at the Claimants and the wider Shell group of companies is fully set out in:

¹ The application notice dated 12 February 2024 was served as explained in AJO5 [C/20/1488].

- a. Brown 1 [C/67/5762] and Brown 2 [C/53/5145] made in respect of the Shell Haven Proceedings; and
- b. Garwood 1 [C/65/5669] and Garwood 2 [C/55/5182] made in respect of the Shell Centre Tower Proceedings.

16. Essentially:

- a. Autumn 2021 - a number of protests took place, which involved the blocking of major roads in the UK, including the M25, including by activists gluing themselves to roads, immovable objects, or each other. This resulted in National Highways being granted a number of injunctions, which were breached many times and committal proceedings followed.
- b. Spring 2022 - protests involving similar tactics re-commenced, but directed at the fossil fuel industry rather than the road network, including at assets owned by the Shell Group.
- c. In April/May 2022, individuals connected with these groups undertook various activities with the apparent aim of causing maximum disruption to Shell's lawful activities and thereby generate publicity for their protest movement. In May 2022, they promised that such activities would continue "*until the government makes a statement that it will end new oil and gas projects in the UK.*"

(ii) **The May 2023 Threat**

17. The factual allegations and the basis on which the Hill J Orders were sought is fully set out in the *Hill Judgment* [AB/1]:

- a. in respect of Haven, the evidence showed a significant number of incidents in relation to oil refinery sites between August 2022 and February 2023: at [30];
- b. in respect of Tower, the evidence suggested that Bennathan J's injunction had had a deterrent effect. However, it continued to be a prime location for protests and corporate buildings more broadly had been the target of unlawful activity since the injunction was made: at [31];
- c. in respect of Petrol Stations:

- i. there had been two incidents affecting ten petrol stations during the relevant period in which fuel pumps were vandalised, customers' access to the forecourt was blocked and on the first of these dates protestors super glued themselves to the forecourt; and
- ii. the evidence described a significant number of incidents of direct-action protest against the wider Shell business and the wider oil and gas industry and operators within it: at [32] – [34].

18. Even though, at the time of the hearing, there did not appear to have been any direct unlawful action at Haven or Tower, Hill J found that the well-documented background of past direct-action protest targeted at sites owned or operated by those involved in or connected with the oil industry and past statements of intention by protest campaign groups to engage in confrontational direct-action activities which led to the grant of a series of injunctions by the courts to Shell and other companies in the oil/gas industry were sufficient evidence of a continued threat that justified the continuation of the injunctions.

(iii) Continued Threat

19. The basis of Shell's view that there continues to be a real and imminent risk of serious harm is set out in Prichard-Gamble 2 at §§2.4-2.5 [C/6/230], namely that since the grant of the original Orders, the Claimants, the wider Shell business and the wider oil and gas industry and operators have continued to be key targets for direct action, some of which is unlawful. In addition, the Defendants have failed to provide assurances that they will no longer target the Claimants by engaging in unlawful activity such that there remains a real risk that without the protection of the injunctions, protest activity would very likely return to the levels of unlawful activity previously experienced: see also Prichard-Gamble 2 at §4.3 [C/6/234-235]. This is consistent with the clear indication that the Protest Groups plan to continue their campaigns and direct action for the foreseeable future: see paragraph 23 below.

20. Overall, as Linden J put it in *Esso Petroleum Company Ltd v Persons Unknown* [2023] EWHC 1837 (KB) at [67] [AB/7/182]:

“it appears that the effect of the various injunctions which have been granted in this case and others has been to prevent or deter them from taking the steps prohibited by the orders of the court although, of course, not invariably so. If, therefore, an injunction

is refused in the present case the overwhelming likelihood is that protests of the sort which were seen in 2021/2022 will resume.”

21. The Claimants have prepared a chronology detailing the incidents which they have been able to identify of instances since the Hill J Orders were granted of direct-action protest against the Claimants, the wider Shell business and the wider oil/gas industry and operators within it (including organisations connection to the use of (and funding towards the use of) fossil fuels generally). As Prichard-Gamble 2 sets out at §§4.2 – 4.10 [C/6/234-243], those chronologies show:

- a. there have been at least three instances (on 12 June 2023, 15 June 2023 and on 19 June 2023) where protestors accessed the entrances to Tower and, on one of these occasions (15 June 2023) protestors also attempted to gain access to the remainder of the building;
- b. save for these incidents, there have not been any other incidents of unlawful breach of the Hill J Orders at any of the locations covered by the current injunctions; however:
 - i. protests have regularly occurred outside the Claimants’ premises, most often Shell Centre Tower (63 separate incidents), with significant numbers of protestors being present; and
 - ii. protest activity – unlawful and lawful - targeting the wider oil and gas industry and the use of fossil fuels generally continues unabated and is far from reaching a conclusion.

22. In addition to these incidents, over the course of 2023, protestors also appear to have turned some of their attention to large scale sporting and other high-profile events. Prichard-Gamble 2 sets these out at §5.1 - the nature of the incidents and the extremity (in some cases) of the lengths protestors are willing to go to is further evidence that some individuals remain willing to carry out unlawful activity in order to advance their campaign.

23. Finally, it is notable that very recently, on 3 March 2024, Just Stop Oil released a press statement outlining their plans for 2024 confirming that nonviolent civil resistance will continue stating (Prichard-Gamble 2 at §7.3.6 [C/6/247-248]):

“nonviolent civil resistance to a harmful state will continue, with coordinated, radical actions that reach out to new people and capture the attention of the world...Just Stop

Oil will continue to be the major focus until we win, but we have a new three part demand: No New Oil, Revoke Tory Licences and Just Stop Oil by 2030. In addition to disrupting high-profile cultural events and continuing our Stop Tory Oil campaign, focussing on MP's and those in power, this summer Just Stop Oil will commence a campaign of high-level actions at sites of key importance to the fossil fuel industry – airports" [emphasis added].

(iv) **Harm**

24. In addition to the gravity of the potential harm and some of the anticipated consequences of unlawful protest activity, the broader impact of such activity at the Sites is further addressed in the *Johnson Judgment* at [18] – [19] [AB/5/140]. In summary:

- a. the Shell Haven and the Shell Petrol Stations store significant quantities of highly flammable petroleum products. If protestors were to carry out a more elaborate activity (either in terms of the simple number of protestors attending or the actual actions undertaken) involving any of Shell's sites, Shell has a legitimate concern that if the injunction were not in place, there is a real risk of a potentially very serious incident which would cause grave and irremediable harm to the protestors, Shell's staff and/or the public which would be incapable of *ex post facto* remedy: Prichard-Gamble 1 at §6.10 [C/39/3084]; see also Prichard-Gamble 2 at §3.10 [C/6/233];
- b. further unlawful activity at Shell Centre Tower presents an unacceptable risk of continuing and significant danger to the health and safety of staff, contractors, the general public and others: Prichard-Gamble 2 at §§3.3-3.5 [C/6/231]; *Hill Judgment* at [17];
- c. Claimants and others have suffered loss and damage by reason of the Protest Groups' activities.

25. In terms of risk of future harm, Hill J accepted Shell's evidence that (*Hill Judgment* at [39] [AB/1/12]):

"(i) the incidents described demonstrate a clear nationwide targeting of members of the wider Shell group of companies and its business operations since April/May 2022; (ii) such demonstrations will continue for the foreseeable future; and (iii) the injunctions need to be extended as they provide a strong deterrent effect and mitigate against the risk of harm which unlawful activities at the sites would otherwise give rise to. Unlawful activity at the sites presents an unacceptable risk of continuing and significant danger to the health and safety of staff, contractors, the general public and other persons visiting them."

26. It is clear from the evidence that unlawful protest at the Sites remains a continuing and real threat and that the consequences of such activity remain just as serious as before: Prichard-Gamble 2 at §§6.1-6.3 [C/6/246]; see also *Johnson Judgment* at [34] [AB/5/145] and *Hill Judgment* at [134] – [136] [AB/1/28]. The evidence of events that have taken place since the granting of the Hill J Orders provides clear grounds for continuing the injunctions.

(v) **Other injunctions granted against environmental protestors.**

27. The Courts have granted a number of interim and final injunctions against environmental protestors prohibiting direct action. These include, most recently²:

- a. 26 January 2024: a final injunction granted by Ritchie J in *Valero Energy Ltd v Persons Unknown* [2024] EWHC 134 (KB).
- b. 6 October 2023: a final injunction granted by Mr Simon Gleeson in *UK Oil Pipelines Ltd v Persons Unknown* (unreported).
- c. 18 July 2023: a final injunction granted by Linden J in *Esso Petroleum Company Ltd v Persons Unknown* [2023] EWHC 1837 (KB).
- d. 14 July 2023: an interim injunction granted by Sweeting J in *North Warwickshire BC v Persons Unknown* [2023] EWHC 1719 (KB). The Judge found that the test in s.12(3) HRA 1998 was satisfied – i.e. the claimant was “likely” to obtain an injunction at trial.
- e. 23 May 2023: a final injunction granted against Just Stop Oil in *Transport for London v Lee* [2023] EWHC 1201 (KB) (Eyre J).
- f. 11 May 2023: an interim injunction granted to Essar – case unreported.
- g. 3 May 2023: a final injunction granted against Insulate Britain in *Transport for London v Persons Unknown* [2023] EWHC 1038 (KB) (Morris J).

see also Prichard-Gamble 2 at §7.4 [C/6/247].

(vi) **Approach of the Court in review hearings**

² These are not included in the authorities bundles but copies will be available in court in case they need to be referred to.

28. Where the hearing of a review is a contested hearing, what takes place is in the form of a “*complete rehearing of the matter, with each party being at liberty to put in evidence.*” “*The matter*” in this context, necessarily includes consideration of the judgments of the previous judges: *Hill Judgment* at [101] and [111] [AB/1/21-22].
29. It is assumed that the present review will proceed on the same basis. Having consideration to the judgments of the previous judgments, the question is whether the evidence of events that have taken place since 23 May 2023 “provides grounds for declining to extend the injunctions on materially identical terms”: per Cavanagh J in *Tfl v Lee* [2023] EWHC 402 (KB) at [20] [AB/6/162].

(vii) **Wolverhampton**

30. It is relevant to draw the attention of the Court to the recent Supreme Court judgment in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45 [AB/8] which has been decided since the grant of the Hill J Orders. It is the Claimants’ case, that *Wolverhampton* has not materially affected the test to be applied when granting an interim injunction in the context of protests against persons unknown (including newcomers).
31. The case involved traveller injunctions which are different to protestor cases because local authorities have duties in relation to travellers. The Supreme Court, in rejecting the appeal, held that injunctions can be granted against persons unknown who are “newcomers”: at [167] [AB/8/237]. The Supreme Court expressly stated that “*nothing we have said should be taken as prescriptive in relation to newcomer injunctions in other cases, such as those directed at protestors who engage in direct action by, for example, blocking motorways, occupying motorway gantries or occupying HS2’s land with the intention of disrupting construction*”: at [235] [AB/8/252].
32. Following the ruling of the Supreme Court³, the seven *Canada Goose* guidelines remain good law, and other factors have been added: see e.g. *Valero* at [57] – [58] [AB/9/284-286]. Those factors are materially the same as those laid down in the protest cases of *Ineos v Persons Unknown* [2019] 4 WLR 100 at [34], and then developed in *Canada Goose v Persons Unknown* [2020] 1 WLR 2802 at [82] [AB/3/79].
33. In respect of protest cases, the Supreme Court made it clear that (at [236]) [AB/8/253]:

³ See in particular at [167], and then expanded upon at [188]-[189] and [218]-[232].

“Often the circumstances of these cases vary significantly one from another in terms of the range and number of people who may be affected by the making or refusal of the injunction sought; the legal right to be protected; the illegality to be prevented; and the rights of the respondents to the application. The duration and geographical scope of the injunction necessary to protect the applicant’s rights in any particular case are ultimately matters for the judge having regard to the general principles we have explained” [emphasis added].

34. The Claimants seek to follow the approach of the Supreme Court and it is accepted that:
- a. there must be a compelling need for a protest injunction against newcomers: at [236] [AB/8/253]; and
 - b. a full duty of disclosure applies to claimants seeking a protest injunction against newcomers: at [219] [AB/8/249].

(viii) **Relevant Factors**

35. Shell has been notified by one of the Named Defendants (Laurie) that he will be attending the hearing and intends to oppose the renewal. It is anticipated that others may also attend.

36. In the previous review hearing (“**the 2023 Review Hearing**”) (which was also contested, with Leading Counsel representing an interested party), Hill J adopted the list of issues identified in the *Johnson Judgment* as the framework for her analysis. The same factors apply here.

37. Taking each of these in turn with reference to the *Hill Judgment* (albeit adapted to reflect the language of factors said to be applicable by the Supreme Court in *Wolverhampton* (see list of 13 factors in *Valero* at [62] – [78]) [[AB/8/287-291]).

(A) Substantive Requirements:

(1) Cause of Action / Is there a serious question to be tried, applying the test set out in *American Cyanamid v Ethicon* [1975] AC 396 per Lord Diplock at 407G?

38. The Court is invited to adopt the judge’s reasoning and conclusions at [115] and [131] – [132]. The position remains the same - there is a serious issue to be tried in the Claims.

(2) Damages not an adequate remedy: would damages be an inadequate remedy for the Claimants and would a cross-undertaking in damages adequately protect the Defendants?

39. The Court is invited to adopt the judge’s reasoning and conclusions [137] and [140]. Given the sorts of sums involved and practicality of obtaining damages, the latter would not be an adequate remedy. There remains no evidence that the Defendants have the

financial means to satisfy an award of damages. More importantly, the health and safety risks, if triggered, could cause serious and/or fatal injuries for which damages would not be adequate. The Petrol Stations Claim involves economic torts and no evidence has been put forward of the Defendants' finances or ability to satisfy any damages. Conversely, Shell has offered a cross-undertaking in damages (see e.g. First Schedule to Petrol Stations Claim draft Order [SB/1/4]) in case this becomes necessary and has the means to satisfy any such order, which would be an adequate remedy for the Defendants (see *Wolverhampton* at [234]).

(3) Is there a compelling justification (*Wolverhampton* at [188]) / Does the balance of convenience otherwise lie in favour of the grant of the order: *American Cyanamid* per Lord Diplock at 408C-F /?

40. As damages are not an adequate remedy and the cross-undertaking is adequate protection for the Defendants, it is not necessary separately to consider the balance of convenience: see *Johnson Judgment* at [38] [AB/5/146]. In any event, the Court is invited to adopt the Hill J's reasoning and conclusion - the balance of convenience is in favour of continuing the relief: at [144] [AB/1/29]. There are compelling reasons to protect the Claimants' Sites and others from the risk of harm which is sought to be protected by the Orders.

(4) Sufficient evidence to prove the claim / Is there a sufficiently real and imminent risk of damage so as to justify the grant of what is a precautionary injunction?

41. It is only appropriate to grant an interim injunction if there is a sufficiently "real" and "imminent" risk of a tort being committed to justify precautionary relief (see, for example, *Canada Goose UK Retail Limited v Persons Unknown* [2020] EWCA Civ 303; [2020] 1 WLR 2802 at [82(3)]) [AB/3/79].

42. The evidence before the Court shows the position remains the same as that assessed by Hill J in April 2023 (at [147]) [AB/1/29]:

"unless restrained by injunctions the Defendants will continue to act in breach of the Claimants' rights; that there continues to be a real and imminent risk of future harm; and that the harm which might eventuate is sufficiently "grave and irreparable" that damages would not be an adequate remedy: see *Vastint Leeds BV v Persons Unknown* [2018] EWHC 2456 (Ch)] at [31(4)(d)], per Marcus Smith J at [31(3)((d))."

43. It is relevant that on each of the occasions that the Claims have come before the Court in these proceedings, the judges have found that the Claimants were likely to succeed

at trial on the basis of the evidence before them. It is also relevant that in recent cases (see paragraph 27 above) brought by those in the energy sector the Courts have accepted that there continues to be a sufficiently real and imminent risk of direct action to justify maintaining the injunctive relief. The Claimants invite the Court to adopt the assessment of Ritchie J in *Valero* (para 26(a) above) at [64] [AB/9/287]:

“I find that the reduction or abolition of direct tortious activity against the Claimants’ 8 Sites was probably a consequence of the interim injunctions which were restraining the PUs connected with the 4 Organisations and that it is probable that without the injunctions direct tortious activity would quickly have recommenced and in future would quickly recommence”.

44. The observation of Linden J in *Esso Petroleum* (para 26(c) above) is also relevant here, namely that it would have been very easy for Protest Groups to give assurances or evidence to the Court that there was no intention to carry out direct action at the Sites but that they did not do so [67] [AB/7/182].

(5) Full and Frank Disclosure (*Wolverhampton* at [219])

45. As demonstrated by their evidence, the Claimants and their legal team have evidenced full and frank disclosure.

(B) Procedural requirements

(6) Scope of the Order: do the prohibited acts correspond to the threatened tort and only include lawful conduct if there is no other proportionate means of protecting the Claimant’s rights: *Canada Goose* at [78] and [82(5)]; *Wolverhampton* at [223]?

46. The Court is being asked to continue the Hill J Orders on materially identical terms. In these circumstances, it is invited to adopt the reasoning and conclusions of the judge at [150] – [153].

47. As to any concern around whether the drafting properly reflected the elements of the tort of conspiracy to injure (the Petrol Stations Claim), this issue was dealt with at the 2023 Review Hearing. Hill J found the acts prohibited in the Petrol Stations Order hey mirror the torts underlying the overarching tort of conspiracy to injure and necessarily amount to conduct that constitutes the tort of conspiracy to injure, when the injunction is read as a whole (at [151]). She determined the language in the Petrol Stations Order was appropriate: at [152] [AB/1/30]. The language in the present draft is the same.

(7) Are the terms of the injunctions sufficiently clear and precise: *Canada Goose* at [82(6)]; and *Wolverhampton* at [222]?

48. Hill J accepted that the terms of the Orders were sufficiently clear and precise (at [154] – [156]) [AB/1/31]. The Court is being asked to continue the Hill J Orders on materially identical terms.

(8) Do the injunctions have clear geographical and temporal limits: *Canada Goose* at [82(7)]; *Wolverhampton* at [167(iv)] and [225]?

49. As to the geographical limits,

- a. the extent of the Haven and Tower injunctions is made clear by the plans appended to them;
- b. in respect of the Petrol Stations injunction, the geographical area was revised before Hill J to more clearly delineate where the scope of the injunction ends and the public highway over which the injunction does not apply begins [AB/1/31]. The Court is being asked to continue the Order on the same terms and is invited to adopt the reasoning and conclusion of Hill J at [159]. The injunction applies to those “*directly blocking or impeding access to any pedestrian or vehicular entrance to a Shell Petrol Station forecourt to a building within the Shell petrol station*” and Hill J found that that wording renders the Petrol Stations Order sufficiently geographically specific as it makes it clear that the area of focus is the petrol station forecourts.

50. As to temporal limits, Shell seeks a short extension to each injunction until the date of final hearing, with a backstop of 23:59 on 12 November 2024: see draft Order at [4] [SB/1/4]. The proposed backstop is subject to the Court being able to accommodate the hearing by 12 November 2024.

51. As is clear from the Directions Application, throughout these proceedings, the Claimants have been mindful of their obligations to progress the litigation and seek to do the same via this hearing. The period sought in the draft order strikes the right balance between the need to progress the litigation whilst allowing the Defendants a reasonable period within which to prepare any defence they wish to file. Further, it reflects the need to protect Shell from the real threat that the Defendants will engage in unlawful protest activity at the Sites during the interim period between expiry of the Hill J Orders and the conclusion of the final trial.

(9) The Defendants having not been identified, are they in principle, capable of being identified and served with the orders: *Canada Goose* at [82(1)] and [82(4)]; *Wolverhampton* at [221]?

52. The Claimants have taken active steps to identify persons falling within the Persons Unknown description and indeed there are now 15 Named Defendants who have been joined to the Petrol Stations Claim. Those persons were added to the proceedings as set out in the Soole J Order at [1], on the basis of the evidence contained in Oldfield 4 [C/22/1639] which was considered at the last hearing and which addressed all identifiable Defendants to date in respect of that Claim.

53. In line with its duty to the Court, in the event that final Orders are made the Claimants will undertake to join any other persons identified as falling within the Persons Unknown description to the three orders as soon as reasonably practicable, following the provision of their names and addresses by the police. The position remains as found by the judge at [169]:

“when people take part in protests at the relevant sites, they are, in principle, capable of being identified and that there is a process in place focussed on achieving that. Such persons can then be personally served with court documents. In the meantime, effective alternative service on the Persons Unknown Defendants can take place in a manner that can reasonably be expected to bring the proceedings to their attention [as explained below].”

(10) Are the Defendants identified in the claim forms and the injunctions by reference to their conduct: *Canada Goose* at [82(2)]; *Wolverhampton* at [221]?

54. The Court is invited to adopt the reasoning and conclusions of Hill J at [170] that the descriptions of the Persons Unknown are sufficiently precise to identify the relevant Defendants in circumstances where the descriptions target their conduct.

(11) Are the interferences with the Defendants’ rights of free assembly and expression necessary for and proportionate to the need to protect the Claimants’ rights: Articles 10(2) and 11(2), read with the HRA, section 6(1)?

55. All three injunctions interfere with the Defendants’ rights under Articles 10(1) and 11(1). However, such interferences can be justified where they are necessary and proportionate to the need to protect the Claimants’ rights. As Lord Sales JSC explained in *DPP v Ziegler* [2022] AC 408 at [125] [AB/4/126] the test is as follows:

“...the interference must be “necessary in a democratic society” in pursuance of a specified legitimate aim, and this means that it must be proportionate to that aim. The four-stage test of proportionality applies: (i) Is the aim sufficiently important to justify interference with a fundamental right? (ii) Is there a rational connection between the means chosen and the aim in view? (iii) Was there a less intrusive measure which could have been used without compromising the achievement of that aim? (iv) Has a fair

balance been struck between the rights of the individual and the general interest of the community, including the rights of others?”.

56. Shell does not propose to rehearse the submissions in respect of this factor that were argued in the contested hearing before Hill J. The Court is invited to adopt Hill J’s reasoning and conclusions at [179] – [180] [**AB/1/35**]:

- a. *“the injunctions strike a fair balance between the Defendants’ rights to assembly and expression and the Claimants’ rights: they protect the Claimants’ rights insofar as is necessary to do so but not further;*
- b. *“the interferences with the Defendants’ rights of free assembly and expression caused by the injunctions are necessary for and proportionate to the need to protect the Claimants’ rights.”*

(12) Have all practical steps been taken to notify the Defendants: the Human Rights Act 1998, section 12(2) / Compliance with requirement to ‘advertise’ the application in advance and give effective notice (*Wolverhampton* at [226]-[227])?

57. Section 12(1) – (2) of the HRA 1998 provides as follows:

“(1) This section applies if a court is considering whether to grant any relief which, if granted, might affect the exercise of the Convention right to freedom of expression.

(2) If the person against whom the application for relief is made (“the respondent”) is neither present nor represented, no such relief is to be granted unless the court is satisfied— (a) that the applicant has taken all practicable steps to notify the respondent; or (b) that there are compelling reasons why the respondent should not be notified”.

58. Oldfield 8 sets out the extensive steps the Claimants have taken to effect service of the Soole J Order and various documents in these proceedings on the relevant persons [**SB/10/68**]. Oldfield 9 will set out the steps taken to notify the Defendants of this hearing. Consequently, the Claimants have complied with the service requirements and with s.12(2) in respect of all Defendants.

(13) If the order restrains “publication”, is the Claimant likely to establish at trial that publication should not be allowed: the HRA, section 12(3)?

59. The HRA, section 12(3) provides as follows:

“No such relief [ie. that defined by section 12(1) at [181] above] is to be granted so as to restrain publication before trial unless the court is satisfied that the applicant is likely to establish that publication should not be allowed”.

60. The arguments on both sides of this issue were fully ventilated in the hearing before Hill J ([184] – [195]) [**AB/1/36**] and Johnson J also addressed this issue in detail in his judgment [**AB/5/151**]. For present purposes, the Claimants do not challenge Hill J’s

finding at [196] that the injunctions do involve some elements of publication for these purposes and that section 12(3) applies (although it should be noted that Johnson J took the opposite view).

61. On that basis, the test is whether the Claimants are “likely” to succeed at a final trial, at least in relation to the “writing” aspects of the injunctions. The Court is invited to adopt Hill J’s conclusion that the test is met: at [198] [AB/1/39]; see also *Johnson Judgment* at [76] [AB/5/153] and [32] [AB/5/145].

(ix) Conclusion

62. For the reasons set out above, it is submitted that it is appropriate to extend the injunctions in the manner sought by the Claimants.

D. ALTERNATIVE SERVICE PROVISIONS AND PROPOSED VARIATIONS

63. The alternative methods of service which have already been endorsed by the Court in relation to Persons Unknown remain applicable and the Court is invited to expressly continue such methods, subject to the variations requested below.

64. Those variations are sought in circumstances where:

- a. Shell has identified that certain addresses are no longer addresses at which some of the Named Defendants and a non-party now reside; and
- b. practical difficulties have also come to light in relation to the requirement to serve copies of documents by email, given the file size of relevant attachments.

65. Applications have therefore been made to vary the alternative service provisions, so far as they relate to the relevant Claims as set out in the recent application notices and Oldfield 8 [SB/10/68].

Variations to alternative service for Named Defendants

66. The proposed variations in relation to alternative service on Named Defendants are (Oldfield 8 at §3.5) [SB/10/76]:

- a. variations to the first limb of paragraph 7 (7.1) of the Soole J Order (which requires the documents to be sent to each of the email addresses listed at Schedule 2 of the Order dated 15th March 2024), by sending an email to such email addresses and providing a link to the documents on the Data Site, rather than sending/attaching copies of the documents themselves to emails sent.

- b. for four of the Named Defendants (McKechnie, Burns, Harris and Goode), to permit service by the same method which is already set out in the Soole J Order at [8] in respect of the Fifteenth Defendant (Samuel Holland) (i.e. by serving them in the same manner as persons Unknown as permitted by paragraphs 7.1 and 7.2 of the Soole J Order). That is sought in circumstances where Shell has now discovered that the last known address supplied by the police for those additional Named Defendants is not the address at which those Named Defendants now reside;
- c. for two of those Named Defendants (McKechnie and Goode) and to the extent it is reasonably possible, service of future documents may also be effected by sending messages to the social media accounts which Shell has obtained, by sending them a link to the www.noticespublic.com (“**Data Site**”), instead of service on the postal addresses previously used) (i.e. by serving them in the same manner as Harris and Burns as permitted by paragraphs 7.4 and 7.5 of the Soole J Order); and
- d. to permit the sending of an email and a link to the documents on the Data Site to Named Defendants who have provided / provide an email address for service, rather than sending/attaching copies of the documents themselves to emails sent.

67. Shell also seeks an order that the steps already taken to effect service as set out in AJO8 on those Named Defendants shall be good service: Oldfield 8 at §3.5.1 [SB/10/76].

Variations to alternative service for Persons Unknown

68. The proposed variations in relation to alternative service on Persons Unknown are (Oldfield 8 at §4.4 §4.6; §4.19 – §4.25 [SB/10/78, 84—86].

- a. variations to the second limb of paragraph 22 (22.2) of the Soole J Order (which requires the documents to be sent to each of the email addresses listed at Schedule 2 of the Order dated 15th March 2024), by sending an email to such email addresses and providing a link to the documents on the Data Site, rather

than sending / attaching copies of the documents themselves to emails sent: Oldfield 8 at §4.1-4.6 [SB/10/77-78];

- b. variations to the third limb of paragraph 22 (22.3) of the Soole J Order (which requires documents to be sent to any person who has previously requested a copy) so as to permit the sending of a letter and a link to the documents on the Data Site to their last known address or sending an email to their email address and a link to the documents on the Data Site or sending an email/letter to their retained solicitors and a link to the documents on the Data Site. That is sought in circumstances where Shell has now discovered that the address held for one of those non-parties (Jessica Branch) is not at the address at which she now resides and that documents sent to that address may not come to her attention: Oldfield 8 at §4.21 [SB/10/85].

69. Shell also seeks an order that the steps already taken to effect service on Persons Unknown as set out in AJO8 shall be good service.

70. It is submitted that the circumstances set out above and in AJO8 amount to a ‘good reason’ for the Court to permit the variations to the existing alternative service provisions: CPR r. 6.15(1).

E. DIRECTIONS

63. Shell respectfully invites the Court to give directions with a view to listing the matters for a final hearing before the proposed backstop date of 12 November 2024.

71. The Court is invited to consider the proposed directions in the draft Order [SB/1/4] the key provisions of which are summarised (with dates) below:

- a. Para 14 (Defence) = **15 May 2024**
- b. Para 15 (Replies) = **19 June 2024**
- c. Para 16 (C’s witness evidence) = **3 July 2024**
- d. Para 17 (D’s witness evidence) = **24 July 2024**

- e. Listing of the final hearing in respect of all three Claims for a final hearing on first available date after **24 July 2024** with a time estimate of 2.5 days⁴ - such listing must take into account the fact that Shell will need approximately 4 weeks to comply with the alternative service provisions at the Petrol Stations - i.e. the need to put up the relevant warning notices – prior to the expiry of any existing injunction.
- f. Paras 16 – 19: Provision for alternative service of the relevant Order in the same manner as previously orders subject to the variations requested and explained above (paras 63).
- g. Para 20: Provision for any person affected to apply to be heard (as per Hill J’s Order at para 16) [C/9/1046].

64. CONCLUSION

72. For the reasons set out above, Shell invites the Court to grant the Orders sought and make the directions in accordance with the draft Order, or such other directions as the Court thinks fit.

MYRIAM STACEY K.C.

JOEL SEMAKULA

LANDMARK CHAMBERS

12 April 2024

⁴ It is these directions that have informed the backstop date of 12 November 2024.

Claim No: QB-2022-001241 (“Haven Claim”)

Claim No: QB-2022-001259 (“Tower Claim”)

Claim No: QB-2022-001420 (“Petrol Stations Claim”)

IN THE HIGH COURT OF JUSTICE

KINGS BENCH DIVISION

B E T W E E N :

(1) SHELL U.K. LIMITED

Claimant: (QB-2022-001241)

(2) SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED

Claimant (QB-2022-001259)

(3) SHELL U.K. OIL PRODUCTS LIMITED

Claimant (QB-2022-001420)

- and -

PERSONS UNKNOWN AND ORS

[more fully described in the Relevant Claim Form]

Defendants

CLAIMANTS’ SKELETON ARGUMENT
