

**Tenth Witness Statement of  
Alison Judith Oldfield  
Party: Claimants  
Exhibit: AJO10  
Date: 24 September 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. LIMITED**

**Claimant: (QB-2022-001241)**

**SHELL U.K. OIL PRODUCTS LIMITED**

**Claimant (QB-2022-001420)**

**- 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)**

**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)**

**(the "Proceedings")**

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**Tenth Witness Statement of Alison Judith Oldfield**

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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 AJO10**.

1.4 The purpose of this witness statement is to confirm the steps taken to serve the various parties to these Proceedings with documents relating to the hearings which took place in April 2024 and in preparation for the final hearing on 21st and 22<sup>nd</sup> October 2024. In particular:

In relation to the hearing which took place in April 2024;

1.4.1 The Sealed Orders made by Mr Justice Cotter on 17 April 2024 relating to the injunction and directions to final hearing in respect of each of Claim Nos: QB-2022-001420, QB-2022-001259 and QB-2022-0001241 (**"the Injunction Orders"**);

1.4.2 The Sealed Orders made by Mr Justice Cotter on 17 April 2024 relating to the service of future documents in respect of each of Claim Nos: QB-2022-001420, QB-2022-001259 and QB-2022-0001241 (**"the Service of Future Documents Orders"**);

(I will refer to the Injunction Orders and Service of Future Documents Orders collectively as the Orders of 17<sup>th</sup> April 2024)

1.4.3 Warning notices concerning the Orders of 17 April 2024 concerning Claim No QB-2022-1240;

And in relation to the preparations for the final hearing on 21<sup>st</sup> and 22<sup>nd</sup> October 2024:

1.4.4 the First Witness Statement of Paul Eilering (PE1) and Exhibit;

1.4.5 The Sealed Orders made by Mr Justice Cotter on 18<sup>th</sup> July 2024 relating to the listing of the final hearing in each of Claim Nos: QB-2022-001420, QB-2022-001259 and QB-2022-0001241 (**"the Listing Orders"**);

1.4.6 The notice of hearing dated 15<sup>th</sup> August 2024

1.5 For completeness I will also explain the steps taken to formally service my ninth witness statement - which deals with service upon the various parties to these Proceedings with certain documents immediately before the renewal hearing on 17<sup>th</sup> and 18<sup>th</sup> of April 2024 .

**2. Service upon the Named Defendants in the Petrol Station Proceedings (“the Named Defendants”)**

2.1 Paragraph 5 of the Service of Future Documents Order in respect of Claim No: QB-2022-001420 provides that the Named Defendants in the Petrol Station proceedings should be served:

2.1.1 by sending an email to each of the email addresses listed in Schedule 2 to that Order and providing a link to notify them that copies of such documents are available at <http://www.noticespublic.com>;

2.1.2 by uploading it to <http://www.noticespublic.com>;

2.1.3 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 17th April 2024 Order – Petrol Stations), by first class post, special delivery and/or by hand delivery to such address; or

2.1.4 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;

2.1.5 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:

2.1.6 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:

2.1.7 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:

2.1.8 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:

2.1.9 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).

2.2 Paragraph 8 of the Service of Future Documents Order in respect of Claim No: QB-2022-001420 provides that service of any further document in the proceedings on the Fifteenth Defendant (Holland) shall be validly effected by the same means as those applying to the First Defendant (persons unknown) unless and until the Fifteenth Defendant provides an alternative address for service.

2.3 As regards service of the Orders of 17 April 2024 specifically these provisions as to service were (in effect) replicated in paragraph 21 of the Injunction Order relating to Claim No: QB-2022-001420.

*Service of the 17<sup>th</sup> April 2024 Orders in respect of Claim No: QB-2022-001420;*

- 2.4 I shall refer to the 17<sup>th</sup> April 2024 Orders relating to Claim No: QB-2022-001420 as the **"Petrol Stations Orders of 17 April 2024"**.
- 2.5 Copies of the Petrol Stations Orders of 17 April 2024 were served by hand upon the Fifth to Ninth and the Eleventh to Fourteenth Defendants by delivering by hand using a process server, Finlays Legal Limited ("Finlays") in accordance with Paragraph 5 of the Sealed Order made by Mr Justice Cotter on 17 April 2024 in relation to the service of future documents in respect of Claim No: QB-2022-001420.
- 2.6 There is now produced and shown to me marked **AJO10 pages 3-13** copies of a series of statements of service prepared by the individuals at Finlays Legal Limited who were responsible for service of the Petrol Stations Orders of 17 April 2024. 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 documents listed at paragraph 1.4 to the Named Defendants as follows:
- 2.6.1 On 25<sup>th</sup> April 2024 to the last known address for David Nixon;
- 2.6.2 On 26<sup>th</sup> April 2024 to the last known addresses for, Christopher Ford, Sean Jordan, Micheal Edward Davies, Kate Bramfit, Simon Reding and Margaret Reid.
- 2.7 At **page 14-15 of AJO10** I have exhibited an example of the covering letter which accompanied the Petrol Stations Orders of 17 April 2024 in the case of each Named Defendant. The exact time of delivery in respect of each Named Defendant is recorded in the statements of service at **pages 3-13 of AJO10**.
- 2.8 We also sent a copy of the Petrol Stations Orders of 17 April 2024 to Charles Philip Laurie and Emma Ireland by emails sent at 09:26 and 09:25 respectively on 29<sup>th</sup> April 2024. Messrs Laurie and Ireland had previously confirmed that they were willing to accept service by email (see paragraph 2.3 of my eighth witness statement). The emails were sent by my colleague, Alexander Wright from this firm's centralised Shell Service email account – ShellService@eversheds-sutherland.com. Copies of the emails to Mr Laurie and Ms Ireland are at **pages 16-19 of AJO10**.
- 2.9 In addition a message was also sent on 26 April 2024 via direct message to the Facebook pages of Louise Harris, Louis McKechnie and Callum Goode advising that they could find copies of the Petrol Stations Orders of 17 April 2024 via the [www.noticespublic.com](http://www.noticespublic.com) data site. A copy of these messages can be found at **pages 20-25 of AJO10**.
- 2.10 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 5<sup>th</sup> March 2024. Screenshots of the error message we received when attempting to serve Ms Burns on 26 April 2024 can be found at **page 26 of AJO10**.

*Service of the First Witness Statement of Paul Eilering (PE1) and Exhibit upon the Named Defendants.*

- 2.11 In addition the First Witness Statement of Paul Eilering (PE1) and Exhibit has also been served upon the Named Defendants in relation to the Claimants' application for the final injunction in each of the Proceedings.
- 2.12 A copy of the First Witness Statement of Paul Eilering (PE1) and Exhibit was served by hand on the Fifth to Ninth and the Eleventh to Fourteenth Defendants by delivering by hand using Finlays (defined above) in accordance with Paragraph 5 of the Service of Future Documents Order in respect of Claim No: QB-2022-001420.
- 2.13 There is now produced and shown to me marked **AJO10 pages 27-36** copies of an additional series of statements of service prepared by the individuals at Finlays Legal Limited who were responsible for service of the First Witness Statement of Paul Eilering (PE1) and Exhibit. 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 Mr Eilering's witness statement and exhibit to the last known addresses for Christopher Ford, Sean Jordan, Micheal Edward Davies, Kate Bramfit, Simon Reding, David Nixon and Margaret Reid all on 2<sup>nd</sup> July 2024.
- 2.14 At **page 37-39 of AJO10** I have exhibited an example of the covering letter which accompanied the First Witness Statement of Paul Eilering (PE1) and Exhibit in the case of each Named Defendant to and which also confirms the contents of each envelope. The exact time of delivery of those document packs is recorded in the statements of service at **pages 27-36 of AJO10**.
- 2.15 We also sent a copy of the First Witness Statement of Paul Eilering (PE1) and Exhibit to Emma Ireland and Charles Philip Laurie by emails both sent at 11:03am on the 2<sup>nd</sup> July 2024. Copies of the emails to Mr Laurie and Ms Ireland are at **pages 40-43 of AJO10**. These emails were sent by my colleague, Alexander Wright from this firm's centralised Shell Service email account – ShellService@eversheds-sutherland.com.
- 2.16 In addition a message was also sent on 2 July 2024 via direct message to the Facebook pages of Louise Harris, Louis McKechnie and Callum Goode advising them that these documents had been uploaded onto [www.noticespublic.com](http://www.noticespublic.com). A copy of these messages can be found at **pages 44-46 of AJO10**.
- 2.17 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 5<sup>th</sup> 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 2 July 2024 can be found at **page 47 of AJO10**.

*Service of the Listing Order relating to Claim No: QB-2022-001420*

- 2.18 The Listing Order relating to Claim No: QB-2022-001420 (“**the Petrol Stations Listing Order**”) has also served upon the Named Defendants in relation to the Claimants’ application for the final injunction in each of the Proceedings.
- 2.19 A copy of the Petrol Stations Listing Order was served by hand on the Fifth to Ninth and the Eleventh to Fourteenth Defendants by delivering by hand using Finlays (defined above) in accordance with Paragraph 5 of the Service of Future Documents Order in respect of Claim No: QB-2022-001420.
- 2.20 There is now produced and shown to me marked **AJO10 pages 48-56** copies of an additional series of statements of service prepared by the individuals at Finlays Legal Limited who were responsible for service of the Petrol Stations Listing 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 an envelope containing the Petrol Stations Listing Order to the last known addresses for Margaret Reid on 7 August 2024 and Christopher Ford, Sean Jordan, Micheal Edward Davies, Kate Bramfit, Simon Reding and David Nixon all on 8 August 2024.
- 2.21 At **page 57 of AJO10** I have exhibited an example of the covering letter which accompanied the Petrol Stations Listing Order in the case of each Named Defendant to and which also confirms the contents of each envelope. The exact time of delivery of those document packs is recorded in the statements of service at **pages 48-56 of AJO10**.
- 2.22 We also sent a copy of the Petrol Stations Listing Order to Emma Ireland and Charles Philip Laurie by emails both sent at 14:21 on 7 August 2024. Copies of the emails to Mr Laurie and Ms Ireland are at **pages 58-59 of AJO10**. These emails were sent by my colleague, Alexander Wright from this firm’s centralised Shell Service email account – ShellService@eversheds-sutherland.com.
- 2.23 In addition a message was also sent on 7 August 2024 via direct message to the Facebook pages of Louise Harris, Louis McKechnie and Callum Goode advising them that these documents had been uploaded onto [www.noticespublic.com](http://www.noticespublic.com) A copy of these messages can be found at **pages 60-62 of AJO10**.
- 2.24 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 5<sup>th</sup> 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 7 August 2024 can be found at **page 63 of AJO10**.

*Service of the Notice of Hearing relating to Claim No: QB-2022-001420*



- 2.25 The Notice of Hearing relating to Claim No: QB-2022-001420 (“**the Petrol Stations Notice of Hearing**”) has also served upon the Named Defendants in relation to the Claimants’ application for the final injunction in each of the Proceedings.
- 2.26 A copy of the Petrol Stations Notice of Hearing was served by hand on the Fifth to Ninth and the Eleventh to Fourteenth Defendants by delivering by hand using Finlays (defined above) in accordance with Paragraph 5 of the Service of Future Documents Order in respect of Claim No: QB-2022-001420.
- 2.27 There is now produced and shown to me marked **AJO10 pages 64-77** copies of an additional series of statements of service prepared by the individuals at Finlays Legal Limited who were responsible for service of the Petrol Stations Notice of Hearing. 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 an envelope containing the Petrol Stations Listing Order to the last known addresses for Margaret Reid, Christopher Ford, Sean Jordan, Micheal Edward Davies, Kate Bramfit, Simon Reding and David Nixon all on 19 August 2024.
- 2.28 At **page 78-79 of AJO10** I have exhibited an example of the covering letter which accompanied the Petrol Stations Notice of Hearing in the case of each Named Defendant to and which also confirms the contents of each envelopej. The exact time of delivery of those document packs is recorded in the statements of service at **pages 64-77 of AJO10**.
- 2.29 We also sent a copy of the Petrol Stations Notice of Hearing to Emma Ireland and Charles Philip Laurie by emails both sent at 10:34 and 10:35 respectively on 15th August 2024. Copies of the emails to Mr Laurie and Ms Ireland are at **pages 80-83 of AJO10**. These emails were sent by my colleague, Alexander Wright from this firm’s centralised Shell Service email account – ShellService@eversheds-sutherland.com.
- 2.30 In addition a message was also sent on 15th August 2024 via direct message to the Facebook pages of Louise Harris, Louis McKechnie and Callum Goode advising them that these documents had been uploaded onto [www.noticespublic.com](http://www.noticespublic.com) A copy of these messages can be found at **pages 84-86 of AJO10**.
- 2.31 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 5<sup>th</sup> 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 15th August 2024 can be found at **page 87 of AJO10**.

*Service of the Ninth Witness Statement of Alison Oldfield*

2.32 For completeness we have also now formally served my ninth witness statement which confirmed service of certain documents (e.g. the hearing bundle and Claimants' skeleton argument) just before the hearing on 18<sup>th</sup> April 2024 and was handed up to the court at that hearing. It was also served upon the Eighth defendant Mr Laurie who was in court for that hearing. Mindful that it had not be formally served on the other defendants though, for completeness it was served upon the Fifth to Seventh, Ninth and the Eleventh to Fourteenth Defendants at the same time as the Notice of Hearing (paragraphs 2.25 to 2.28 above). It was served upon Ms Ireland under cover of an email timed at 16:38 on 15<sup>th</sup> August 2024.

2.33 Copies of the statements of service prepared by individuals at Finlays Limited in relation to service on my ninth witness statement on the various named defendants by hand are exhibited at **pages 64-77 of AJO10**. A copy of the email sent to Ms Ireland is exhibited at **page 88 of AJO10**.

### **3. Service upon Persons Unknown in each of the Proceedings**

3.1 I now set out the steps taken to serve various documents in relation to the hearing which took place in April 2024 and in preparation for the final hearing upon First Defendants in each set of Proceedings (being Persons Unknown).

3.2 To recap, paragraph 13 of the Service of Future Documents Order in relation to Claim No: QB-2022-001420 and paragraph 4 of the Service of Future Documents Order in relation to Claim Nos: QB-2022-1421 and QB-2022-1259 provides that the First Defendant in the each proceedings should be served by:

3.3 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/>

3.4 Uploading it to <https://www.noticespublic.com/>

3.5 sending a link to the documents on the [www.noticespublic.com](http://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).

3.6 In addition, paragraph 20 of the Injunction Order in the Petrol Station Proceedings and paragraph 19 of the Injunction Orders in relation to Claim Nos: QB-2022-1421 and QB-2022-1259 provides that service of those Orders specifically shall be validly served on the First Defendants in each Proceedings by:

3.6.1 replacing warning notices which had previously been affixed at the properties in respect of which the injunction had been granted;

- 3.6.2 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 the Warning notices are available at <https://www.noticespublic.com/>
- 3.6.3 Uploading the Warning Notice to <https://www.noticespublic.com/>
- 3.6.4 sending a link to the documents on the [www.noticespublic.com](http://www.noticespublic.com) data site including the warning notice 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).

*Service of the Injunction Orders and the Service of Future Documents Order*

3.7 The Orders of 17<sup>th</sup> April 2024 were served upon the First Defendants in the following ways:

*Uploading to [www.noticespublic.com](http://www.noticespublic.com)*

3.8 Copies of the Orders of 17 April 2024 were uploaded onto the [www.noticespublic.com](http://www.noticespublic.com) datasite on 25<sup>th</sup> April 2024.

*Service upon the Schedule 2 email addresses*

3.9 Copies of the Orders of 17 April 2024 were also served by email upon the Schedule 2 email addresses at 09:38 on 29<sup>th</sup> April 2024.

3.10 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. A copy of this email is exhibited at **pages 89-91 of AJO10**.

3.11 11 automatic responses were received in response to the above emails. Having reviewed the timings of the automated responses, I believe that:

3.11.1 2 automatic responses were received on 29 April 2024 from [xr-legal@riseup.net](mailto:xr-legal@riseup.net), and [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk) which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at pages **92-93** of **Exhibit AJO10**.

3.11.2 8 further automatic responses were received on 29 April 2024 from [eoextnt@protonmail.com](mailto:eoextnt@protonmail.com); [xrmidlandstraining@protonmail.com](mailto:xrmidlandstraining@protonmail.com); [xrpoliceliason@protonmail.com](mailto:xrpoliceliason@protonmail.com) [xrpeopleassembly@protonmail.com](mailto:xrpeopleassembly@protonmail.com) [xrdemocracy@protonmail.com](mailto:xrdemocracy@protonmail.com) [youthclimateswarm@protonmail.com](mailto:youthclimateswarm@protonmail.com) [xr-regionaldevelopment@protonmail.com](mailto:xr-regionaldevelopment@protonmail.com) and [xrne.training@protonmail.com](mailto:xrne.training@protonmail.com) noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages 94-101** of **Exhibit AJO10**). I understand from this firm's IT team that these emails

were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full.

3.11.3 1 further automatic response was received on 29 April 2024 from [support@xrnorth.org](mailto: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 102 of Exhibit AJO10**.

3.12 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.

3.13 I therefore consider that the remaining emails sent to the Schedule 2 email addresses (being those from whom no bounce back was received) were delivered.

#### *Service of the Warning Notices*

In addition Warning Notices in the form prescribed by paragraphs 19 and 20 of QB-2022-001421/ QB-2022-001259 and QB-2022-001240 respectively were affixed to premises covered by the relevant injunction on or before 21 June 2024 and Certificates of Service were lodged in respect of service those Warning Notices at court on that date. The time taken to effect service reflects the fact that that service of the Injunction Order in the Petrol Stations Proceedings is only deemed to have been effective once the Warning Notice has been affixed on at least half of the Claimant's Petrol Stations (as well as completing the other service methods set out in that Order).

#### *Service of the First Witness Statement of Paul Eilering (PE1) and Exhibit upon the Schedule 2 email addresses*

3.14 A copy of the First Witness Statement of Paul Eilering and Exhibit was sent to the Schedule 2 email addresses from [shell.service@eversheds-sutherland.com](mailto:shell.service@eversheds-sutherland.com) on 2 July 2024 at 11:02am. A copy of the relevant email is exhibited at pages **103-104** of **Exhibit AJO10**.

3.15 19 automatic responses were received in response to the above emails. Having reviewed the timings of the automated responses, I believe that:

3.15.1 10 automatic responses were received on 2 July 2024 from [xr-legal@rise-up.net](mailto:xr-legal@rise-up.net), [xrsw.trainings@gmail.com](mailto:xrsw.trainings@gmail.com), [artsxr@gmail.com](mailto:artsxr@gmail.com), [xrlondoncoord@gmail.com](mailto:xrlondoncoord@gmail.com), [xr.connectingcommunities@gmail.com](mailto:xr.connectingcommunities@gmail.com), [xrsocialmediaevents@gmail.com](mailto:xrsocialmediaevents@gmail.com), [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk), [xr-action@protonmail.com](mailto:xr-action@protonmail.com), [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk) and [xrlondoncommunityevents@gmail.com](mailto:xrlondoncommunityevents@gmail.com) and which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at pages **105-115** of **Exhibit AJO10**.

3.15.2 8 further automatic responses were received on 2 July 2024 from [eoexrtnt@protonmail.com](mailto:eoexrtnt@protonmail.com), [xrne.training@protonmail.com](mailto:xrne.training@protonmail.com), [xrpoliceliasion@protonmail.com](mailto:xrpoliceliasion@protonmail.com), [support@xrnorth.org](mailto:support@xrnorth.org), [xr-regionaldevelopment@protonmail.com](mailto:xr-regionaldevelopment@protonmail.com), [xrdemocracy@protonmail.com](mailto:xrdemocracy@protonmail.com), [xrmidlandstraining@protonmail.com](mailto:xrmidlandstraining@protonmail.com), [xr-peoplesassembly@protonmail.com](mailto:xr-peoplesassembly@protonmail.com) and [youthclimateswarm@protonmail.com](mailto:youthclimateswarm@protonmail.com) noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages 116-123** of **Exhibit AJO10**). I understand from this firm's IT team that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full.

3.15.1 1 further automatic response was received on 2 July 2024 from [support@xrnorth.org](mailto: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 124** of **Exhibit AJO10**.

3.16 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.

3.17 I therefore consider that the remaining emails sent to the Schedule 2 email addresses (being those from whom no bounce back was received) were delivered.

*Service of the Listing Order relating to each proceedings*

3.18 A copy of the Listing Order in relation to each proceedings was sent to the Schedule 2 email addresses from [shell.service@eversheds-sutherland.com](mailto:shell.service@eversheds-sutherland.com) on 7 August 2024 at 14:15. A copy of the relevant email is exhibited at pages **125-126** of **Exhibit AJO10**.

3.19 18 automatic responses were received in response to the above emails. Having reviewed the timings of the automated responses, I believe that:

3.19.1 9 automatic responses were received on 7 August 2024 from [xr-legal@rise-up.net](mailto:xr-legal@rise-up.net), [xrsw.trainings@gmail.com](mailto:xrsw.trainings@gmail.com), [artsxr@gmail.com](mailto:artsxr@gmail.com), [xrlondoncoord@gmail.com](mailto:xrlondoncoord@gmail.com), [xr.connectingcommunities@gmail.com](mailto:xr.connectingcommunities@gmail.com), [xrsocialmediaevents@gmail.com](mailto:xrsocialmediaevents@gmail.com), [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk), [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk) and [xrlondoncommunityevents@gmail.com](mailto:xrlondoncommunityevents@gmail.com) and which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at pages **127-135** of **Exhibit AJO10**.

3.19.2 8 further automatic responses were received on 7 August 2024 from [eoexrtnt@protonmail.com](mailto:eoexrtnt@protonmail.com), [xrne.training@protonmail.com](mailto:xrne.training@protonmail.com), [xrpoliceliasion@protonmail.com](mailto:xrpoliceliasion@protonmail.com), [support@xrnorth.org](mailto:support@xrnorth.org), [xr-regionaldevelopment@protonmail.com](mailto:xr-regionaldevelopment@protonmail.com), [xrdemocracy@protonmail.com](mailto:xrdemocracy@protonmail.com), [xrmidlandstraining@protonmail.com](mailto:xrmidlandstraining@protonmail.com), [xr-peoplesassembly@protonmail.com](mailto:xr-peoplesassembly@protonmail.com) and

[youthclimateswarm@protonmail.com](mailto:youthclimateswarm@protonmail.com) noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages 136-143** of **Exhibit AJO10**). I understand from this firm's IT team that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full.

3.19.3 1 further automatic response was received on 7 August 2024 from [support@xrnorth.org](mailto: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 AJO10**.

3.20 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.

3.21 I therefore consider that the remaining emails sent to the Schedule 2 email addresses (being those from whom no bounce back was received) were delivered.

*Service of Notice of Hearing relating to each proceedings*

3.22 An email was sent to the Schedule 2 email addresses at 10:39 on 15<sup>th</sup> August 2024 from [shell.service@eversheds-sutherland.com](mailto:shell.service@eversheds-sutherland.com) informing them that the final hearing would take place on 21 and 22<sup>nd</sup> October 2024. A copy of the relevant email is exhibited at **pages 145** of **Exhibit AJO10**.

3.23 17 automatic responses were received in response to the above emails. Having reviewed the timings of the automated responses, I believe that:

3.23.1 8 automatic responses were received on 15th August 2024 from [xr-legal@rise-up.net](mailto:xr-legal@rise-up.net), [xrsw.trainings@gmail.com](mailto:xrsw.trainings@gmail.com), [artsxr@gmail.com](mailto:artsxr@gmail.com), [xrlondoncoord@gmail.com](mailto:xrlondoncoord@gmail.com), [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk), [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk) and [xrlondoncommunityevents@gmail.com](mailto:xrlondoncommunityevents@gmail.com) and which appear to be automatic tailored responses to any emails received. A copy of the relevant emails are exhibited at **pages 146-153** of **Exhibit AJO10**.

3.23.2 8 further automatic responses were received on 15th August 2024 from [eoexrtnt@protonmail.com](mailto:eoexrtnt@protonmail.com), [xrne.training@protonmail.com](mailto:xrne.training@protonmail.com), [xrpoliceliason@protonmail.com](mailto:xrpoliceliason@protonmail.com), [support@xrnorth.org](mailto:support@xrnorth.org), [xr-regionaldevelopment@protonmail.com](mailto:xr-regionaldevelopment@protonmail.com), [xrdemocracy@protonmail.com](mailto:xrdemocracy@protonmail.com), [xrmidlandstraining@protonmail.com](mailto:xrmidlandstraining@protonmail.com), [xr-peoplesassembly@protonmail.com](mailto:xr-peoplesassembly@protonmail.com) and [youthclimateswarm@protonmail.com](mailto:youthclimateswarm@protonmail.com) noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages 154-161** of **Exhibit AJO10**). I understand from this firm's IT team that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full.

3.23.3 1 further automatic response was received on 15<sup>th</sup> August 2024 from [support@xrnorth.org](mailto: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 162 of Exhibit AJO10**

3.24 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.

3.25 I therefore consider that the remaining emails sent to the Schedule 2 email addresses (being those from whom no bounce back was received) were delivered.

*Service of the Ninth Witness Statement of Alison Oldfield*

3.26 An email was sent to the Schedule 2 email addresses at 16:39 on 15<sup>th</sup> August 2024 from [shell.service@eversheds-sutherland.com](mailto:shell.service@eversheds-sutherland.com) serving the recipients with a copy of my ninth witness statement together with a link to the exhibit AJO9. A copy of the relevant email is exhibited at pages **163 of Exhibit AJO10**.

3.27 10 automatic responses were received in response to the above emails. Having reviewed the timings of the automated responses, I believe that:

3.27.1 1 automatic response was received on 15<sup>th</sup> August 2024 from [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk), which appears to be an automatic tailored response to any emails received. A copy of the relevant email is exhibited at page **164 of Exhibit AJO10**.

3.27.2 8 further automatic responses were received on 15<sup>th</sup> August 2024 from [eoexrtnt@protonmail.com](mailto:eoexrtnt@protonmail.com), [xrne.training@protonmail.com](mailto:xrne.training@protonmail.com), [xrpoliceliaison@protonmail.com](mailto:xrpoliceliaison@protonmail.com), [support@xrnorth.org](mailto:support@xrnorth.org), [xr-regionaldevelopment@protonmail.com](mailto:xr-regionaldevelopment@protonmail.com), [xrdemocracy@protonmail.com](mailto:xrdemocracy@protonmail.com), [xrmidlandstraining@protonmail.com](mailto:xrmidlandstraining@protonmail.com), [xr-peoplesassembly@protonmail.com](mailto:xr-peoplesassembly@protonmail.com) and [youthclimateswarm@protonmail.com](mailto:youthclimateswarm@protonmail.com) noting the "mailbox quota exceeded" or "mailbox full" (exhibited at **pages 165-172 of Exhibit AJO10**). I understand from this firm's IT team that these emails were properly sent but will not have been delivered to / received by the recipient mailbox as the mailboxes were full.

3.27.1 1 further automatic response was received on 15<sup>th</sup> August 2024 from [support@xrnorth.org](mailto: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 173 of Exhibit AJO10**

3.28 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.

3.29 I therefore consider that the remaining emails sent to the Schedule 2 email addresses (being those from whom no bounce back was received) were delivered.

#### **4. Service upon non-parties to the Proceedings**

4.1 In addition, the following documents were sent to individuals who have previously asked to receive documents in connection with the proceedings.

##### *Petrol Stations Orders of 17 April 2024*

4.2 Michaela Marc and Nick Hoffman were sent the Petrol Stations Orders of 17 April 2024 by email on 29 April 2024 at 9:25am. A copy of those emails are exhibited at page **174-177** of **Exhibit AJO10**.

##### *Orders of 17 April 2024*

4.3 Alice Hardy of Bindmans LLP was sent the Cotter J Orders of 17 April 2024 by email on 29 April 2024 at 9:44am. A copy of the email is exhibited at page **178** of **Exhibit AJO10**.

##### *Service of the First Witness Statement of Paul Eilering (PE1) and Exhibit upon non-parties*

4.4 Michaela Marc and Nick Hoffman were sent the First Witness Statement of Paul Eilering (PE1) and Exhibit by email on 2 July 2024 at 11:04am. A copy of those emails are exhibited at pages **179-180** of **Exhibit AJO10**.

4.5 Alice Hardy of Bindmans LLP was sent the First Witness Statement of Paul Eilering (PE1) and Exhibit by email on 2 July 2024 at 11:06am. A copy of the email is exhibited at page **181** of **Exhibit AJO10**.

##### *The Listing Order*

4.6 Michaela Marc and Nick Hoffman were sent the Listing Order by email on 7 August 2024 at 14:19 and 14:16 respectively. A copy of those emails are exhibited at pages **182-183** of **Exhibit AJO10**.

4.7 In response Mr Hoffman confirmed that he no longer wished to receive documentation in relation to these proceedings. A copy of that email is exhibited at pages **185-187** of **Exhibit AJO10**.

4.8 Alice Hardy of Bindmans LLP was sent the Listing Order by email on 7 August 2024 at 14:11. A copy of the email is exhibited at pages **184** of **Exhibit AJO10**.

##### *Notice of Hearing*



- 4.9 Michaela Marc was informed that the final hearing will take place on 21<sup>st</sup> and 22<sup>nd</sup> October 2024 by an email timed at 10:39 on 15<sup>th</sup> August 2024. A copy of that email is exhibited at page **188** of **Exhibit AJO10**.
- 4.10 Alice Hardy of Bindmans LLP was informed that the final hearing will take place on 21<sup>st</sup> and 22<sup>nd</sup> October 2024 by email on 15<sup>th</sup> August 2024 at 10:38 am. A copy of the email is exhibited at pages **189** of **Exhibit AJO10**.

*Ninth Witness Statement of Alison Oldfield*

- 4.11 Michaela Marc was served with a copy of my ninth witness statement together with a link to Exhibit AJO9 by email on 15<sup>th</sup> August 2024 at 16:39. A copy of that email is exhibited at page **190** of **Exhibit AJO10**.
- 4.12 Alice Hardy of Bindmans LLP was sent a copy of my ninth witness statement together with a link to Exhibit AJO9 by email at 16:38 on 15<sup>th</sup> August 2024. A copy of the email is exhibited at page **191** of **Exhibit AJO10**.

*Service upon other postal addresses*

- 4.13 Finally, copies of documents were sent to the following other addresses by hand delivery via Finlays as follows.
- 4.14 Michael Gibson has previously requested copies of documents in relation to the Petrol Stations proceedings only. Therefore copies of the Petrol Stations Orders of 17 April 2024 were served by hand on him on the 26<sup>th</sup> April 2024. The details are confirmed in the statements of service at **pages 3-13 of AJO10**.
- 4.15 On the 28 June 2024, Michael Gibson signed a confirmation slip acknowledging that he no longer wishes to receive documents relating to the Proceedings. A copy of the confirmation slip is exhibited at page **192** of **Exhibit AJO10**.
- 4.16 Bindmans LLP were served the Orders of 17 April 2024 by hand on 26 April 2024. The details are confirmed in the statements of service at **pages 3-13 of AJO10**. Bearing in mind the provisions of paragraphs 13 (c) and 4 (c) of the Orders of 17<sup>th</sup> April 2024 – which permit service of documents by sending them to anyone who has requested copy documents by email or post, details of the Listing Order, notice of hearing and my ninth witness statement were sent to Bindmans LLP via email only to Alice Hardy (paragraphs 4.10 and 4.12 above.)

**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: 24 September 2024**