

**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**

**Proposed First Defendant (QB-2022-001420)**

**Louis McKechnie**

**Proposed Second Defendant (QB-2022-001420)**

**Louise Harris**

**Proposed Third Defendant (QB-2022-001420)**

**Callum Goode**

**Proposed Fourth Defendant (QB-2022-001420)**

**Christopher Ford**

**Proposed Fifth Defendant (QB-2022-001420)**

**Sean Jordan**

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

**Proposed Sixth Defendant (QB-2022-001420)**

**Emma Ireland**  
**Proposed Seventh Defendant (QB-2022-001420)**

**Charles Philip Laurie**  
**Proposed Eighth Defendant (QB-2022-001420)**

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

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

**Simon Reding**  
**Proposed Eleventh Defendant (QB-2022-001420)**

**Kate Bramfit**  
**Proposed Twelfth Defendant (QB-2022-001420)**

**Stephen Gingell**  
**Proposed Thirteenth Defendant (QB-2022-001420)**

**Margaret Reid**  
**Proposed Fourteenth Defendant (QB-2022-001420)**

**David Nixon**  
**Proposed Fifteenth Defendant (QB-2022-001420)**

**Samuel Holland**  
**Proposed Sixteenth Defendant (QB-2022-001420)**

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**DRAFT ORDER**

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**RECITALS**

**UPON** reading the orders of Hill J dated 23 May 2023 relating to claims QB-2022-001259 (the "**Shell Centre Tower Injunction Order**"), QB-2022-001420 (the "**Shell Petrol Stations Injunction Order**") and QB-2022-001241 (the "**Shell Haven Injunction Order**") (together the "**Hill J Orders**")

**UPON** the Claimants wishing to progress the claims to a final hearing and the Claimant of QB-2022-001420 having identified persons to be joined to the Shell Petrol Station Proceedings and recognising that the Application Documents should be served upon them as named parties and that those Defendants may wish to file a Defence.

**UPON** reading the Claimants' application dated 12 February 2024 for (a) permission to add certain individuals whose names are now known to the Claimant of QB-2022-001420 and (b) service of the application and claim documents and any other documents made in respect of QB-2022-001420 on the Named Defendants pursuant to CPR r. 6.9 and for permission to serve certain of the Named

Defendants by alternative service pursuant to CPR r. 6.15 and 6.27; and (c) directions for final hearings for each of the claims QB-2022-001259, QB-2022-001420 and QB-2022-001241 and for the claims to continue to be managed together.

**IT IS ORDERED THAT:**

**The Application to add Defendants to the Shell Petrol Stations Proceedings**

1. The persons named in Schedule 1 to this order (the "**Named Defendants**") be added to claim QB-2022-001420 (the "**Shell Petrol Stations Proceedings**") as the 2<sup>nd</sup> – 16<sup>th</sup> Defendants.

**Service of this Order and the Application Documents on the Named Defendants to the Shell Petrol Stations Proceedings and Alternative Service on Ms Burns and Ms Harris in addition**

2. The QB-2022-001420 claim form, particulars of claim, the Shell Petrol Stations Injunction Order, together with details of the Claimant's website (<http://www.noticespublic.com/>) on which copies of supporting evidence and all other documents filed during the course of the QB-2022-001420 proceedings will be available shall together be referred to as the "**Application Documents**".

3. Pursuant to CPR 6.9, 6.15 and 6.27 the Claimant in the proceedings QB-2022-001420 shall serve this Order, the Application Documents and any other document in the proceedings QB-2022-001420:

- 3.1 on the Named Defendants by the following methods:

- 3.1.1 by posting copies to the last known address which was supplied to the QB-2022-001420 Claimant by the relevant police authority (and as set out in Schedule 1 to this Order), by first class post or by hand

- 3.1.2 In addition, in respect of the Third Defendant, by sending a message to the Third Defendant's social media account (as set out below) providing a link to the Claimant's website (<http://www.noticespublic.com/>) on which copies of the Application Documents will be available and specifically noting in the message that copies of the Application Documents (including the Claimants' application dated 12 February 2024) are available via that website

- 3.1.2.1 <https://www.facebook.com/lolly.harris>

- 3.1.2.2 Louise Harris (@louisehmusic) / X (twitter.com)

- 3.1.2.3 <https://www.instagram.com/louiseharrismusic/>

3.1.3 In addition, in respect of the Tenth Defendant, by sending a message to the Tenth Defendant's social media account (as set out below) providing a link to the Claimant's website (<http://www.noticespublic.com/>) on which copies of the Application Documents will be available and specifically noting in the message that copies of the Application Documents (including the Claimants' application dated 12 February 2024) are available via that website

3.1.3.1 <https://www.linkedin.com/in/tez-burns/>

4. Service of this Order and the Application Documents in accordance with paragraph 3 above shall:

4.1 Be verified by the completion of a certificate of service to be filed by the Claimant in the proceedings QB-2022-001420 with the Court;

4.2 in respect of each of the Named Defendants individually, be deemed effective as at the latest date on which all the methods of service referred to above have been completed (as applicable to them individually) and shall be within 7 days upon receipt of the sealed order from the Court. Such date shall be specified by the certificate of service.

4.3 Be good and sufficient service of this Order on the Named Defendants and each of them.

5. In relation to paragraphs 3.1.2 and 3.1.3 (where service by alternative methods is required), the period for filing (i) an acknowledgment of service, (ii) admission or (iii) defence for the purposes of CPR 6.15(4) shall be the dates set out in paragraphs 6 and 7.

#### **Directions for final hearing for all claims**

6. The Named Defendants and any other person falling within the definition of the First Defendant (in respect of each of the claims QB-2022-001259, QB-2022-001420 and QB-2022-001241) who may wish to defend the claims or any of them (or any interested party who might wish to do so) shall file and serve on the relevant Claimant an Acknowledgment of Service, (or, if no acknowledgment is served, an Admission or a Defence) by no later than **[Insert date 21 days from the date of this order]**

*Explanatory Note to the Court: the reference above to 21 days from the date of the order is intended to reflect the 7 day period upon which the Claimants are to complete the steps in paragraph 3 to effect service, plus a 14 day period for the Named Defendants to file (i) an acknowledgment of service (ii) admission or (iii) defence for the purposes of CPR 6.15(4). For practical purposes, the Claimants are content for such date to be calculated as 21 days from the date of the order (notwithstanding that completion of the steps in accordance with paragraph 3 may in fact be completed earlier than the 7<sup>th</sup> day)*

7. If an Acknowledgment of Service is filed in accordance with paragraph 6 above, any Named Defendant and other person falling within the definition of the First Defendant (in respect of each of the claims QB-2022-001259, QB-2022-001420 and QB-2022-001241) or any interested party 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 [**Insert Date 35 days from the date of this order**]

*Explanatory Note to the Court: As above, the reference above to 35 days from the date of the order is intended to reflect the 7 day period upon which the Claimants are to complete the steps in paragraph 3 to effect service, plus a 28 day period for the Named Defendants to file (i) an acknowledgment of service (ii) admission or (iii) defence for the purposes of CPR 6.15(4). For practical purposes, the Claimants are content for such date to be calculated as 35 days from the date of the order (notwithstanding that completion of the steps in accordance with paragraph 3 may in fact be completed earlier than the 7<sup>th</sup> day)*

8. Any Named Defendant or person falling within the definition of the First Defendant (in respect of each of the claims QB-2022-001259, QB-2022-001420 and QB-2022-001241) or interested party who fails to comply with paragraphs 6 or 7 above will need to apply for permission to be heard at the final hearing if they wish to defend the claims or any of them but if they wish to do so they must inform the Claimants' 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 as set out in paragraph 16 below.

9. The Claimants are to file and serve any updating evidence that they wish to rely upon in support of their claims for final injunctions by 4pm on [**Date 2 weeks after filing of AoS/Defence**].

*Explanatory Note to the Court: As above, the Claimant must take the steps set out in paragraph 3 to effect service within 7 days of the date of the order and therefore the directions flow from the date of the order. The timetable for the proposed directions has been calculated by reference to the date suggested for the preceding direction.*

10. The Defendants are to file and serve any evidence upon which they seek to rely upon by [**Date 2 weeks after Claimant's evidence**].

*Explanatory Note to the Court: As above, the Claimant must take the steps set out in paragraph 3 to effect service within 7 days of the date of the order and therefore the remainder of the directions flow from the date of the order. The timetable for the proposed directions has been calculated by reference to the date suggested for the preceding direction.*

11. The claims be listed for final hearing on the first available date in April 2024 with a time estimate of 1.5 days and if possible prior to 12 May 2024 (when the current injunction expires).

12. If it is not possible to list a final hearing date by 12 May 2024, the Hill J Orders shall be reconsidered at a short hearing which shall be listed on a date prior to 12 May 2024 (with a time estimate of no more than 2 hours) at which the Court will determine whether a short continuation of the Hill J Orders is justified to cover the additional time required for the claims to be listed for a final hearing.

13. In the event that the Claimants apply for summary judgment of the claims by **[Date 2 weeks after the date specified in paragraph 7]**, such application shall be heard at the outset of the final hearing date listed under paragraph 11 above.
14. Skeleton arguments are to be filed two days before the final hearing date.
15. The Claimants are to file two hard copies of the hearing bundle and an electronic copy of the bundle in a form compliant with the Kings Bench Division Guide 2022 by 5 days before the final hearing date.
16. Any Defendant who has not complied with paragraphs 6 and 7 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 who is not a Named Defendant 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 on Persons Unknown / The First Defendant in each of the claims QB-2022-001259, QB-2022-001420 and QB-2022-001241**

17. Service of this Order upon the First Defendant in each of the claims QB-2022-001259, QB-2022-001420 and QB-2022-001241 (being the relevant 'Persons Unknown' in each case) shall be validly effected by:
  - 17.1 uploading a copy of this Order to <http://www.noticespublic.com/>
  - 17.2 sending a copy of this Order to the email addresses set out in the Second Schedule of this Order
  - 17.3 sending a copy of this Order to any person who has previously requested a copy of documents in these proceedings from the Claimants or their solicitors, either by post or email (as was requested by that person)
18. The taking of such steps as are set out in paragraph 17 above shall be good and sufficient service of this Order upon the First Defendant in each of the claims QB-2022-001259, QB-2022-001420 and QB-2022-001241 (being the relevant 'Persons Unknown' in each case).
19. Pursuant to CPR 6.15 and 6.27, this Order shall be deemed to be served on the latest date on which all the methods of service referred to in paragraph 17 have been completed in respect of this Order, such date to be verified by the completion of a certificate of service or witness statement.
20. Costs in the case.
21. The Court will provide sealed copies of this Order to the Claimants' solicitors for service (whose details are below).

**Communication With The Claimant**

The Claimant's solicitors' contact details are:

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

**SCHEDULE 1**

“Named Defendants” are detailed in the below table and shall be added to the proceedings as follows:

- (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) **Stephen Gingell**
- (14) **Margaret Reid**
- (15) **David Nixon**
- (16) **Samuel Holland**

No	Name	Address	Incident / Property	Offence(s) arrested for	Undertaking provided?
2.	Louis McKechnie				No response
3.	Louise Harris				No response (no proof of delivery obtained)
4.	Callum Goode				No response
5.	Christopher Ford				No response



No	Name	Address	Incident Property /	Offence(s) arrested for	Undertaking provided?
6.	Sean Jordan (also known as Sean Irish, John Jordan, John Michael Jordan and Sean O'Rourke)	[REDACTED]	[REDACTED]	[REDACTED]	No response
7.	Emma Ireland				No (refused to provide undertaking, however no further details regarding position provided)
8.	Charles Philip Laurie				No response
9.	Michael Edward Davies also previously known as Michael Edward Jones				No response
10.	Tessa-Marie Burns (also known as Tez Burns)				No response (no proof of delivery obtained)
11.	Simon Reding				No response
12.	Kate Bramfit				No response
13.	Stephen Gingell				No response

No	Name	Address	Incident / Property	Offence(s) arrested for	Undertaking provided?
14.	Margaret Reid	[REDACTED]	[REDACTED]	[REDACTED]	No response
15.	David Nixon				No response
16.	Samuel Holland				No response (letter returned with a note that Mr Holland no longer lives there)

**Schedule 2**  
**(list of email addresses)**

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

- 1.29 [xrlondoncoord@gmail.com](mailto:xrlondoncoord@gmail.com)
- 1.30 [XRMidlands@protonmail.com](mailto:XRMidlands@protonmail.com)
- 1.31 [xrne@protonmail.com](mailto:xrne@protonmail.com)
- 1.32 [support@xrnorth.org](mailto:support@xrnorth.org)
- 1.33 [xrni@rebellion.earth](mailto:xrni@rebellion.earth)
- 1.34 [xrscotland@gmail.com](mailto:xrscotland@gmail.com)
- 1.35 [XR-SouthEastRegionalTeam@protonmail.com](mailto:XR-SouthEastRegionalTeam@protonmail.com)
- 1.36 [xr.regional.sw@protonmail.com](mailto:xr.regional.sw@protonmail.com)
- 1.37 [talksandtraining.xrbristol@protonmail.com](mailto:talksandtraining.xrbristol@protonmail.com)
- 1.38 [xrcymrutalksandtraining@gmail.com](mailto:xrcymrutalksandtraining@gmail.com)
- 1.39 [eoexrtnt@protonmail.com](mailto:eoexrtnt@protonmail.com)
- 1.40 [xrlondoncommunityevents@gmail.com](mailto:xrlondoncommunityevents@gmail.com)
- 1.41 [xrmidlandstraining@protonmail.com](mailto:xrmidlandstraining@protonmail.com)
- 1.42 [XRNE.training@protonmail.com](mailto:XRNE.training@protonmail.com)
- 1.43 [xrnw.training@gmail.com](mailto:xrnw.training@gmail.com)
- 1.44 [xryorkshire.training@gmail.com](mailto:xryorkshire.training@gmail.com)
- 1.45 [xrni.tt@rebellion.earth](mailto:xrni.tt@rebellion.earth)
- 1.46 [talksandtrainings.scotland@extinctionrebellion.uk](mailto:talksandtrainings.scotland@extinctionrebellion.uk)
- 1.47 [xrttse@gmail.com](mailto:xrttse@gmail.com)
- 1.48 [xrsw.trainings@gmail.com](mailto:xrsw.trainings@gmail.com)

## 2. **JUST STOP OIL**

- 2.1 [Ring2021@protonmail.com](mailto:Ring2021@protonmail.com)
- 2.2 [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- 2.3 [youthclimateswarm@protonmail.com](mailto:youthclimateswarm@protonmail.com)

## 3. **YOUTH CLIMATE SWARM**

- 3.1 [youthclimateswarm@protonmail.com](mailto:youthclimateswarm@protonmail.com)