

N244

Application notice

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

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Name of court High Court of Justice King's Bench Division		Claim no. QB-2022-001241/ 001259/001420
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)	
	H W F - [] [] [] - [] [] []	
Warrant no. (if applicable)		
Claimant's name (including ref.) (1) Shell U.K. Limited (2) Shell International Petroleum Company Limited (3) Shell U.K. Oil Products Limited 356009.000001/Oldfield		
Defendant's name (including ref.) Persons Unknown (more fully described in the appropriate Claim form)		
Date	QB-2022-001420	

Sub Event ID: 69

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?

The Claimants

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

An order:

- Adding 15 individuals arrested as named defendants to the proceedings QB-2022-001420 (the "**Proposed Defendants**")
- Providing directions for trial for each of the proceedings (QB-2022-001241, QB-2022-001259 and QB-2022-001420)
- Granting permission to serve this application and associated documents relating to QB-2022-001420 on certain named defendants by alternative means

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 to be fixed in April 2024. Injunction backstop of 23:50 on 12 May 2024

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

Proposed Named Defendants

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

See Schedule 1 of Draft Order provided

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.

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
12	02	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.

356009.000001/Oldfield

Email

alisonoldfield@eversheds-sutherland.com