

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

Claim No. QB-2022-001241

Before:

On:

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

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DRAFT ORDER

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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 final hearing pursuant to paragraph 15 of the Order of Cotter J dated 24 April 2024

**AND UPON** hearing from Leading Counsel for the Claimant [and hearing submissions from Ms Ireland and Mr Laurie who are unrepresented and no other defendant appearing or being represented]

**AND UPON** the Claimant giving the undertaking set out in the First Schedule to this Order

**IT IS ORDERED:**

**DEFINITIONS:**

1. the "**Shell Haven Injunction Order**" means the Order of Cotter J dated 24 April 2024 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 Third Schedule and marked "Plan of Shell Haven Site"
3. "**Warning Notice**" means a notice substantially in the form as set out in the Fourth 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. Subject to the annual review referred to in paragraph 14, with immediate effect until 23:59 on [12 November 2029], unless varied, discharged or extended by further order, the Defendants and each of them must not do any of the acts listed in paragraphs 5 and 6 of this Order in express or implied agreement with any other person.
5. 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 Third 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.
6. 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.

## **SERVICE OF THIS ORDER**

7. 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 uploaded to [www.shell.co.uk](http://www.shell.co.uk);
  - c. Sending an email to each of the addresses set out in the Second 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](http://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).
8. 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 to be served on the latest date on which all the methods of service referred to in paragraph 7 above have been completed (such date shall be specified by the certificate of service).
9. The taking of such steps as are set out in paragraph 7 shall be good and sufficient service of this Order upon the Defendants and each of them.
10. The Court will provide sealed copies of this Order to the Claimant's solicitors for service (whose details are set out below).

## **SERVICE OF FUTURE DOCUMENTS**

11. Pursuant to CPR 6.15 and 6.27 and CPR 81.4(c) and (d), service of any further document in these proceedings upon the Defendants (other than any Defendant who is subsequently named in these proceedings), shall be validly effected by:
  - a. Sending an email to each of the email addresses listed in the Second Schedule to this Order and providing a link to and 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 <https://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)
12. Such service shall be deemed effective on the latest date on which all of the steps in paragraph 11 have been completed.

## **LIBERTY TO APPLY AND FURTHER DIRECTIONS**

13. 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.

14. There shall be, subject to Court availability, for so long as this Order is in force, a hearing to annually review this final injunction Order to determine whether any material change has arisen since the granting of this Order that provides grounds for declining to continue the injunction as set out in paragraphs 4- 6 above. Such annual reviews shall take place at a hearing to be listed no later than 1 month before the anniversary of this Order. The Claimant shall liaise with the Court to list any such hearing and provide a suggested time estimate and provide the Defendants with the notice of hearing as soon as practicable in accordance with paragraph 11 above.
15. The Claimant shall have permission to file and serve any further evidence not less than 14 days before the review hearing.
16. The Claimant shall 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 7 days before the review hearing.
17. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 3 days before the review hearing.
18. The Parties have liberty to apply to extend this Order or to seek further directions.

**[COSTS**

19. ]

**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](mailto:shell.service@eversheds-sutherland.com)

### **First 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.

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

1. **EXTINCTION REBELLION UK**
- 1.1 <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)

**Third Schedule  
Plans of Shell Haven Site**







**Fourth Schedule**  
**Form of Warning Notice**  
**SHELL U.K. LIMITED**

**Important  
Notice**

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

On                    2024 and following a final hearing held on [21/22] October 2024, a final 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](mailto:shell.service@eversheds-sutherland.com).