

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
Before Mr Justice Cotter
17th April 2024

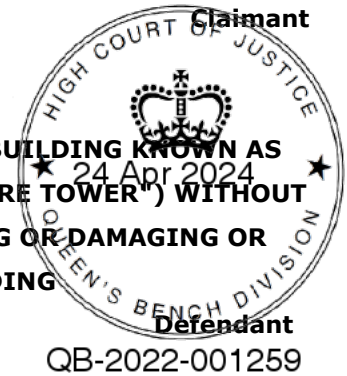
Claim No. QB-2022-001259

BETWEEN

SHELL INTERNATIONAL PETROLEUM COMPANY LIMITED

- 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



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 and hearing submissions from Mr Laurie in person

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 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. This Order shall continue to operate until 12 November 2024 or the date which corresponds with 4 weeks after the date of the final hearing (whichever is later), 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 must file and serve on the Claimant an Acknowledgment of Service by no later than 4pm on 30 April 2024 (and paragraph 15 of the Order of Soole J dated 15 March 2024 shall be amended accordingly).
9. Any Defendants who may wish to defend the claims or any of them and to be heard at the final hearing shall, file and serve their Defence by no later than 15 May 2024.
10. Any Defendant who has not filed an Acknowledgment of Service and Defence in accordance with paragraphs 8 and 9 above, shall not be entitled to defend the claims, be heard at the final hearing or take any further role in these proceedings without further order of the Court.
11. If any Defences are filed and served in accordance with paragraph 9 above, the Claimant shall file and serve its Replies (if any) to any such Defences by 19 June 2024.
12. If any Defences are filed and served in accordance with paragraph 9 above, the Claimant shall file and serve any evidence that they wish to rely upon in response to any such Defences by 3 July 2024.
13. Any Defendant who has filed an Acknowledgment of Service and Defence in accordance with paragraphs 8 and 9 above, shall file and serve any evidence that they seek to rely upon in response to the claim by 24 July 2024.
14. 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 by no later than 3 July 2024 and must provide the Claimant's solicitors with a copy of such application by email to the addresses specified below at the same time as it is made. 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 be heard at the final hearing or take any further role in these proceedings without further order of the Court.
15. 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 24 July 2024 with a time estimate which shall be determined by Mr Justice Cotter and notified to the Claimant. The Claimant shall notify the King's Bench Listing Office by email by 8 July 2024 with its suggestions for a proposed time estimate and specifying the extent to which paragraphs 8, 9 and 14 have been complied with.
16. Skeleton Arguments are to be filed two days before the final hearing date.
17. 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.
18. The parties shall have liberty to apply to vary the directions if necessary and shall make such application by email to Mr Justice Cotter (to whom the matter is reserved for case management purposes) via the King's Bench listing office.

SERVICE OF THIS ORDER

19. 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 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 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).
20. 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); and
 - b. be deemed to be served on the latest date on which all the methods of service referred to in paragraphs 19 above have been completed (such date shall be specified by the certificate of service).
21. The taking of such steps as are set out in paragraph 19 shall be good and sufficient service of this Order upon the Defendants and each of them.
22. 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

23. 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
24. The Parties have liberty to apply to extend this Order or to seek further directions.

COSTS

25. 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

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 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

Third Schedule Plans



— Tower Reception



**Fourth Schedule
Form of Warning Notice**

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 17 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