IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO: QB-2022-001241
and QB-2022-001259

B E T W E E N:

SHELL UK LIMITED

Claimant

and

(1) 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 CLAIMANTS, OR BLOCKING THE ENTRANCES TO THAT SITE

and

(2) 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

Defendants

SKELETON ARGUMENT ON BEHALF OF JESSICA BRANCH
for Return Date 28 April 2022

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*References in square brackets are to the Hearing Bundle in the format [**Tab/page**]*

A. INTRODUCTION

1. This skeleton argument sets out objections to the interim injunctions granted to the Claimant on 14 and 15 April 2022 against Persons Unknown ("**the Orders**"), relating to the sites known as Shell Haven, Stanford-le-Hope ("**Shell Haven**") and Shell Centre Tower respectively.

2. The submissions below are made on behalf of Ms Jessica Branch. Ms Branch is not a named Defendant. She has not been involved in any protests in or around the Shell terminals or headquarters, nor does she intend to be so involved. However, she is concerned by the

wide scope of the Orders, the vagueness of their terms and the chilling effect that they may have on her and others' ability to participate in lawful protests.

3. It is submitted on Ms Branch's behalf that the Orders granted on 14 and 15 December 2022 should be discharged. In the alternative, their terms should be varied to ensure that they are clear, understandable and that any interference with protestors' rights under Articles 10 and 11 of the European Convention on Human Rights ("**ECHR**") are proportionate.

4. The rest of this document is structured as follows: B. Background; C. Relevant Legal Principles; D. Submissions; and E. Conclusion.

B. BACKGROUND

5. Ms Branch is a mother of two young children who attends demonstrations organised by Extinction Rebellion ("**XR**"), a global movement committed to combatting catastrophic climate change. The 2022 XR UK Strategy Document included in the Hearing Bundle makes clear that XR's "*main bread and butter tactic*" is Nonviolent Direct Action, which in turn encompasses Nonviolent Civil Resistance: "*a form of peaceful conflict or confrontation*" [**6/118**].

6. The Claimant is an oil and gas "supermajor" and by revenue and profits is one of the largest companies in the world. It is one of the major global producers of greenhouse gas emissions. The role of the fossil fuel industry in contributing to climate change is at the heart of XR's campaigning.

7. In April 2019, XR participated in a single incident of Nonviolent Direct Action at the Shell Centre Tower.

8. In April 2022, XR joined a number of other campaigning groups in a series of protest events aimed at the oil industry. On 3 April 2022, there was an incident at the Shell Haven site during which one of the entrances of the site was allegedly blocked for a number of hours. There were further incidents on 6 April, 13 April and 15 April 2022 at Shell Centre Tower.

9. In its 2022 Strategy Document, XR indicates that while April 2022 is devoted to "Mass Resistance – London", the following month will involve only "*Celebration, Rest, Onboarding/Training & Strategy Update*" [**6/123**].

10. The Claimants issued claims against Persons Unknown in relation to trespass and nuisance on 14 and 15 April 2022. On those same days, interim injunctions were obtained following *ex parte* hearings before Sweeting J. The return date is accordingly listed for 28 April 2022.

C. RELEVANT LEGAL PRINCIPLES

Rights under Articles 10 and 11 ECHR

11. Article 10 ECHR provides, as relevant, that:

> *"1. Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. […]*
>
> *2. The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary."*

12. Article 11 ECHR provides, as relevant, that:

> *"1. Everyone has the right to freedom of peaceful assembly and to freedom of association with others […]*
>
> *2. No restrictions shall be placed on the exercise of these rights other than such as are prescribed by law and are necessary in a democratic society in the interests of national security or public safety, for the prevention of disorder or crime, for the protection of health or morals or for the protection of the rights and freedoms of others. This Article shall not prevent the imposition of lawful restrictions on the exercise of these rights by members of the armed forces, of the police or of the administration of the State."*

13. Taken together, Articles 10 and 11 protect the right to protest. The relevant principles concerning the scope of that right are well-settled. Ms Branch places particular reliance upon the fact that:

    i. Articles 10 and 11 enshrine fundamental rights in a democratic society;

    ii. although they are qualified rights, any restrictions upon the exercise of Articles 10 and 11 rights must be "*narrowly construed*", and their necessity "*convincingly established*": Sunday Times v United Kingdom *(No 2)* (1992) 14 EHRR 229;

    iii. any interference must be "*necessary in a democratic society*", meaning that it is more than merely "*useful*", "*reasonable*" or "*desirable*": Handyside v United Kingdom (1976) 1 EHRR 737 at §46;

    iv. the freedom to hold and to express views of a *political* nature (as opposed to views of a commercial or artistic nature) is afforded particularly stringent protection under the Convention: Lindon v France (2008) 46 EHRR 35 at §48. Indeed, the European Court of Human Rights has gone so far as to say that limitations upon speech of a political nature "*do a disservice to democracy and often even endanger it*": Kuznetsov v Russia (Application No. 10877/04, 23 October 2008) at §45;

    v. the right to protest embraces protests which are disruptive. As Laws LJ observed in Tabernacle v Secretary of State for Defence [2009] EWCA Civ 23 at §43: "*Rights worth having are unruly things. Demonstrations and protests are liable to be a nuisance. They are liable to be inconvenient and tiresome, or at least perceived as such by others who are out of sympathy with them*";

    vi. Articles 10 and 11 protect direct action protests, i.e., those which take the form of directly impeding the activities of which the protester disproves: Hashman and Harrup v United Kingdom (1999) 30 EHRR 241 at §28; R v Roberts [2018] EWCA Crim 2739 at §39 (Lord Burnett CJ);

vii. in addressing the balance between Articles 10 and 11, particular weight ought to be given to the chosen manner and form of a protest. Indeed, the manner and form of the protest may constitute the actual quality and nature of the protest itself. In *Mayor of London (on behalf of the Greater London Authority) v Hall* [2011] 1 WLR 504 (CA) at §37, Lord Neuberger MR (as he then was) considered that the Convention protection extended to "*the manner in which the defendants wish to express their views and to the location where they wish to express and exchange their views. If it were otherwise, these fundamental human rights would be at risk of emasculation*."

Proportionality and Highway Cases:

14. In assessing the proportionality of any interference with a qualified right, the Court is required to adopt the structured approach set out in *Bank Mellat v HM Treasury* (No 2) [2014] AC 700 at §74 (Lord Reed), namely:

    i. first, whether the objective of the measure is sufficiently important to justify the limitation of a protected right;
    ii. secondly, whether the measure is rationally connected to the objective;
    iii. thirdly, whether a less intrusive measure could have been used without unacceptably compromising the achievement of the objective; and
    iv. fourthly, whether, the measure strikes a fair balance between the objective pursued, and the infringement of the protected right.

15. The Supreme Court in *DPP v Ziegler* [2021] UKSC 23 ("***Ziegler***") emphasised the fact-specific nature of the assessment of proportionality:

    i. the "*determination of the proportionality of an interference with ECHR rights is a fact-specific enquiry which requires the evaluation of the circumstances in the individual case*" (§59);
    ii. "*deliberate obstructive conduct which has a more than de minimis impact on others still requires careful evaluation in determining proportionality*" (§67); and
    iii. although "*disruption and whether it is intentional are relevant factors in relation to an evaluation of proportionality*" (§70), there should be "*a certain degree of tolerance to*

disruption to ordinary life, including disruption of traffic, caused by the exercise of the right to freedom of expression or freedom of peaceful assembly" (§68).

16. The Supreme Court in *Ziegler* also set out "*various factors applicable to the evaluation of proportionality*" at §§72-78. The Court emphasised that "*it is important to recognise that not all of them will be relevant to every conceivable situation*" and that, moreover, "*the examination of the factors must be open textured without being given any pre-ordained weight*" (§71). The non-exhaustive list of factors "*normally to be taken into account in an evaluation of proportionality*" (§72) includes, as relevant:

    i. the importance of the precise location to the protesters (§72; §76), recognising that "*the right to freedom of assembly includes the right to choose the time, place and modalities of the assembly, within the limits established in paragraph 2 of article 11*" (*Sáska v Hungary* (Application No 58050/08) at (§21));
    ii. the "*extent of the actual interference the protest causes to the rights of others, including the property rights of the owners of the land, and the rights of any members of the public*" (§72);
    iii. whether the views giving rise to the protest relate to "*very important issues*" and whether they are "*views which many would see as being of considerable breadth, depth and relevance*" (§72); and
    iv. whether the protesters "*believed in the views they were expressing*" (§72).

17. In the context of obstructions on the highway, the starting point is that the public have a right of reasonable use of the highway which may include protest: *DPP v Jones* [1999] 2 AC 240 ("***Jones***"). That is so even when protests deliberately obstruct other road users. Any consideration of limiting or prohibiting such protest involves a consideration of the proportionality of the interference with rights under Articles 10 and 11 (see the High Court decision in *DPP v Ziegler* [2019] EWHC 71 (Admin)).

18. The Court of Appeal in *Boyd v Ineos Upstream Ltd* [2019] 4 W.L.R. 100 ("***Ineos***") stated at §40: "*the concept of 'unreasonably' obstructing the highway is not susceptible of advance definition … that is a question of fact and degree that can only be assessed in an actual situation and not in advance*".

Interrelation of Trespass and Nuisance with proportionality

19. In *Jones*, the Court considered that the use of the public highway to protest will not constitute trespass provided such use is reasonable: "*provided these activities are reasonable, do not involve the commission of a public or private nuisance, and do not amount to an obstruction of the highway unreasonably impeding the primary right of the general public to pass and repass, they should not constitute a trespass*" (244-45) [emphasis added].

20. However, in the High Court judgment in *DPP v Ziegler* [2019] EWHC 71, Singh LJ and Farbey J referred (at §57) to Lord Bingham's comments in *R (Laporte) v Chief Constable of Gloucestershire* [2007] 2 AC 105 (at §§34-37) that the Human Rights Act 1998 marked a "*constitutional shift*" in the protection of the rights to freedom of expression and assembly. In that context, the High Court went on to reject a submission that "*the public have 'the primary right' to use the highway for the purposes of free passage and re-passage*". Neither that right, nor the Article 10 and 11 rights of protestors is to be afforded primacy; "*rather the exercise which has to be performed is to assess the proportionality of any interference with the Convention rights and, in particular, whether a fair balance has been struck between the different rights and interests at stake*" (at §108).

21. Similarly, protests which do not cause undue interference with the rights of others do not fall within the definition of nuisance. Private nuisance is defined as activity "*causing a substantial and unreasonable interference with the claimants use of land*": *Bamford v Turnley* 122 ER 25. Public nuisance includes an act which obstructs the public in the exercise of rights common to all citizens: *R v Goldstein* [2003] EWCA Crim 3450. Where this is based on obstructing the 'right' to pass on the highway, the issue clearly falls back on the assessment of what constitutes an unreasonable obstruction.

Injunctions: scope of terms

22. The Court in *Canada Goose UK Retail Ltd v Persons Unknown* [2020] 1 WLR 2802 ("***Canada Goose***") set out guidelines at §82 for interim injunctive relief against 'Persons Unknown'

(acknowledged subsequently in *London Borough of Barking and Dagenham and Others v Persons Unknown, London Gypsies and Travellers intervening* [2022] EWCA Civ 13).

23. Guidelines (5) and (6) are of particular relevance in the present case:

> *"(5) The prohibited acts must correspond to the threatened tort. They may include lawful conduct if, and only to the extent that, there is no other proportionate means of protecting the claimant's rights.*
>
> *(6) The terms of the injunction must be sufficiently clear and precise as to enable persons potentially affected to know what they must not do. The prohibited acts must not, therefore, be described in terms of a legal cause of action, such as trespass or harassment or nuisance. They may be defined by reference to the defendant's intention if that is strictly necessary to correspond to the threatened tort and done in non-technical language which a defendant is capable of understanding and the intention is capable of proof without undue complexity. It is better practice, however, to formulate the injunction without reference to intention if the prohibited tortious act can be described in ordinary language without doing so."* [emphasis added]

24. Further, even where the strict terms of an order are limited, consideration must be given to any "chilling effect" that the injunction has beyond conduct falling directly within its terms. This is particularly so for injunctions that are vague or broadly drawn (see *Ineos* at §40). The temporary nature of an order may still be disproportionate when the chilling effect is considered: *Christian Democratic People's Party v Moldova* (2007) 45 EHRR 13.

D. SUBMISSIONS

25. Ms Branch takes no point on the definition of 'Persons Unknown' in the Orders. However, it is respectfully submitted that the terms of the Orders are disproportionate and impermissibly vague, for the reasons set out in the paragraphs below.

The Shell Centre Tower Order

Paragraph 2.2: *"block access"* term is disproportionate

26. Paragraph 2.2 of the Shell Centre Tower Order states that the Defendants must not "*block access to any entrance to Shell Centre Tower*".

27. At the *ex parte* hearing on 14 April 2022, leading counsel for the Claimant submitted that "*the authorities recognise the principle that members of the public do not have the right to demonstrate over private land other than in extreme circumstances such as where there would otherwise be nowhere to protest peaceably, which was not this case*" [**18/457**]. That is true so far as it goes. However, it is plain from the descriptions of protest activity at the Shell Centre Tower, cross-referenced to the plans of the site provided in the hearing bundle [**30/575**], that this prohibition is in part levelled at protesters gathered on public land.

28. That is clear from paragraphs 9.13-9.14 of the Particulars of Claim:

> *"9.13. … around 500 protestors amassed outside of Shell Centre Tower. Various photographs showing these protestors outside of Shell Centre Tower, in Belvedere Road, and in Jubilee Gardens opposite the tower are at pages 68- 78 …*
>
> *9.14 In addition to swamping the entrance to Shell Centre Tower, banging drums to create significant noise, both of which I consider to be intimidating to staff, the protestors also unfurled large banners in Belvedere Road and Jubilee Gardens … "* [emphasis added]

29. In circumstances where protestors are evidently located outside the boundaries Claimant's freehold land, it is not at all clear that the clause preventing the blocking of any entrance to the Shell Tower Centre corresponds with the threatened torts of trespass or nuisance (in line with the requirement set out in *Canada Goose* Guideline (5)). Indeed, It is submitted that the protestors are exercising their Article 10 and 11 rights to protest on a public highway. The question is therefore whether such an obstruction is "reasonable" and consequently, whether any prohibition is proportionate.

30. The Claimant's case is that the blocking of entrances/exits to the Shell Centre Tower Centre presents a health and safety risk. The first witness statement of Emma Pinkerton states at §2.7 that "*the Claimant's primary concern is for the health and safety of those working in or visiting the Shell Centre Tower and the public generally (including the protestors themselves). Activities which … block [the Tower's] exits, as well as being obviously very intimidating, create obvious dangers to the health and safety of those in and around the building*". The first witness statement of Keith Garwood, meanwhile, states at §5.5: "*the restriction of entrances and exits posed a clear safety risk particularly if the building needed to be evacuated in an emergency. The protestors also seemed to intimidate and frighten a large number of staff*" [emphasis added].

31. Whilst as a matter of common sense, it is possible to envisage a safety risk arising from the blocking of entrances/exits of a large building, it is submitted that the risk in this case has been expressed in wholly general and unparticularised terms. The requirement articulated (albeit in the Local Authority Context) in *Bromley LBC v Persons Unknown* [2020] 4 All E.R. 114 for "*credible evidence of … risks to health and safety*" (§107) to justify the imposition of a broad injunction has arguably not been met.

32. There is no exploration, for example, of whether a single blocked entrance would have any material effect on an evacuation in circumstances where there are no fewer than six entrances/exits to the Tower. Further, in both accounts, apparent concerns as to health and safety are conflated with fears about staff being "intimidated" and "frightened". It is submitted that these accounts are highly speculative: no witness statement has been provided from such a staff member and the Court should be slow to accept uncritically the position as described by Ms Pinkerton and Mr Garton. In particular, Mr Garton's view that banners reading "Shell = Death" "*can only be directed at Shell's members of staff*" should be approached with scepticism, in circumstances where the entire raison d'être of the protests was to draw attention to the unfolding climate emergency and its potentially fatal consequences.

33. In any event, these fears must be balanced against the protestors' Article 10 and Article 11 rights. With reference to the factors set out in *Ziegler* as pertinent to this balancing exercise, it is submitted that:

    i. the importance of the precise location to the protesters is highly relevant in the present case. The ability to protest outside the central Shell headquarters is symbolically important for XR and other environmental groups;

    ii. the views giving rise to the protests plainly relate to very important issues. The XR press release at [**6/154**] describes what is felt to be at stake: "*we are out of time – weather patterns are destabilised and climate related deaths occurred on almost every continent in 2021. Our current political system is incapable of acting with the speed and integrity needed in this moment of crisis. Life as we know it is going to change, whether or not we choose to act on the climate crisis … in the words of [the] Environment Agency, we*

must 'adapt or die'". It is hard to conceive of issues more important than the impending destruction of the planet and the potential annihilation of the species;

iii. the protestors involved in the various Nonviolent Direct Action protests in April 2022 clearly believed in the views they were expressing – that is the only possible inference from the material accumulated by the Claimant (in particular with reference to the detailed strategy document at [**6/87-133**]).

34. *DPP v Cuciurean* [2022] EWHC 736 (Admin), relied on by the Claimant, is not relevant insofar as the prohibition on the protestors relates to public (rather than private) land. To the extent that the Divisional Court's discussion of proportionality is relevant to the present case, it may be distinguished: gathering outside the entrances and exits of the Shell Tower Centre on a handful of distinct occasions is very different from a scenario in which protestors "*use guerrilla tactics endlessly to delay and increase the cost of an infrastructure project which has been subjected to the most detailed public scrutiny, including in Parliament*" (§84).

35. It is submitted that in those circumstances, the term constitutes a disproportionate interference with any protestors' rights under Articles 10 and 11 ECHR and the paragraph should be struck out. In the alternative, the term should at least be amended to fulfil the requirement for clarity and precision in *Canada Goose* Guideline (6). It is not clear what constitutes "*blocking*" access to the entrances/exits of the building: this could arguably catch a protestor holding up a "No Entry" sign at one end of Belvedere Road, or even chanting noisily at an entrance so as to deter staff from exiting. Additional words making clear that the Defendants must not "*block access to any entrance to Shell Centre Tower* ***by physically obstructing the entrance so as to make entry/exit impossible for others***" would go some way to clarifying the term.

Paragraph 2.3: *"deliberately cause damage"* clause is otiose

36. Paragraph 2.3 of the Shell Centre Tower Order prohibits Defendants from *"deliberately caus[ing] damage to any part of the Shell Centre Tower"*.

37. It is submitted that this term merely prohibits conduct that is already criminalised. Under section 1(1) of the Criminal Damage Act 1971, a person who without lawful excuse destroys or damages any property belonging to another, intending to destroy or damage any such property, or being reckless as to whether any such property would be destroyed or damaged, is guilty of an offence.

38. In *Heron v Plymouth City Council* [2009] EWHC 3562 (Admin), the Court deprecated a term (in the context of an Anti-Social Behaviour Order) requiring the Appellant "*not to behave in any way causing or likely to cause harassment, alarm or distress to any person*". Moses LJ noted that such a term had no real efficacy, as it did "*no more than repeat offences contained within the Public Order Act 1986*"(§8). More recently, in *R v Brain* [2020] 2 Cr App R (S.) 34, the Court of Appeal restated the principle that "*prohibitions should not be imposed in relation to conduct which would constitute a criminal offence on its own merits*" (§41).

39. The Claimant should not be permitted to use the facility of a Persons Unknown injunction to buy a more serious criminal sanction for a Defendant who finds him or herself in breach of the Order. This term should be struck out.

Paragraph 2.4: *"affixing"* term is overly broad

40. Paragraph 2.4 of the Shell Centre Tower Order states that the Defendants must not "*affix 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 the Shell Centre Tower*".

41. This paragraph appears to be targeted at Nonviolent Direct Action such as employed on 13 April 2022, when protestors superglued themselves to different parts of the Shell Centre Tower reception area. However, the current wording of the paragraph would catch a much wider range of activity. For example, the stapling of two pieces of paper together, or fixing a stamp on a letter *"in the Shell Centre Tower"* would fall within the current prohibition. Such a broad formulation is clearly not required "*in order to provide effective protection of the rights of the claimant in the particular case*": *Cuadrilla Bowland v Lawrie* [2020] EWCA Civ 9 at §50.

42. It is submitted that the term should be struck out. In the alternative, it should be amended, such that Defendants must not: "*affix themselves, or any object, or thing, to any part of the Shell Centre Tower, or to any other person* ***in*** *or* ~~*object or thing on fixture of*~~ ***any fixture of the*** *Shell Centre Tower*".

Paragraph 2.6: "*substance*" term is overly broad

43. Paragraph 2.6 of the Shell Centre Tower Order states that the Defendants must not "*spray, paint, pour, stick or write with any substance on or inside any part of Shell Centre Tower*".

44. This paragraph appears to be targeted at Nonviolent Direct Action such as employed on 6 April 2022, when protestors from the group Scientist Rebellion allegedly poured a black oily substance over the walls of the Shell Centre Tower. Here again, it is submitted that the drafting of the term is too broad, catching as it does an individual using an ink pen to write on a pad of paper within the confines of Shell Centre Tower.

45. It is submitted that the term should be struck out. In the alternative, it should be amended, such that Defendants must not: "*spray, paint, pour, stick or write with any substance on or inside any* ~~*part*~~ ***internal fixture*** *of Shell Centre Tower*".

The Shell Terminal Order

Paragraph 2.6: "*block access*" term is disproportionate

46. Under this term, the Defendants must not "*block any of the entrances to Shell Haven to vehicular or pedestrian traffic*".

47. The submissions above at paragraphs 26-39 are repeated. It is accepted that this term is more tightly drafted than its equivalent in the Shell Centre Tower Order, given the inclusion of the words "*vehicular or pedestrian traffic*". It is also accepted that there is a more serious health and safety risk made out. Nevertheless, given that there appear to be eight entrances/exits to the Shell Haven site, it is not clear that a total ban on the blocking of entrances is proportionate, especially in circumstances where such a prohibition

constitutes an interference with the right to protest on the highway. It is submitted the term should be amended, such that Defendants may not "*block any **more than one** of the entrances to Shell Haven to vehicular or pedestrian traffic **at any given time***".

Paragraph 2.5: *"place object"* term is overly broad

48. Under this term, the Defendants must not "*place any object on the Sites, or in front of the entrances to Shell Haven"*.

49. It is not clear that this term corresponds to the threatened torts, catching as it does the leaving of a letter outside one of the Shell Haven entrances. It is submitted that the second part of the term should be amended so that Defendants may not "*place any object on the Sites, or in front of the entrances to Shell Haven **so as to make entry/exit impossible for others***".

Both Orders

Paragraph 3: "*encouragement"* term is disproportionate

50. Paragraph 3 in both Orders is drafted in identical terms:

> *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.*

51. The final part of this term would likely catch a person waving a banner encouraging its reader to "Staple together pages in Shell Tower" or "Leave a letter by Shell Haven" . It is submitted that this would be a wholly disproportionate interference with a putative Defendant's rights to freedom of expression under Article 10 ECHR. The words *"or by another person acting with his/her their encouragement"* should be removed from the paragraph.

E. CONCLUSION

52. Ms Branch respectfully asks that the court discharge/vary the interim injunction in accordance with the submissions above.

ROBBIE STERN
Matrix Chambers

27 April 2022