## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

CLAIM NO.

BETWEEN:

### TELEDYNE UK LIMITED

Claimant

-and-

- (1) JULIAN ALLEN GAO
  - (2) RUBY HAMILL
  - (3) DANIEL JONES
  - (4) NAJAM SHAH
  - (5) RICKY SOUTHALL
  - (6) AMAREEN AFZAL
  - (7) SERENA FENTON
- (8) PERSONS UNKNOWN WHO ARE WITHOUT THE CONSENT OF THE CLAIMANT ENTERING OR REMAINING ON LAND AND IN OR ON BUILDINGS ON ANY OF THE SITES LISTED IN SCHEDULE 2 TO THE CLAIM FORM, THOSE BEING:
  - A. THE 'SHIPLEY SITE' (TELEDYNE UK LIMITED, AIREDALE HOUSE, ACORN PARK, SHIPLEY BD17 7SW);
  - B. THE 'LINCOLN SITE' (TELEDYNE UK LIMITED, 168 SADLER ROAD, LINCOLN LN6 3RS);
  - C. THE 'WIRRAL SITE' (TELEDYNE UK LIMITED, UNIT A, 6 TEBAY ROAD, BROMBOROUGH, BIRKENHEAD, WIRRAL CH62 3PA);
    - D. THE 'CHELMSFORD SITE' (TELEDYNE UK LIMITED, 106 WATERHOUSE LANE, CHELMSFORD, CM1 2QU);
  - E. THE 'PRESTEIGNE SITE' (TELEDYNE UK LIMITED, BROADAXE BUSINESS PARK, PRESTEIGNE LD8 2UH); AND
    - F. THE 'NEWBURY SITE' (TELEDYNE UK LIMITED, REYNOLDS NAVIGATION HOUSE, CANAL VIEW ROAD, NEWBURY RG14 5UR).

- (9) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING THE 'SHIPLEY SITE' (TELEDYNE UK LIMITED, AIREDALE HOUSE, ACORN PARK, SHIPLEY BD17 7SW) FROM THE HIGHWAY
- (10) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING THE HIGHWAY FROM THE 'SHIPLEY SITE' (TELEDYNE UK LIMITED, AIREDALE HOUSE, ACORN PARK, SHIPLEY BD17 7SW)
- (11) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT SCHEDULE 3 TO THE CLAIM FORM

	<b>Defendants</b>
-	
EXHIBIT MS1	

This is Exhibit MS1 referred to in the First Witness Statement of Manan Singh.



IN THE HIGH COURT OF JUSTICE BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES BUSINESS LIST (ChD)

### In the matter of an Injunction

BL-2022-001396

Before Jonathan Hilliard KC (sitting as a Deputy Judge of the High Court) 26 July 2024

BETWEEN:

- (1) ARLA FOODS LIMITED
- (2) ARLA FOODS HATFIELD LIMITED

**Claimants** 

-and-

- (1) PERSONS UNKNOWN WHO ARE, WITHOUT THE CONSENT OF THE CLAIMANTS, ENTERING OR REMAINING ON LAND AND IN BUILDINGS ON ANY OF THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM ("the Sites"), THOSE BEING:
- a. "THE AYLESBURY SITE" MEANING ARLA FOODS LIMITED'S SITE AT AYLESBURY DAIRY, SAMIAN WAY, ASTON CLINTON, AYLESBURY HP22 5EZ, AS MARKED IN RED ON THE PLANS AT ANNEXE 1 TO THE CLAIM FORM;
- b. "THE OAKTHORPE SITE" MEANING ARLA FOODS LIMITED'S SITE AT OAKTHORPE DAIRY, CHEQUERS WAY, PALMERS GREEN, LONDON N13 6BU, AS MARKED IN RED ON THE PLANS AT ANNEXE 2 TO THE CLAIM FORM;
  - c. "THE HATFIELD SITE" MEANING ARLA FOODS HATFIELD LIMITED'S SITE AT HATFIELD DISTRIBUTION WAREHOUSE, 4000 MOSQUITO WAY, HATFIELD BUSINESS PARK, HATFIELD, HERTFORDSHIRE AL10 9US, AS MARKED IN RED ON THE PLANS AT ANNEXE 3 TO THE CLAIM FORM; AND
- d. "THE STOURTON SITE" MEANING ARLA FOODS LIMITED'S DAIRY AT PONTEFRACT ROAD, LEEDS LS10 1AX AND NATIONAL DISTRIBUTION CENTRE AT LEODIS WAY, LEEDS LS10 1NN AS MARKED IN RED ON THE PLANS AT ANNEXE 4 TO THE CLAIM FORM
  - (2) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING FROM THE HIGHWAY THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM

- (3) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING THE HIGHWAY FROM ANY OF THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM
- (4) PERSONS UNKNOWN WHO ARE FOR THE PURPOSE OF PROTESTING CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING, OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF, OR ALONG THE ROADS LISTED AT ANNEXE 1A, 2A, 3A, AND 4A TO THE CLAIM FORM
- (5) PERSONS UNKNOWN WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES ON TO ANY VEHICLE WHICH IS ACCESSING OR EXITING THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM
- (6) PERSONS UNKNOWN WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES ON TO, ANY VEHICLE WHICH IS TRAVELLING TO OR FROM ANY OF THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM)
  - (7) 34 OTHER NAMED DEFENDANTS LISTED AT SCHEDULE 1 OF THIS ORDER

	<u>Defendants</u>
ORDER	

### **PENAL NOTICE**

IF YOU, THE ABOVE NAMED DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

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 IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

**UPON** the hearing of the Claimants' Claim for final injunctive relief against the named Defendants, and a continuation of the injunction Order against Persons Unknown

**AND UPON** all of the named Defendants other that the Fortieth Defendant settling the proceedings by giving undertakings to the Court

**AND UPON** hearing Counsel for the Claimants, Caroline Bolton and Natalie Pratt, without any attendance by or on behalf of the remaining Fortieth Defendant or Persons Unknown

**AND UPON** the Court reading the application and the witness statements listed in Schedule A

**AND UPON** the Court having particular regard to the importance of the Defendants' Article 10 and Article 11 Convention rights to freedom of expression and freedom of lawful assembly

**AND UPON** the Court being satisfied that the order sought does not prohibit peaceful protest

**AND UPON** the Court considering its discretion to grant injunctive relief pursuant to s.37(1) Senior Courts Act 1981 and considering it just and convenient to do so

### IT IS ORDERED THAT:

### **Definitions**

- 1. For the purpose of this Order:
  - 1.1 **"The Roads"** shall mean the Roads identified in Annexe 1A, 2A, 3A, 4A to this Order and to the Claim Form, as marked in purple on the maps at Annexes 1A, 2A, 3A, and 4A to this Order and to the Claim Form.
  - 1.2 "The Aylesbury Site" shall mean Arla Foods Limited's site at Aylesbury Dairy, Samian Way, Aston Clinton, Aylesbury HP22 5EZ, as marked in red on the plans at Annexe 1 to this Order and to the Claim Form ("the Aylesbury Site Plan").
  - 1.3 "The Oakthorpe Site" shall mean Arla Foods Limited's site at Oakthorpe Dairy, Chequers Way, Palmers Green, London N13 6BU, as marked in red on the plans at Annexe 2 to this Order and to the Claim Form ("the Oakthorpe Site Plan").
  - 1.4 "The Hatfield Site" shall mean Arla Foods Hatfield Limited's site at Hatfield Distribution Warehouse, 4000 Mosquito Way, Hatfield Business Park, Hatfield, Hertfordshire AL10 9US, as marked in red on the plans at Annexe 3 to this Order and to the Claim Form ("the Hatfield Site Plan").
  - 1.5 "The Stourton Site" shall mean Arla Foods Limited's Dairy at Pontefract Road, Leeds LS10 1AX and National Distribution Centre at Leodis Way, Leeds LS10 1NN as marked in red on the plans at Annexe 4 to this Order and to the Claim Form ("the Stourton Site Plan").

### **INJUNCTION**

### **Prohibitions**

- 2. Until and including 26 July 2029, the **First to Sixth Defendants (Persons Unknown)** and the **Fortieth Defendant** and each of them (whether by themselves or by instructing, encouraging or allowing any other person), are <u>forbidden</u> from:
  - 2.1 Entering into, entering onto, tunnelling under or remaining on the following Sites:
    - (i) The Aylesbury Site as marked in red on the attached Aylesbury Site Plan at Annexe 1;
    - (ii) The Oakthorpe Site as marked in red on the attached Oakthorpe Site Plan at Annexe 2;
    - (iii) The Hatfield Site as marked in red on the attached Hatfield Site Plan at Annexe 3;
    - (iv) **The Stourton Site** as marked in red on the attached **Stourton Site Plan** at Annexe 4.
  - 2.2 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to or from the highway at the following sites:
    - (i) The Aylesbury Site as marked in red on the attached Aylesbury Site Plan at Annexe 1;
    - (ii) The Oakthorpe Site as marked in red on the attached Oakthorpe Site Plan at Annexe 2;
    - (iii) The Hatfield Site as marked in red on the attached Hatfield Site Plan at Annexe 3; and
    - (iv) The Stourton Site as marked in red on the attached Stourton Site Plan at Annexe 4.
  - Approaching, slowing down, or obstructing any vehicle on or moving along or accessing **the Roads** identified in Annexes 1A, 2A, 3A, 4A to this Order for the purpose of:
    - (i) disrupting vehicular access to or from The Aylesbury Site, The Oakthorpe Site, The Hatfield Site, and/or The Stourton Site; and
    - (ii) protesting.
  - 2.4 Entering, climbing onto, climbing into, or climbing under any vehicle travelling to or from **The Aylesbury Site**, **The Oakthorpe Site**, **The Hatfield Site**, and/or **The Stourton Site**:

- (i) for the purpose of protesting; and
- (ii) and without the permission of the registered keeper of the vehicle.
- 2.5 Affixing themselves ("locking on") to any vehicle on, entering or exiting **The Aylesbury Site**, **The Oakthorpe Site**, **The Hatfield Site**, and/or **The Stourton Site** where the "locking on" is for the purpose of protesting.
- 2.6 Affixing themselves ("locking on") or any other items to any of **the Roads** or any other person or object on, under or over **the Roads** for the purpose of:
  - (i) disrupting vehicular access to or from **The Aylesbury Site**, **The Oakthorpe Site**, **The Hatfield Site**, and/or **The Stourton Site**; and
  - (ii) protesting.
- 2.7 Erecting any structure on **the Roads** for the purpose of:
  - (i) disrupting vehicular access to or from Arla Foods Limited at The Aylesbury Site, The Oakthorpe Site, The Hatfield Site, and/or The Stourton Site; and
  - (ii) protesting.

### **Alternative service**

- 3. Pursuant to CPR rules 6.15 and 6.27, the Claimants have permission, in addition to personal service, or in the alternative to personal service, to serve the **First to Sixth Defendants (Persons Unknown)** and the **Fortieth Defendant** with this Order and any further documents in the Claim by **all** of the following methods (with paragraph 3.1 to 3.5 to be treated conjunctively):
  - 3.1 **Websites:** placing a web link on the First Claimant's website and Facebook page at which a copy of the re-Amended Claim Form, Application(s) for an Interim Injunction, the supporting documents relied on in this Claim, and this Order can be accessed; and
  - 3.2 **Email:** sending a copy of this Order to Animal Rebellion and Extinction Rebellion at the following email addresses:

actions@animalrebellion.org; fundraising@animalrebellion.org; integration@animalrebellion.org; talks@animalrebellion.org; global@animalrebellion.org; localgroups@animalrebellion.org; media@animalrebellion.org; pressoffice@animalrebellion.org; finance@animalrebellion.org; governance@animalrebellion.org; techsupport@animalrebellion.org; press@extinctionrebellion.uk; AnimalRisingLegal@protonmail.com.

- and providing a web link at which they can access documents relied on in this Claim and this Order; and
- 3.3 **Post:** where an address of a named Defendant is known to the Claimants, by posting a copy of this Order together with a covering letter through the letterbox of the named Defendant's address (or by leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact that the package contains a court order. If the premises do not have a letterbox, or mailbox, or the package will not fit through the letterbox, a package may be left next to the front door and a notice containing this Order may be affixed to the front door marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The notices shall be given in the form set out in Schedule 2 to this Order; and
- 3.4 **Text messages:** sending a text message to any named Defendant for whom the Claimants have a mobile telephone number, notifying them that an injunction order has been granted against them and providing a web link at which the Defendant can access the re-Amended Claim Form, Application(s) for an Interim Injunction, the supporting documents relied on in this Claim, and this Order. The notice shall be given in the form set out in Schedule 2 to this Order; and
- 3.5 Placing signs and/or notices: on the perimeter of The Aylesbury Site, The Oakthorpe Site, The Hatfield Site, and The Stourton Site providing a web link and/or QR code at which the Amended Claim Form, Application(s) for an Interim Injunction, the supporting documents relied on in this Claim, and this Order can be found; OR
- 3.6 **Where requested:** the re-Amended Claim Form, Application(s) for an Interim Injunction, the supporting documents relied on in this Claim, and this Order may be served by email where the Defendant has requested that they be served by email and by sending the email to the address provided by the Defendant; **OR**
- 3.7 **Lawyers:** By serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
- 4. The **deemed date of service** of any documents referred to in paragraph 3 above shall be the day on which service of the document or documents is completed in accordance with paragraph 3 above.

### **FURTHER DIRECTIONS**

### Liberty to apply

5. The First to Sixth Defendants or any person other than the named Defendants may each of them apply to the Court on 48 hours prior written notice (not to include weekends or public holidays) to both the Court and the Claimants to vary or discharge this Order (or so much of it as affects that person).

6. Any person applying to vary or discharge this order must provide their full name and address for service.

### **Review of this Order**

7. The Order against the **First to Sixth Defendants (Persons Unknown)** shall be reviewed at a hearing no later than **24 July 2025** (or as near to that date as the court can reasonably accommodate), with a time estimate of one day, unless the Claimants indicate to the Court that they do not seek an extension of the Order, upon which the Order will expire as against Persons Unknown only. The Claimants must file and serve in accordance with paragraph 3 above any evidence upon which they intend to rely at the review hearing by 4pm on 10 July 2025. Any other person who would like to participate in the review hearing must also file and serve on the Claimants any evidence upon which they intend to rely at the review hearing by 4pm on 10 July 2025.

### Costs

8. No Order as to costs.

### **GUIDANCE NOTES**

### Effect of this Order - the Defendants

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

### **Interpretation of this Order**

- 2. In this Order references to 'the Defendant' means any or all of them (unless expressly stated otherwise).
- 3. A requirement to serve on 'Defendant' means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
- 4. An Order requiring 'the Defendant' not to do anything applies to all Defendants.
- 5. This Order contains the following schedules and annexes
  - (i) Schedule A-Witness Statements;
  - (ii) Schedule 1-List of Named Defendants:
  - (iii) Schedule 2-Notices;
  - (iv) Annex 1 the plan of the Aylesbury Site;
  - (v) Annex 2 the plan of the Oakthorpe Site;
  - (vi) Annex 3 the plan of the Hatfield Site;
  - (vii) Annex 4 the plan of the Stourton Site;
  - (viii) Annexe 1A, 2A, 3A, and 4A-The List of "The Roads".

### **Communications with the Court**

6. All communications with the Court about this Order should be sent to the Rolls Building at 7 Rolls Buildings, Fetter Lane, London, EC4A 1NL. The telephone number is 020 79476690. The Email address is <a href="mailto:ChanceryJudgesListing@justice.gov.uk">ChanceryJudgesListing@justice.gov.uk</a>. The offices are open between 10am and 4pm Monday to Friday.

### SCHEDULE A-WITNESS STATEMENTS

- 1. The Court read the following witness statements filed on behalf of the Claimants:
  - i. Joanne Taylor;
  - ii. Melanie Savage (first and second witness statements);
  - iii. David Dons;
  - iv. Anne-Frances Ball;
  - v. Afshin Amirahmadi;
  - vi. Nicholas McQueen (first to eleventh witness statements, inclusive);
  - vii. Samantha Sage;
  - viii. James Damarell.

### **Service of this Order**

This Order will be served by the Claimants on the Defendants. The Court has provided a sealed copy of this order to the Claimants' legal representative, Walker Morris at email <a href="mick.mcqueen@walkermorris.co.uk">mcqueen@walkermorris.co.uk</a>

### SCHEDULE 1-NAMED DEFENDANTS

Defendant No.	
7	Xanthe Wells
8	Stephen Bone
9	Kim Wainwright
10	Bryan Mongelli
11	Nikola Muratova
12	Radim Sandr
13	Robert King-Houston
14	Vojtech Palencar
15	Jan Kratky
16	Anna Wilkinson
17	Lucia Bree Alexander
18	Rueben Lemer
19	Solene Rashleigh
20	Cristina Acosta
21	Sined Singhage
22	Vaclav Opatril
23	Cathy Eastburn
24	Marina Ballestra Candel
25	Hamish Gardner
26	Euphemia Smith
27	Dev Vyas
28	Vita Sleigh
29	Gabriella Ditton
30	Robert Smith
31	Emily Camp
32	Gemma Barnes
33	Marcus Decker
34	Robert Allan
35	Theresa Higginson
36	Rachel Steele
37	Alexander Bourke
38	Rosa Sharkey
39	Rik Jansen
40	Person identified in image 1 at Schedule 1A to the re-Amended Claim Form

### **SCHEDULE 2-NOTICES**

On the package containing this Order:

"VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWNLOAD IT FROM <a href="https://www.walkermorris.co.uk/arla-injunction/">https://www.walkermorris.co.uk/arla-injunction/</a> OR CALL 0113 283 2500"

to affix to the front door when the package has been posted through the letterbox or placed in a mailbox:

"VERY URGENT: A PACKAGE HAS BEEN LEFT THAT CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWLOAD IT FROM https://www.walkermorris.co.uk/arla-injunction/ OR CALL 0113 283 2500"

For service by text message:

"VERY URGENT: A HIGH COURT INJUNCTION ORDER HAS BEEN MADE AGAINST YOU, THE LINK PROVIDED IN THIS TEXT MESSAGE CONTAINS AN ORDER OF THE HIGH COURT AND THE SUPPORTING DOCUMENTS RELIED UPON BY THE CLAIMANTS. YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL 0113 283 2500"



# ANNEXE 1A ROADS AT THE AYLESBURY SITE

- 1. SAMIAN WAY
- COLLEGE ROAD NORTH
   MODEL ROW



### ANNEXE 2 THE OAKTHORPE SITE



### ANNEXE 2A ROADS AT THE OAKTHORPE SITE

- 1. OSTLIFFE ROAD
- 2. CHEQUERS WAY
- 3. OWEN ROAD
- 4. MITCHELL ROAD

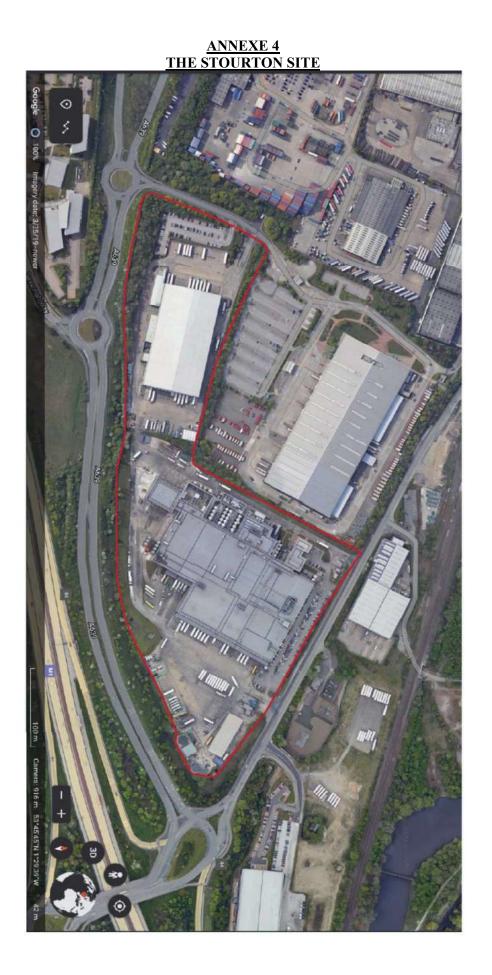




### ANNEXE 3A ROADS AT THE HATFIELD SITE

- 1. HATFIELD AVENUE
- 2. GYSPY MOTH AVENUE
- 3. MOSQUITO WAY





## ANNEXE 4A ROADS AT THE STOURTON SITE

- A639
   PONTEFRACT ROAD
   LEODIS WAY



In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles 12 July 2024

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL



-and-

### (1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

(223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<u>Defenda</u>
ORDER	

### PENAL NOTICE

IF YOU, PERSONS UNKNOWN, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

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 IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

### POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST ATTACHED AT SCHEDULE 2 OF THIS ORDER FOR BREACH OF PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006. ANY PERSON CAUGHT BREACHING PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER MAY BE ARRESTED AND BROUGHT BEFORE THE COURT

**UPON** the review of the injunction Order granted by Foster J and dated 26 January 2023 insofar as it applies to Persons Unknown (only)

**AND UPON** hearing Caroline Bolton and Natalie Pratt of counsel and no person appearing for or on behalf of the Defendants

### IT IS ORDERED THAT:

### **Definitions**

- 1. For the purpose of this Order:
  - 1.1 "The Roads" shall mean the Roads identified in Annexe 1 to this Order and to the Claim Form as marked in red on the maps at Annexes 2 and 3 to this Order and to the Claim Form.
  - 1.2 "The Administrative Area of Thurrock" shall mean the administrative area as marked with the purple line on the map at Annexe 2 to this Order and to the Claim Form.
  - 1.3 "The Administrative Area of Essex" shall mean the administrative area as marked with the pink line on the map at Annexe 3 to this Order and to the Claim Form.
  - 1.4 "The Administrative areas of Thurrock and Essex" shall mean those areas in 1.2 and 1.3 above.
  - 1.5 "The Fuel Terminals" shall refer to the following four sites collectively:
    - 1.5.1 The Navigator Fuel Terminal, Oliver Road, West Thurrock RM20 3ED;
    - 1.5.2 The Esso Fuel Terminal, London Road, Purfleet RM19 1RS;
    - 1.5.3 Exolum Storage Ltd, off Askews Farm Lane, London Road, Grays RM17 5YZ; and
    - 1.5.4 Oikos Storage Limited, Haven Road, Hole Haven Wharf, Canvey Island, Essex SS8 0NR.

### **INJUNCTION**

### **Prohibitions**

- 2. Until and including 12 July 2029, and subject to paragraph 6 below, the 223<sup>rd</sup> to 229<sup>th</sup> Defendants (Persons Unknown) (whether by themselves or by instructing, encouraging or allowing any other person) are <u>forbidden</u> from:
  - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off **the Roads** for the purpose of protesting.
  - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
  - 2.3 Entering, climbing onto, climbing into, climbing under **any vehicle** travelling on to, off or along **the Roads** or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
  - 2.4 Entering, climbing onto, climbing into, climbing under any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
  - 2.5 **Affixing themselves** ("locking on") to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.
  - 2.6 Affixing themselves ("locking on") to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the "locking on" is for the purpose of protesting.
  - 2.7 Affixing themselves ("locking on") or any other items to any of the Roads or any other person or object on, under or over the Roads.
  - 2.8 Affixing themselves ("locking on") or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the "locking on" is for the purpose of protesting.
  - 2.9 Erecting any structure on the Roads.
  - 2.10 **Tunnelling**, excavating, drilling or digging under or adjacent to the Roads.
  - 2.11 Occupying existing tunnels under the Roads for the purpose of protesting.
  - 2.12 **Causing damage** to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.

- 2.13 Abandoning any vehicle or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.
- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to **any petrol station** in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any **petrol station forecourt or access road**, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by delivery tankers of fuel supplies and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.
- 2.17 **Causing, assisting** or encouraging any other person to do any act prohibited by paragraphs 2.1 to 2.16 above.
- 2.18 Continuing any acts prohibited by paragraphs 2.1 to 2.16 above.

### Power of arrest

3. Pursuant to s.27 Police and Justice Act 2006, a power of arrest shall apply to paragraphs 2.1 to 2.16 above in the form attached at Schedule 2 of this Order.

### Alternative service

- 4. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission to serve the 223<sup>rd</sup> to 229<sup>th</sup> Defendants (Persons Unknown) with this Order, the power of arrest and any further documents in the Claim by (4.1 4.3 to be treated conjunctively):
  - 4.1 **Websites:** placing a copy of the documents to be served on the Claimants' websites and Facebook pages; and
  - 4.2 **Email:** sending a copy of the documents to be served to Just Stop Oil, Youth Climate Swarm, Extinction Rebellion and Insulate Britain at the following email addresses: juststopoilpress@protonmail.com; youthclimateswarm@protonmail.com; press@extinctionrebellion.uk; insulatebritainpress@protonmail.com
    - and providing a web link at which they can access the documents to be served; and
  - 4.3 Placing signs: on A-Road entry points and exit points to the administrative area of Thurrock, and within 50 metres of The Fuel Terminals and on the A130 and B1014 between the entrance to Canvey Island and the roundabout known as the Waterside Road roundabout on Canvey Island, stating that there is a High Court

Injunction in place prohibiting protest on the highway and providing a web link and QR code at which the documents to be served can be found.

5. The **deemed date of service** of any documents referred to in paragraph 4 above shall be the day on which service of the document or documents is completed in accordance with paragraph 4 above.

### Review of this Order

6. The Order against the 223<sup>rd</sup> to 229<sup>th</sup> Defendants (Persons Unknown) shall be reviewed at a hearing no later than 11 July 2025 (and as near to that date as the court can reasonably accommodate), with a time estimate of one day, unless the Claimants indicate to the Court that they do not seek an extension of the Order, upon which the Order will expire. The Claimants must file and serve in accordance with paragraph 4 above any evidence upon which they intend to rely at the review hearing by 4pm on 27 June 2025. Any other person who would like to participate in the review hearing must also file and serve on the Claimants any evidence upon which they intend to rely at the review hearing by 4pm on 27 June 2025.

### Liberty to apply

- 7. The Defendants or any other 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 the Claimants' solicitors at the same time as the application is filed at court (and in any event not less than 48 hours before the hearing of any such application, not to include weekends or public holidays).
- 8. Any person applying to vary or discharge this order must provide their full name and address for service.

#### Costs

9. No order as to costs.

### **GUIDANCE NOTES**

### Effect of this Order - the Defendants

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

### Interpretation of this Order

2. In this Order references to 'the Defendant' means any or all of them (unless expressly stated otherwise).

- 3. A requirement to serve on 'Defendant' means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
- 4. An Order requiring 'the Defendant' not to do anything applies to all Defendants.
- 5. This Order contains the following schedules and annexes
  - (i) Schedule A-Witness Statements;
  - (ii) Schedule 1-List of Named Defendants;
  - (iii) Schedule 2-The Power of Arrest;
  - (iv) Annexe 1-The List of "The Roads" in Thurrock;
  - (v) Annexe 2-The map of the Administrative Area of Thurrock; and
  - (vi) Annexe 3-The map of the Administrative Area of Essex.

### Communications with the Court

6. All communications with the Court about this Order should be sent to Room E03, The Royal Courts of Justice, Strand, London, WC2A 2LL. The telephone number is 020 3938957. The offices are open between 10am and 4pm Monday to Friday.

#### SCHEDULE A-WITNESS STATEMENTS

- 1. The Court read the following witness statements filed on behalf of the Claimants:
  - (a) The witness statement of Adewale Adesina 23.4.2022;
  - (b) The witness statement of Morgan Cronin 23.4.2022;
  - (c) The witness statement of Paul Crick 23.4.2022;
  - (d) The first witness statement of Adam Rulewski 24.4.2022;
  - (e) The second witness statement of Adam Rulewski dated 11.5,2022:
  - (f) The third witness statement of Adam Rulewski dated 16.5.2022;
  - (g) The fourth witness statement of Adam Rulewski dated 25.1.2023;
  - (h) The second witness statement of Adewale Adesina 20.3.2024;
  - (i) The witness statement of Stephen Jennings 23.3.2024;
  - (j) The third witness statement of Adewale Adesina 26.6.2024;
  - (k) The fifth witness statement of Adam Rulewski 11.7.2024.

### SCHEDULE 1-NAMED DEFENDANTS

- 1. Madeline Adams
- 2. Mary Adams
- 3. David Addy
- 4. Amber Alexandar
- 5. Mina-Mae Alexander
- 6. Eric Anderson
- 7. Christine Aslett
- 8. Nicholas Aslett
- 9. Lachlan Ayles
- 10. Stephanie Aylett
- 11. Pete Bailey
- 12. William Bajwa
- 13. Jeremy Banks
- 14. Colin Barrington
- 15. Kai Bartlett
- 16. Joshua Bates
- 17. Christopher Bennett
- 18. Gillian Bird
- 19. John Blanco
- 20. John Blewett
- 21. Poppy Bliss
- 22. Hilary Bond
- 23. Trevor Boulden
- 24. Geoffroy Bowman
- 25. Simon Bramwell
- 26. Joseph Bream
- 27. Scott Breen
- 28. Stephen Brett
- 29. Emily Brocklebank
- 30. Claire Brook
- 31. Emma Brooker
- 32. Michael Brown
- 33. Judith Bruce
- 34. Madeleine Budd
- 35. Tes Burns
- 36. Benjamin Buse
- 37. Catherine Cannon
- 38. Rebecca Cassar
- 39. Jessica Causby
- 40. Susan Chamberlayne
- 41. Sally Chapman
- 42. Vishal Chauhan
- 43. Katherine Chesterman
- 44. Phillipa Clarke
- 45. Oliver Clegg
- 46. Orla Coghlan
- 47. John Coghlan
- 48. Ruth Cook

- 49. Heather Cooper
- 50. Jasmine Corkhill Harris
- 51. Joy Susan Corrigan
- 52. Richard Crane
- 53. David Crawford
- 54. Rosemary Croft
- 55. Joseph Daldorph
- 56. Beverley Ann Daniel
- 57. Ben Delap
- 58. Gaie Delap
- 59. Gabriella Ditton
- 60. Igors Djomins
- 61. Laura Doehlei
- 62. Marguerite Doubleday
- 63. Ella Eason
- 64. Christine Essex
- 65. Janet Flynn
- 66. Michael Forton
- 67. Phoebe Frewer
- 68. Amy Friel
- 69. Robin Gardner
- 70. Cressida Gething
- 71. Alasdair Gibson
- 72. Hugo Glashier
- 73. Stephanie Golder
- 74. William Goldring
- 75. Xavier Gonzalez Trimmer
- 76. Alfie Goodland
- 77. Emma-Rose Goodwin
- 78. Sophie Greenland
- 79. Aaron Gunning
- 80. Louisa Hadden
- 81. Catherine Hallett
- 82. Finn Halsall
- 83. Jake Handling
- 84. Gareth Harper
- 85. Louise Harris
- 86. Patrick Hart
- 87. Yvonne Hayward
- 88. Selma Heimedinger
- 89. Jonathan Herbert
- 90. Noah Herfort
- 91. Suzanne Hetherington
- 92. Sarah Hirons
- 93. Rupert Horlick
- 94. Adrian Howlett
- 95. Eric Hoyland
- 96. Abigail Hubbucks
- 97. Hannah Hunt
- 98. Emma Ireland

- 99. Pavel Ivanov
- 100. Rik Jansen
- 101. Ruth Jarman
- 102. Stephen Jarvis
- 103. Russell Jarvis
- 104. John Johnson
- 105. Hannah Johnston
- 106. Timothy Jones
- 107. Pascale Kann
- 108. Hallum Kelly
- 109. Linda Latter
- 110. Charles Laurie
- 111. Peter Lay
- 112. Eben Lazarus
- 113. Isobel Lewis
- 114. Elanor Lewis-Holmes
- 115. Joseph Linheart
- 116. El Litten
- 117. Rebecca Lockyer
- 118. Felix Lozano
- 119. Barbara Lund
- 120. Jacqueline Macey
- 121. Catharine Maclean
- 122. Jacob Main
- 123. Elizabeth McCormack
- 124. Eilidh McFadden
- 125. Nathan McGovern
- 126. Louis McKechnie
- 127. Lilah McKim
- 128. Grace McMeekin
- 129. Adalaide Meaney
- 130. Anna Middleton
- 131. Hannah Miles
- 132. Benjamin Mitchell
- 133. Darcy Mitchell
- 134. Deborah Mitchell
- 135. Teddy Monroe
- 136. Fiona Moore
- 137. Stefania Morosi
- 138. Paul Morozzo
- 139. Virgenia Morris
- 140. Paul Morrison
- 141. Zak Mullen
- 142. Alexandra Mulvey
- 143. Reuben Mychaleckyj
- 144. Richard Newell-Price
- 145. Ben Newman
- 146. Alexander Newnham
- 147. Jessica Norgard
- 148. Rachel Norris

- 149. Rose Norris
- George Oakenfold
- 151. Nicholas Onley
- 152. Jakub Pabiniak
- 153. Ella-Rose Paez
- 154. Sophie Page-Hall
- 155. Susan Parfitt
- 156. Dillon Parsons
- 157. Rose Patterson
- 158. Ethan Paul
- 159. Rosalind Pears
- 160. Abigail Percy-Ratcliff
- 161. Ursula Pethick
- 162. Jacqueline Phillips
- 163. Mitchel Phillips-White
- 164. Robert Possnett
- 165. Matthew Powell
- 166. Emily Price
- 167. Robert Price
- 168. Amy Pritchard
- 169. Felix Reeves-Whymark
- 170. Anna Retallack
- 171. Anne Richards
- 172. Bethan Roberts
- 173. Jasmin Robertson
- 174. Sebastian Roblyn
- 175. Isabel Rock
- 176. Elizabeth Rosser
- 177. Christian Rowe
- 178. Finn Roweth
- 179. Adelheid Russenberger
- 180. Isla Sandford
- Daniel Sargison
- 182. James Sargison
- 183. Cat Scothorne
- 184. James Sebley
- 185. Rosa Sharkey
- 186. Sophie Sharples
- 187. Susan Sidey
- 188. James Skeet
- 189. Hannah Skwarska
- 190. Jacqueline Slade
- 191. Oliver Slaughter
- 192. David Smartknight
- 193. Heather Smith
- 194. Joshua Smyth
- 195. David Squire
- 196. Katherine Steer
- 197. Oliver Stevens
- 198. Madeleine Stewart

- 199. Ferdi Suleyman
- 200. Vivien Talbot
- 201. Ben Taylor
- 202. Jacqueline Teggin
- 203. Zachary Tenquist
- 204. David Thorneywork
- 205. Hannah Torrance-Bright
- 206. Lucy Trinder
- 207. Morgan Trowland
- 208. Jan Van Der Knapp
- 209. Rik Venhoutteghem
- 210. Sally Webber
- 211. Leonard Weber
- 212. Miranda Whelehan
- 213. Philip White
- 214. Edred Whittingham
- Alexander Wilcox
- 216. Clare Wilson
- 217. Thomas Winter
- 218. Carol-Ann Wood
- 219. Lizia Woolf
- 220. Amorel Kennedy
- Grace Lally
- 222. Morien Morgan
- 230. Alice Wharrie
- 231. Anne Hart
- 232. Anthony Whitehouse
- 233. Callum Goode
- 234. Caroline Cattermole
- 235. [Not used]
- 236. Christopher Hardy
- 237. David Nixon
- 238. Isabel Walters
- 239. Jade Calland
- 240. Jane Touil
- 241. Joe Howlett
- 242. John Jordan
- 243. Jonathan Coleman
- 244. Judy Judkins
- 245. Karan Wildin
- 246. Kayleigh Matthews
- 247. Larch Maxey
- 248. Lindsay Hart
- 249. Margaret Reid
- 250. Mia Powell
- 251. Phoebe Plummer
- 252. Sam Parry Holland
- Samuel Johnson
- 254. Sarah MacDonald
- Seiriol Davies

Simon Reding
Stephen Gingell
Suzie Webb
Victoria Lindsell
Wendy Cocks
Diana Martin
Tony Muir

#### SCHEDULE 2 – POWER OF ARREST

N110A

### Power of arrest

Name of defendant (1) Madeline Adams (2)-(222) Other Named Defendants Defendant's address See attached continuation sheet

Name of court High Court of Justice King's Bench Division Claim No.

QB-2022-001317

Claimant's name (including ref.)

- (1) Thurrock Council
- (2) Essex County Council

Defendant's name (including ref.)

(223)-(229) Persons Unknown



Date order made | 1 | 2 | / 0 | 7 | / 2 | 0 | 2 | 4

Name of judge Mr Justice Julian Knowles

Order made under (insert statutory provision)

Local Government Act 1972, s222 and Highways Act 1980, s130(5)

This order includes a power of arrest under (insert statutory provision)

Police and Justice Act 2006, s27

The relevant paragraphs of the order to which a power of arrest has been attached are:

(set out those paragraphs of the order to which the power of arrest is attached, if necessary continue on a separate sheet)

Paragraphs 2.1 to 2.16 of the Order of Mr Justice Julian Knowles dated 12 July 2024 (see attached continuation sheet)

This power of arrest was ordered on 1 2 / 0 7 / 2 0 2 4

and expires on the | 1 | 1 | 0 | 7 | 2 | 0 | 2 | 9

#### **Note to Arresting Officer**

Where the defendant is arrested under the power given by section 155 of the Housing Act 1996, or section 27 of the Police and Justice Act 2006; or section 43 of the Policing and Crime Act 2009; or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014:-

- · the defendant shall be brought before the judge within the period of 24 hours beginning at the time of their arrest;
- a constable shall inform the person on whose application the injunction was granted, forthwith where the defendant is arrested under the power given by section 155 of the Housing Act 1996 or as soon as reasonably practicable where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014.

Nothing in section 155 of the Housing Act 1996 or section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014, shall authorise the detention of the respondent after the expiry of the period of 24 hours beginning at the time of their arrest.

In calculating any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Name of Claimant

- (1) Thurrock Council
- (2) Essex Council

Claimant's address

Sharpe Pritchard LLP

Elm Yard

10-16 Elm Street

London

WC1X 0BJ

Claimant's phone number

020 7405 4600

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles 12 July 2024

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

Claimants

-and-

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)
- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	Defendants
POWER OF ARREST: CONTINUATION SHEET	

#### **DEFENDANTS**

PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,	223
CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN,	
OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE	
FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT	
ANNEXE 1 TO THE CLAIM FORM	
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,	224
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OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO	
ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS	
ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE	
CLAIM FORM	
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,	225
CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN.	

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TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY	TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY	
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AUTHORITY	TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY	
	AUTHORITY	

# THE RELEVANT PARAGRAPHS OF THE ORDER TO WHICH A POWER OF ARREST HAVE BEEN ATTACHED ARE:

Paragraphs 2.1 to 2.16 of the Order of Mr Justice Julian Knowles dated 12 July 2024:

- 2. The Defendants and each of them (whether by themselves or by instructing, encouraging or allowing any other person) are forbidden from:
  - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
  - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
  - 2.3 Entering, climbing onto, climbing into, climbing under any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
  - 2.4 Entering, climbing onto, climbing into, climbing under any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested

- in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
- 2.5 Affixing themselves ("locking on") to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.
- 2.6 Affixing themselves ("locking on") to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the "locking on" is for the purpose of protesting.
- 2.7 Affixing themselves ("locking on") or any other items to any of the Roads or any other person or object on, under or over the Roads.
- 2.8 Affixing themselves ("locking on") or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the "locking on" is for the purpose of protesting.
- 2.9 Erecting any structure on the Roads.
- 2.10 Tunnelling, excavating, drilling or digging under or adjacent to the Roads.
- 2.11 Occupying existing tunnels under the Roads for the purpose of protesting.
- 2.12 Causing damage to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.
- 2.13 Abandoning any vehicle or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.
- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station forecourt or access road, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by delivery tankers of fuel supplies and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.

IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles 12 July 2024

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

Claimants

-and-

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)
- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

ANNEXE 1

### **Thurrock Council Roads**

NORTH ROAD	B186
SANDY LANE	B1335
ROMFORD ROAD ROUNDABOUT	B1335
MILL ROAD	C Class
PURFLEET ROAD	C Class
WEST ROAD	C Class
ARISDALE AVENUE	C Class
DAIGLEN DRIVE	C Class
STIFFORD ROAD	B1335
LANCE CORPORAL NICKY MASON WAY	B1335
STIFFORD ROAD	B1335
ARTERIAL ROAD	A1306
THURROCK SERVICES ROAD	Unclassified
POND ROAD ROUNDABOUT	Unclassified

LONDON ROAD ROUNDABOUT	A1306
LONDON ROAD	A1306
ENTRY ON SLIP WELLINGTON INTERCHANGE TO A13 EASTBOUND	A13
EXIT OFF SLIP A13 TO WELLINGTON INTERCHANGE WESTBOUND	A13
PURFLEET BYPASS	B1335
LINK ROAD FROM A13 SOUTHBOUND TO A1306	A1090
CANTERBURY WAY SLIP ROAD ANTICLOCKWISE	A282
LINK ROAD FROM A1306 TO A13 NORTHBOUND	A282
CANTERBURY WAY SLIP ROAD CLOCKWISE	A282
STONEHOUSE CORNER ROUNDABOUT	A1090
ARTERIAL ROAD ROUNDABOUT	A1090
STONEHOUSE LANE	A1090
CYGNET VIEW	Unclassified
ARTERIAL ROAD ROUNDABOUT A1306	A1306
WEST THURROCK WAY RETAIL PARK ROUNDABOUT	B186
ARTERIAL ROAD	A1306
LAKE RISE	Unclassified
OLIVER CLOSE	A1090
ST CLEMENTS WAY ROUNDABOUT	A1090
ST CLEMENTS WAY	A1090
LONDON ROAD	A1090
WEST THURROCK WAY	A126
Access road Cost Co	Unclassified
JUNCTION 30 M25 TO BOROUGH BOUNDARY WESTBOUND	A13
BOROUGH BOUNDARY TO M25 JUNCTION 30 EASTBOUND	A13
ACCESS ROAD FROM BURGHLEY ROAD TO SUPERSTORE	Private Road
BURGHLEY ROAD ROUNDABOUT	B146
SEALLY ROAD	Unclassified
BURGHLEY ROAD	B146
PILGRIMS LANE ROUNDABOUT	A1306
ARTERIAL ROAD	A1306
ENTRY ON SLIP NORTH SLIFFORD ROUNDABOUT TO A13	
EASTBOUND	A13
ENTRY ON SLIP NORTH STIFFORD ROUNDABOUT TO A13	
WESTBOUND	A13
EXIT OFF SLIP A13 TO NORTH STIFFORD ROUNDABOUT	
WESTBOUND	A13
EXIT OFF SLIP A13 TO NORTH STIFFORD ROUNDABOUT	
EASTBOUND	A13
STIFFORD ROUNDABOUT	A1012
TREACLE MINE ROUNDABOUT	A1012
LINK FROM A1012 ROUNDABOUT TO A1306 INTERCHANGE	A1012
HOGG LANE	A1012
ELIZABETH ROAD	A1012
HOGG LANE ROUNDABOUT	A1012
LONDON ROAD	A126
HOGG LANE ROUNDABOUT	A1012
EASTERN WAY	A126

A AVERTICAL DESCRIPTION AND AVERTICAL PROPERTY OF THE AVERTY O	
LAKESIDE INTERCHANGE TO NORTH STIFFORD ROUNDABOUT	
EASTBOUND	A13
NORTH STIFFORD ROUNDABOUT TO LAKESIDE INTERCHANGE	
WESTBOUND	A13
LAKESIDE INTERCHANGE TO M25 JUNCTION 30 WESTBOUND	A13
JUNCTION 30 M25 TO LAKESIDE INTERCHANGE EASTBOUND	A13
BRENTWOOD ROAD	A128
STANFORD ROAD	A1013
SOUTHEND ROAD	A1013
CEMENT BLOCK COTTAGES	Unclassified
DOCK ROAD	A126
ORSETT COCK ROUNDABOUT	A1013
ENTRY ON SLIP ORSETT COCK ROUNDABOUT TO A13 WESTBOUND	A13
EXIT OFF SLIP A13 EASTBOUND TO ORSETT COCK ROUNDABOUT	A13
EXIT OFF SLIP A13 WESTBOUND TO ORSETT COCK ROUNDABOUT	A13
DENEHOLES ROUNDABOUT	A1013
WOOD VIEW	B149
LODGE LANE	A1013
CHADWELL HILL	C Class
EXIT OFF SLIP A1089 TO A126 SOUTHBOUND	A1089
ENTRY ON SLIP A126 TO A1089 NORTHBOUND	A1089
MARSHFOOT ROAD ROUNDABOUT	A126
ST CHADS ROAD ROUNDABOUT	A126
GATEWAY ACADEMY ROUNDABOUT MARSHFOOT ROAD	A126
MARSHFOOT ROAD	A126
MARSHFOOT ROAD	A126
BROADWAY	A126
THURROCK PARK WAY	Unclassified
ACCESS ROADS FOR ASDA SUPPERSTORE	Unclassified
NORTH STIFFORD ROUNDABOUT TO A 1089 EASTBOUND	A13
A1089 TO NORTH STIFFORD ROUNDABOUT WESTBOUND	A13
A1089 TO ORSETT COCK ROUNDABOUT EASTBOUND	A13
ORSETT COCK ROUNDABOUT TO A1089 WESTBOUND	
DOCK APPROACH ROAD	A13
DOCK APPROACH ROAD  DOCK APPROACH ROAD	A1089
	A1089
DOCK APPROACH ROAD	A1089
THURROCK PARK WAY ROUNDABOUT	A1089
SLIP ROAD FROM DOCK APPROACH ROAD TO A13	A13
SLIP ROAD FROM DOCK APPROACH ROAD TO A13	A13
STANFORD ROAD	A1013
LONDON ROAD	C Class
ENTRY ON SLIP ORSETT COCK ROUNDABOUT TO A13 EASTBOUND	A13
Orsett Cock FS West Slip Roads	A13
Orsett Cock FS East Slip Roads	A13
STANFORD ROAD	A1013
STANFORD BYPASS INTERCHANGE	A1014
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 EASTBOUND	A13
EXIT OFF SLIP A13 EASTBOUND TO STANFORD INTERCHANGE	A13

EXIT OFF SLIP A13 WESTBOUND TO STANFORD INTERCHANGE	A13
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 WESTBOUND	A13
SOUTHEND ROAD	B1420
THE MANORWAY SOUTHEND ROAD LINK WESTBOUND	A1014
THE MANORWAY SOUTHEND ROAD LINK EASTBOUND	A1014
THE MANORWAY	A1014
CORRINGHAM ROAD A1014 ROUNDABOUT	A1014
ORSETT COCK ROUNDABOUT TO STANFORD INTERCHANGE	
EASTBOUND	A13
STANFORD INTERCHANGE TO ORSETT COCK ROUNDABOUT	
WESTBOUND	A13
STANFORD INTERCHANGE TO BOROUGH BOUNDARY AT FIVE	
BELLS EASTBOUND	A13
BOROUGH BOUNDARY AT FIVE BELLS TO STANFORD	
INTERCHANGE WESTBOUND	A13
BELLS CORNER PARADE SOUTHEND ROAD	A176
BELLS CORNER ROUNDABOUT	A176
SOUTHEND ROAD	B1420
LINK ROAD FROM B1420 AND BELLS CORNER ROUNDABOUT TO	D.1.100
BOUNDARY	B1420
THE MANORWAY	A1014
GIFFORDS CROSS ROAD	C Class
FOBBING ROAD	C Class
CHURCH ROAD LAMPITS HILL	B1420
SOUTHEND ROAD	B1420
ENTRY ON SLIP FIVE BELLS ROUNDABOUT TO A13 WESTBOUND	B1420
FIVE BELLS ROUNDABOUT SOUTH	A13
FIVE BELLS ROUNDABOUT NORTH	A176
EXIT OFF SLIP A13 EASTBOUND TO FIVE BELLS ROUNDABOUT	A176
FIVE BELLS SLIP ROAD FROM SOUTHEND ROAD WESTBOUND	A13
FIVE BELLS SLIP ROAD FROM SOUTHEND ROAD WESTBOUND	A13
ASKEWS FARM LANE	Unclassified
WOULDHAM ROAD	Unclassified
LONDON ROAD	A126
ST CLEMENTS WAY ROUNDABOUT	A1090
BURNLEY ROAD	Unclassified
ST CLEMENTS WAY	A1090
STONEHOUSE CORNER ROUNDABOUT	A1090
SHIP LANE	C Class
ARTERIAL ROAD ROUNDABOUT	A1306
STONEHOUSE LANE	A1090
ARTERIAL ROAD	A1306
LONDON ROAD	A1090
LONDON ROAD	A1090
OLIVER ROAD	A1090
OLIVER CLOSE	A1090
STANFORD BYPASS INTERCHANGE	A1014

CORRINGHAM ROAD A1014 ROUNDABOUT	A1014
THE MANORWAY	A1014
THE MANORWAY	A1014
THE MANORWAY	A1014
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 WESTBOUND	A13
EXIT OFF SLIP A13 EASTBOUND TO STANFORD INTERCHANGE	A13
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 EASTBOUND	A13
EXIT OFF SLIP A13 WESTBOUND TO STANFORD INTERCHANGE	A13
CANTERBURY WAY SLIP ROAD ANTICLOCKWISE	A282
CANTERBURY WAY SLIP ROAD CLOCKWISE	A282
LINK ROAD FROM A13 SOUTHBOUND TO A1306	A13
LINK ROAD FROM A1306 TO A13 NORTHBOUND	A13

#### **Essex County Council Roads**

HAVEN ROAD, CANVEY ISLAND
ROSCOMMON WAY, CANVEY ISLAND
NORTHWICK ROAD, CANVEY ISLAND
A130 FROM SADDLERS FARM ROUNDABOUT TO JUNCTION WITH
HAVEN ROAD
SADLERS FARM ROUNDABOUT
SLIPROADS LEADING TO AND FROM A13 FROM SADLERS FARM
ROUNDABOUT
SLIPROADS LEADING TO AND FROM A130 FROM SADLERS FARM
ROUNDABOUT
B1014 CANVEY ROAD FROM WATERSIDE ROUNDABOUT TO
ROUNDABOUT ON HIGH STREET BENFLEET
CANVEY ISLAND PUBLIC FOOTPATH NUMBER 8
A130 AND B1014 BETWEEN THE ENTRANCE TO THE ISLAND AND
ROUNDABOUT KNOWN AS THE WATERSIDE ROAD ROUNDABOUT

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

Before the Honourable Mr Justice Julian Knowles 12 July 2024

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

Claimants

-and-

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)
- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

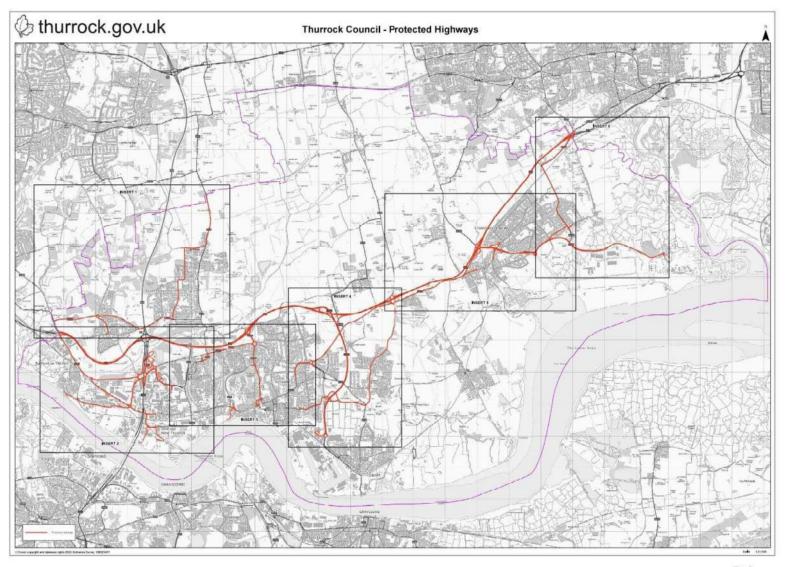
(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

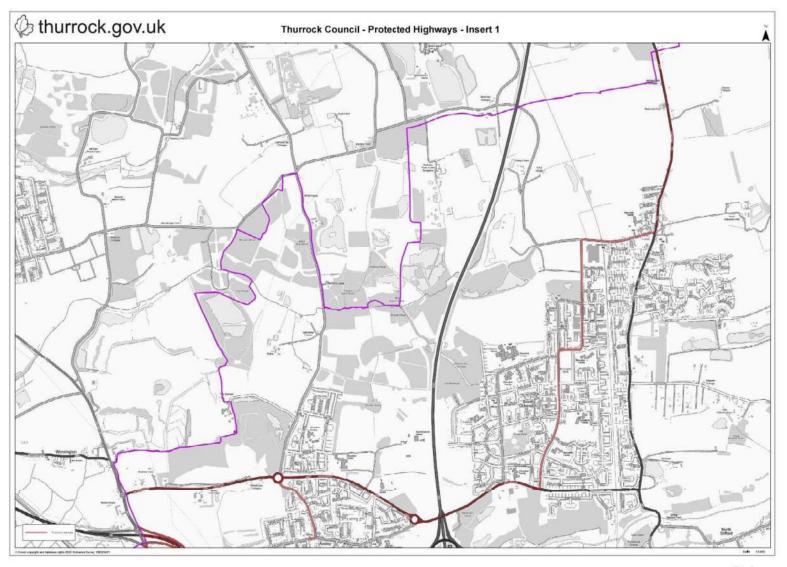
(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

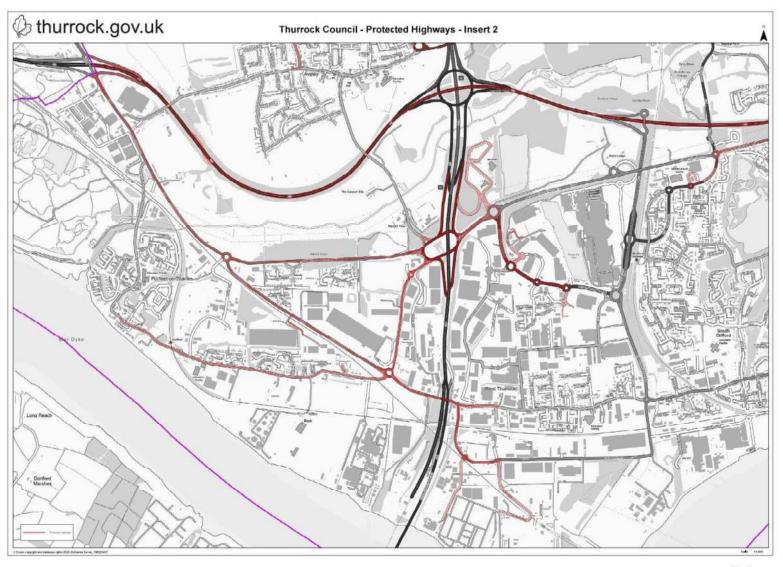
	<u>Defendants</u>
ANNEXE 2	



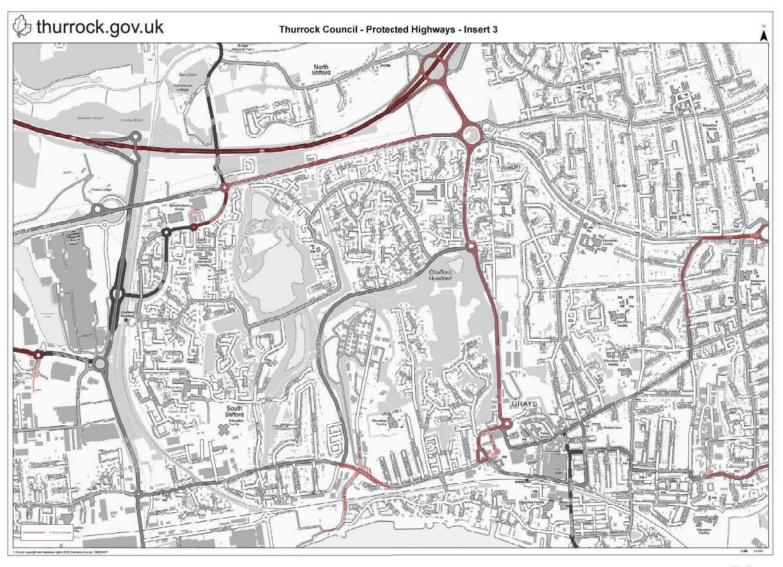
B 3



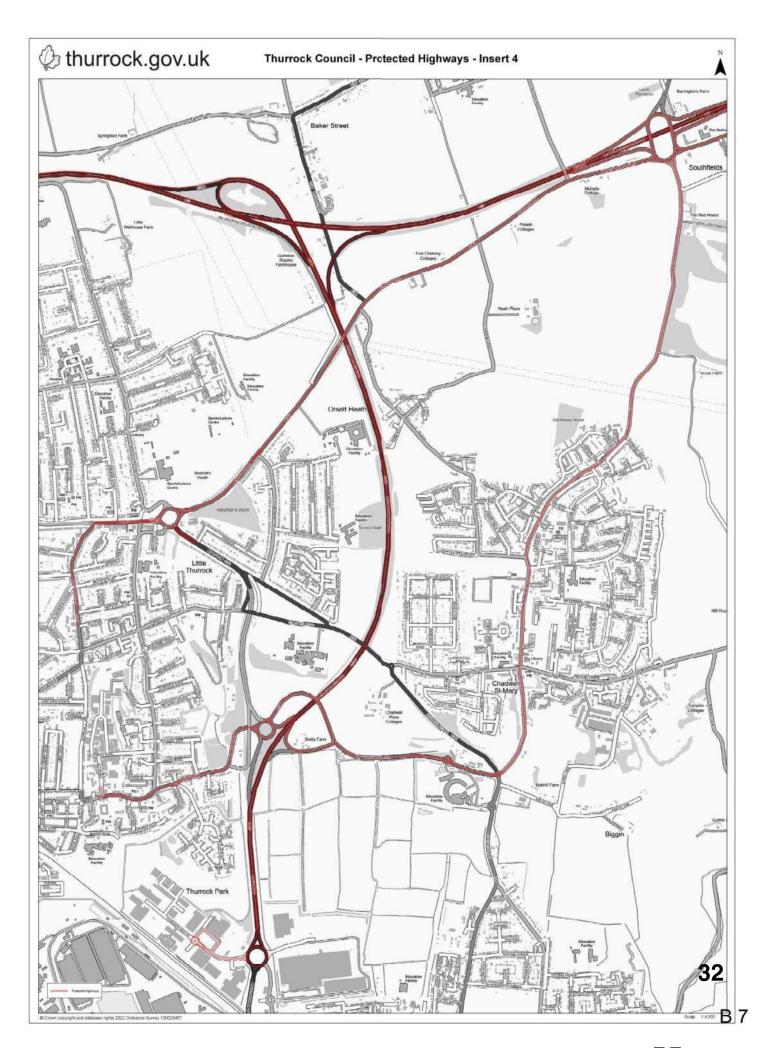
B 4

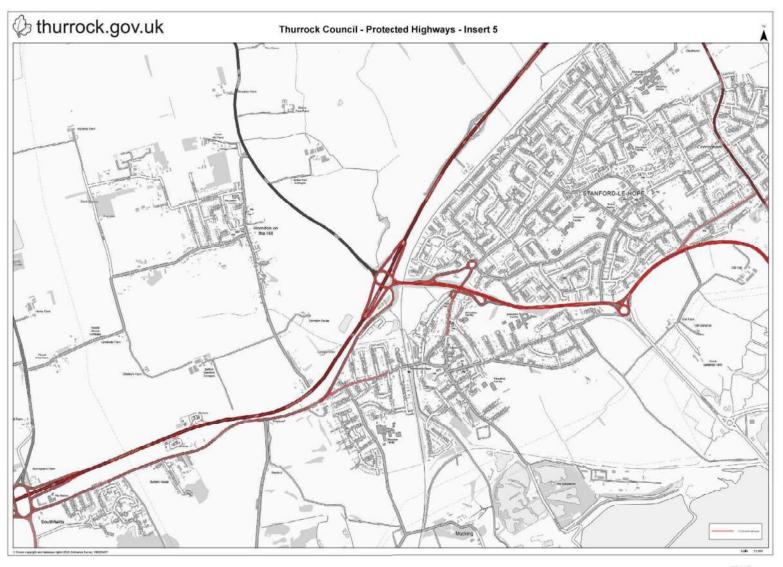


B 5

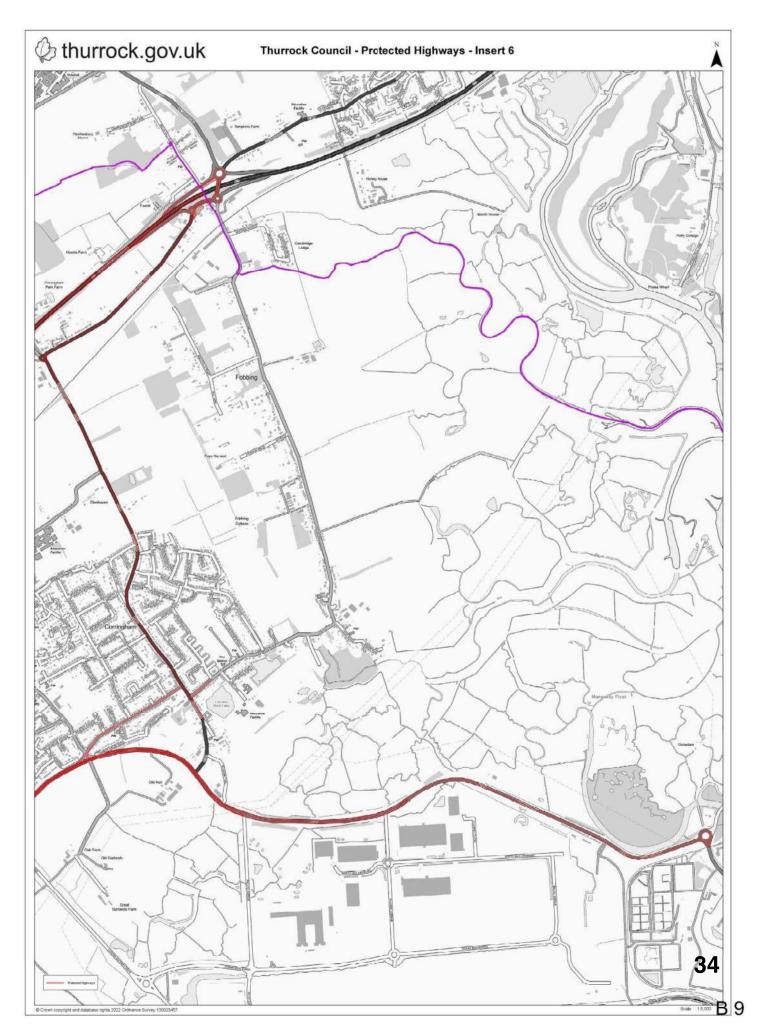


B 6





B 8



In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

**Before the Honourable Mr Justice Julian Knowles** 12 July 2024

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)
- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

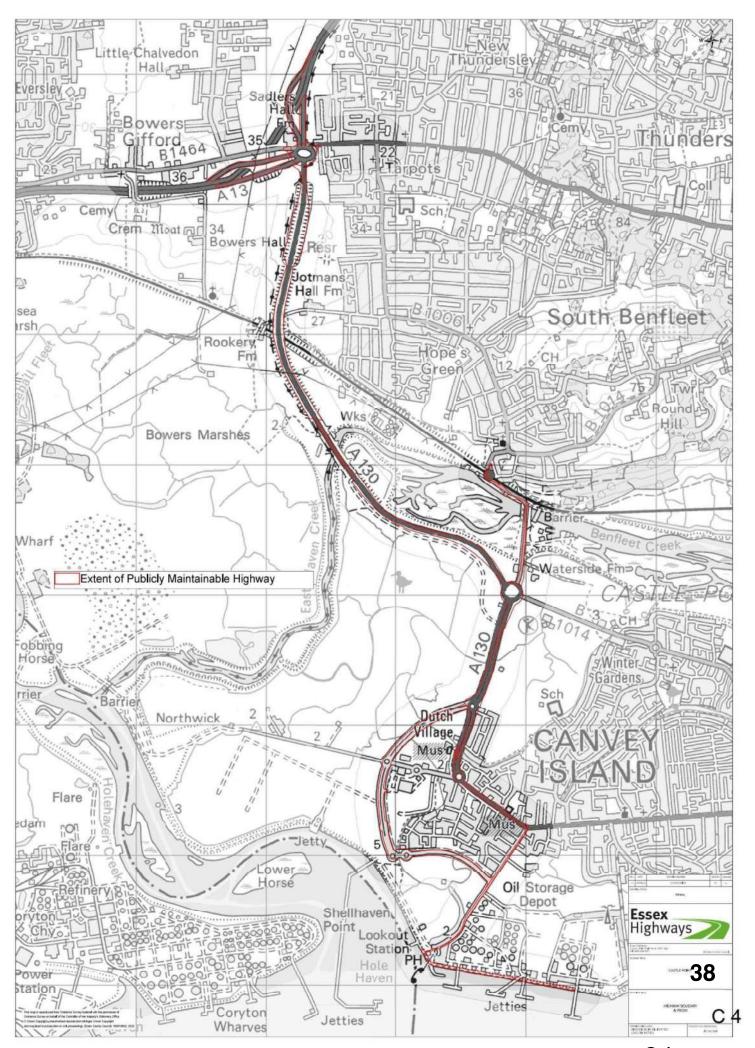
(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<u>Defendants</u>
ANNEXE 3	





## IN THE HIGH COURT OF JUSTICE KING BENCH DIVISION

**CLAIM NO: KB-2024-001765** 

Before Mr Justice Julian Knowles On 20 June 2024

**BETWEEN:-**

(1) LONDON CITY AIRPORT LIMITED

(2) DOCKLANDS AVIATION GROUP LIMITED

**★** 20 Jun 202

- v -

PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER DEFINED IN THE CLAIM FORM

	<u>Defendant</u>
ORDER	

#### **PENAL NOTICE**

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

#### **IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN**

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. You have the right to ask the Court to vary or discharge this Order.

**UPON** the Claimants' claim by Claim Form, dated 12 June 2024

**AND UPON** hearing the Claimants' application for an interim injunction, dated 12 June 2024, and supporting evidence, without Persons Unknown being notified

**AND UPON** hearing Counsel for the Claimants

**AND UPON** the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

**AND UPON** the "Land" being defined as that land known as London City Airport, as shown for identification edged red on the attached Plan 1 in Schedule 1, but <u>excluding</u>:

- a. Those buildings shaded blue on Plan 1;
- b. In those buildings shaded green on Plan 1, the areas edged blue on Plans 2-8;
- c. In those areas shaded purple, the land suspended over the ground and forming part of the Docklands Light Railway.
- d. In the areas shaded pink, the underground rail tunnel, the subway and that part of Docklands Light Railway located below ground level.

#### IT IS ORDERED THAT:

#### **INJUNCTION**

- 1. Until 20 June 2029 or final determination of the claim or further order in the meantime, whichever shall be the earlier, Persons Unknown must not, without the consent of the Claimants, enter, occupy or remain upon the Land.
- 2. In respect of paragraph 1, Persons Unknown must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
- 3. The injunction contained at paragraph 1 of this Order shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1.5 hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the review hearing.

#### **VARIATION**

- 4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 48 hours in advance of any hearing.
- 5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
- 6. The Claimants have liberty to apply to vary this Order.

#### **SERVICE AND NOTIFICATION**

- 7. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
- 8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and Note of the Hearing on 20 June 2024 will be notified to Persons Unknown by the Claimants carrying out each of the following steps:
  - Uploading a copy onto the following website:
     <a href="https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction">https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction</a>
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
  - c. Either affixing a notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9(d) below.
- 9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to Persons Unknown by the Claimants carrying out each of the following steps:

- a. Uploading a copy of the Order onto the following website: <a href="https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction">https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction</a>
- b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
- c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 1.
- d. Affixing warning notices of A2 size at those locations marked with an "X" on Plan 1.
- 10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to Persons Unknown of any further applications shall be effected by the Claimants carrying out each of the following steps:
  - a. Uploading a copy of the application onto the following website: <a href="https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction">https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction</a>.
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
  - c. Affixing a notice at those locations marked with an "X" on Plan 1 stating that the application has been made and where it can be accessed in hard copy and online.
- 11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(a)-(b) only.
- 12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.
- 13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8(c), 9(c)-(d) and 10(c), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

#### **FURTHER DIRECTIONS**

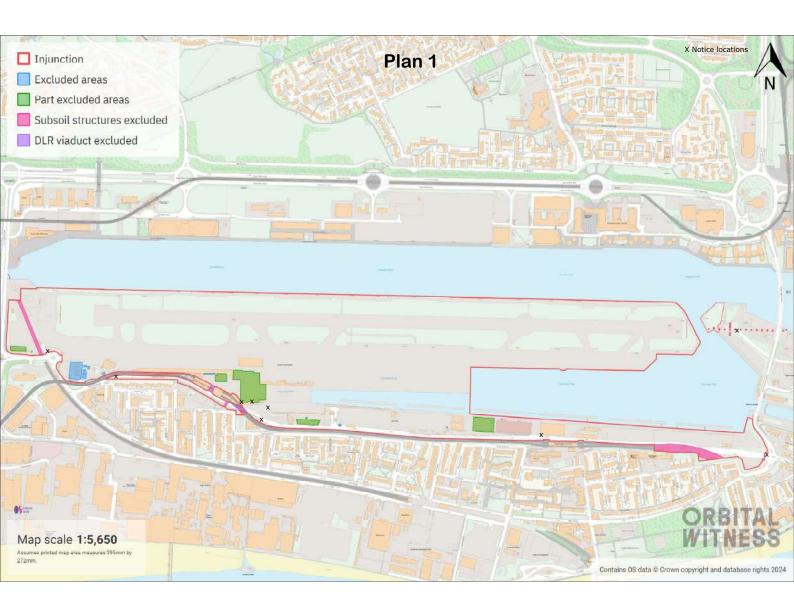
- 14. Liberty to apply.
- 15. Costs are reserved.

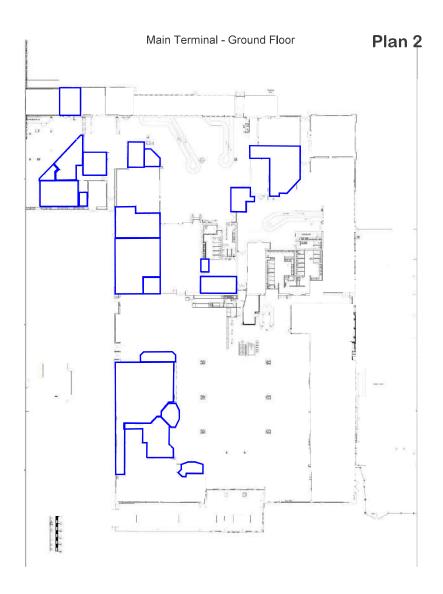
#### **COMMUNICATIONS WITH THE CLAIMANT**

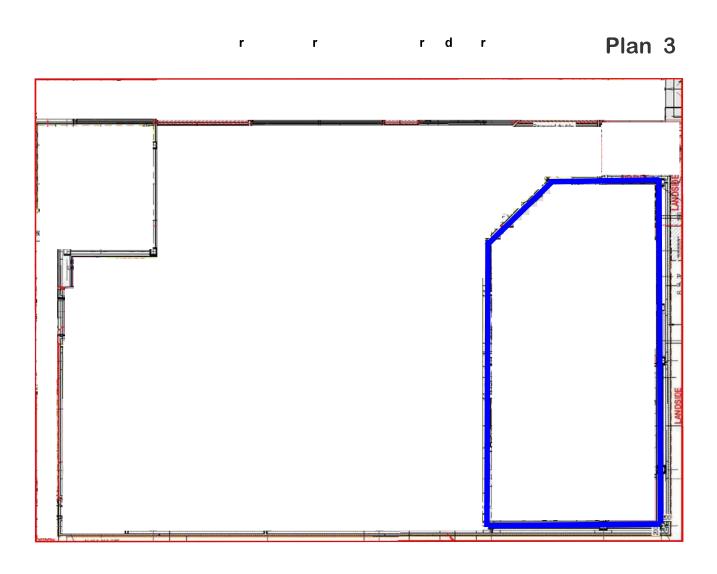
- 16. The Claimants' solicitors and their contact details are:
  - (1) Stuart Wortley
    Eversheds Sutherland (International) LLP
    StuartWortley@eversheds-sutherland.com
    07712 881 393
  - (2) Nawaaz Allybokus
    Eversheds Sutherland (International) LLP
    NawaazAllybokus@eversheds-sutherland.com
    07920 590 944

**Dated: 20 June 2024** 

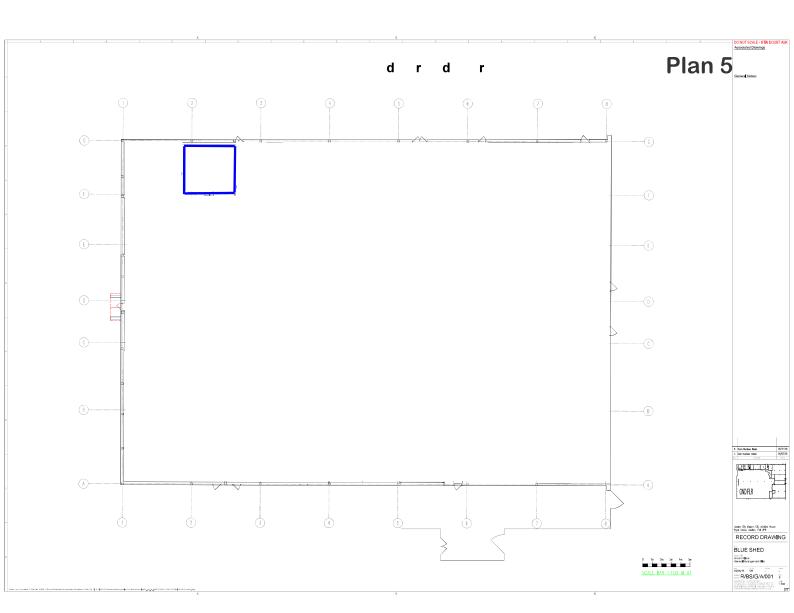
### SCHEDULE 1 - PLANS

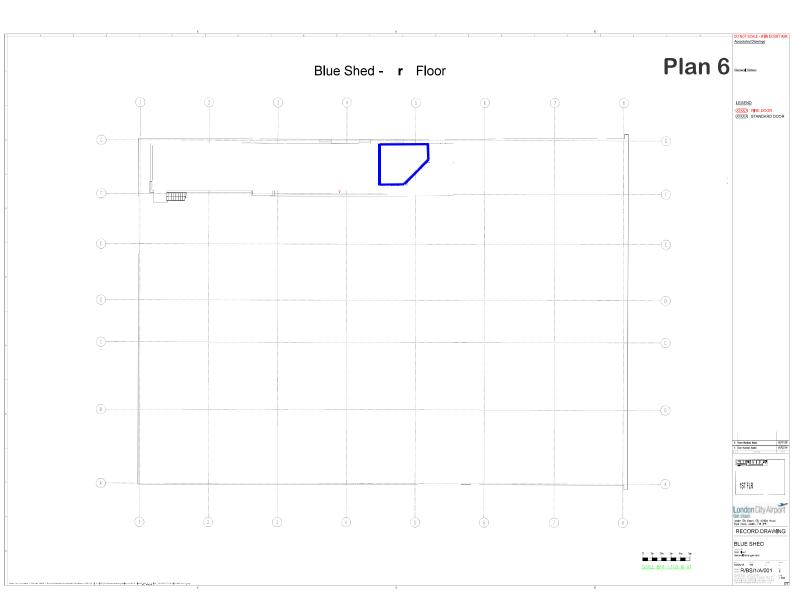


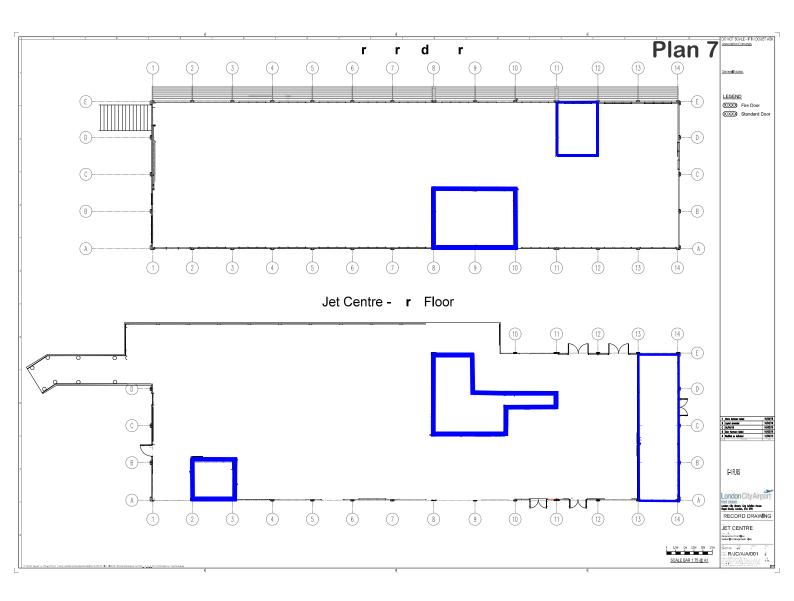


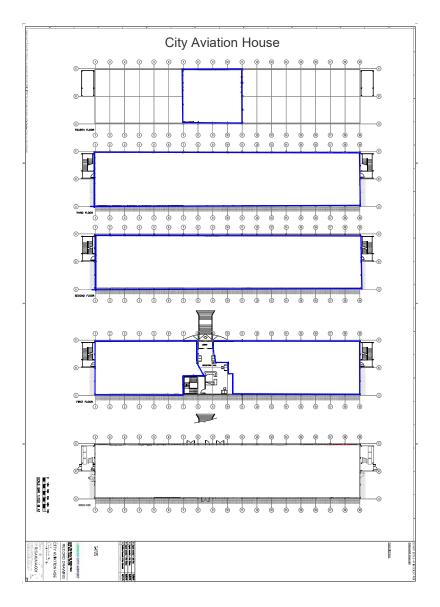


Terminal Immigration Facilities - r Floor Plan 4









# Plan 🗆

#### **SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS**

- (1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.
- (2) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

#### **SCHEDULE 3 – EMAIL ADDRESSES**

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org

#### IN THE HIGH COURT OF JUSTICE

#### **KINGS BENCH DIVISION**

**Before The Honourable Mr Justice Julian Knowles BETWEEN:** 

#### **HEATHROW AIRPORT LIMITED**

Claim No: KB-2024-002210

-and-

PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OF REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATER OW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PERSON PARTICULARS OF CLAIM

	<u>Defendants</u>
ORDER	_
PENAL NOTICE	_

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

**UPON** the Claimant having issued this Claim by a Claim Form dated 7 July 2024

**AND UPON** hearing the Claimant's application for an interim injunction by Application Notice dated 7 July 2024

**AND UPON READING** the Witness Statements of Akhil Markanday dated 6 July 2024 and Jonathan Daniel Coen dated 7 July 2024

AND UPON HEARING Leading Counsel and Junior Counsel for the Claimant

**AND UPON** the Claimant giving and the Court accepting the undertakings set out in Schedule 1 to this Order

#### IT IS ORDERED THAT:

#### **INJUNCTION**

- 1. Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 ("Plan A").
- 2. In respect of paragraph 1, the Defendants must not (a) do it himself/herself/themselves in any other way (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
- 3. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing.

#### **VARIATION**

- 4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.
- 5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
- 6. The Claimant has liberty to apply to vary this Order.

#### SERVICE AND NOTIFICATION

- 7. Service of the Claim Form, the Application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
- 8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024 will be notified to the Defendants by the Claimant carrying out each of the following steps:
  - 8.1 Uploading a copy on to the following website: <a href="www.heathrow.com/injunction">www.heathrow.com/injunction</a>
  - 8.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made and that the documents can be found at the website referred to above.
  - 8.3 Either affixing a notice at the locations shown marked with a red dot on the second plan attached to this Order at Schedule 4 ("Plan B") setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9.4 below.

- 9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to the Defendants by the Claimant carrying out each of the following steps:
  - 9.1 Uploading a copy of the Order on to the following website: www.heathrow.com/injunction
  - 9.2 Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
  - 9.3 Affixing a copy of the Order in A4 size in a clear plastic envelope at each of the locations shown with a red dot on Plan B.
  - 9.4 Affixing warning notices of A2 size at those locations marked with a red dot on Plan B, substantially in the form of the notice at Schedule 5.
- 10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to the Defendants of any further applications shall be effected by the Claimant carrying out each of the following steps:
  - 10.1 Uploading a copy of the application on to the following website: www.heathrow.com/injunction
  - 10.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
  - 10.3 Affixing a notice at these locations marked with a red dot on Plan B stating that the application has been made and where it can be accessed in hard copy and online.
- 11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to the Defendants may be effected by carrying out the steps set out in paragraphs 10.1 and 10.2 only.

12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have

taken place on the date on which all the relevant steps have been carried out.

13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8.3, 9.3

and 10.3, effective notification will be deemed to have taken place when the

documents have all been first affixed regardless of whether they are subsequently

removed.

#### **FURTHER DIRECTIONS**

14. Liberty to apply.

#### **COSTS**

15. Costs reserved.

#### **COMMUNICATIONS WITH THE CLAIMANT**

16. The Claimant's solicitors and their contact details are:

(1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,

London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

(2) Phil Spencer

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,

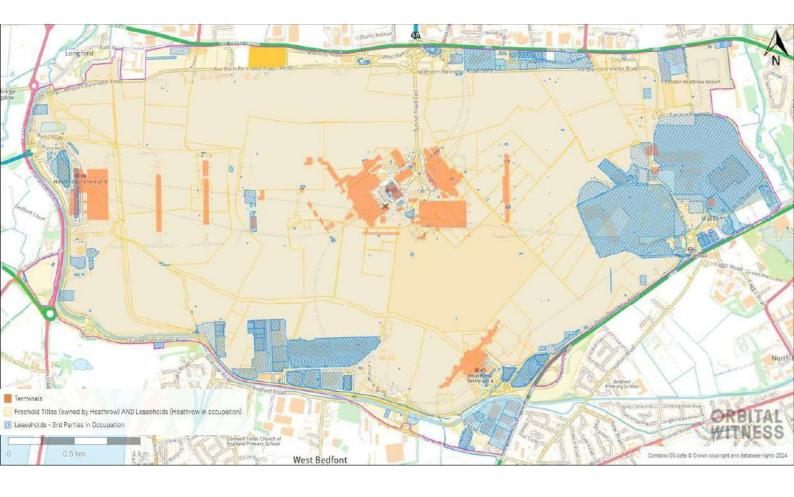
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

Dated: 9 July 2024

#### **SCHEDULE 1 – UNDERTAKINGS**

- 1. The Claimant will take steps to notify Defendants of the Claim Form, Application Notice, evidence in support, the Order and a Note of the Hearing on 9 July 2024 as soon as practicable and no later than 5pm on 15 July 2024.
- 2. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

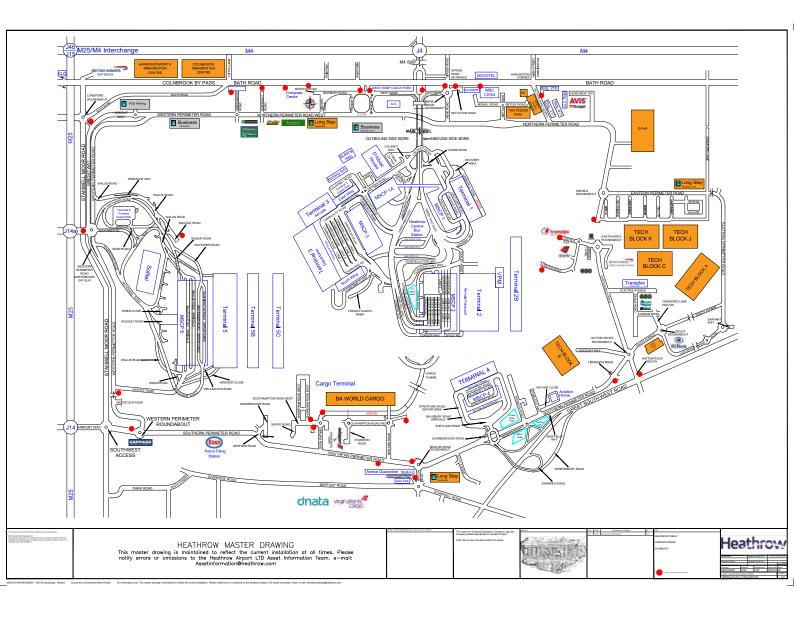
### SCHEDULE 2 – PLAN A



# SCHEDULE 3 – EMAIL ADDRESSES

- 1. juststopoil@protonmail.com
- 2. <u>juststopoilpress@protonmail.com</u>
- 3. <u>info@juststopoil.org</u>

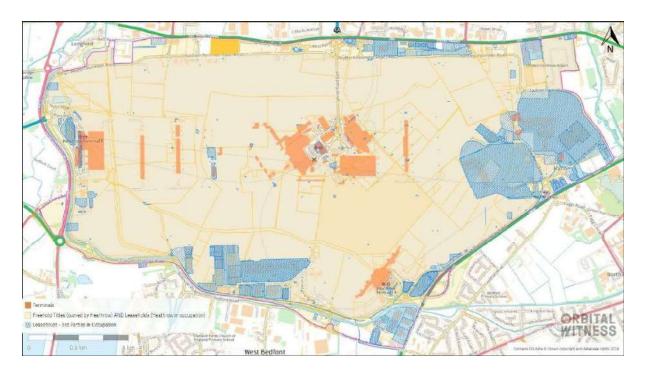
# SCHEDULE 4 – PLAN B



# SCHEDULE 5 – NOTICE WARNING – NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted in Claim No KB-2024-002210 granted on 9 July 2024 until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, now exists in relation to Heathrow Airport. The injunction means you may NOT without the express consent of HEATHROW AIRPORT LIMITED:

IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN ENTER, OCCUPY OR REMAIN UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE PLAN BELOW:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED, OR HAVE THEIR ASSETS SEIZED.

A copy of the legal proceedings (including the Order, Claim Form, Application Notice, evidence in support and a note of the hearing on 9 July 2024) can be viewed at <a href="https://www.heathrow.com/injunction">www.heathrow.com/injunction</a> or obtained from:

- (1) Compass Centre, Heathrow Airport, Nelson Road, Hounslow TW6 2GW, which is open between 9am-5pm Monday-Friday; or
- (2) Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR (Reference: AMRK/PSPE/20H0904.000140; Telephone: 020 3400 3119).

Anyone notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. The address of the Court is the Royal Courts of Justice, Strand, London WC2A 2LL.

# WARNING INJUNCTION

THIS AREA IS SUBJECT TO A
HIGH COURT INJUNCTION
WHICH PLACES RESTRICTIONS ON
SOME PROTEST ACTIVITIES.
YOU MUST NOT ENTER THIS SITE.
BREACH OF THE INJUNCTION COULD
LEAD TO IMPRISONMENT.

FOR DETAILS, PLEASE SEE
WWW.TELEDYNE-INJUNCTION.CO.UK
OR FOLLOW THIS QR CODE

