

RE-RE-AMENDED CLAIM FORM



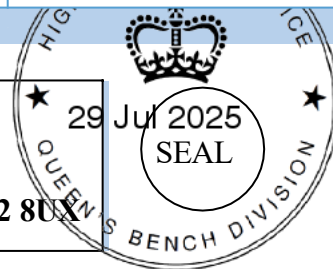
Claim Form

You may be able to issue your claim online which may save time and money. Go to www.moneyclaims.service.gov.uk/make-claim to find out more.

In the	High Court of Justice Queen's Bench Division
Fee Account no.	PBA 0087211
Help with Fees - Ref no. (if applicable)	/
	For court use only
Claim no.	QB-2022-001098
Issue date	4 April 2022

Claimant(s) name(s) and address(es) including postcode

- (1) ESSO PETROLEUM COMPANY, LIMITED
 (2) EXXONMOBIL CHEMICAL LIMITED
 both of Ermyn House, Ermyn Way, Leatherhead, Surrey KT22 8UX



Defendant(s) name and address(es) including postcode

QB-2022-001098

- (1) Persons Unknown as further described in the attached ~~rider~~ further re-amended rider
 (2) The named Defendants listed in the attached further re-amended rider

Brief details of claim

Claim for injunctions as further described in the Particulars of Claim

Value

Defendant's
name and
address for
service
including
postcode

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	£
Amount claimed	
Court fee	
Legal representative's costs	
Total amount	

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.

QB-2022-001098

You must indicate your preferred County Court Hearing Centre for hearings here
(see notes for guidance)

Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- ☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

☒ No

Does, or will, your claim include any issues under the Human Rights Act 1998?

Yes

☐ No

Claim no.	QB-2022-001098
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Particulars of Claim

☒ attached

to follow

Statement of truth

Note: you are reminded that a copy of this claim form must be served on all other parties.

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

☐ **I believe** that the facts stated in this claim form and any attached sheets are true.

☒ **The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

Signature



☐ Claimant

☐ Litigation friend (where claimant is a child or protected party)

☒ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

Month

Year

4

April

2022

Full name

Stuart Sherbrooke Wortley

Name of claimant's legal representative's firm

Eversheds Sutherland (International LLP)

If signing on behalf of firm or company give position or office held

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Postcode

E	C	2	V	7	W	S
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If applicable

Phone number

020 7919 4500

DX number

Your Ref.

SSW.066758.010081

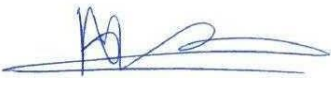
Email

stuartwortley@eversheds-sutherland.com

STATEMENT OF TRUTH

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

The Claimants believe that the facts stated in this **re-re-amended** claim form and any attached sheets are true. I am authorised by the Claimants to sign this statement of truth.

Signed: 

Claimants' legal representative (as defined by CPR 2.3(1))

23 July 2025

Holly Stebbing

Partner

Norton Rose Fulbright LLP, 3 More London Riverside, London, SE1 2AQ

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holly.stebbing@nortonrosefulbright.com

FURTHER AMENDED PURSUANT TO CPR PART 17.1.1

FURTHER AMENDED RIDER TO CLAIM FORM QB-2022-001098

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT) UPON ANY OF THE FOLLOWING SITES ("THE SITES")

(A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON ~~SO45 1TH~~ SO45 ITX (postcode amended under the slip rule in accordance with the order of Mrs Justice Ellenbogen DBE dated 21 January 2025) (AS SHOWN ~~FOR IDENTIFICATION~~ EDGED RED AND GREEN ~~BUT EXCLUDING THOSE AREAS EDGED BLUE~~ ON THE 'FAWLEY PLAN' ATTACHED TO THE PARTICULARS OF CLAIM)

(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN ~~FOR IDENTIFICATION~~ EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE PARTICULARS OF CLAIM)

(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN ~~FOR IDENTIFICATION~~ EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE PARTICULARS OF CLAIM)

(D) BIRMINGHAM OIL TERMINAL, ~~WOOD LANE~~, BIRMINGHAM B24 8DN (AS SHOWN ~~FOR IDENTIFICATION~~ EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE PARTICULARS OF CLAIM)

(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN ~~FOR IDENTIFICATION~~ EDGED RED AND ~~BROWN~~ ON THE 'PURFLEET PLAN' ATTACHED TO THE PARTICULARS OF CLAIM)

(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN ~~FOR IDENTIFICATION~~ EDGED RED ON THE 'WEST LONDON PLAN' ATTACHED TO THE PARTICULARS OF CLAIM)

~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN ~~FOR IDENTIFICATION~~ EDGED RED ON THE 'HARTLAND PARK PLAN' ATTACHED TO THE PARTICULARS OF CLAIM) (removed in accordance with the order of Mrs Justice Ellenbogen DBE dated 29 January 2024)~~

(H) ALTON COMPOUND, PUMPING STATION, A31, HOLYBOURNE (AS SHOWN EDGED ~~FOR IDENTIFICATION~~ RED ON THE "ALTON COMPOUND PLAN" ATTACHED TO THE PARTICULARS OF CLAIM)

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON ~~SO45 1TH~~ SO45 1TX (postcode amended under the slip rule in accordance with the order of Mrs Justice Ellenbogen DBE dated 21 January 2025) (AS SHOWN ~~FOR IDENTIFICATION~~ EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES (WHERE "SITES" FOR THIS PURPOSE DOES NOT INCLUDE THE AREA EDGED BROWN ON THE PURFLEET PLAN)

(4) PAUL BARNES, [REDACTED]

(5) DIANA HEKT, [REDACTED]