TRIAL BUNDLE FOR THE ANNUAL REVIEW HEARING ON 22 JULY 2026

CLAIM NO. QB-2022-001098

(1) ESSO PETROLEUM COMPANY, LIMITED

(2) EXXONMOBIL CHEMICAL LIMITED

CLAIMANTS

-and-

(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')

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

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

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

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

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

~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~

(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) 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 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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

(5) DIANA HEKT

DEFENDANTS

NORTON ROSE FULBRIGHT

9 July 2026

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Your reference

Our reference
HMOR/1001267389

To whom it may concern

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown – Service of Trial Bundle

Trial Bundle

We refer to the Order of Mrs Ellenbogen J, dated 29 January 2024 (as amended on 21 January 2025 and on 10 July 2025, **the Ellenbogen Order**) and our notice dated 28 April 2026, both in connection with the above-mentioned proceedings. In our notice of 28 April 2026, we provided notice that this year's injunction review hearing had been fixed for Wednesday, 22 July 2026 with a time estimate of half a day.

Pursuant to paragraph 9 of the Order, the Claimants are to file and serve a trial bundle not less than 7 days before the annual review hearing. The trial bundle for the review hearing on 22 July 2026 (the **Trial Bundle**), can be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

Further copies of the Trial Bundle may be obtained from Norton Rose Fulbright LLP by emailing ExxonMobil.Service@nortonrosefulbright.com.

Application Notice

The Trial Bundle includes an application notice that the Claimants have filed with the Court to amend the Ellenbogen Order (TB/852-857) (the **Application**) to reflect the changes in boundary to the Avonmouth Terminal described in the Eighth Witness Statement of Holly Stebbing and reflected in the updated Avonmouth Plan (TB/770). The Trial Bundle also includes the draft Order that we will ask the Court to make at the review hearing (TB/858-861) and the draft amended Ellenbogen Order (TB/862-881), incorporating the updated Avonmouth Plan.

We will serve the Application prior to the hearing on 22 July 2026, once it has been sealed by the Court.

Yours faithfully

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Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(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")

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(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER)
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(4) PAUL BARNES
(5) DIANA HEKT

Defendants

TRIAL BUNDLE – 22 JULY 2026

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RE-RE-AMENDED CLAIM FORM

Claim Form

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

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.

HIGH COURT OF JUSTICE
29 Jul 2025
SEAL
QUEEN'S BENCH DIVISION

QB-2022-001098

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

(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

	£
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.

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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**

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**

If applicable

Phone number

020 7919 4500

DX number

Your Ref.

SSW.066758.010081

Email

stuartwortley@eversheds-sutherland.com

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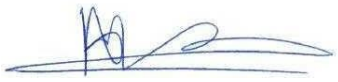
STATEMENT OF TRUTH

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

Tel +44 20 7444 5143 | Fax +44 20 7283 6500
holly.stebbing@nortonrosefulbright.com

RE-RE-AMENDED THIS 23RD DAY OF JULY 2025 UNDER THE ORDER OF MR JUSTICE SWEETING DATED 10 JULY 2025

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")

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(4) PAUL BARNES, [redacted]

(5) DIANA HEKT, [redacted]

Re-Re-Amended this 23rd day of July 2025 under the order of Mr Justice Sweeting dated 10 July 2025
Re-Amended Pursuant to CPR Part 17.1.1

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
B E T W E E N:

Claim No QB-2022-001098

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(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

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SITES (WHERE "SITES" FOR THIS PURPOSE DOES NOT INCLUDE THE AREA EDGED BROWN ON THE PURFLEET PLAN)

(4) PAUL BARNES
(5) DIANA HEKT

RE-RE-AMENDED PARTICULARS OF CLAIM

The Sites

1.1 The land and property to which this Claim relates ("the Sites") are as follows:

1. The Fawley Petrochemical Complex

1. This site is at Marsh Lane, Southampton SO45 1TH ("the Fawley Petrochemical Complex).

2. The Fawley Petrochemical Complex comprises an oil refinery ("the Fawley Oil Refinery"), a chemical plant ("the Chemical Plant) and a jetty ("the Fawley Jetty").

3. The Fawley Oil Refinery is the largest oil refinery in the UK and provides 20% of UK refinery capacity.

4. The Chemical Plant has a capacity of 800,000 tonnes per year, is highly integrated with the operations of the Fawley Oil Refinery and produces key components for a multitude of finished products manufactured in the UK or elsewhere in Europe.

5. The Fawley Oil Refinery and the Chemical Plant comprise part of the freehold land registered under title number HP5287836.

6. The Chemical Plant is also the subject of the unregistered leasehold interest created by a Lease dated 28 August 1975 for a term of 99 years from 1 January 1971.

7. The Fawley Jetty is the subject of a registered leasehold title under title number HP528740 comprising 4 Leases each expiring on 5 July 2049 and dated 14 March 29151, 17 January 2961, 16 April 1956 and 2 December 1968.

8. The First Claimant's freehold land is shown edged red, the First Claimant's leasehold interest in the Fawley Jetty is shown edged green and the Second Claimant's leasehold land is shown edged purple on the plan attached to these Amended Particulars of Claim marked "Fawley Plan". The Sites and this claim do not relate to those areas edged blue in the Fawley Plan.

2. The Hythe Terminal

1. This site is at New Road, Hardley S045 3NR ("the Hythe Terminal").
2. The Hythe Terminal is located close to the Fawley Petrochemical Complex and is an oil terminal which primarily serves the south and west of England.
3. The Hythe Terminal comprises a part of the freehold land registered under title number HP5287836.
4. The First Claimant's freehold land is shown edged red on the plan attached to these Amended Particulars of Claim marked "Hythe Plan".

3. The Avonmouth Terminal

1. This site is at St Andrew's Road, Bristol BS11 9BN ("the Avonmouth Terminal").
2. The Avonmouth Terminal is an oil terminal which primarily serves the southwest of England.
3. The Avonmouth Terminal comprises the leasehold interest registered under title number BL105954 created by a Lease dated 22 January 2008

for a term of 15 years from 2 January 2007, which is currently the subject of a statutory continuation tenancy under Part II of the Landlord and Tenant Act 1954.

1.3.4 The First Claimant's leasehold land is shown edged red on the plan attached to these Amended Particulars of Claim marked "Avonmouth Plan".

4. The Birmingham Terminal

1. This site is at Wood Lane, Birmingham B24 8DN ("the Birmingham Terminal").

2. This Birmingham Terminal is an oil terminal which primarily serves the Midlands.

3. The Birmingham Terminal is the subject of two registered freehold titles, namely WK118802 and WK66930 and unregistered freehold land.

4. The First Claimant's freehold land is shown edged red on the plan attached to these Amended Particulars of Claim marked "Birmingham Plan".

5. The Purfleet Terminal

1. This site is at London Road, Purfleet, RM19 1RS ("the Purfleet Terminal").

2. The Purfleet Terminal comprises a terminal and also a jetty "the Purfleet Jetty".

3. The Purfleet terminal is an oil terminal which primarily serves London and southeast England.

4. That part of the Purfleet Terminal which comprises just the terminal is the subject of two registered freehold titles, namely EX869151 and EX869958, although part of EX869958 has now been sold to Purfleet Real Estate Limited (albeit the sale has not yet been registered).

5. The title to the Purfleet Jetty is unregistered but the First Claimant has occupied this jetty for around 100 years.

6. The First Claimant's freehold land (omitting that part of EX869958 which has been sold) is shown edged red and the First Claimant's unregistered interest in the Purfleet Jetty is shown edged brown on the plan attached to these Amended Particulars of Claim marked "Purfleet Plan".

6. The West London Terminal

1. This site is at Bedfont Road, Stanwell, Middlesex TW19 7LZ ("the West London Terminal").

2. The West London Terminal serves a wide range of customers in southern and central England and supplies aviation fuel to Heathrow Airport.

3. The West London Terminal is the subject of five freehold registered title, namely MX232530, MX442259, MX440505, MX219704 and SY346160.

4. The First Claimant's freehold land is shown edged red on the plan attached to these Amended Particulars of Claim marked "West London Plan".

7. The Hartland Park Logistics Hub

1. This site is at Ively Road, Farnborough ("the Hartland Park Logistics Hub").

2. This site comprises a temporary logistics hub which comprises project offices, welfare facilities and car parking for staff and contractors together with storage of construction plant materials, machinery and equipment in connection with the construction of a replacement fuel pipeline between the Petrochemical Complex and the West London Terminal.

3. The Hartland Park Logistics Hub is the subject of an unregistered leasehold interest created by a Lease dated 2 September 2021 made between SHE Manger Limited and SHE Nominee Limited and the First Claimant for a term commencing on 6 September 2021 and 30 September 2024.

4. The First Claimant's leasehold land is shown edged red on the plan attached to these Amended Particulars of Claim marked "Hartland Park Plan".

8. The Alton Compound

1. This site is at the A31, Holybourne ("the Alton Compound").

2. This site is a pumping station and another compound used in connection with the construction of the pipeline referred to in Paragraph 1.7.2 above.

3. The Alton Compound is the subject of a freehold title, namely SH30798.

4. The First Claimant's freehold land is shown edged red on the plan attached to these Amended Particulars of Claim marked "Alton Compound Plan".

<u>The Interests of the Claimants in the Sites</u>

2. The interests of the Claimants in respect of each of these Sites are as follows:

1. The Fawley Petrochemical Complex

1. The First Claimant is the freehold owner of the Fawley Oil Refinery and the Chemical Plant, being the registered freehold proprietor in respect of Title No HP5287836.

2. The Second Claimant is the lessee of the Chemical Plant under the Lease dated 28 August 1975 referred to in Paragraph 1.6.1 above.

2.1.3 The First Claimant is the registered lessee of the Fawley Jetty, being the registered proprietor in respect of Title Number HP528740.

2. The Hythe Terminal

1. The First Claimant is the freehold owner of the Hythe Terminal, being the registered freehold proprietor in respect of Title No HP5287836.

3. The Avonmouth Terminal

1. The First Claimant is the registered lessee of the Avonmouth Terminal, as the registered leasehold proprietor in respect of Title No BL105954.

4. The Birmingham Terminal

1. The First Claimant is the freehold owner of the Birmingham Terminal, being the registered proprietor in respect of Title Numbers WK118802 and WK66930 and the unregistered title referred to in Paragraph 1.4.3 above.

5. The Purfleet Terminal

1. The First Claimant is the freehold owner of the Purfleet Terminal, being the registered freehold proprietor in respect of Title Numbers EX869151 and EX869958, save for that part of EX869958 which has now been sold.

6. The West London Terminal

1. The First Claimant is the freehold owner of the West London Terminal, being the registered freehold proprietor in respect of title numbers MX232530, MX442259, MX440505, MX219704 and SY346160.

7. Hartland Park Logistics Hub

1. The First Claimant is the lessee of the Hartland Park Logistics Hub, being the lessee under the Lease referred to in Paragraph 1.7.3 above.

8. The Alton Compound

1. The First Claimant is the freehold owner of the Alton Compound, being the registered freehold proprietor in respect of title number SH30798.

3. The First Claimant is also the owner or lessee (as the case may be) of such of the airspace over these sites as is necessary for the use of these sites. The Second Claimant is the lessee over such of the airspace over the Fawley Chemical Plan as is necessary for the use of that site.

The Campaigns

4. There are three campaigns in respect of which there has now been direct action affecting some of the Sites and from whom further direct action is apprehended:

1. 'Extinction Rebellion' is an established protest campaign, which promotes the use of civil disobedience with a view to influencing government policy.

2. 'Just Stop Oil' is newer protest campaign, the target of which is to end the use of fossil fuels in the UK.

3. The 'Just Stop Oil' campaign also incorporates 'Youth Climate Swarm', which is specifically for 'Just Stop Oil' activists under the age of 30, the target again being to end the use of fossil fuels in the UK.

The Acts of Nuisance and Trespass

5. On 1 to 3 April 2022 the following acts of trespass and/or nuisance occurred in relation to the following Sites:

    1. On 1 April 2022, at around 4am approximately 20 protestors blocked the entrance to the Birmingham Terminal, blocking vehicular access and preventing customers from collecting fuel in vehicle tankers. One protestor glued himself to the path outside the Birmingham Terminal.

    2. On 1 April 2022, at around 4am approximately 20 protestors blocked the entrance to the West London Terminal by attaching barriers to the vehicular entrance gates and customers were prevented from collecting fuel in vehicle tankers. Protestors also erected tripods immediately outside the access gate, thereby blocking it. One of the protestors cut a hole in the access fence and scaled one of the fuel storage tanks.

    3. On 1 April 2022, at around 5am, 7 protestors blocked the access to the Hythe Terminal and customers were unable to gain access.

    4. On 1 April 2022, at around 6.30am, 20 protestors blocked the access road to the Purfleet Terminal and prevented customers from accessing. 6 protestors climbed on to a truck making a delivery to the site.

    5. On 2 April 2022, at around 9:30am, approximately 20 protestors blocked the entrance and exist to the Purfleet Terminal. A number of protestors locked themselves onto the access gates.

    6. On 3 April 2022, at around 5am, approximately 20 protestors blocked the access to the Birmingham Terminal. Some protestors also climbed onto a Sainsbury's fuel truck. Another protestor cut through the security fence, and scaled one of the fuel storage tanks in order to display a banner.

    7. On 4 April 2022, at around 4.30 am, approximately 20 protestors blocked the access to the West London Terminal.

6. Both 'Extinction Rebellion' and 'Just Stop Oil' have claimed involvement in the protest activities of 1 and 2 April 2022 and there is a threat of further acts of trespass and/or nuisance in connection with these campaigns. In particular:

6.1 In relation to the 'Just Stop Oil' campaign, the website for this campaign has stated that in "*March and April 2022, 100s of people all round the country will be taking action to force the Government to take action against the fossil fuel industry"* and reference is made to the following phases of activity:

> *"March onwards*
>
> *Phase 1* *In March 2022 teams will block the oil networks to demand that the government Just Stop Oil. They will block oil refineries, storage units, and adjacent motorways.*
>
> *Phase 2A* *Teams will block petrol stations in the South-East. Many people will do sit-ins, sitting on the ground in the forecourt. Others will do tanker-surfing and spray paint filling points.*
>
> *Phase 2B* *High stakes resistance against oil"*

6.2 In relation to 'Extinction Rebellion', their website has referred to the "Next UK Rebellion" and indicated that in April 2022 they proposed *"one aligned action plan, rather than having a scattergun approach across several different targets, in order to have the most impact"*.

The Fourth and Fifth Defendants

7.1 The Fourth and Fifth Defendants trespassed on the First Claimant's land at the Birmingham Terminal as part of the campaign of disruption on 3 April 2022. They were each convicted of aggravated trespass at Wolverhampton Magistrates' Court on 16 February 2023.

The Relief Sought

1. The Claimants apprehend that, unless restrained by the Court, there will be further acts of trespass and/or nuisance of the type referred to above.

2. Accordingly, by reason of the facts and matters set out above, the First Claimant seeks:

1. an order that the First, Fourth and Fifth Defendants must not without the consent of the First Claimant:

   (a) enter or remain upon any part of the Sites;

   (b) damage any part of any of the Sites;

   (c) affix themselves or any person or object to any part of any of the Sites;

   (d) erect any structures on any part of any of the Sites.

2. an order that the Third, Fourth and Fifth Defendants must not 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

8.3 Further, by reason of the facts and matters set out above, the Second Claimant claims an order that the Second, Fourth and Fifth Defendants must not without the consent of the Second Claimant:

1. enter or remain upon any part of the Chemical Plant;

2. damage any part of the Chemical Plant;

3. affix themselves or any person or object at the Chemical Plant;

4. erect any structures on any part of the Chemical Plant.

AND THE FIRST CLAIMANT CLAIMS

(1) An order that until 4 April 2024 the First, Fourth and Fifth Defendants must not:

1. enter or remain upon any part of the First Claimant's properties ("the Sites") without the consent of the First Claimant at:

   (1) the Oil Refinery and Jetty at the Petrochemical Complex, Marsh Lane, Southampton SO45 1TH (as shown for identification edged red and green but excluding those areas edged blue on the attached 'Fawley Plan').

(2) Hythe Terminal, New Road, Handley, SO45 3NR (as shown for identification edged red on the attached 'Hythe Plan').

(3) Avonmouth Terminal, St Andrews Road, Bristol BS11 9BN (as shown for identification edged red on the attached 'Avonmouth Plan').

(4) Birmingham Terminal, Wood Lane, Birmingham B24 8DN (as shown for identification edged red on the attached 'Birmingham Plan').

(5) Purfleet Terminal, London Road, Purfleet, Essex RM19 1RS (as shown for identification edged red and brown on the attached 'Purfleet Plan').

(6) West London Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ (as shown for identification edged red on the attached 'West London Plan').

(7) Hartland Park Logistics Hub, Ively Road, Farnborough (as shown for identification edged red on the attached 'Hartland Park Plan').

(8) Alton Compound, Pumping Station, A31, Holybourne (as shown for identification edged red on the attached 'Alton Compound Plan')

2. damage any part of any of the Sites;

3. affix themselves or any person or object to any part of any of the Sites;

4. erect any structures on any part of any of the Sites.

(2) An order that until 4 April 2024 the Third, Fourth and Fifth Defendants must not 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND THE SECOND CLAIMANT CLAIMS

(2) An order that until 4 April 2024 the Second, Fourth and Fifth Defendants must not without the consent of the Second Claimant:

1. enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH ("the Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

2. damage any part of the Chemical Plant;

3. affix themselves or any person or object at the Chemical Plant;

4. erect any structures on any part of the Chemical Plant.

~~**KATHARINE HOLLAND QC**~~

TIMOTHY MORSHEAD KC

YAASER VANDERMAN

HOLLY STEBBING, NORTON ROSE FULBRIGHT (re-re-amendments only)

STATEMENT OF TRUTH

The Claimant believes that the facts stated in these particulars of claim are true. The Claimant understands that proceedings for contempt of court may be brought against anyone 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 am duly authorised by the Claimant to sign this statement.



Stuart Sherbrooke Wortley

Partner

Eversheds Sutherland (International) LLP

Claimant's solicitor

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 these re-re-amended particulars of claim are true. I am authorised by the Claimants to sign this statement of truth.

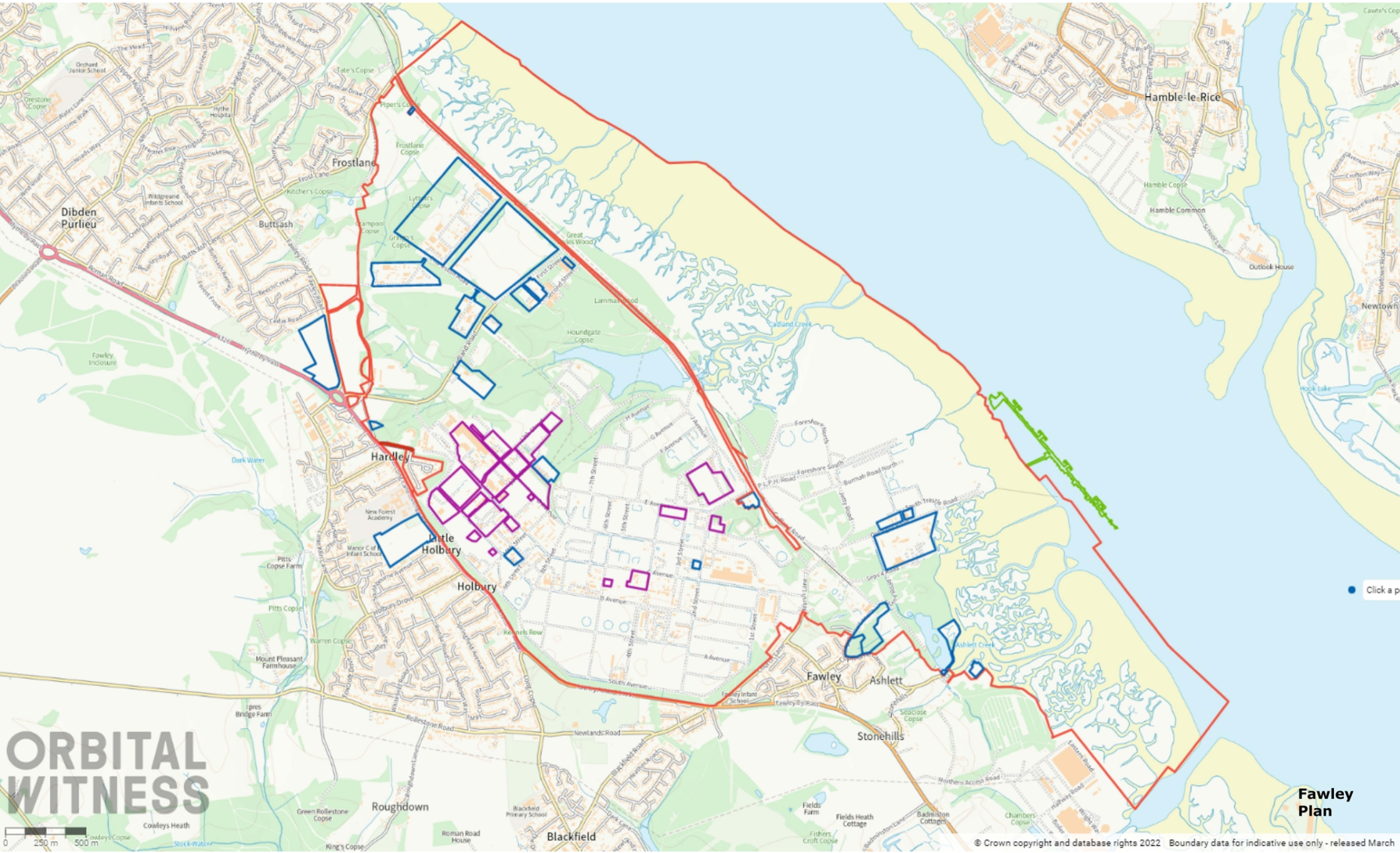
Signed: 

Holly Stebbing

Partner

Norton Rose Fulbright LLP

Claimants' solicitor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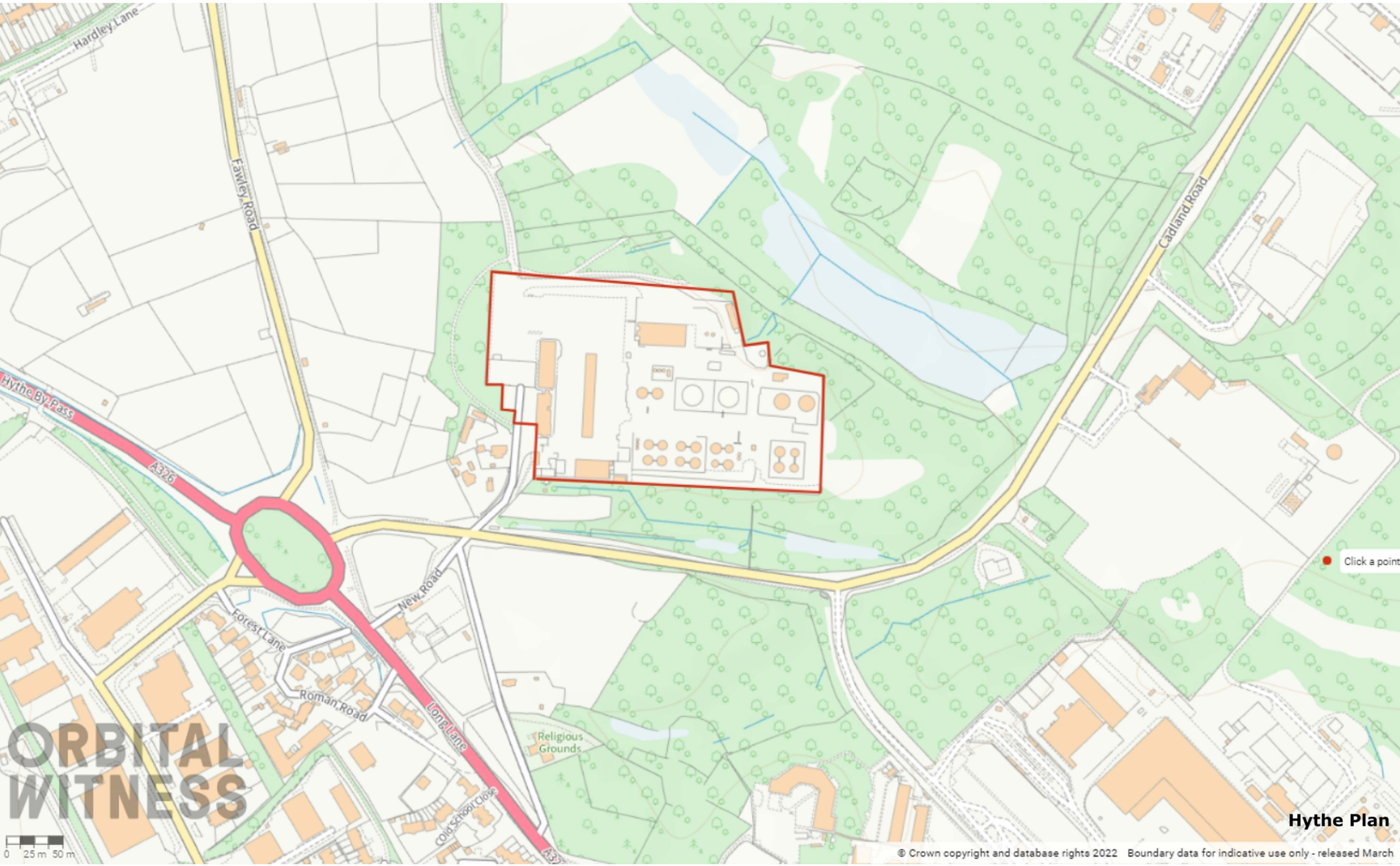
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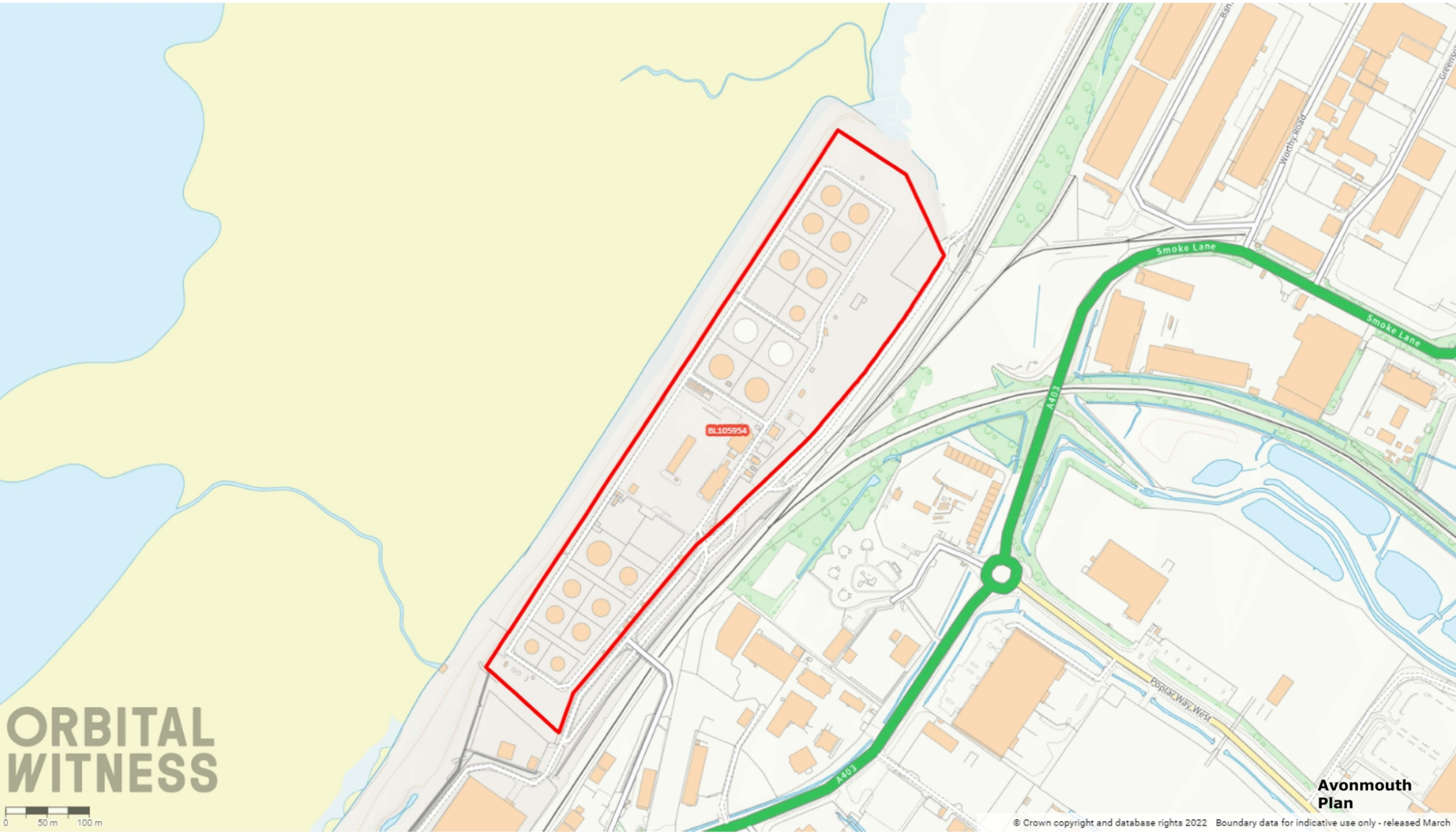
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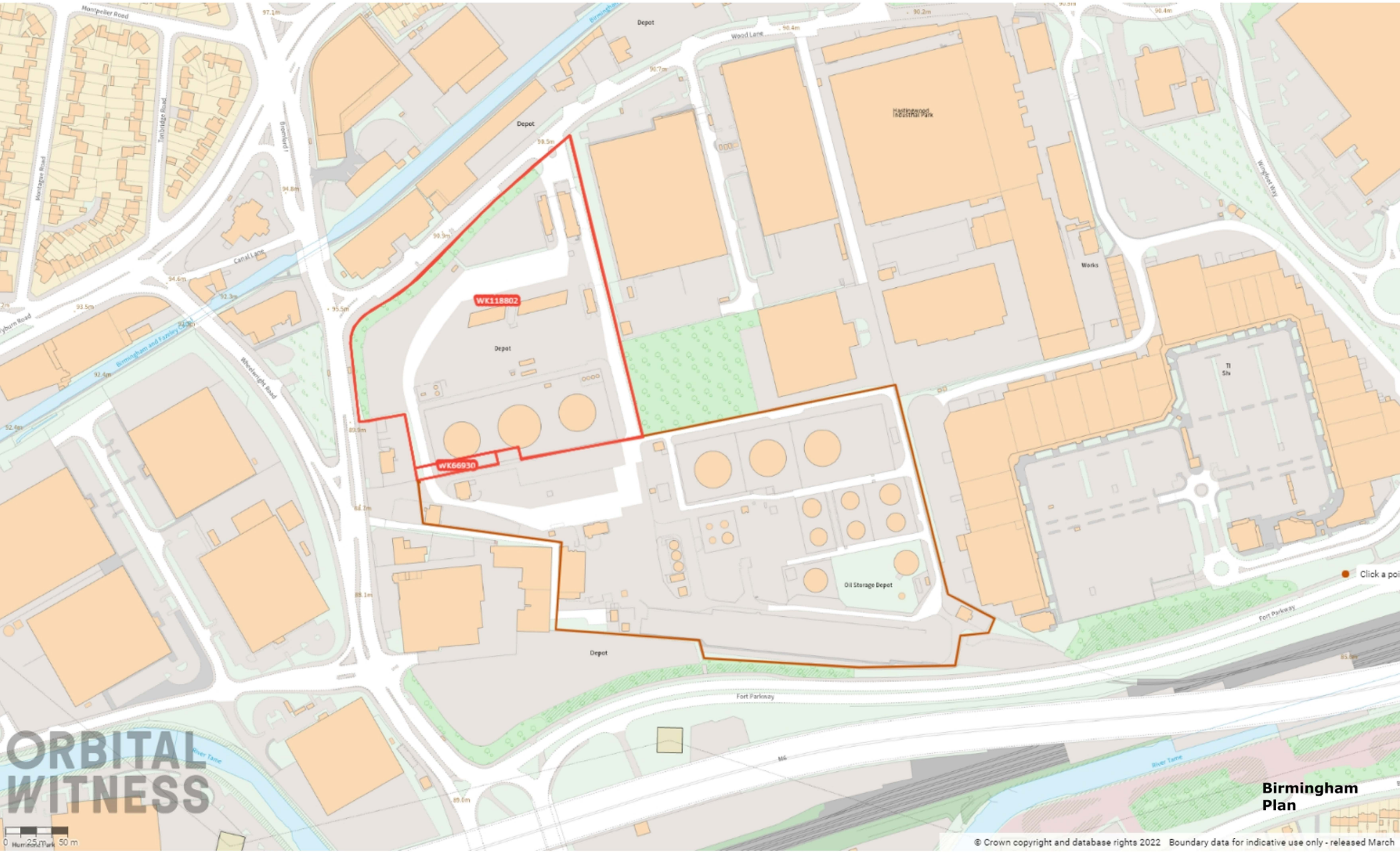
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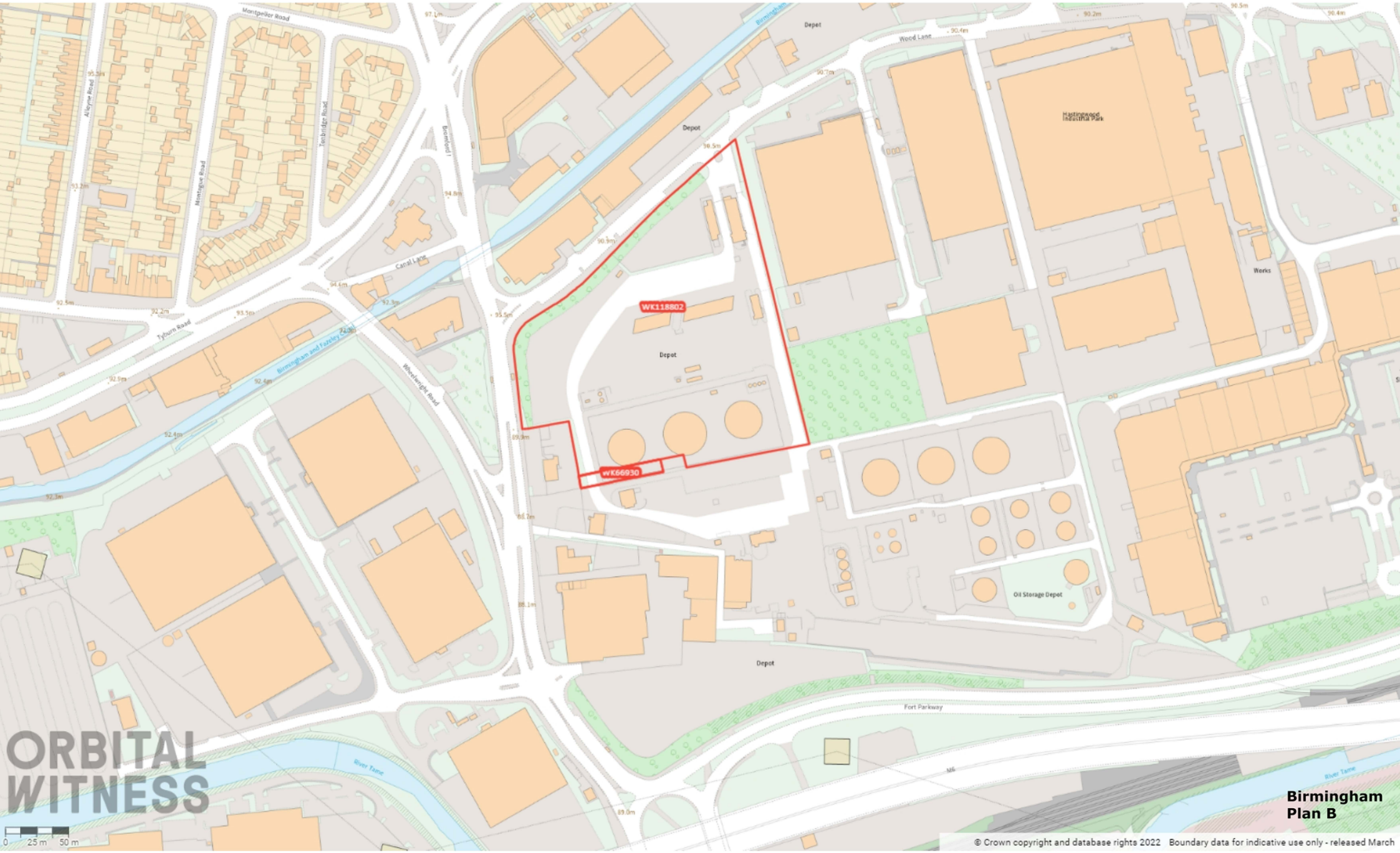
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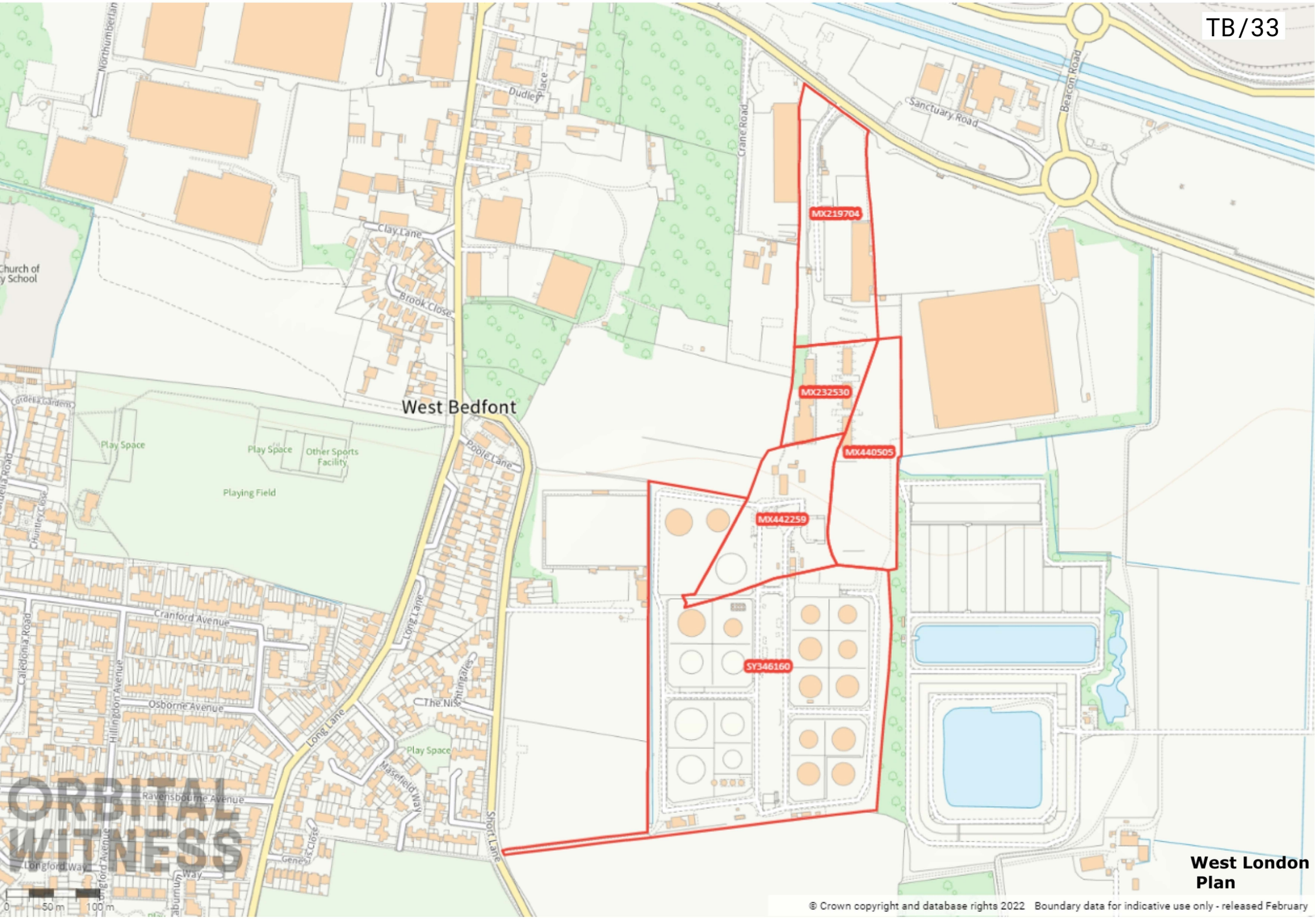
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Beacon Road
Poole Lane
Long Lane
Short Lane
Cranford Avenue
Osborne Avenue
Ravensbourne Avenue
Hillingdon Avenue
Caledonia Road
Cordelia Gardens
Play Space
Other Sports Facility
Playing Field
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The Nightingales
Masefield Way
Longford Way
Genesis Close
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West London Plan
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ORBITAL WITNESS
Hartland Park Plan
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ORBITAL WITNESS

Alton Compound Plan

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Neutral Citation Number: [2022] EWHC 966 (QB)

Case No: QB-2021-001098

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Royal Courts of Justice
Strand, London
WC2A 2LL

Date: 06/04/2022

Before:

THE HONOURABLE MRS. JUSTICE ELLENBOGEN DBE

- -

Between:

(1) ESSO PETEROEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

- and -

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN EDGED RED AND GREEN ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, TYBURN ROAD, BIRMINGHAM B24 8HJ (AS SHOWN EDGED RED AND BROWN ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD,

PURFLEET, ESSEX RM19 1RS (AS SHOWN EDGED RED AND BROWN ON THE ATATCHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')
(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')
PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES

Defendants

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MS. KATHARINE HOLLAND QC and MR. YAASER VANDERMAN (instructed by Eversheds Sutherland (International) LLP) appeared on behalf of the Claimants.

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APPROVED JUDGMENT

If this Transcript is to be reported or published, there is a requirement to ensure that no reporting restriction will be breached. This is particularly important in relation to any case involving a sexual offence, where the victim is guaranteed lifetime anonymity (Sexual Offences (Amendment) Act 1992), or where an order has been made in relation to a young person.

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MRS. JUSTICE ELLENBOGEN :

1. This judgment follows an application for interim injunctive relief made before me as interim applications judge yesterday. The time estimate was unrealistic and it took most of the day to hear, such that I necessarily reserved judgment until this morning.

2. The application is made by the claimants, Esso Petroleum Company Limited and ExxonMobil Chemical Limited, against three categories of persons unknown, respectively:

   i) 'the first defendants', being those who, in connection with the 'Extinction Rebellion' campaign or the 'Just Stop Oil' campaign, enter or remain, without the consent of the first claimant, upon any of eight specified sites, respectively at: Fawley; Hythe; Avonmouth; Birmingham; Purfleet; West London; Hartland Park; and Alton compound, each of which shown edged on a plan (collectively, "the Sites");

   ii) 'the second defendants', being those who, in connection with the 'Extinction Rebellion' campaign or the 'Just Stop Oil' campaign, enter or remain, without the consent of the first claimant, or the second claimant, upon the Fawley chemical plant (as shown edged purple on the "Fawley Plan"); and

   iii) 'the third defendants', being those who, in connection with the 'Extinction Rebellion' campaign or the 'Just Stop Oil' campaign, obstruct any of the vehicular entrances or exits to any of the Sites.

3. The application is made to restrain acts of trespass and/or nuisance. Until trial or further order, the claimants seek to restrain:

   i) the first defendants from: (a) entering or remaining upon any part of the Sites, without the consent of the first claimant; (b) damaging any part of the Sites; (c) affixing themselves, or any person or object, to any part of the Sites; and (d) erecting any structures on any part of any of the Sites;

   ii) the second defendants, in like terms, in connection with the Fawley Chemical Plant; and

   iii) the third defendants from obstructing any of the vehicular entrances or exits to any of the Sites (excluding the area edged in brown on the Purfleet Plan), so as to restrict or prevent or endanger the use of such entrances or exits for the claimants, their contractors, servants, agents, employees or licensees.

4. The application is supported by the witness statements and exhibits of:

   i) Mr. Anthony Milne, employed as the first claimant's Global Security Advisor, dated 3 April 2022;

   ii) Mr. Stuart Wortley, a partner in the firm of solicitors retained by the claimants, dated 4 April 2022; and

iii) Mr. Nawaaz Allybokus, a solicitor in the same firm, who has provided two witness statements - one of which in the course of the hearing - each dated 5 April 2022 (respectively, "Allybokus 1" and "Allybokus 2").

For the most part, Mr. Wortley's witness statement sets out the claimants' respective property interests in one or more of the relevant sites. Clarification of certain interests is provided by Mr. Allybokus, in his two witness statements. The circumstances giving rise to this application and the asserted justification for the orders sought are set out in Mr. Milne's statement, and at paragraph 7 of Allybokus 1.

5. Whilst the application was made without notice, during the afternoon of 4 April 2022 Mr. Allybokus sent two e-mails to three e-mail addresses, two of which obtained from the website of Extinction Rebellion ("ER") and the third from that of Just Stop Oil ("JSO"). The first such e-mail alerted all recipients to the fact that proceedings had been issued and to the claimants' intention to seek urgent injunctive relief. The second informed the recipients of the hearing details, notified them that the hearing bundle would shortly be available at a specified URL, and invited them to identify the individuals who (1) had been involved in certain direct action since 1 April 2022; (2) intended to take part in any future protests; or (3) remained at any of the sites involved in the activities in question. Delivery confirmation was received in each case, together with an automated reply to the first e-mail which had been sent to one of the ER e-mail addresses, acknowledging receipt and stating that the e-mail would be read, *"usually within 24 hours"*. No substantive response was received, and no-one appeared at the hearing on behalf of any respondent, or either organisation.

The claimants' interests in the Sites

6. The Fawley Petrochemical Complex comprises an oil refinery, a chemical plant and a jetty. The first of the Sites is defined to mean the oil refinery and the jetty. The first claimant is the freehold owner of the refinery and of the chemical plant, and the registered lessee of the jetty. The second claimant is the lessee of the chemical plant; the only site in which it has a proprietary interest. Fawley is the largest oil refinery in the UK, providing twenty per cent of the UK's refinery capacity. The chemical plant has an annual capacity of 800,000 tonnes, is highly integrated with the operations of the refinery and produces key components for a large number of finished products manufactured in the UK, or elsewhere in Europe.

7. The first claimant is also the freehold owner of the oil Terminals at Hythe (primarily serving the South and West of England); that part of Birmingham which is material to this application (primarily serving the Midlands); Purfleet (primarily serving London and the South East of England); and West London (serving a range of customers in Southern and Central England and supplying aviation fuel to Heathrow Airport). It is the registered lessee of the Avonmouth Terminal (primarily serving the South West of England). Title to the Purfleet jetty is unregistered, although the first claimant has occupied the jetty for approximately 100 years.

8. The first claimant has an unregistered leasehold interest in Hartland Park, a temporary logistics hub, comprising project offices, welfare facilities and car parking for staff and contractors, together with storage for construction plant materials, machinery and equipment in connection with the construction of a replacement fuel pipeline between the Fawley Petrochemical Complex and the West London oil terminal. It is the freehold

owner of the Alton compound, comprising a pumping station and another compound used in connection with the replacement fuel pipeline.

The circumstances giving rise to this application

9. It is the claimants' case that there are three campaigns in furtherance of which there has been direct protest action affecting some of the Sites, as well as further apprehended direct protest action:

   i) ER is an established protest campaign which promotes the use of civil disobedience with a view to influencing government policy;

   ii) JSO is a newer protest campaign, the target of which is to end the use of fossil fuels in the UK; incorporating

   iii) "Youth Climate Swarm" ("YCS"), which is specifically for JSO activists under the age of 30, and has the same target.

10. In relation to each such campaign, the claimants' evidence is that there have been indications of potential threats of trespass and acts of nuisance:

   i) In relation to the JSO campaign:

      a) the JSO website included the following information:

      "In March and April 2022, hundreds of people all around the country will be taking action to force the government to take action against the fossil fuel industry. Hundreds of meetings are happening and the whole thing is taking off",

      referring to the following phases of activity:

      "March onwards

      Phase 1 *In March 2022 teams will block the oil networks to demand that the government Just Stop Oil. They will block oil refineries, storage units, and adjacent motorways.*

      Phase 2A *Teams will block petrol stations in the South-East. Many people will do sit-ins, sitting on the ground in the forecourt. Others will do tanker-surfing and spray paint filling points.*

      Phase 2B *High stakes resistance against oil."*;

      b) the first page of the website encouraged individuals to sign up and pledge formally *"to take part in action which will lead to my arrest at least once*

in late March". By 3 March 2022, according to a "live counter" on the website, 744 individuals had signed up. That counter was removed on 8 March 2022, such that the current number of signatories is unknown;

c) in a JSO presentation in Falmouth, given by Dr. Larch Maxey (a.k.a. Ian Maxey) in January 2022, Dr. Maxey explained that JSO would: be training activists in civil resistance during February 2022; be encouraging disruption to the oil economy; and engage in disruptive activity in March 2022, before handing over to ER, which, it was indicated, would continue the disruption in April 2022 (Milne, paragraph 9.22);

d) as reported in mainstream media, on 14th February 2022 Mr. Louis McJechnie and Ms. Hannah Hunt, as representatives of JSO, delivered an "ultimatum", in person, to the UK government, stating that, unless it ceased the licensing of oil projects by 14 March 2022, protests would commence shortly thereafter (Milne, paragraph 9.23);

ii) ER's website referred to the "Next UK Rebellion" and indicated that, in April 2022, it proposed *"one aligned action plan, rather than having a scattergun approach across several different targets, in order to have the most impact...Later focused action will take place at a single fossil fuel target -- more info to come soon!"* (Milne, paragraph 9.25);

iii) On 8 March 2022, ER delivered a letter to the Prime Minister demanding that the UK Government *"end the fossil fuel economy before April..."*. The letter continued, *"...Either you do what the entire scientific community and International Energy Agency is telling us we need to do to save humanity, and stop all new fossil fuel investments immediately, or we are going to do what you refuse to do. We are going to stop the UK oil flow, and bring the country with us."* (Milne, paragraphs 9.27 and 9.28);

iv) On 9 March 2022, as reported in the Press, ER issued a press release reinforcing its message concerning its plans to block major UK oil refineries in April 2022 (Milne, paragraphs 9.29 and 9.30).

11. Further, between 1 and 4 April 2022, four of the Sites (West London, Hythe, Purfleet and Birmingham) were subject to direct action, as part of a wider campaign, disrupting various oil terminals in the UK. Both ER and JSO claimed involvement in that action, on social media, and logos and banners were displayed during some of the incidents in question. The detail is set out at paragraph 8 of Mr. Milne's witness statement, paragraph 7 of Allybokus 1 and paragraph 41 of Mr. Wortley's witness statement:

1st April 2022

i) At around 4:00 a.m, approximately 20 individuals blocked the entrance to the Birmingham Site, blocking vehicular access and preventing the first claimant's customers from collecting fuel from the site in tankers. A tanker was stopped at the site entrance and two individuals climbed onto it. Others sat in front of it. One individual glued himself to the path outside the terminal. Police attended and around six arrests were made. The protest was dispersed and the site

reopened to the first claimant's customers at approximately 5.30 p.m. Those carrying out direct action wore orange jackets, some of which bearing the JSO logo;

ii) At around the same time, approximately 24 individuals blocked the entrance to the West London Terminal, by attaching barrels to the vehicular entrance gates in order to weigh them down and prevent them from lifting. The first claimant's customers were prevented from collecting fuel. Various individuals erected tripods immediately outside the access gate, further blocking access. At approximately 6.45 a.m, four individuals cut a hole in the access fence and scaled one of the fuel storage tanks. They and approximately another eight individuals were arrested a few hours later. As a result, by around 3:00 p.m, those responsible for the direct action had left the site which was reopened to the first claimant's customers. As a consequence of the activity, the first claimant initiated its emergency site procedures, including the temporary shutdown of the pumping of aviation and ground fuels from Fawley to the West London Terminal;

iii) At around 5:00 a.m, seven individuals blocked the access to the Hythe Terminal, using the ER "pink boat", preventing the first claimant's customers from accessing the site. Police attended. The boat was removed at around 11.45 a.m. and those responsible were moved away. The site reopened an hour later;

iv) At around 6:30 a.m, 20 individuals blocked the access road to the Purfleet Terminal and prevented the first claimant's customers from accessing the site. Six individuals climbed onto a truck delivering additives to the site. Police attended. By 3:00 p.m, some individuals remained on the truck, but others in attendance at the site had been arrested, or had dissipated. The site opened to customers at approximately 5:00 p.m;

2 April 2022

v) At around 09:45 a.m, approximately 20 individuals blocked the entrance to and exit from the Purfleet Terminal. Some locked themselves to the access gates and others sat in the access road. Police attended, made a number of arrests and removed the protestors. The site opened to customers at approximately 5:30 p.m;

vi) Additional protests were conducted at other terminals in the UK, not owned by the first claimant, with the Press reporting that around 80 arrests had been made;

3 April 2022

vii) At around 5:00 a.m, approximately 20 protestors blocked access to the Birmingham Terminal, by sitting in the road. Some also climbed on to a Sainsbury's fuel truck. One protestor cut through the security fence to the terminal, scaled one of the fuel storage tanks (situated on the part of the site which comprises unregistered land) and displayed a JSO banner. In consequence, the first claimant initiated its emergency site procedures, including the temporary shutdown of the pumping of ground fuel from Fawley

to the terminal. Police attended and made a number of arrests. The site was reopened to customers at around 4:00 p.m;

viii) On the same day, protests occurred at other terminals, owned by third parties;

4 April 2022

ix) At around 4.30 a.m, approximately 20 protestors arrived at the West London Terminal, using a structure to obstruct access to and egress from the site.

12. In the course of her submissions on behalf of the claimants, Ms. Holland QC informed me of her instructions that, on the evening of 4 April, a number of individuals were arrested en route to the Purfleet site.

13. In addition to the immediate impact, as already described, of the activities in question, the claimants say that the following broader consequences flow:

i) Operations at the various sites can involve the production and storage of highly flammable and otherwise hazardous substances. The Fawley Petrochemical Complex and each of the oil terminals is regulated under the *Control of Major Accident Hazards Regulations 2015*, by the Health and Safety Executive. Access to those sites is very strictly controlled. Whereas the relevant employees of the claimants are appropriately trained and, where appropriate, provided with protective clothing and equipment, the protestors do not understand the hazards, are untrained and are unlikely to have the appropriate protective clothing or equipment, giving rise to associated risks of personal injury and to health and safety;

ii) The claimants have contractual obligations to customers, which have to be fulfilled in order to "keep the country moving", including through road, rail and air travel. There is a risk of disruption to the claimants' operations, with its subsequent impact upon the UK's downstream fuel resilience.

14. From the incidents and information summarised above, together with earlier incidents running from 28 August 2020, the claimants conclude that direct action will continue to be carried out at their sites. Those incidents are detailed at paragraphs 9.1 to 9.19 of Mr. Milne's witness statement and variously involved similar action, varying in gravity, affecting Esso's UK head office (August 2020); Hythe Terminal (August 2021); the Fawley Petrochemical Complex (October 2021); the Alton compound, at which extensive damage was caused (December 2021); Queen Elizabeth Park, in Surrey, a construction site relating to the Southampton to London Pipeline Project (two occasions in February 2022, the first of which timed to coincide with the first day of ground clearing works) and apparent (though denied) surveillance by a single individual at Hartland Park (February 2022, with three to four similar incidents on an earlier date). The incidents in August 2020, October 2021, December 2021, and at Queen Elizabeth Park, in February 2022, each involved banners, posters or similar bearing the ER logo. In the Press and social media, ER associated the organisation with action to resist the pipeline project.

15. Mr. Milne states that the claimants recognise the fundamental importance of basic rights protected by the Human Rights Act 1988 ("the HRA"), including those to

freedom of speech and freedom of assembly; they do not seek to stifle criticism or debate. Nevertheless, the exercise of those rights does not necessitate trespassing on the claimants' land, prevention of the conduct of normal operations, and/or engaging in any unlawful activity. The material in Mr. Milne's witness statement is said to demonstrate that those organising the JSO and ER direct action are intending to replicate the 2000 fuel protests (during which the haulage industry set out to bring the country to a standstill) and threatening specifically to blockade all refineries and storage units. The urgent need for injunctive relief is said to be born of the significant consequences which further direct action would entail. In addition to the risk of personal injury, the nature of the risks to the claimants' operations and to downstream fuel resilience is asserted to be substantial. In particular:

i) If the first claimant were unable to access, operate fully or transport fuels from the Fawley refinery and the terminals, the implications for the UK economy could extend to:

   a) disruption to the production, transportation and storage of refined transport fuels (including road, heating, rail and aviation fuel);

   b) an inability to supply wholesale customers, including national supermarkets, major aviation companies at London's Heathrow and Gatwick airports; Esso-branded retail filling stations; other oil companies, and rail companies;

   c) supply disruption and the risk of local outages at retail filling stations;

ii) If the first claimant were unable to access the Hartland Park logistics hub, or the Alton compound, the Southampton to London Pipeline construction programme could be delayed; and

   the second claimant would be unable to manufacture and transport products from the Fawley chemical plant, which itself might have an impact upon refinery operations, given the integrated nature of the petrochemical complex.

16. Mr. Milne asserts that, in light of the coordinated campaign of direct action which took place between 1 and 3 April 2022 (to which Ms. Holland would, no doubt, add the events of 4 April 2022, post-dating that statement), and having regard to what JSO and ER themselves have said about their intentions in March and April 2022, each of the claimants' sites in respect of which an injunction is being sought is an obvious target, from which it is said to follow that:

i) absent an injunction, there is a genuine risk of activists trespassing on the claimants' land, or otherwise impeding access to it, for which there is no effective deterrent. It is considered to be telling that no charges have been brought against any of the individuals involved in the incidents which took place in August, October and December 2021 (despite the first incident having involved obstruction of the highway and the other two incidents having involved criminal damage); and

ii) the grant of an injunction to restrain trespass on the claimants' land or otherwise impeding access to it would provide an effective deterrent for activists who

might otherwise be contemplating carrying out direct action (given that breach of the order would carry the risk of imprisonment for contempt of court).

17. Damages would not be an adequate remedy, it is said, because of the significant consequences of the direct action and because the claimants have no reason to believe that the defendants would be in a financial position to pay any damages which could be identified. Since the orders sought are only to prevent unlawful activity, there is no question, states Mr. Milne, of any of the defendants suffering any actionable loss or needing to be compensated in damages, albeit that a cross-undertaking in damages is offered.

The applicable legal principles

18. The legal principles applicable to the claimants' application are as follows:

Applications against persons unknown

i) This being an application against persons unknown, I must have regard to the principles set out by Longmore LJ in *Boyd v Ineos Upstream* [2019] EWCA Civ 515 ("Ineos"), as developed in *Canada Goose Retail Limited v Persons Unknown* [2020] EWCA Civ 303 and in *Barking and Dagenham London Borough Council v Persons Unknown* [2021] EWCA Civ 13. In short, for present purposes:

a) There must be a sufficiently real and imminent risk of a tort being committed to justify precautionary relief. As to that:

1) in *Network Rail Infrastructure Limited v Williams* [2018] 3 WLR 1105, Sir Terence Etherton MR held:

> "It is usually said that there must be proof of imminent physical harm for a quia timet injunction to be granted: *Fletcher v Bailey* [1885] 28 Ch D 688 at 698; *Birmingham Development Co Ltd v Tyler*; [2008] EWCA Civ 859; [2008] BLR 445 at [45]; *Islington LBC v Elliott* [2012] EWCA Civ 57; [2012] 1 WLR 1275 at [29]. It is possible, however that that is too prescriptive and that what matters is the probability and likely gravity of damage rather than simply its imminence: *Hooper v Rogers* [1973] 1 Ch 43 at [30]; *Islington LBC v Elliott* at [31], quoting Chadwick LJ in *Lord v Symonds* [1998] EWCA Civ 511 at [33]-[34] and [36]; D Nolan 'Preventative Damages' (2016) 132, LQR, 68-95."

2) In *Hooper v Rogers* [1975] Ch 43, at page 50B, Russell LJ said that the word 'imminent' *"is used in the sense that the circumstances must be such that the remedy sought is not premature"*;

b) It must be impossible to name the persons who are likely to commit the tort unless restrained;

c) It must be possible to give effective notice of the injunction and for the method of such notice to be set out in the order;

d) The terms of the injunction must correspond to the threatened tort and not be so wide that they prohibit lawful conduct;

e) The terms of the injunction must be sufficiently clear and precise to enable persons potentially affected to know what they must not do; and

f) The injunction should have clear geographical and temporal limits.

Substantive legal principles

ii) As to the substantive application, the starting point is the well-known test in *American Cyanamid v Ethicon Limited* [1975] AC 396 HL:

a) whether there is a serious issue to be tried;

b) if so, whether damages would be an adequate remedy for the claimant, and whether the defendant would be in a financial position to pay them;

c) if not, whether the defendant would be adequately compensated under the claimant's cross-undertaking as to damages, in the event of his succeeding at trial;

d) where there is doubt as to the adequacy of damages, the balance of convenience in all the circumstances. If matters are easily balanced, it may be wise to take such measures as are calculated to preserve the status quo.

iii) In this case, when addressing the first and fourth such issues, I am required to have regard to the defendants' Articles 10 and 11 ECHR rights (respectively to freedom of expression and to peaceful assembly/freedom of association with others). Articles 10 and 11 ECHR confer qualified rights whereby (albeit differently expressed) restrictions may be imposed such as are prescribed by law and are necessary in democratic society, amongst other reasons in the interests of public safety; for the prevention of disorder or crime; for the protection of health; or for the protection of the rights of others. Where such rights are at stake, a claimant should establish not merely that there is a serious issue to be tried, but that, at trial, the relief claimed would be likely to be granted;

iv) Albeit in the context of a criminal charge of obstruction of the highway, contrary to section 137 of the Highways Act 1980, in *DPP v Ziegler* [2019] EWHC 71 (Admin) the court set out the sub-set of questions to be posed when considering whether the relevant interference with a person's Articles 10 and 11 ECHR rights in pursuit of a legitimate aim is "necessary in a democratic society" to achieve that aim:

a) Is the aim sufficiently important to justify interference with a fundamental right?

b) Is there a rational connection between the means chosen and the aim in view?

c) Are there less restrictive alternative means available to achieve that aim?

d) Is there a fair balance between the rights of the individual and the general interests of the community, including the rights of others?

v) I am also required to have regard to section 12 of the HRA, which applies if a court is considering whether to grant any relief which, if granted, might affect the exercise of Article 10 ECHR. That section provides:

"(1) This section applies if a court is considering whether to grant any relief which, if granted, might affect the exercise of the Convention right to freedom of expression.

(2) If the person against whom the application for relief is made ("the respondent") is neither present nor represented, no such relief is to be granted unless the court is satisfied-

(a) that the applicant has taken all practicable steps to notify the respondent; or

(b) that there are compelling reasons why the respondent should not be notified.

(3) No such relief is to be granted so as to restrain publication before trial unless the court is satisfied that the applicant is likely to establish that publication should not be allowed.

(4) The court must have particular regard to the importance of the Convention right to freedom of expression and, where the proceedings relate to material which the respondent claims, or which appears to the court, to be journalistic, literary, or artistic material (or to conduct connected with such material) to

(a) the extent to which-

(i) the material has, or is about to, become available to the public, or

(ii) it is, or would be, in the public interest for the material to be published;

(b) any relevant privacy code."

vi) In *Ineos* [48], notwithstanding its reference to 'publication', section 12(3) of the HRA was applied to a case concerning trespasses, private nuisance, public nuisance and causing loss by unlawful means. Whilst reserving their right to

argue the point (if necessary) in the future, at first instance the claimants in this case proceed on the basis that section 12(3) applies. In *Cream Holdings Limited v Banerjee* [2004] UKHL 44 [22-23], Lord Nicholls stated that the "general approach" to the interpretation of "likely" in section 12(3), meaning "more likely than not", would need to be modified in circumstances which include those in which *"the adverse consequences of disclosure are particularly grave"*, in order to be *"Convention-compliant"*. In such cases, *"a lesser degree of likelihood will suffice as a prerequisite"*.

vii) The following cases have considered injunctions against persons unknown in circumstances involving protests and potential trespasses and obstructions of access to operational sites:

a) In *City of London v Samede* [2012] PTSR 1624, the Court of Appeal refused permission to appeal from a possession order made against a group of protestors and an injunction requiring their removal from St. Paul's Churchyard. Giving the judgment of the court, Lord Neuberger held [49]:

> *"...The essential point...is that, while the protestors' Article 10 and 11 rights are undoubtedly engaged, it is very difficult to see how they could ever prevail against the will of the land owner when they are continuously and exclusively occupying public land, breaching not just the owner's property rights and circumstantial provisions, but significantly interfering with the public and Convention rights of others, and causing other problems (connected with health, nuisance and the like), particularly in circumstances where the occupation has already continued for months and is likely to continue indefinitely."*

b) In *DPP v Cuciurean* [2022] EWHC 736 (Admin), the Divisional Court held [45] and [76]-[77] that:

> *"We conclude that there is no basis in the Strasbourg jurisprudence to support the respondent's proposition that the freedom of expression linked to the freedom of assembly and association includes a right to protest on privately owned land or upon publicly owned land from which the public are generally excluded. The Strasbourg Court has not made any statement to that effect. Instead, it has consistently said that Articles 10 and 11 do not 'bestow any freedom of forum' in the specific context of interference with property rights (see Appleby at [47] and [52]). There is no right of entry to private property or to any publicly owned property. The furthest that the Strasbourg Court has been prepared to go is that where a bar and access to property has the effect of preventing any effective exercise of rights under articles 10 and 11, or of destroying the essence of those rights, then it would*

not exclude the possibility of a State being obliged to protect them by regulating property rights.

...

Thirdly, a protest which is carried out for the purposes of disrupting or obstructing the lawful activities of other parties does not lie at the core of articles 10 and 11, even if carried out on a highway or other publicly accessible land. Furthermore, it is established that serious disruption may amount to reprehensible conduct, so that articles 10 and 11 are not violated...

Fourthly, articles 10 and 11 do not bestow any "freedom of forum" to justify trespass on private land or publicly owned land which is not accessible by the public..."

c) In *Ineos*, in which the claimant companies undertook fracking and obtained interim injunctions restraining unlawful protesting activities, such as trespass and nuisance, against persons unknown, at first instance ([2017] EWHC 2945), Morgan J held [105]:

In the present case, if a final injunction were sought on the basis of the evidence presented on this interim application, the court is (to put it no higher) likely to grant an injunction to restrain the protestors from trespassing on the land of the claimants. The land is private land and the rights of the claimants in relation to it are to be given proper weight and protections under Articles 10(2) and 11(2). The claimants' rights are prescribed by law, namely the law of trespass, and that law is clear and predictable. The protection of private rights of ownership is necessary in a democratic society and the grant of an injunction to restrain trespass is proportionate having regard to the fact that the protestors are free to express their opinions and to assemble elsewhere. There would also be concerns as to safety in the case of trespass on the claimants' land at a time when the land was an operational site for shale gas exploration.

I take the same view as to the claim in private nuisance to prevent a substantial interference with the private rights of way enjoyed in relation to Sites 3 and 4. I would not distinguish for present purposes between the claim in trespass to protect the possession of private land and the claim in private nuisance to protect the enjoyment of a private right of way over private land."

d) In *Secretary of State for Transport v Persons Unknown* [2018] EWHC 1404 (Ch) [58], relating to protests against HS2, Barling J stated:

> *"In my view, the claimants have clearly surmounted the American Cyanamid hurdle in all respects, both as to the seriously arguable case and as to the inadequacy of any relief in damages. With respect to the higher hurdle that applies in the present case, I also consider, in the light of the material before me, that it is likely at trial that the claimants would succeed in obtaining the kind of protective orders that they seek, both in relation to the application for trespassory injunction and the application for an injunction in respect of activities in or about the entrance compounds, north and south. I make these findings having carried out the balancing exercise which is appropriate given that Articles 10 and 11 are engaged here. The defendants are undoubtedly exercising their freedoms of expression and assembly in protesting as they have done (and will in all likelihood continue to do) about the activities carried out on this site. However, in my view the balance very clearly weighs in favour of granting relief because the defendants' right to protest and to express their protest both by assembling and by vociferating the views that they hold can be exercised without trespassing on the land and without obstructing the right of the claimants to come in and out of the land from and on to the public highway. What the defendants seek to do by carrying out these activities goes beyond the exercise of the undoubted freedoms of expression and assembly. What they wish to do, as well as protesting, is to slow down or stop or otherwise impede the work being carried out. Whilst a legitimate protest might encompass an element of pressure, so that how we protest and how far we are allowed to go in protesting about something with which we do not agree may involve a difficult balance and assessment, here the defendants have clearly strayed beyond what those qualified rights under the Convention entitle them to do. I consider that in all the circumstances the balance of convenience favours the grant of relief and that it is just and convenient for me to do so."*

e) A similar approach was adopted by David Holland QC (sitting as a Deputy Judge of the High Court) when the injunction was renewed ([2019] EWHC 1437 (Ch) [127]) and by Falk J, in *UK Oil and Gas v Persons Unknown* [2021] EWHC 599, in which the claimants had applied for variation and continuation of an interim injunction granted in 2018, in relation to a protest concerning the oil and gas industry, and the injunction granted prevented the persons unknown from entering or remaining upon one of the claimants' sites; climbing onto vehicles or trailers coming out of the site; and obstructing a particular entrance, thereby preventing the claimant, its contractors, agents and servants from entering. Falk J said [54]:

> *"Having regard to the revised scope of the injunction, which is very narrowly focused on people actually trespassing on the site, people climbing onto vehicles seeking access to or coming from the site, and obstructing the entrance to the site in a way that prevents people or vehicles coming into and out of the site, I am satisfied that, in the narrowed manner, there is a fair balance being struck between the rights of individuals and the rights of the Claimants to go about their lawful business."*

The principles applied: discussion and conclusions

The underlying causes of action

19. The causes of action underpinning the interim relief sought are trespass and/or private nuisance:

i) Trespass to land consists of any unjustifiable intrusion by one person upon land in the possession of another. The slightest crossing of the boundary is sufficient. Trespass is a direct infringement of another's right, actionable without proof of damage (*Clerk & Lindsell on Torts*, 23rd Ed, paragraphs 18-01 and 18-08 – 18-09). It is actionable at the suit of a person in possession of land, who may claim damages and/or an injunction (18-10). Possession means generally the occupation or physical control of land, proof of ownership is, prima facie, proof of possession (18-13 and 18-15).

ii) The essence of nuisance is a condition or activity which unduly interferes with the use or enjoyment of land (*Clerk & Lindsell on Torts*, 23rd Edition, paragraph 19-01). As explained in *Cuadrilla Bowland Ltd and ors v Persons Unknown* [2020] EWCA Civ 9 [13]:

> *"...An owner of land adjoining a public highway has a right of access to the highway and a person who interferes with this right commits the tort of private nuisance. In addition, it is a public nuisance to obstruct or hinder free passage along a public highway and an owner of land specifically affected by such a nuisance can sue in respect of it, if the obstruction of the highway causes them inconvenience, delay or other damage which is substantial and appreciably greater in degree than any suffered by the general public..."*

It is generally actionable only on proof of special damage (19-02) and Ms. Holland was prepared to proceed, for the purposes of this application, on the basis that such a requirement would obtain in this case. Persons having no proprietary interest have no cause of action, though de facto possession can be sufficient (19-63).

iii) The claim in nuisance is necessary only to underpin the relief sought against the third category of persons unknown (where the obstruction in question is on land

in which neither claimant has a proprietary interest, but which blocks entrances situated on land to which the first claimant has title). The relief sought against the other two categories of persons unknown relates to those who would be trespassing on the land in question. In so far as the injunction sought extends to land at Purfleet to which the first claimant does not have registered title, that claimant relies upon its superior interest, in relative terms, gained by possession and control of the land in question over many years and to date.

20. Ms. Holland meticulously took me through the title documents and plans which established the freehold and leasehold interests to all of the Sites. Whilst the Birmingham and Purfleet oil terminals include additional parcels of land, as matters developed in the course of the hearing certain possessory land at Birmingham was excluded from that Site, as defined and shown on an attached plan. If and to the extent that the excluded land assumes a relevance in due course, it will need to be the subject of a separate application, as Ms. Holland expressly recognised. The unregistered land at Purfleet (the jetty) has been excluded from the definition of, and relief sought against, the third defendants. It remains part of the Purfleet Site, as defined, for the purposes of the definition of and relief sought against the first defendants. As previously noted, and as is supported by the evidence of Mr. Wortley, the first claimant has occupied the jetty at Purfleet, which has exclusively served the terminal, for approximately one hundred years.

21. In connection with the relief as now limited, I am satisfied that the claimants have established the proprietary rights necessary to ground a claim in trespass and, if and in so far as necessary, in nuisance.

22. In relation to each cause of action, there is, self-evidently and at least, a serious issue to be tried. There is no apparent legal right of any defendant to enter onto, or impede access to and from, the private land in question, still less to cause criminal damage or danger to health and safety. The key issue is likely to be whether the qualified Article 10 and 11 ECHR rights of those engaging in the activity which it is sought to prohibit outweigh the rights which the claimants seek to exercise. The dicta cited above from *Cuciurean* are apt here. Articles 10 and 11 do not bestow any freedom of forum in the context of interference with property rights. A protest which is carried out for the purposes of disrupting or obstructing the lawful activities of other parties does not lie at the core of those articles, even if carried out on a highway or other publicly accessible land. It is established that serious disruption may amount to reprehensible conduct so that Articles 10 and 11 are not violated. Addressing the *Ziegler* questions, it is likely that:

i) The claimants' aim - to enable the smooth operation of their lawful commercial activities, on and from land in which they have a proprietary interest - is sufficiently important to justify interference with a fundamental right;

ii) Given the methods employed and encouraged, and the intentions expressed, by ER and JSO, there is a rational connection between the means chosen (injunctive relief) and the aim in view;

iii) For the same reasons, there would appear to be no less restrictive alternative means available to achieve that aim;

iv) There is a fair balance between the relevant rights and interests, principally because the interference, such as it is, does not preclude the exercise of the protestors' Article 10 and 11 rights, having regard to the dicta in *Cuciurean*. At worst, it precludes their exercise in a specific location, in which there is no necessity for the protest to take place; legitimate protest may take many other forms and should not involve unlawful activity.

23. For the same reasons, I am satisfied that, for the purposes of section 12(3) of the HRA, the claimants are likely to establish that the activity which it is sought to prohibit should be restrained. In that regard, I do not consider that the factual matrix of this application requires a deviation from the standard meaning of the word "likely".

24. In all the circumstances, I am satisfied that the claimants have established that there is a serious issue to be tried and that, at trial, the relief claimed is likely to be granted.

Damages and adequate remedy?

25. Given the health and safety risks; the unquantifiable but substantial financial risks arising from operational disruption; and the fact that there can be no legitimate expectation that the defendants will be able to pay any quantifiable damages, I am satisfied that damages would not be an adequate remedy for the claimants. Whilst it is difficult to envisage that any defendant, were he or she to succeed at trial, could establish any loss arising from the interim relief sought, I am satisfied, having regard to the cross-undertaking in damages given by the claimants (supported by the evidence of Mr. Milne, at paragraph 13 of his witness statement), that such a defendant could and would be adequately compensated.

The balance of convenience

26. In my judgment, the balance of convenience weighs clearly in favour of granting the relief sought; a defendant's right to protest, including by assembling, can be exercised without trespassing on, or obstructing, private property, or causing criminal damage or risk to health and safety. I gratefully adopt the analysis of Barling J, in *Secretary of State for Transport v Persons Unknown* [58], which is equally apposite here and I repeat, for ease of reference:

> *"…What the Defendants seek to do by carrying out these activities goes beyond the exercise of the undoubted freedoms of expression and assembly, what they wish to do, as well as protesting, is to slow down, or stop, or otherwise impede the work being carried out. Whilst a legitimate protest might encompass an element of pressure, so that how we protest and how far we are allowed to go in protesting about something with which we do not agree may involve a difficult balance and assessment, here the Defendants have clearly strayed beyond what those qualified rights under the Convention entitle them to do. I consider that in all the circumstances the balance of convenience favours the grant of relief, and that it is just and convenient for me to do so."*

27. That is subject to the additional considerations applicable where relief is sought against persons unknown, to which I now turn.

The nature of the injunction sought

28. Whilst the claimants' application relies upon past interferences with their rights in relation to certain sites, of which the relief sought is intended to prevent repetition, much of the relief claimed is based upon their asserted reasonable apprehension of future unlawful acts against which it is intended to protect and all of it is against persons unknown, i.e. is claimed on a precautionary (or, in the Latin of the use of which disapproval has been expressed, *quia timet*) basis. It is, therefore, appropriate to approach the matter on that basis and I did not understand the claimants to suggest otherwise. That requires consideration of whether there is a real risk of an unlawful act being committed from which the contemplated harm is imminent, in the sense that the remedy sought is not premature. I am satisfied that the evidence demonstrates that to be the case. As Ms. Holland candidly recognised, the phased timetable for the direct action contemplated on the JSO website appears to have slipped somewhat. It is also to be noted that not all of the recent activities of which evidence has been given necessarily establish a connection with the campaigns being run by JSO and/or ER, or that the two organisations and those supportive of their aims necessarily act in concert. To date, not all of the Sites have been affected by the direct action taken. The earlier activities of which evidence has been given are now of some age. But that is to adopt an excessively granular, artificial approach to the evidence, considered as a whole. So considered, I am satisfied that the risk of infringement of the claimants' rights, absent injunction, is real. Those aligning themselves with one or both campaigns have shown themselves willing to engage in direct action in furtherance of their aims. ER's stated plans include focused economic disruption at an unspecified single fossil fuel target and to block major UK oil refineries this month.

29. There is no reason to think that the key sites proportionately identified by the claimants will be treated any differently, going forward, from those sites which have been the subject of past direct action. The risk of harm is sufficiently imminent to justify intervention by the court; activity has escalated since the beginning of this month, with all the associated risks to health and safety and the claimants' operational activities, set out in their evidence. In those circumstances, in particular, there is no legal basis upon which the claimants should be obliged to suffer harm at each of the Sites before the court will grant relief in relation to it.

30. The claimants do not know the names of any individual likely to commit the torts in question, unless restrained, albeit that they are in possession of photographs, in certain cases. I accept Ms. Holland's submission that the evidence available thus far does not establish the requisite causal nexus between the known activities of Dr. Maxey, Mr. McJechnie or Ms. Hunt and the direct action which has taken place to date, or which it is sought to restrain. I accept that, at this stage, it is impossible to name individuals. Should that position change, the claimants will be obliged to apply to join named defendants to proceedings, as appropriate, as they, through Ms. Holland, expressly acknowledge.

31. The claimants have proposed methods by which to give effective notice of the injunction, set out in their draft order, and I am satisfied that, subject to certain minor

amendments to which I shall come, the nature and number of those methods will constitute effective notice in all the circumstances. In broad terms, those entail:

i) fixing copies of the order; the claim form and particulars of claim; the response pack; the application notice and supporting witness statements; and an application notice and any further evidence in respect of the return date in clear, transparent sealed envelopes, at a minimum number of locations around the perimeter of each of the Sites, together with a notice to the effect that copies of the order and other court documents may be obtained from the claimants' solicitors and viewed on a specified website;

ii) posting the documents mentioned at paragraph 31(i) above on the specified website;

iii) fixing copies of prominent warning notices around the perimeters of the Sites, explaining the existence and nature of the order and of proceedings; the potential consequences of breaching the order; the address at which copies of the proceedings may be obtained; and details of the website on which the injunction can be viewed; and

iv) Sending an e-mail to two specified e-mail addresses (respectively for ER and JSO), notifying the recipients of the information which may be viewed on the above website.

32. I have previously set out the terms of the injunction sought, which correspond to the threatened torts, are suitably narrowly framed to avoid the prohibition of lawful conduct and have clear geographical limits. They are also in terms sufficiently clear and precise to enable those persons who are potentially affected to understand that which they must not do. The temporal limit is clear and a return date can be set for an *inter partes* hearing within a suitable, relatively short period.

33. I am satisfied that appropriate injunctive relief would provide an effective deterrent for activists who might otherwise be contemplating carrying out direct action (having regard to the penal notice identifying the risk of imprisonment for contempt of court). In any event, I do not consider that the risk of breach should prevent me from granting appropriate relief - per Lord Rodger of Earlsferry, in *Secretary of State for the Environment v Meier & ors* [2009] 1 WLR 2780:

> *"Nevertheless, as Lord Bingham of Cornhill observed in South Buckinghamshire DC v Porter [2003] 2 AC 558 at paragraph 32, in connection with a possible injunction against gypsies living in caravans in breach of planning controls:*
>
> *'When granting an injunction the court does not contemplate that it will be disobeyed. Apprehension that a party may disobey an order should not deter the court from making an order otherwise appropriate: there is not one law for the law-abiding and another for the lawless and 'truculent'.'"*

Section 12(2) of the HRA

34. This being an application in which section 12(2) of the HRA is engaged, I have considered, as I must, whether its requirements are satisfied. Ms. Holland relied upon each limb of section 12(2), in the alternative. She contended that a concern that formal notice of the application would result in the escalation of direct action, with all of its apprehended consequences, constituted a compelling reason why the defendants should not have been notified. In any event, she contended, the informal notice given satisfied limb (a), in which *"all practicable"* did not equate with "every possible": given the voluminous nature of the documentation in question, the urgency of the application and the nature of the relevant sites, the steps in fact taken had sufficed. I accept the merit in those submissions and consider that the claimants satisfy the requirements of limb (b), alternatively limb (a) of section 12(2).

Relief

35. Accordingly, I am satisfied that, with minor amendments to paragraph 9.3, it is just and convenient to grant the relief sought (as set out in the revised draft order sent to the court for my attention by e-mail, at 16.18 yesterday) and to set a return date of Wednesday, 27th April 2022, that is three weeks from today. On that date, the matter will be listed with a one-day time estimate. Paragraph 7 of the order will so provide and the same date will be recorded at paragraph 1 of Schedule 2 to the order. Paragraph 9.3, as amended, will provide:

> "fixing a minimum of four ~~copies of large~~ warning notices, at conspicuous locations around the perimeters of each of the Sites, explaining:
>
> (a) the existence and nature of this order
>
> (b) the existence of the proceedings
>
> (c) the potential consequences of breaching the order
>
> (d) the address at which copies of the proceedings can be obtained
>
> (e) details of the website at which the injunction can be viewed.
>
> Each such warning notice must be a minimum of 1.5 metres x 1 metre in size."

Before approving the order made, I shall need to be sent, electronically, a revised order reflective of the above, to which all plans to which the order refers are attached, in their final form.

Ancillary orders

36. The claimants have sought ancillary orders for alternative service of the claim form and other court documents, for the purposes of CPR 6.15; 6.27; and 81.4(2)(c) and (d). The methods proposed correspond with those which are proposed in order to give effective notice of the injunction. In all the circumstances, in my judgment, the requirements of all such rules of procedure are satisfied. The nature and location of the activities to which proceedings relate and the fact that the defendants are persons unknown renders

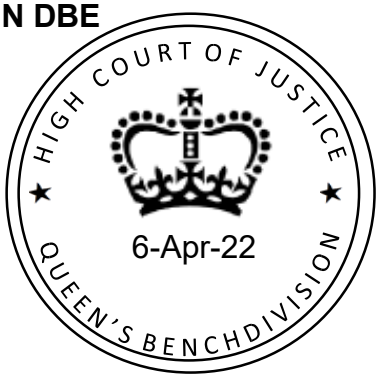
it appropriate, as a matter of principle, to make such an order and the requirements of CPR 6.15(3), also applicable to CPR 6.27, are satisfied. For the purposes of any subsequent contempt application under CPR Part 81, against persons unknown (but not against any defendant named, or who ought to have been named), by my order of today's date I have dispensed with the need for personal service of that order.

Postscript

37. Following judgment, Ms Holland read out a revised form of notice which is intended to comply with paragraph 9.3 of the order, a copy of which will be submitted for my approval with the final draft order. I consider it prudent that paragraph 9.3 be further amended to provide, *'fixing a minimum of four ~~copies of large~~ warning notices, in the form attached at Appendix A to this order, at conspicuous locations around the perimeters of each of the Sites, explaining:…'* Ms Holland also noted that, given the quantity of documentation which they need contain, the word 'envelopes', in paragraph 9.1 of the order, might not be apt to describe the transparent receptacles in which it will be placed. In those circumstances, and to avoid any issue arising in due course, the word 'containers' should be used instead.

IN THE HIGH COURT OF JUSTICE **CLAIM NO. QB-2022-001098**
QUEEN'S BENCH DIVISION

BEFORE THE HONOURABLE MRS JUSTICE ELLENBOGEN DBE
6 April 2022



B E T W E E N: **(1) ESSO PETROLEUM COMPANY, LIMITED**

(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, TYBURN ROAD, BIRMINGHAM B24 8HJ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, 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)

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY 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 ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANT

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible.

If you disobey this Order you may be found guilty of contempt of court and you may be sent to prison or your assets seized.

You have the right to apply to the court to vary or discharge this order (which is explained below).

RECITALS

UPON the hearing of the Claimants' Application dated 4 April 2022

AND UPON HEARING Leading Counsel and Junior Counsel for the Claimants

AND UPON READING the Witness Statements of Stuart Sherbrooke Wortley dated 4 April 2022, Anthony Milne dated 3 April 2022, and the First and Second Witness Statements of Nawaaz Allybokus dated 5 April 2022

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

AND UPON the Claimants confirming that this Order is not intended to prohibit any lawful protest outside any of the sites referred to in this Order which does not obstruct any of the vehicular entrances or exits or restrict or prevent or endanger the use of such entrances or exits

IT IS ORDERED THAT:

THE INJUNCTIONS

1. Until trial or further order the First Defendants must not:

    1.1 enter or remain upon any part of the First Claimant's properties ("the Sites"), without the consent of the First Claimant, at:

        (1) the Oil Refinery and Jetty at the Petrochemical Complex, Marsh Lane, Southampton SO45 1TH (as shown for identification edged red and green but excluding those areas edged blue on the attached 'Fawley Plan').

        (2) Hythe Terminal, New Road, Handley, SO45 3NR (as shown for identification edged red on the attached 'Hythe Plan').

(3) Avonmouth Terminal, St Andrews Road, Bristol BS11 9BN (as shown for identification edged red on the attached 'Avonmouth Plan').

(4) Birmingham Terminal, Tyburn Road, Birmingham B24 8HJ (as shown for identification edged red on the attached 'Birmingham Plan').

(5) Purfleet Terminal, London Road, Purfleet, Essex RM19 1RS (as shown for identification edged red and brown on the attached 'Purfleet Plan').

(6) West London Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ (as shown for identification edged red on the attached 'West London Plan').

(7) Hartland Park Logistics Hub, Ively Road, Farnborough (as shown for identification edged red on the attached 'Hartland Park Plan').

(8) Alton Compound, Pumping Station, A31, Hollybourne (as shown for identification edged red on the attached 'Alton Compound Plan');

1.2 damage any part of any of the Sites;

1.3 affix themselves or any person or object to any part of any of the Sites;

1.4 erect any structures on any part of any of the Sites.

2. Until trial or further order the Second Defendants must not, without the consent of the Second Claimant:

2.1 enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH ("the Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

2.2 damage any part of the Chemical Plant;

2.3 affix themselves or any person or object at the Chemical Plant;

2.4 erect any structures on any part of the Chemical Plant.

3. Until trial or further order the Third Defendants must not 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

VARIATION OR DISCHARGE OF THIS ORDER

4. The Defendants may apply to vary or discharge this Order at any time upon giving not less than 4 hours' notice to the Claimant's solicitors, Eversheds Sutherland (International) LLP, by emailing exxonmobil.service@eversheds-sutherland.com;

5. Any person applying to vary or discharge this Order must provide their full name and address, an address for service and must also apply to be joined as a named defendant to the proceedings at the same time.

6. The Claimants have liberty to apply to extend or vary this Order or to seek further directions.

THE RETURN DATE

7. The return date hearing will be fixed for Wednesday 27 April 2022 ("the Return Date"), with a time estimate of one day.

INTERPRETATION OF THIS ORDER

8. A Defendant who is ordered not to do something must not do it him/herself/themselves or in any other way. He/she/they must not do it

through another acting on his/her/their behalf or on his/her/their instructions or with his/her/their encouragement.

SERVICE OF THIS ORDER

9. Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of this Order and the Court documents comprising the Claim Form, the Particulars of Claim, Response Pack, the Application Notice dated 4 April 2022, the Witness Statement of Stuart Sherbrooke Wortley dated 4 April 2022, the Witness Statement of Anthony Milne dated 3 April 2022, the First Witness Statement of Nawaaz Allybokus dated 5 April 2022 and the Second Witness Statement of Nawaaz Allybokus dated 5 April 2022, an Application Notice in respect of the return date hearing and any further evidence to be relied upon on the Return Date ("the Court documents") shall be effected as follows:

9.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that copies of the Order and the Court documents may be obtained from the Claimants' solicitors, Eversheds Sutherland (International) LLP, One Wood Street, London EC2V 7WS (Ref: Stuart Wortley tel: 020 7919 4500) email: exxonmobil.service@eversheds-sutherland.com and (b) that copies of the Order and the Court documents may be viewed at the website referred to in Paragraph 9.2 of this Order;

9.2 posting the Order and the Court documents on the following website: https:/www.exxonmobil.co.uk/Company/Overview/UK-operations; and

9.3 fixing a minimum of four warning notices, in the form attached at Appendix A to this Order, at conspicuous locations around the perimeters of the Sites, explaining:

(a) the existence and nature of this Order

(b) the existence of the proceedings

(c) the potential consequences of breaching the Order

(d) the address at which copies of the proceedings can be obtained

(e) details of the website at which the injunction can be viewed.

Each such warning notice must be a minimum of 1.5m x 1m in size.

9.4 sending an email to each of the following email addresses with the information that copies of the Order and the Court documents may be viewed at the website referred to in Paragraph 9.2 of this Order:

(a) xr-legal@riseup.net

(b) juststopoil@protonmail.co.uk

10. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), this Order shall be deemed to be served on the latest date on which all of the methods of service referred to in Paragraph 9 above have been completed, such date to be verified by the completion of a certificate of service.

11. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 9 of this Order shall stand as good service of the Order and the Court documents.

12. The Court will provide sealed copies of this Order for service to the Claimants' solicitors, whose details are set out in Paragraph 9.1 of this Order.

13. Pursuant to CPR 6.15(4), the period for service of any acknowledgement of service, admission or defence shall be 56 days.

COSTS

14. Costs reserved.

COMMUNICATIONS WITH THE COURT

15. All communications to the Court about this Order should be sent to:

- Queen's Bench Division, Room E07,
- Royal Courts of Justice, Strand WC2A 2LL

- The office are open between 10.00am and 4.30pm Monday to Friday (except Bank Holidays)
- The telephone number is 020 7936 8957
- The email address is qbjudgeslistingoffice@justice.gov.uk

SCHEDULE 1

The Judge read the following Witness Statements before making this Order:

(1) First Witness Statement of Stuart Sherbrooke Wortley dated 4 April 2022 together with the exhibits marked “SSW1” - “SSW9”.
(2) First Witness Statement of Anthony Milne dated 3 April 2022 together with the exhibits marked “AM1” – “AM15”.
(3) First Witness Statement of Nawaaz Allybokus dated 5 April 2022 together with the exhibit marked “NA1”.
(4) Second Witness Statement of Nawaaz Allybokus dated 5 April 2022 together with the exhibit marked “NA2”.

SCHEDULE 2

Undertakings given to the Court by the Claimants and each of them

(1) To issue and serve an Application Notice for the Return Date hearing, on Wednesday, 27 April 2022.
(2) To pay any damages which the Defendants (or any other party served with or notified of this Order) shall sustain which the Court considers ought to be paid.

SCHEDULE 3

Plans

1. Fawley Plan
2. Hythe Plan
3. Avonmouth Plan
4. Birmingham Plan
5. Purfleet Plan
6. West London Plan
7. Hartland Park Plan
8. Alton Compound Plan

APPENDIX A TO THE ORDER OF ELLENBOGEN J, DATED 6 APRIL 2022: WARNING NOTICE

ESSO PETROLEUM COMPANY, LIMITED

EXXONMOBIL CHEMICAL LIMITED

IMPORTANT NOTICE

High Court of Justice – Claim No QB-2022-001098

On 6 April 2022, an injunction was ordered by the High Court of Justice in the proceedings referred to above concerning all of the Sites listed below:-

- The Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Fawley, Southampton SO45 1TH;
- Hythe Oil Terminal, New Road, Harley SO45 3NR;
- Avonmouth Oil Terminal, St Andrews Road, Bristol BS11 9BN;
- Birmingham Oil Terminal, Tyburn Road, Birmingham B24 8HJ;
- Purfleet Oil Terminal, London Road, Purfleet, Essex RM19 1RS;
- West London Oil Terminal, Bedford Road, Stanwell, Middlesex TW19 7LZ;
- Hartland Park Logistics Hub, Ively Road, Farnborough; and
- Alton Compound, Pumping Station, A31, Holybourne.

The Order prohibits entering or remaining upon, damaging, affixing any person or object to, erecting structures on and/or obstructing vehicular access to and from the above sites and the chemical plant at the address of the first site.

The persons affected by the Order are Persons Unknown acting in connection with the Extinction Rebellion campaign and/or the Just Stop Oil campaign.

Anyone in breach of the injunction may be in contempt of court and may be imprisoned, fined or have their assets seized. Any person who knows of the court's order and does anything which permits the Defendants or any of them

to breach the terms of the Order may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

THIS MEANS THAT YOU MUST NOT GO BEYOND THIS NOTICE AND ENTER THIS SITE WITHOUT PERMISSION.

THIS ALSO MEANS THAT YOU MUST NOT OBSTRUCT ANY VEHICULAR ENTRANCE OR EXIT.

IF YOU DO, YOU MAY BE SENT TO PRISON OR HAVE YOUR ASSETS SEIZED.

Copies of the court order and other documents in the proceedings may be viewed at www.exxonmobil.co.uk/Company/Overview/UK-operations.

Copies may also be obtained from exxonmobil.service@eversheds-sutherland.com.

IN THE HIGH COURT OF JUSTICE **CLAIM NO. QB-2022-001098**
QUEEN'S BENCH DIVISION
Mr Justice Bennathan
27 April 2022

B E T W E E N: **(1) ESSO PETROLEUM COMPANY, LIMITED**

(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-



(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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)

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY 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 ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANT

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible.

If you disobey this Order you may be found guilty of contempt of court and you may be sent to prison or your assets seized.

You have the right to apply to the court to vary or discharge this order (which is explained below).

RECITALS

FOLLOWING the Order of Ellenbogen J dated 6 April 2022

UPON the hearing of the Claimants' Applications dated 6 April 2022 and 22 April 2022

AND UPON hearing Leading Counsel and Junior Counsel for the Claimants

AND UPON reading the evidence recorded on the Court file as having been read

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

AND UPON the Metropolitan Police, Hampshire Constabulary, West Midlands Police, Avonmouth & Somerset Constabulary, Essex Police having been sent the Application dated 22 April 2022 seeking third party disclosure on 22 April 2022 by email and those police authorities taking no objection to that application

AND UPON the Claimants confirming that this Order is not intended to prohibit any lawful protest outside any of the sites referred to in this Order.

IT IS ORDERED THAT:

THE INJUNCTIONS

1. Until 27 April 2023 or further order in the meantime, the First Defendants must not:

   1.1 enter or remain upon any part of the First Claimant's properties ("the Sites") without the consent of the First Claimant at:

      (1) the Oil Refinery and Jetty at the Petrochemical Complex, Marsh Lane, Southampton SO45 1TH (as shown for identification edged red and green but excluding those areas edged blue on the attached 'Fawley Plan').

      (2) Hythe Terminal, New Road, Handley, SO45 3NR (as shown for identification edged red on the attached 'Hythe Plan').

      (3) Avonmouth Terminal, St Andrews Road, Bristol BS11 9BN (as shown for identification edged red on the attached 'Avonmouth Plan').

      (4) Birmingham Terminal, Wood Lane, Birmingham B24 8DN (as shown for identification edged red on the attached 'Birmingham Plan').

      (5) Purfleet Terminal, London Road, Purfleet, Essex RM19 1RS (as shown for identification edged red and brown on the attached 'Purfleet Plan').

      (6) West London Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ (as shown for identification edged red on the attached 'West London Plan').

      (7) Hartland Park Logistics Hub, Ively Road, Farnborough (as shown for identification edged red on the attached 'Hartland Park Plan').

      (8) Alton Compound, Pumping Station, A31, Hollybourne (as shown for identification edged red on the attached 'Alton Compound Plan');

   1.2 damage any part of any of the Sites;

1.3 affix themselves or any person or object to any part of any of the Sites;

1.4 erect any structures on any part of any of the Sites.

2. Until 27 April 2023 or further order in the meantime, the Second Defendants must not without the consent of the First Claimant or Second Claimant:

2.1 enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH ("the Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

2.2 damage any part of the Chemical Plant;

2.3 affix themselves or any person or object at the Chemical Plant;

2.4 erect any structures on any part of the Chemical Plant.

3. Until 27 April 2023 or further order in the meantime, the Third Defendants must not enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

VARIATION OR DISCHARGE OF THIS ORDER

4. The Defendants may apply to vary or discharge this Order at any time upon giving not less than 3 clear days' notice to the Claimant's solicitors, Eversheds Sutherland (International) LLP, by emailing exxonmobil.service@eversheds-sutherland.com. Any evidence to be relied upon in support of such an application must be communicated in writing to the Claimants' solicitors at least 2 clear days before the hearing.

5. Any person applying to vary or discharge this Order must provide their full name and address, an address for service and must also apply to be joined as a named defendant to the proceedings at the same time.

6. The Claimants have liberty to apply to extend or vary this Order or to seek further directions.

INTERPRETATION OF THIS ORDER

7. A Defendant who is ordered not to do something must not do it him/herself/themselves or in any other way. He/she/they must not do it through another acting on his/her/their behalf or on his/her/their instructions or with his/her/their encouragement.

SERVICE OF THIS ORDER

8. Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of this Order shall be effected as follows:

8.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that a copy of the Order may be obtained from the Claimants' solicitors, Eversheds Sutherland (International) LLP, One Wood Street, London EC2V 7WS (Ref: Stuart Wortley tel: 020 7919 4500) email:exxonmobil.service@eversheds-sutherland.com and (b) that a copy of the Order may be viewed at the website referred to in Paragraph 8.2 of this Order;

8.2 posting the Order on the following website: https:/www.exxonmobil.co.uk/Company/Overview/UK-operations; and

8.3 fixing a minimum of four large warning notices in the forms annexed to this Order in conspicuous places around the perimeters of the Sites. Such notices must be a minimum of A2 size.

8.4 sending an email to each of the following email addresses with the information that a copy of the Order may be viewed at the website referred to in Paragraph 8.2 of this Order:

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

9. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), this Order shall be deemed to be served on the latest date on which all of the methods of service referred to in Paragraph 8 above have been completed, such date to be verified by the completion of a certificate of service.

10. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 8 of this Order shall stand as good service of the Order.

SERVICE OF OTHER DOCUMENTS

11. Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of any other applications and evidence in support by the Claimants ("the Further Documents"), shall be effected as follows:

    11.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that copies of the Further Documents may be obtained from the Claimants' solicitors, Eversheds Sutherland (International) LLP, One Wood Street, London EC2V 7WS (Ref: Stuart Wortley tel: 020 7919 0969) email:exxonmobil.service@eversheds-sutherland.com and (b) that copies of the Further Documents may be viewed at the website referred to in Paragraph 11.2 of this Order;

    11.2 posting the Further Documents on the following website: https:/www.exxonmobil.co.uk/Company/Overview/UK-operations; and

    11.3 sending an email to each of the following email addresses with the information that copies of the Further Documents may be viewed at the website referred to in Paragraph 11.2 of this Order:

        (a) xr-legal@riseup.net

        (b) enquiries@extinctionrebellion.uk

        (c) juststopoilpress@protonmail.com

12. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the Further Documents shall be deemed to be served on the latest date on which all of the methods of service referred to in Paragraph 11 above have been completed, such date to be verified by the completion of a certificate of service.

13. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 11 of this Order shall stand as good service of the Further Documents.

DISCLOSURE

14. Pursuant to CPR 31.17, the Chief Constables of the Constabularies and police authorities listed in Schedule 4 to this Order shall as soon as reasonably practicable upon request by the Claimants give disclosure by provision of copy of documents in the following classes to the Claimants:

    14.1 documents identifying the names and addresses of any person who has been arrested or is arrested by one of their officers in the course of, or as a result of, the protests which are the subject of these proceedings at the Sites in relation to conduct which may constitute a breach of the injunctions granted in these proceedings;

    14.2 arrest notes and other photographic material relating to possible breaches of the injunctions granted in these proceedings.

15. The duty of disclosure imposed by paragraph 14 of this Order shall be a continuing one, and shall continue until 1 June 2022 or further order in the meantime.

16. Without the permission of the Court, the Claimants shall make no use of any document disclosed by virtue of paragraph 14 of this Order, other than one or more of the following uses:

    16.1 applying to name and join any person as a named defendant to these proceedings and to serve the said person with any document in these proceedings;

    16.2 investigating, formulating and pleading and prosecuting any claim within these proceedings arising out of any alleged disruptive protest at any of the Sites which are (or become) the subject of these proceedings;

16.3 use for purposes of formulating, pleading and prosecuting any application for committal for contempt of court against any person for breach of any order made within these proceedings.

17. Until further order, the address and address for service of any person who is added as a defendant to these proceedings shall be redacted in any copy of any document which is served other than by means of it being sent directly to that person or their legal representative.

18. Pursuant to CPR 6.15(2), 6.27 and Practice Direction 6A, paragraph 9.2, the sending of the application dated 22 April 2022 by email to the email addresses set out at paragraph 18 above on 22 April 2022 shall stand as good service.

19. Pursuant to CPR 6.15(2), 6.27 and Practice Direction 6A, paragraph 9.2, the sending of the application dated 22 April 2022 by email to xr-legal@riseup.net, enquiries@extinctionrebellion.uk and juststopoilpress@protonmail.com on 22 April 2022 shall stand as good service.

20. The Claimants shall serve this order by email only on the following email addresses, which shall stand as good service, pursuant to CPR 6.15(2) and 6.27:

- Julia.bartholomew@met.police.uk
- Civil.litigation@hampshire.pnn.police.uk
- Victoria.james@avonandsomerset.police.uk
- Adam.hunt@essex.police.uk
- Ls_joint_services@westmidlands.police.uk

PERMISSION TO AMEND

21. Pursuant to CPR 17.3 and 19.2, permission is granted to amend the description of the First Defendant (as reflected in the title to this Order) in the Amended Claim Form, paragraph 1.4.1 of the Amended Particulars of Claim and the relief claimed in the Amended Particulars of Claim by the addition of the words underlined in red in: (a) the amended rider to the Amended Claim Form in the form attached; and (b) paragraph 1.4.1 of the Amended Particulars of Claim and paragraph (1)1.1(4) of the relief claimed in the Amended Particulars of Claim in the form attached.

22. Service of the Re-Amended Claim Form and Re-Amended Particulars of Claim as permitted by paragraph 21 above is dispensed with.

COSTS

23. Costs reserved.

THE COURT

24. The Court will provide sealed copies of this Order for service to the Claimants' solicitors, whose details are set out in Paragraph 11.1 of this Order.

25. All communications to the Court about this Order should be sent to:
    - Queen's Bench Division, Royal Courts of Justice, Strand WC2A 2LL
    - The office are open between 10.00am and 4.30pm Monday to Friday (except Bank Holidays)
    - The telephone number is 020 7947 6000
    - The email address is qbjudgeslistingoffice@justice.gov.uk

SERVICE OF THE ORDER

26. This Order shall be served by the Claimants on the Defendants.

SCHEDULE 1

The Judge read the following Witness Statements before making this Order:

(1) First Witness Statement of Stuart Sherbrooke Wortley dated 4 April 2022 together with the exhibits marked "SSW1" - "SSW9".
(2) First Witness Statement of Anthony Milne dated 3 April 2022 together with the exhibits marked "AM1" – "AM15".
(3) First Witness Statement of Nawaaz Allybokus dated 5 April 2022 together with the exhibit marked "NA1".
(4) Second Witness Statement of Nawaaz Allybokus dated 5 April 2022 together with the exhibit marked "NA2".
(5) Third Witness Statement of Nawaaz Allybokus dated 22 April 2022 together with the exhibit marked "NA3".
(6) Fourth Witness Statement of Nawaaz Allybokus dated 22 April 2022 together with the exhibit marked "NA4".

SCHEDULE 2

Undertakings given to the Court by the Claimants and each of them

(1) The First Claimant undertakes to pay any damages caused by paragraphs 1, 2 or 3 of this Order which the Defendants (or any other party served with or notified of this Order) have sustained and which the Court considers ought to be paid.

(2) The Second Claimant undertakes to pay any damages caused by paragraphs 2 or 3 of this Order which the Second or Third Defendants (or any other party served with or notified of this Order) have sustained and which the Court considers ought to be paid.

SCHEDULE 3

Plans

1. Fawley Plan
2. Hythe Plan
3. Avonmouth Plan
4. Birmingham Plan
5. Purfleet Plan
6. West London Plan
7. Hartland Park Plan
8. Alton Compound Plan

Schedule 4

Site	**Constabulary**
Fawley and Hythe	Hampshire Constabulary
Avonmouth Terminal	Avonmouth and Somerset Constabulary
Birmingham Terminal	West Midlands Police
Purfleet Terminal	Essex Police
West London Terminal	Metropolitan Police
Hartland Park Terminal	Hampshire Constabulary
Alton Compound	Hampshire Constabulary

IN THE HIGH COURT OF JUSTICE **CLAIM NO. QB-2022-001098**
KING'S BENCH DIVISION
BEFORE: Mrs Justice Collins Rice
On 27 March 2023

B E T W E E N: **(1) ESSO PETROLEUM COMPANY, LIMITED**
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-



(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY 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 ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANT

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible.

If you disobey this Order you may be found guilty of contempt of court and you may be sent to prison or your assets seized.

You have the right to apply to the court to vary or discharge this Order (which is explained below).

RECITALS

FOLLOWING the Orders of Ellenbogen J dated 6 April 2022 and Bennathan J dated 27 April 2022

UPON the hearing of the Claimants' Applications dated 27 February 2023, 20 March 2023 and 21 March 2023

AND UPON hearing Leading Counsel and Junior Counsel for the Claimants and Alan Woods representing himself

AND UPON reading the evidence recorded in Schedule 2 to this Order

AND UPON the Claimants giving and the Court accepting the undertakings to the Court set out in Schedule 3 to this Order

AND UPON the Claimants having received assurances from Paul Fawkesley, Oliver Clegg, Alan Woods and Michael Brown that they do not intend to breach any injunction covering the Sites (as defined below)

IT IS ORDERED THAT:

ADDITION OF NAMED DEFENDANTS

1. The Claimants have permission to join as additional defendants to this claim each of the individuals named in Schedule 1 and to amend the Claim Form and Particulars of Claim accordingly.

2. The publication by the Claimants of this Order and Claim Form shall not include (in the published version) the addresses of these additional defendants.

3. In view of the assurances given by them mentioned above, Paul Fawkesley, Oliver Clegg, Alan Woods and Michael Brown are not to be subject to the injunctions set out in paragraphs 5, 6, or 7 below, without further order.

4. The Claimants have liberty to extend paragraph 3 above so as to include also the Fourth and Fifth Defendants, in the event that the like assurances are forthcoming from those individuals.

THE INJUNCTIONS

5. Until trial or further order in the meantime, the First, Fourth and Fifth Defendants must not:

    5.1 enter or remain upon any part of the First Claimant's properties ("the Sites") without the consent of the First Claimant at:

        (1) the Oil Refinery and Jetty at the Petrochemical Complex, Marsh Lane, Southampton SO45 1TH (as shown for identification edged red and green but excluding those areas edged blue on the attached 'Fawley Plan').

        (2) Hythe Terminal, New Road, Handley, SO45 3NR (as shown for identification edged red on the attached 'Hythe Plan').

(3) Avonmouth Terminal, St Andrews Road, Bristol BS11 9BN (as shown for identification edged red on the attached 'Avonmouth Plan').

(4) Birmingham Terminal, Wood Lane, Birmingham B24 8DN (as shown for identification edged red on the attached 'Birmingham Plan').

(5) Purfleet Terminal, London Road, Purfleet, Essex RM19 1RS (as shown for identification edged red and brown on the attached 'Purfleet Plan').

(6) West London Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ (as shown for identification edged red on the attached 'West London Plan').

(7) Hartland Park Logistics Hub, Ively Road, Farnborough (as shown for identification edged red on the attached 'Hartland Park Plan').

(8) Alton Compound, Pumping Station, A31, Hollybourne (as shown for identification edged red on the attached 'Alton Compound Plan');

5.2 damage any part of any of the Sites;

5.3 affix themselves or any person or object to any part of any of the Sites;

5.4 erect any structures on any part of any of the Sites.

6. Until trial or further order in the meantime, the Second, Fourth and Fifth Defendants must not without the consent of the First Claimant or Second Claimant:

6.1 enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH ("the Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

6.2 damage any part of the Chemical Plant;

6.3 affix themselves or any person or object at the Chemical Plant;

6.4 erect any structures on any part of the Chemical Plant.

7. Until trial or further order in the meantime, the Third, Fourth and Fifth Defendants must not enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

VARIATION OR DISCHARGE OF THIS ORDER

8. The Defendants may apply to vary or discharge this Order at any time upon giving not less than 3 clear days' notice to the Claimant's solicitors, Eversheds Sutherland (International) LLP, by emailing exxonmobil.service@eversheds-sutherland.com. Any evidence to be relied upon in support of such an application must be communicated in writing to the Claimants' solicitors at least 2 clear days before the hearing.
9. Any person applying to vary or discharge this Order must provide their full name and address, an address for service.
10. The Claimants have liberty to apply to extend or vary this Order or to seek further directions.

INTERPRETATION OF THIS ORDER

11. A Defendant who is ordered not to do something must not do it him/herself/themselves or in any other way. He/she/they must not do it through another acting on his/her/their behalf or on his/her/their instructions or with his/her/their encouragement.

SERVICE OF THIS ORDER

12. Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of this Order shall be effected on the First, Second and Third Defendants as follows:
    12.1. fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that a copy of the Order may be obtained from the Claimants' solicitors, Eversheds Sutherland (International) LLP, One Wood Street, London EC2V 7WS (Ref: Stuart Wortley tel: 020 7919 4500) email:exxonmobil.service@eversheds-sutherland.com and (b) that a copy of the Order may be viewed at the website referred to in Paragraph 12.2 of this Order;
    12.2. posting the Order on the following website: https:/www.exxonmobil.co.uk/Company/Overview/UK-operations; and
    12.3. fixing a minimum of four large warning notices in the forms annexed to this Order in conspicuous places around the perimeters of the Sites. Such notices must be a minimum of A2 size.

12.4. sending an email to each of the following email addresses with the information that a copy of the Order may be viewed at the website referred to in Paragraph 12.2 of this Order:

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

13. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), this Order shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in Paragraph 12 above have been completed.

14. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 12 of this Order shall stand as good service of the Order on the First, Second and Third Defendants.

SERVICE OF OTHER DOCUMENTS

15. Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of any other applications and evidence in support by the Claimants ("the Further Documents"), shall be effected on the First, Second and Third Defendants as follows:

15.1. fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that copies of the Further Documents may be obtained from the Claimants' solicitors, Eversheds Sutherland (International) LLP, One Wood Street, London EC2V 7WS (Ref: Stuart Wortley tel: 020 7919 0969) email:exxonmobil.service@eversheds-sutherland.com and (b) that copies of the Further Documents may be viewed at the website referred to in Paragraph 12.2 of this Order;

15.2. posting the Further Documents on the following website: https:/www.exxonmobil.co.uk/Company/Overview/UK-operations; and

15.3. sending an email to each of the following email addresses with the information that copies of the Further Documents may be viewed at the website referred to in Paragraph 12.2 of this Order:

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

16. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the Further Documents shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in Paragraph 15 above have been completed.

17. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 15 of this Order shall stand as good service of the Further Documents on the First, Second and Third Defendants.

DIRECTIONS FOR TRIAL

18. Any Defence to this claim from the Fourth or Fifth Defendant is to be filed and served by 4pm on 24 April 2023.

19. The Claimants have permission to file and serve further evidence, if so advised, by 4pm on 8 May 2022.

20. The Defendants shall file and serve any evidence on which they wish to rely by 4pm on 22 May 2022.

21. Disclosure of documents is dispensed with.

22. Costs management is dispensed with.

23. The claim be listed for trial on the first available date after 12 June 2023 with a time estimate of 1 day (plus reading time).

24. The Claimants shall file and serve a trial bundle not less than 7 days before the trial.

25. Skeleton arguments on behalf of any represented party shall be lodged and exchanged, with bundle of authorities, not less than 3 days before the trial.

26. The Claimants and any Defendant who has filed an acknowledgment of service shall have permission to apply for further or other case management directions.

COSTS

27. Costs reserved.

THE COURT

28. The Court will provide sealed copies of this Order for service to the Claimants' solicitors, whose details are set out in Paragraph 12.1 of this Order.

29. All communications to the Court about this Order should be sent to:
    - King's Bench Division, Royal Courts of Justice, Strand WC2A 2LL
    - The office are open between 10.00am and 4.30pm Monday to Friday (except Bank Holidays)
    - The telephone number is 020 7947 6000
    - The email address is kbjudgeslistingoffice@justice.gov.uk

SERVICE OF THE ORDER

30. This Order shall be served by the Claimants on the Defendants.

SCHEDULE 1

(4) Paul Barnes of [redacted]

(5) Diana Hekt, of [redacted]

SCHEDULE 2

The Judge read the following Witness Statements before making this Order:

(1) First Witness Statement of Stuart Sherbrooke Wortley dated 4 April 2022 together with the exhibits marked “SSW1” - “SSW9”.

(2) First Witness Statement of Anthony Milne dated 3 April 2022 together with the exhibits marked “AM1” – “AM15”.

(3) First Witness Statement of Martin Pullman dated 27 February 2023 together with exhibits marked “MP1” and “MP2”.

(4) Third Witness Statement of Nawaaz Allybokus dated 22 April 2022 together with the exhibit marked “NA3”.

(5) Fifth Witness Statement of Nawaaz Allybokus dated 20 March 2023 together with the exhibit marked “NA5”.

SCHEDULE 3

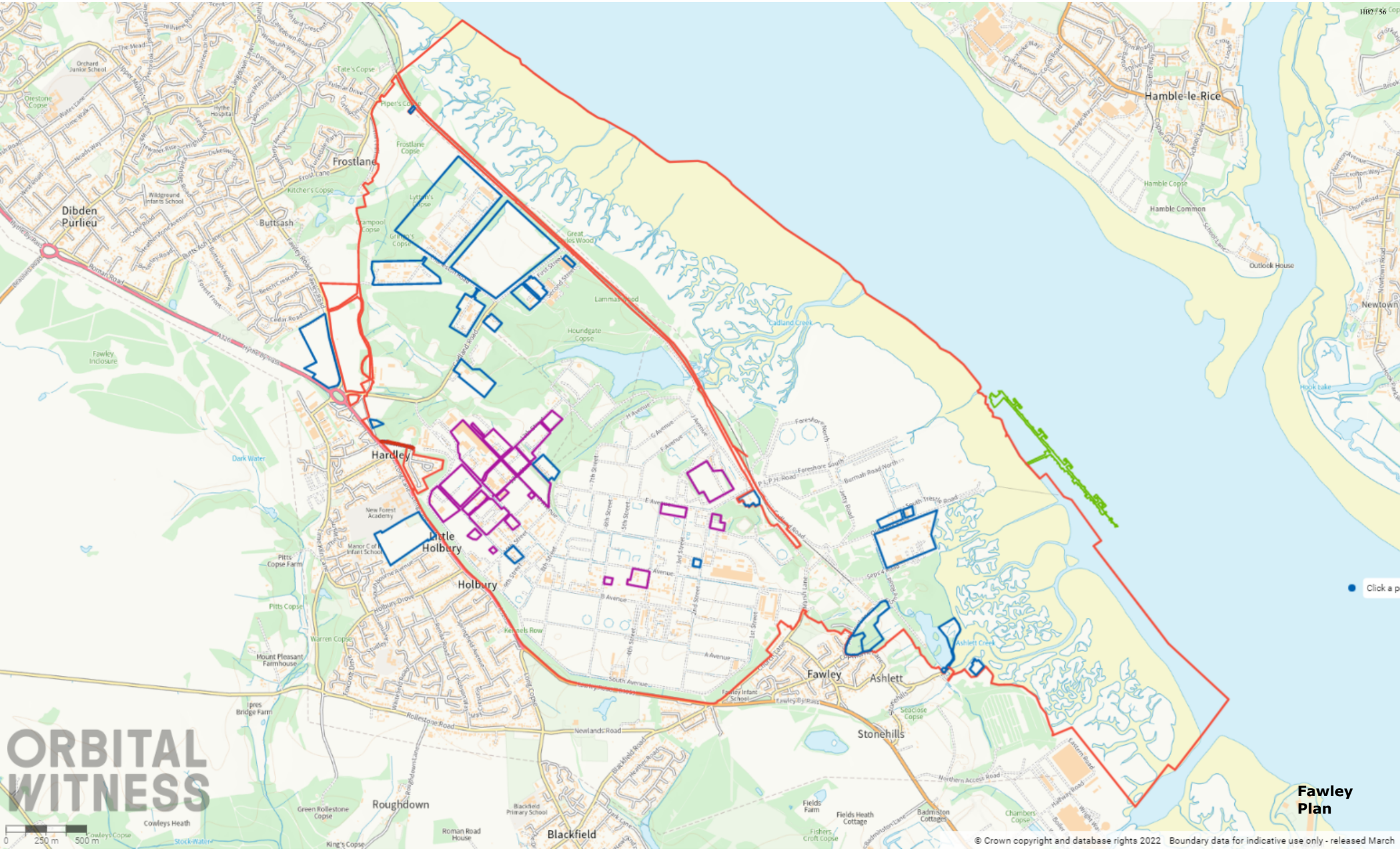
Undertakings given to the Court by the Claimants and each of them

(1) The First Claimant undertakes to pay any damages caused by paragraphs 5, 6 or 7 of this Order which the Defendants (or any other party served with or notified of this Order) have sustained and which the Court considers ought to be paid.

(2) The Second Claimant undertakes to pay any damages caused by paragraphs 6 or 7 of this Order which the Defendants (or any other party served with or notified of this Order) have sustained and which the Court considers ought to be paid.

SCHEDULE 4 - Plans

1. Fawley Plan
2. Hythe Plan
3. Avonmouth Plan
4. Birmingham Plan
5. Purfleet Plan
6. West London Plan
7. Hartland Park Plan
8. Alton Compound Plan


Hamble-le-Rice
Frostlane
Dibden Purlieu
Butts Ash
Hardley
Little Holbury
Holbury
Fawley
Ashlett
Stonehills
Roughdown
Blackfield
Newtown
Fawley Plan
ORBITAL WITNESS
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HB2 / 57
Hardley Lane
Fawley Road
Hythe By-Pass
A326
New Road
Forest Lane
Roman Road
Long Lane
Religious Grounds
Cold Shoot Close
A326
Cadland Road
Click a point
ORBITAL WITNESS
0 25 m 50 m
Hythe Plan
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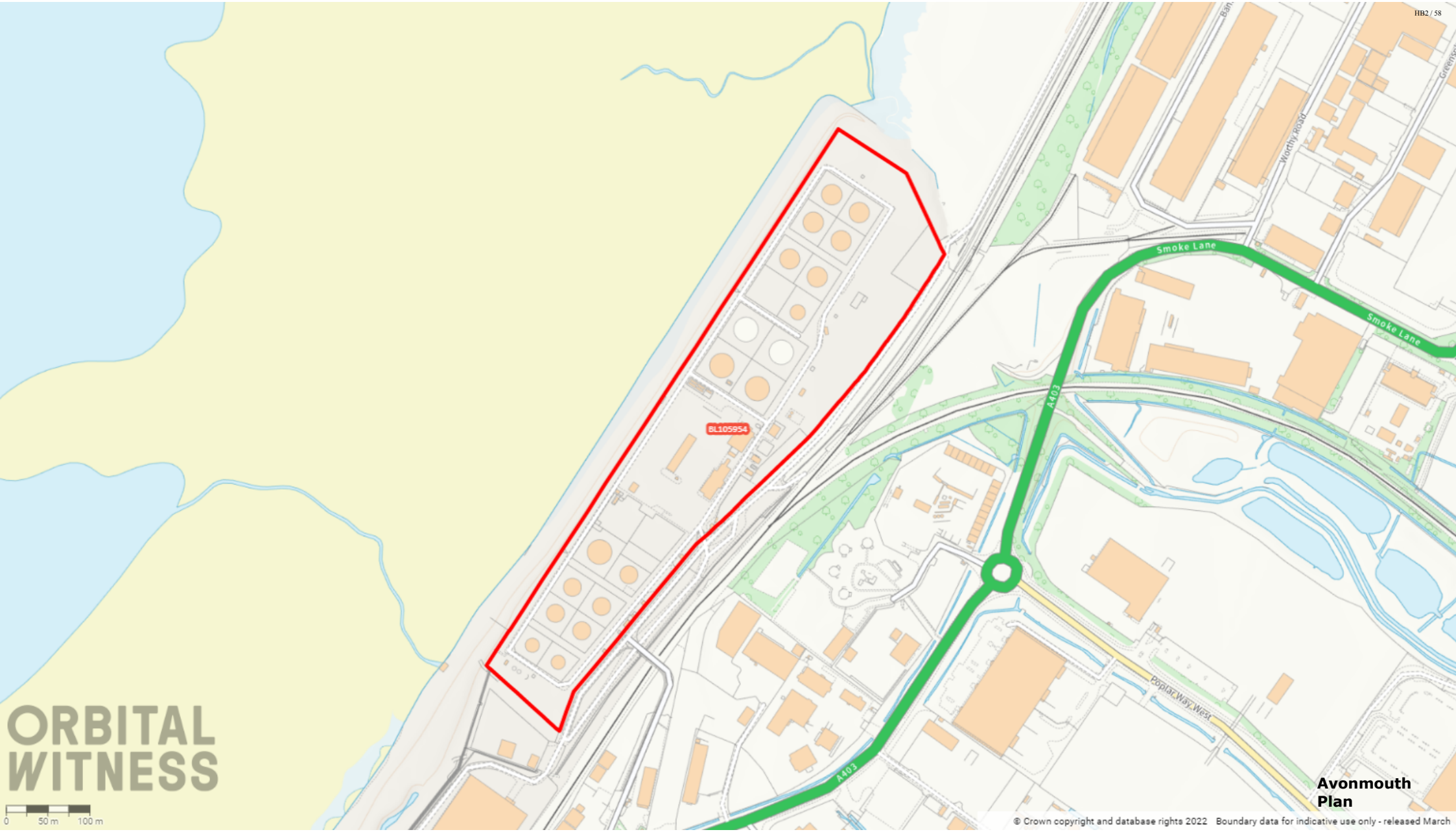
HB2 / 58
Smoke Lane
Smoke Lane
A403
A403
Worthy Road
Poplar Way West
BL105954
ORBITAL WITNESS
0
50 m
100 m
Avonmouth Plan
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HB2 / 59
WK118802
WK66930
Depot
Depot
Depot
Hastingwood Industrial Park
Works
Oil Storage Depot
Fort Parkway
Canal Lane
Tonbridge Road
Bromford I
Wheelwright Road
Birmingham and Fazeley Canal
Click a point to
ORBITAL WITNESS
Birmingham Plan
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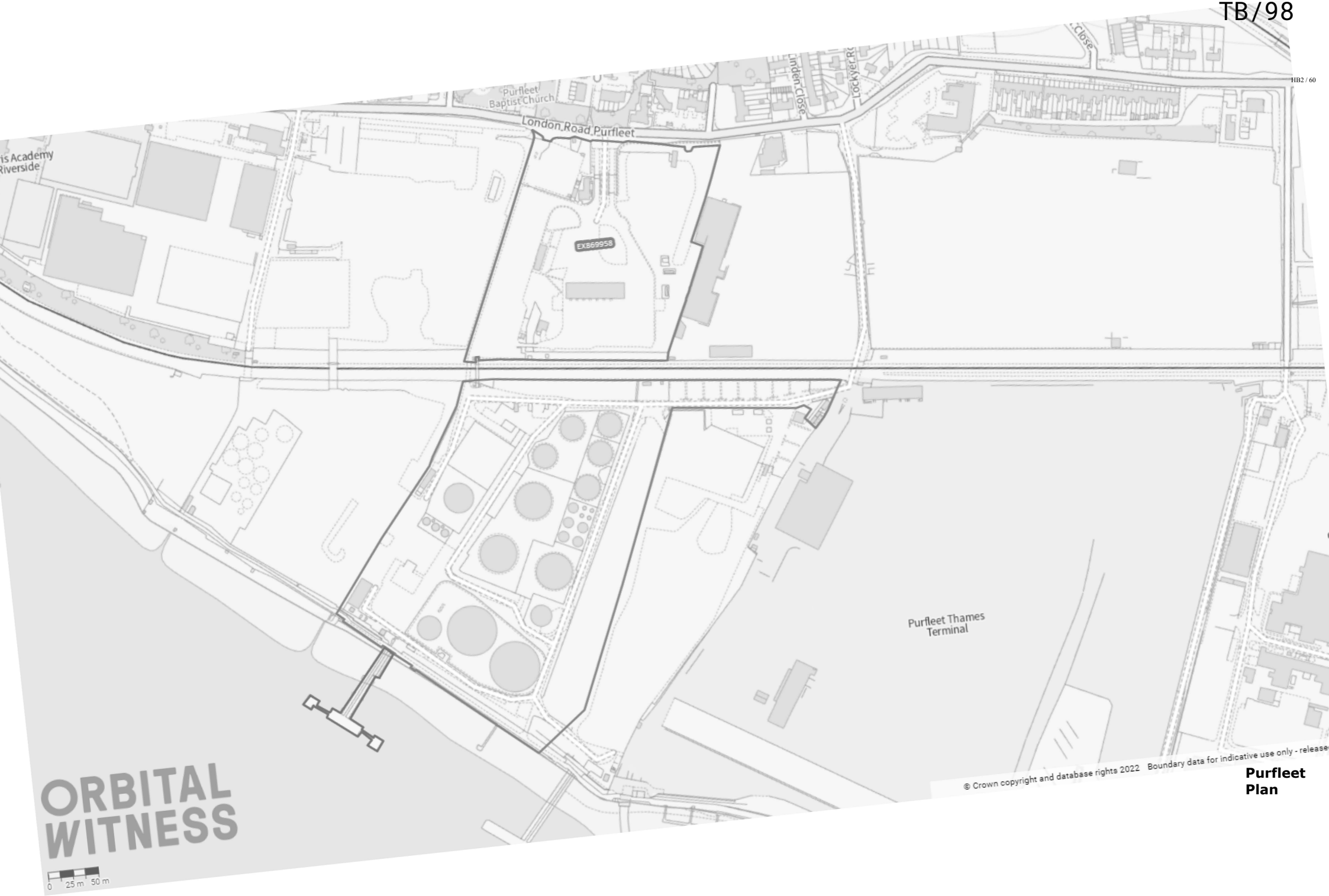
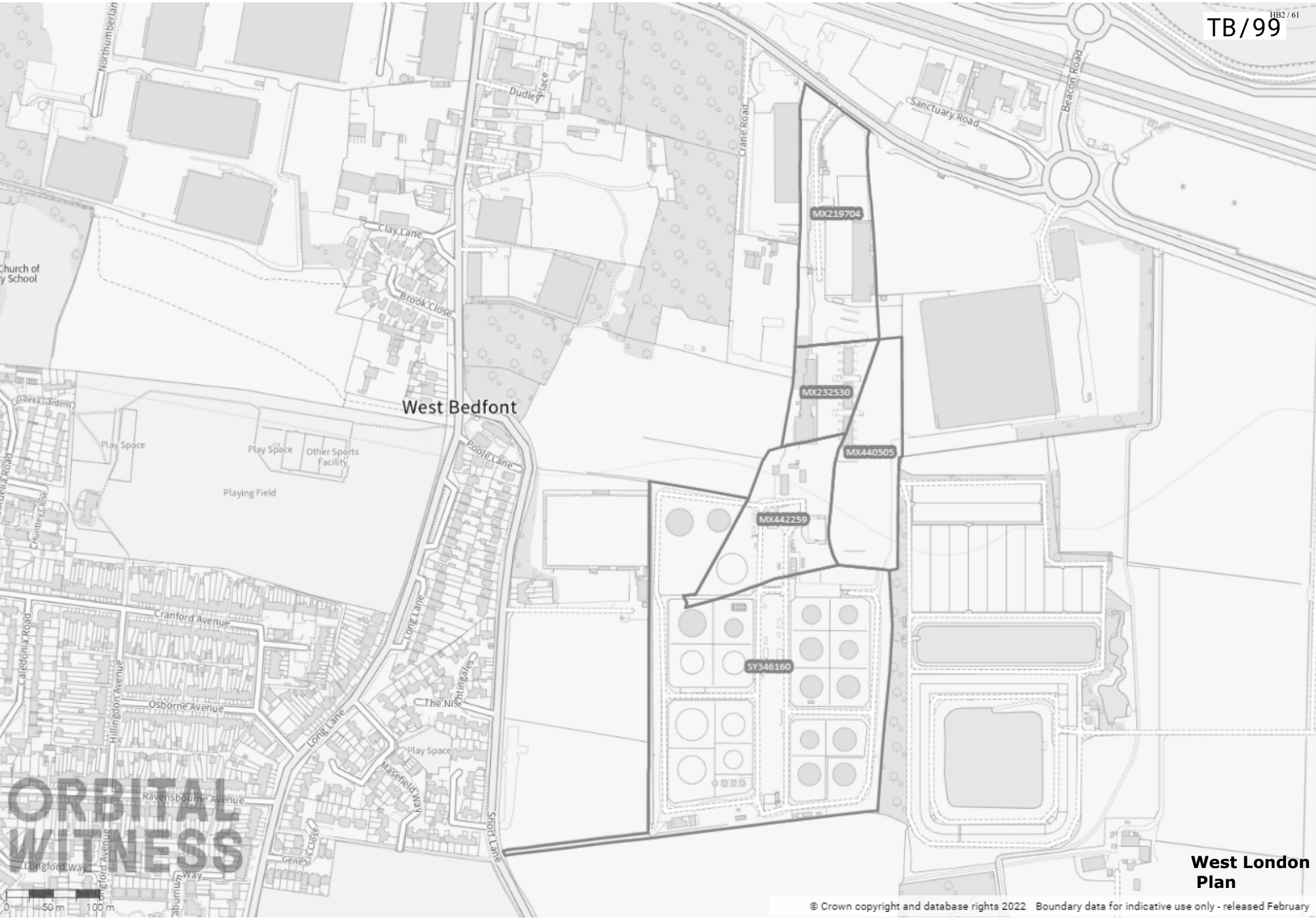


Purfleet Plan

TB/99



West London Plan

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TB/100


ORBITAL WITNESS
0
50 m
100 m
Hartland Park Plan
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Alton Compound Plan

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ESSO PETROLEUM COMPANY, LIMITED (First Claimant)
EXXONMOBIL CHEMICAL LIMITED (Second Claimant)

Important Notice
High Court of Justice – Claim No QB-2022-001098

On 27 March 2023, an injunction was made by the High Court of Justice in the proceedings referred to above concerning this Site

The Order prohibits entering or remaining, damaging, affixing any person or object, erecting structures and / or obstructing vehicular access.

The persons affected by the Order are Persons Unknown acting in connection with the Extinction Rebellion campaign and / or the Just Stop Oil campaign (and other Defendants who are named in the proceedings).

Anyone in breach of the injunction will be in contempt of court and may be imprisoned, fined or have their assets seized. Any person who knows of this Order and does anything which permits the Defendant or any of them to breach the terms of the Order may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

This means that you must not go beyond this notice and enter this site without permission.
This also means that you must not obstruct any vehicular entrance or exit.
If you do, you may be sent to prison or have your assets seized.

Copies of the Court documents may be viewed at www.exxonmobil.co.uk/Company/Overview/UK-operations

Copies may also be obtained from exxonmobil.service@eversheds-sutherland.com

The injunction applies to the following Sites:-

- The Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Fawley, Southampton SO45 1TH
- Hythe Oil Terminal, New Road, Harley SO45 3NR
- Avonmouth Oil Terminal, St Andrews Road, Bristol BS11 9BN
- Birmingham Oil Terminal, Tyburn Road, Birmingham B24 8HJ
- Purfleet Oil Terminal, London Road, Purfleet, Essex RM19 1RS
- West London Oil Terminal, Bedford Road, Stanwell, Middlesex TW19 7LZ
- Hartland Park Logistics Hub, Ively Road, Farnborough
- Alton Compound, Pumping Station, A31, Holybourne

IN THE HIGH COURT OF JUSTICE **CLAIM NO. QB-2022-001098**
KING'S BENCH DIVISION
The Honourable Mr Justice Linden
On 10 July 2023
B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

HIGH COURT OF JUSTICE
12 Jul 2023
QUEEN'S BENCH DIVISION
QB-2022-001098

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY 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 ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANT

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible.

If you disobey this Order you may be found guilty of contempt of court and you may be sent to prison or your assets seized.

You have the right to apply to the court to vary or discharge this Order (which is explained below).

RECITALS

UPON the trial on 10 July 2023 of the Claimants' claim for a final injunction

AND UPON hearing Timothy Morshead KC and Yaaser Vanderman for the Claimants

AND UPON the Court indicating that it would hand down judgment shortly

IT IS ORDERED THAT:

1. The Order of Collins Rice J, dated 27 March 2023 (sealed on 30 March 2023), is to continue to have effect until further order.

2. Pursuant to CPR r.6.27, service of this Order shall be effected on the Defendants using the steps set out at paragraph 12.2 and 12.4 of the Order of Collins Rice J, dated 30 March 2023.

3. Pursuant to 6.15(4)(b) and CPR r.6.27, such service shall be deemed effective on the latest date on which all of the said steps shall have been completed or, if sooner, the date of actual notice of the Order.

Mr Justice Linden

Dated 10 July 2023

IN THE HIGH COURT OF JUSTICE **CLAIM NO. QB-2022-001098**

KING'S BENCH DIVISION

The Honourable Mr Justice Linden
10th July 2023



B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

and

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')**
- **(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')**
- **(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')**
- **(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')**
- **(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')**
- **(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')**
- **(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')**
- **(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')**

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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

(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

If you the within named Fourth and Fifth Defendants disobey the undertakings set out in this order or instruct (which includes training, coaching, teaching or educating) others to do the acts which you have undertaken not to do, 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 undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE FOURTH AND FIFTH DEFENDANTS

This order prohibits you from doing the acts set out in paragraphs 4, 5 and 6 below.

You should read it very carefully.

UPON the **Fourth and Fifth Defendants** having agreed to an order in the terms set out below

AND UPON the **Fourth and Fifth Defendants** giving undertakings to the Court as set out below; and

IT IS ORDERED THAT:

1. There be no order for costs.

2. Pursuant to CPR r.6.15, r.6.27 and r.81.4(2)(c)-(d), service of this Order and any subsequent court documents in these proceedings on the Fourth Defendant may be effected by alternative means by email to PBHPXR@protonmail.com and such service shall be deemed to be good and sufficient service on the Fourth Defendant. Any such document shall be deemed served on the date the email is sent.

3. Pursuant to CPR r.6.15, 6.27 and 81.4(2)(c)-(d), service of this Order and any subsequent court documents in these proceedings on the Fifth Defendant may be effected by alternative means by email to hekt@outlook.com and such service shall be deemed to be good and sufficient service on the Fifth Defendant. Any such document shall be deemed served on the date the email is sent.

UNDERTAKINGS TO THE COURT

The **Fourth and Fifth Defendants** undertake to the Court promising as follows:-

4. not to:-

   a. enter or remain on any part of the First Claimant's properties ("the Sites") without the consent of the First Claimant at:-

      i. the Oil Refinery and Jetty at the Petrochemical Complex, Marsh Lane, Southampton SO45 1TH (as shown for identification edged red and green but excluding those areas edged blue on the attached 'Fawley Plan');

      ii. Hythe Terminal, New Road, Hardley, SO45 3NR (as shown for identification edged red on the attached 'Hythe Plan');

      iii. Avonmouth Terminal, St Andrews Road, Bristol BS11 9BN (as shown for identification edged red on the attached 'Avonmouth Plan');

      iv. Birmingham Terminal, Wood Lane, Birmingham B24 8DN (as shown for identification edged red on the attached 'Birmingham Plan');

      v. Purfleet Terminal, London Road, Purfleet, Essex RM19 1RS (as shown for identification edged red and brown on the attached 'Purfleet Plan');

      vi. West London Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ (as shown for identification edged red on the attached 'West London Plan');

      vii. Hartland Park Logistics Hub, Ively Road, Farnborough (as shown for identification edged red on the attached 'Hartland Park Plan');

      viii. Alton Compound, Pumping Station, A31, Hollybourne (as shown for identification edged red on the attached 'Alton Compound Plan');

   b. damage any part of any of the Sites;

   c. affix themselves or any person or object to any part of any of the Sites;

   d. erect any structures on any part of any of the Sites.

5. not to:-

   a. enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH ("the Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

   b. damage any part of the Chemical Plant;

   c. affix themselves or any person or object at the Chemical Plant;

   d. erect any structures on any part of the Chemical Plant.

6. not to enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THESE PROMISES UNTIL 30 June 2024

10 July 2023

STATEMENT

I understand the undertakings that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.

_____
Paul Barnes
Fourth Defendant
June 2023

_____
Diane Hekt
Fifth Defendant
June 2023

We consent to an order in these terms

_____
Eversheds Sutherland (International) LLP

Solicitors for the Claimants

June 2023

Neutral Citation Number: [2023] EWHC 1837 (KB)

Case No: QB-2022-001098

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Royal Courts of Justice
Strand, London, WC2A 2LL

Date: 18/07/2023

Before :

THE HONOURABLE MR JUSTICE LINDEN

- -

Between :

(1) ESSO PETROLEUM COMPANY, LIMITED — **Claimant**

(2) EXXONMOBIL CHEMICAL LIMITED

- and –

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

(A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')

(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

- -
- -

Timothy Morshead KC and **Yaaser Vanderman** (instructed by **Eversheds Sutherland (International) LLP**) for the **Claimant**
No appearance or representation by the **Defendants**

Hearing date: 10 July 2023
- -

Approved Judgment

This judgment was handed down remotely at 2pm on 18 July 2023 by circulation to the parties or their representatives by e-mail and by release to the National Archives.

.....

THE HONOURABLE MR JUSTICE LINDEN

Mr Justice Linden :

Introduction

1. This was the trial of the Claimants' claim for an injunction to restrain certain forms of trespass by Extinction Rebellion and Just Stop Oil protesters at specified sites around the country ("the Sites").

Procedural matters

2. An interim injunction was first granted in these proceedings by Ellenbogen J at a without notice hearing on 6 April 2022, and that injunction was extended by Bennathan J on the return date, which was 27 April 2022. That hearing was not attended by any of the Defendants, and they were not represented, but Counsel instructed by a person involved in the environmental movement attended and made submissions to the court with a particular focus on whether the Claimants had sufficient proprietary interests in the Sites which they sought to protect, to be entitled to bring a claim in trespass.

3. The injunction was then extended again by Collins Rice J at a hearing on 27 March 2023. However, she was unwilling to do so on an interim basis for a period of a year, as proposed by the Claimants, and she therefore gave directions for trial. Again, there was no attendance or representation on the Defendants' side. But four individuals who had been identified as actual or potential Defendants gave assurances that they did not intend to act inconsistently with the terms of the injunction. On that basis Collins Rice J directed that they were not subject to its terms.

4. Similarly, no Defendants attended the trial before me or were represented or submitted evidence. However, the Fourth and Fifth Defendants gave undertakings which were satisfactory to the Claimants, and these will be embodied in an Order which applies to their cases.

5. In the course of Mr Morshead KC's submissions, however, it became apparent that a person in the public gallery wished to address the court. She told me she was Ms Sarah Pemberton, that she was qualified as a barrister (though not practising) and that she was informally representing her friend, Mr Martin Marston-Paterson, because he would not have been able to attend the hearing until the afternoon. I allowed her to address the court and she drew to my attention the fact that there had been correspondence between Bindmans LLP, who were acting for Mr Marston-Paterson, and Eversheds Sutherland (International) LLP who were instructed by the Claimants. Bindmans had proposed that the hearing be adjourned pending the decision of the Supreme Court in the appeal from the decision in *London Borough of Barking & Dagenham & Others v Persons Unknown* [2022] EWCA Civ 13; [2023] QB 295 (now *Wolverhampton City Council & Others v London Gypsies and Travellers & Others* UKSC 2022/0046).

6. Ms Pemberton stressed that she was not making an application to adjourn the trial but she pointed out that if the Supreme Court were to overturn the decision of the Court of Appeal in the *Barking & Dagenham* case, any final injunction which I granted would likely be unlawful. She also told me that submissions had been made to the Supreme Court to the effect that the risk of an adverse order for costs was having a chilling effect on climate change protesters who might otherwise have contested this type of application for injunctive relief. She said that provision for a review of any injunction which I granted

would not adequately safeguard the position of the Defendants given that I would have made findings of fact which it would be problematic to reopen in circumstances in which, at least possibly, Defendants had been prevented from putting in evidence by the risk of an order for costs.

7. The correspondence was handed up to me by Mr Morshead. This showed that the matter had been raised by Bindmans on 30 June 2023. In a phone call and an email dated 3 July, Eversheds Sutherland said that their clients would be unwilling to consent to an adjournment, pointing out that Collins Rice J had directed that the trial take place. No threat of an application for costs in the event of an adjournment was made. On 7 July, Bindmans confirmed that they were not instructed to apply to adjourn or to intervene in the matter.

8. I decided not to adjourn the trial. It had been listed, by Order of Collins Rice J, since 5 May 2023. There had expressly not been any application to adjourn. Nor had I been shown any evidence that submissions or evidence would have been put before the court by any Defendant or interested party were it not for the fear of an adverse costs order, still less given an indication of what those submissions or that evidence might be. The appropriate course was, in my view, to decide the Claim on the law as it currently stands but to make provision in any Order for a review shortly after the judgment of the Supreme Court is handed down. This, in my judgment, fairly addressed any risk of injustice caused by proceeding with the trial.

9. As far as service and notice of the trial are concerned, I had regard to section 12(2) of the Human Rights Act 1998 which, so far as is relevant for present purposes, provides that in cases where the court is considering whether to grant any relief which might affect the exercise by the respondent of the right to freedom of expression under Article 10 of the European Convention on Human Rights ("ECHR"), and the respondent is not present or represented, such relief must be refused unless the court is satisfied *"(a) that the applicant has taken all practicable steps to notify the respondent"*. Each of the judges who has dealt with this matter has considered this question and, in the case of Bennathan J and Collins Rice J, whether the alternative directions for service in the preceding order had been complied with. Each has been satisfied that they had been and that, accordingly, all practicable steps had been taken for the purposes of section 12(2)(a).

10. As far as the trial is concerned, Collins Rice J directed that service of her Order and any further documents would be effected on the First to Third Defendants by fixing copies in clear transparent containers at a minimum of 2 locations on the perimeter of each of the Sites, together with notices which stated that they could be obtained from the Claimants' solicitors and viewed at a specified company website. Service was also to be effected by posting the documents on that company website and by sending an email to specified email addresses for Extinction Rebellion and Just Stop Oil, notifying them of the availability of the documents on that website.

11. Mr Nawaz Allybokus, who is one of the solicitors acting for the Claimants in these proceedings, gave evidence, in his 6th witness statement dated 24 May 2023, that the Order of Collins Rice J and the Notice of Trial were served in accordance with the directions of the Court on 12 May 2023. In his 8th witness statement, dated 4 July 2023, he gives evidence that the directions as to service of the evidence relied on by the Claimants for

the purposes of the trial were complied with in the third week in June 2023 and therefore in good time before the trial.

12. I was therefore satisfied that sufficient notice of the hearing had been given to the Defendants. They had also been provided with access to the materials on which the Claimants rely, and all practical steps had been taken to notify them for the purposes of section 12(2)(a) of the 1998 Act. I decided to proceed notwithstanding the absence of any Defendant but, bearing this in mind, to probe the Claimants' case appropriately.

13. Mr Morshead answered questions from the court about the identity of the parties and the scope of the relief which he was seeking. He had put in a skeleton argument dated 4 July 2023, and he developed some of the points in that document orally. At the invitation of the court there was a particular focus on the question whether it was appropriate to impose a final injunction in the light of the evidence about the risk of acts of trespass by protesters at the sites in question and the likelihood of harm as a result in the event that the injunction was refused.

14. I also gave Ms Pemberton an opportunity to make any points in reply which she wished to make. She did not specifically challenge what Mr Morshead had submitted about the risk of trespass in the future, or the potential risks if this were to happen, but she drew attention to the distinction between the official positions of Extinction Rebellion and Just Stop Oil in relation to direct action, the former having said in January 2023 that it was stepping back from direct action. She also emphasised the risk that a lack of clarity in any Order which I might make could have a chilling effect on the rights to freedom of expression and association. I have taken these points into account in coming to my decision.

15. Ms Pemberton also raised a concern that Mr Marston-Paterson had not received the full trial bundle. She told me that she had checked and had received a message from him during the hearing which confirmed this point. Whereas Mr Morshead was referring to a 708-page bundle, the bundle which had been forwarded to Mr Marston-Paterson by Extinction Rebellion by email dated 16 June 2023 ran to 413 pages. Mr Morshead said, in response, that his instructions were that the full bundle had been sent to Extinction Rebellion. At her request, I gave permission for Mr Marston-Paterson to put in evidence on this matter if he wished, and permission to the Claimants to reply within 24 hours.

16. I then reserved judgment and extended the interim injunction pending the handing down of my decision.

17. On the day after the trial, I received statements made by Ms Pemberton and Mr Allybokus, both dated 11 July 2023. Her statement covered new matters, reprised what had happened at the trial and provided more detail on points which she made to me. No doubt inadvertently, some aspects of her account of what happened at the trial were not accurate but, in any event, I was not prepared to admit further evidence other than in relation to the question of service of the trial bundles. Ms Pemberton had an opportunity to put in any evidence on which she wished to rely before the trial and, other than the extent which I had indicated, it was not in the interests of justice for her to be permitted to do so after it had concluded.

18. There was then a 10th witness statement submitted by Mr Allybokus on 12 July 2023 but, with respect to him, this did not add anything material.

19. The evidence shows that Mr Allybokus sent the correct trial bundles to the three email addresses identified in the Order of Collins Rice J on 16 June 2023. They were enclosed via Mimecast. The email said that copies of the trial bundles would be uploaded shortly onto the company website. Ms Pemberton says in her statement that she manages the relevant email address for Extinction Rebellion and therefore read Mr Allybokus' email on 16 June 2023. She did not access the documents via Mimecast for reasons which she does not explain in her statement. Instead, she went on the company website and downloaded the bundles from there on 16 and 18 June. The final versions had not yet been uploaded at this point: that took place on 20 June 2023.

20. I do not consider that this issue means that the trial was unfair and Ms Pemberton does not suggest that it does. The concern which she raised with me about Mr Marston-Paterson not having the full bundle, and him messaging her during the trial to confirm this, is not referred to in her statement. What she says is that she read the trial bundles which she had downloaded and that the purpose of her attendance at the hearing was to observe and take a note. She does not suggest that she is a party. She then became concerned because her version of volume 2 to the trial bundle did not contain documents to which Mr Morshead referred in his oral submissions.

21. From the section of volume 2 of the trial bundle which Ms Pemberton says she did not see, Mr Morshead referred me to the undertakings which were given by the Fourth and Fifth Defendants and two press reports in which Just Stop Oil made statements about their intention to carry on protesting until they achieved their objectives. The material parts of these statements were read out by him in open court and they are referred to by me below. This point was also covered in the witness statements, and the press statements were two examples amongst many. I have not taken any other document in volume 2 into account in coming to my conclusion. Nothing in Ms Pemberton's statement therefore causes me to think that it would be in accordance with the overriding objective for me to revisit my decision to proceed with the trial.

Factual background

22. The detail of the factual background is set out in the witness statements relied on by the Claimants for the purposes of the trial, in particular the witness statements of Mr Anthony Milne (Global Security Adviser at the First Claimant) dated 3 April 2022; Mr Stuart Wortley (Partner at Eversheds Sutherland) dated 4 April 2022; Mr Allybokus dated 22 April 2022, 20 March 2023 and 13 June 2023; and Mr Martin Pullman (European Midstream Manager at the First Claimant) dated 27 February and 6 June 2023. The facts which led to the interim injunctions are also helpfully summarised by Ellenbogen J in her judgment of 6 April 2022, neutral citation number [2022] EWHC 966 (QB) and therefore need not be rehearsed by me in detail.

23. In outline, the Claimants are well known oil, petroleum and petrochemical companies. The injunction which they seek would restrain certain forms of trespass on their sites at the Fawley Petrochemical Complex in Southampton, the Hythe Terminal in Hardley, the Avonmouth Terminal near Bristol, the Birmingham Terminal, the Purfleet Terminal, the

West London Terminal, the Hartland Park Logistics Hub near Farnborough and the Alton compound at Holybourne.

24. Ellenbogen J carefully considered whether the Claimants had a sufficient proprietary rights in each of these sites to bring a claim in trespass and concluded that they did: see [21] of her judgment. At [6]-[8] she found that the Fawley Petrochemical Complex comprises an oil refinery, a chemical plant, and a jetty. The First Claimant is the freehold owner of the refinery and the chemical plant, and the registered lessee of the jetty. The Second Claimant is the lessee of the chemical plant. This is the explanation for a separate category of persons unknown: the Second Defendant in the proceedings.

25. Fawley is the largest oil refinery in the United Kingdom. It provides twenty per cent of the country's refinery capacity and is classed as Tier 1 Critical National Infrastructure. The chemical plant has an annual capacity of 800,000 tonnes, is highly integrated with the operations of the refinery, and produces key components for a large number of finished products here and elsewhere in Europe.

26. Ellenbogen J found that the First Claimant is also the freehold owner of the oil terminals at Hythe (primarily serving the South and West of England); that part of Birmingham which is material to the application (primarily serving the Midlands); Purfleet (primarily serving London and the South East of England); and West London (serving a range of customers in Southern and Central England and supplying aviation fuel to Heathrow Airport). It is also the registered lessee of the Avonmouth Terminal (primarily serving the South West of England). Title to the Purfleet jetty is unregistered, although the First Claimant has occupied the jetty for approximately 100 years. These Terminals are large and they play an important role in supplying the national economy.

27. The First Claimant has an unregistered leasehold interest in Hartland Park which is a temporary logistics hub comprising project offices, welfare facilities and car parking for staff and contractors, together with storage for construction plant materials, machinery and equipment in connection with the construction of a replacement fuel pipeline between the Fawley Petrochemical Complex and the West London oil terminal. It is also the freehold owner of the Alton compound, comprising a pumping station and another compound at Holybourne used in connection with the replacement fuel pipe line.

28. Submissions on this subject were addressed to Bennathan J on 27 April 2022 by Counsel for the interested person but he rejected them: see his judgment at [2022] EWHC 1477 (QB) [27]. He said that he was fully satisfied that the Claimants had the necessary proprietary interests. No evidence has been put before me to question the decisions of Ellenbogen and Bennathan JJ on this point and I therefore accept and adopt their findings.

29. Extinction Rebellion and Just Stop Oil are well known campaigns on the issue of climate change. The latter is focussed on the fossil fuel sector, and the former on climate change more generally.

30. The evidence before Ellenbogen and Bennathan JJ was that Just Stop Oil and Extinction Rebellion were organising action against the fossil fuel industry in March and April 2022. The intention was that groups or teams would block or disrupt oil networks including refineries, storage units and adjacent roads. Individuals were also being encouraged to sign up to direct action which would lead to their arrest.

31. Ellenbogen J summarised the evidence before her that, between 1 and 4 April 2022, four of the Sites - West London, Hythe, Purfleet and Birmingham - were subject to direct action as part the wider campaign which was disrupting various oil terminals in the United Kingdom. The evidence was that both Extinction Rebellion and Just Stop Oil were claiming involvement in that action on social media and through logos and banners which were displayed during some of the incidents.

32. On 1st April 2022, the operations of each of these four sites had been disrupted. At Birmingham approximately 20 people blocked the entrance in the small hours of the morning, preventing the collection of fuel from the site. A tanker was stopped at the entrance and two individuals climbed onto it. Others sat in front of it. One person glued himself to the path outside the Terminal. Police attended and around six arrests were made. The protest was dispersed and the site reopened at 5.30 p.m. that day.

33. At around the same time, approximately 24 people blocked the entrance to the West London Terminal by attaching barrels to the gates to the entrance used by vehicles so as to weigh them down and prevent them from lifting. Tripods were also erected immediately outside the access gate so as to block access. At approximately 6.45 a.m., four people cut a hole in the access fence and scaled one of the fuel storage tanks. The First Claimant was obliged to initiate its emergency site procedures, including the temporary shutdown of the pumping of aviation and ground fuels from Fawley to the West London Terminal. The four, and approximately eight others, were arrested a few hours later. As a result, by around 3:00 p.m., those responsible for the direct action had left the site and it was reopened.

34. At around 5:00 a.m. on the same day, seven people blocked the access to the Hythe Terminal, using the Extinction Rebellion “pink boat” and preventing access to the site. The police attended, the boat was removed at around 11.45 a.m. and the protesters were moved away. The site reopened an hour later.

35. Also on 1 April 2022, at around 6:30 a.m., 20 people blocked the access road to the Purfleet Terminal. Six people climbed onto a lorry which was delivering additives to the site. The police attended. By 3:00 p.m., some individuals remained on the lorry, but others in attendance had been arrested, or had dispersed. The site opened to customers at approximately 5:00 p.m.

36. On 2 April 2022, at around 09:45 a.m., approximately 20 people blocked access to and from the Purfleet Terminal. Some locked themselves to the access gates, and others sat in the access road. The police made a number of arrests and removed the protestors. The site opened to customers at approximately 5:30 p.m. There were other protests at other terminals across the country, albeit not terminals owned by the First Claimant and it was reported in the Press that around 80 arrests had been made.

37. At around 5:00 a.m., on 3 April 2022, approximately 20 protestors blocked access to the Birmingham Terminal by sitting in the road. Some also climbed on to a Sainsbury's fuel tanker. One protestor cut through the security fence around the Terminal, scaled one of the fuel storage tanks and displayed a Just Stop Oil banner. The First Claimant therefore initiated its emergency site procedures, including the temporary shutdown of the pumping

of ground fuel from Fawley to the Terminal. The police attended and made a number of arrests. The site was reopened to customers at around 4:00 p.m.

38. At around 4.30 a.m. on 4 April 2022, approximately 20 protestors arrived at the West London Terminal and used a structure to obstruct access to and egress from the Site. That evening, a number of individuals were arrested whilst they were on their way to the Purfleet site.

39. At [14] Ellenbogen J also noted a number of earlier incidents, going back to August 2020, which she accepted were evidence of the risk of the disruption continuing. These incidents were similar in nature to the incidents at the beginning of April 2022, although they varied in seriousness. At least four of the incidents had included displaying Extinction Rebellion banners or other insignia, and Extinction Rebellion had also associated itself with a number of these activities in the Press and on social media. In an incident in October 2021 protesters had broken into the Fawley Petrochemical Complex using bolt cutters and had climbed to the top of two storage tanks. In December 2021 they had used the same method to break into the site at Alton and had caused extensive damage to buildings, plant, and equipment there.

40. According to the evidence of Mr Allybokus there were further incidents around the time of the Order made by Ellenbogen J which included the following:

    a. On 6 April 2022, a group blocked a roundabout on the main route from the M25 to the Purfleet Terminal by jumping onto a tanker and gluing themselves onto the road. Another group blocked a roundabout on the main route to the West London Terminal by jumping onto lorries.

    b. On 8 April 2022, around 30 individuals blocked a main route from the M25 to the Purfleet Terminal.

    c. On 13 April 2022, a group blocked an access road near the Purfleet Terminal, and 3 people climbed on top of a tanker.

41. Mr Wortley also gives evidence of more than 500 arrests in March/April 2022 at the Kingsbury Terminal operated by Valero Energy Limited in Staffordshire, and of injunctions being granted in that case.

42. However, the evidence is that the interim injunctions which were granted in the present case have been complied with.

43. In relation to the risk of trespass should the claim for a final injunction be refused, Mr Morshead also relied on the evidence of Mr Pullman that Just Stop Oil protesters have targeted the First Claimant's Southampton to London pipeline (which does not comprise one of the Sites). This included digging and occupying a pit so as to obstruct specialist construction equipment, and it led to injunctions being granted by Eyre J on 16 August 2022 and then HHJ Lickley KC on 21 October 2022. There was also a committal of one person to prison for breach of Eyre J's Order. Another admitted that he had breached that Order but the Court accepted his undertaking not to do so again.

44. Protesters have organised a number of events in order to carry out direct action against various targets, all with some connection to the energy industry. They have also targeted the offices of the Claimants' solicitors including by a sit-down protest in November 2022 which obstructed the entrance and by throwing purple paint over the glass structure of the building.

45. Although, in January 2023, Extinction Rebellion announced that it was changing its tactics and moving away from public disruption as a primary tactic, Just Stop Oil has made clear its intention to continue with this approach. Mr Morshead showed me public statements by Just Stop Oil along the lines that the public should "expect us every day and anywhere" and that its supporters "will be returning – today, tomorrow and the next day – and the next day after that – and every day until our demand is met: no new oil and gas in the UK". This includes asking people to "Sign up for arrestable direct action…".

46. Mr Morshead also relied on evidence that, more generally, there has been no let-up in the activities of climate change protesters. For example, there was disruption of the Grand National and the World Snooker Championship in April 2023, as well as a sit-down protest at the Global Headquarters of Shell following a weekend of protest in central London organised by Extinction Rebellion. Since 24 April 2023 there has been a campaign of "slow marching" in London and Just Stop Oil protesters were arrested in or around Whitehall and Parliament in May 2023. There was also disruption of the Chelsea Flower Show and other sporting events including the Ashes test match and Wimbledon. Mr Pullman also gave evidence about extensive litigation in the civil and criminal courts arising out of protest activities with a number of injunctions being granted and/or extended, and various prosecutions and convictions in the Magistrates Court for public order offences.

47. As for the harm which would result from the acts of trespass which are sought to be restrained, disruption of the Claimants' operations is in itself harmful to their interests. The evidence is that such disruption has potential financial consequences for them, but it also has consequence for the wider economy given the impact on the businesses of wholesale and retail suppliers of fuel, and the effect on access to fuel for purposes including road, rail and air transport as well as heating. Indeed, in March/April 2022 Just Stop Oil and Extinction Rebellion were open about the fact that they were seeking to emulate the 2000 protests by haulage drivers, which disrupted supplies of oil to the country with severe economic consequences.

48. There is also evidence of the risk of serious physical harm resulting from acts of trespass by protesters. This refers not merely to the damage to property which results from them cutting through security fences and vandalising the Sites, but also to the risk of very serious accidents. The Claimants' sites are used for the production and storage of highly flammable and otherwise hazardous substances. As is obvious, this is a highly dangerous activity and for this reason there are stringent security and health and safety measures in operation at the Sites. Access is strictly controlled, and all of the Claimants' employees and contractors are trained in relation to the hazards which they might encounter and, where appropriate, provided with protective clothing and equipment.

49. Mr Milne and Mr Pulman give written evidence on this subject. The Petrochemical Complex at Fawley and each of the oil Terminals are regulated by the Health & Safety Executive under the Control of Major Accident Hazards Regulations 2015 (COMAH).

All of the Sites have fully licensed security personnel, security barriers at the point of vehicular access, closed circuit television infrastructure linked to an Access Control system and fenced areas where active operations are undertaken. The operational area of the Petrochemical Complex at Fawley is protected by 2 fences, one of which is electrified.

50. All authorised visitors to the Sites are required to watch an induction safety video which highlights both the hazards and the emergency safety procedures. Most of the Sites include higher risk areas which require additional safety precautions. Within these areas, authorised personnel are required to wear fire retardant clothing and the appropriate personal protective equipment (hard hats, safety glasses, fire retardant gloves, safety shoes).

51. In some areas, devices which measure hydrocarbon vapour levels in the air must be carried. One of the potential hazards inside these facilities is a vapour cloud, which can result from an unplanned release of hydrocarbon or biofuels. Such a release can be extremely hazardous. Potential ignition risks such as smoking, using mobile phones or cameras and wearing clothes which accumulate static electricity (e.g. nylon) are strictly prohibited within the higher risk areas.

52. Protesters will not be trained in relation to the risks on these sites, nor familiar with which areas are the more dangerous ones, and nor are they likely to be wearing appropriate protective clothing. As I have noted, in previous incidents in 2021 and 2022 protesters have used bolt cutters to cut through both security fences at the Fawley Petrochemical Complex, the security fence at the First Claimant's compound in Alton and the security fences at the West London and Birmingham Terminals. During the protests in 2022 some protesters broke into higher risk areas and were carrying iPhones, cameras, cigarette lighters and/or nylon sleeping bags, thus exposing themselves and others to the risk of death or serious injury.

53. Apart from the risk of an explosion or a fire, there are obvious risks in protesters climbing onto fuel tanks 20 metres above the ground without the necessary safety equipment, and in climbing onto fuel tankers as they have been. Moreover, blocking access to the Sites prevents evacuation and access for emergency vehicles in the event of an incident.

Jurisdiction

54. In *London Borough of Barking and Dagenham & Others v Persons Unknown* (supra) the Court of Appeal confirmed that the jurisdiction to grant both interim and final injunctions in this context is provided by section 37 Senior Courts Act 1981. This states, so far as material:

> *"(1) The High Court may by order (whether interlocutory or final) grant an injunction…in all cases in which it appears to the court to be just and convenient to do so.*
>
> *(2) Any such order may be made either unconditionally or on such terms and conditions as the court thinks just."*

55. The Court of Appeal held that there is, therefore, jurisdiction to grant a final injunction against persons unknown who are "newcomers" i.e., persons who have not committed or

threatened to commit any tortious act against the applicant for the injunction and therefore have not been served with the proceedings and made subject to the jurisdiction of the court before the order was made. Provided such a person has been served with the order they will become a party to the proceedings if they knowingly breach the terms of the injunction. Any risk of injustice which arises from this position is mitigated by the fact that such a person may apply to vary the injunction or set it aside, and by the fact that the duration of the injunction can be limited by the court, and it can be subject to periodic review. As I have noted, an appeal was heard by the Supreme Court in February this year and judgment is awaited. However, at the time of writing the law is as stated by the Court of Appeal.

The Claimants' cause of action

56. The cause of action relied on by the Claimants is now limited to trespass, and the relief which they seek is limited to restraining protesters from entering the Sites in order to carry out their activities. This point is important because of the effect which it has on the balancing of rights under the ECHR.

57. As a general proposition *"seriously disrupting the activities of others is not at the core of"* the right to freedom of assembly and this is relevant to the assessment of proportionality: see Lords Hamblen and Stephens in *DPP v Ziegler* [2021] UKSC 23; [2022] AC 408 at [67]. As Leggatt LJ (as he then was) put it in *Cuadrilla Bowland Ltd & Others v Persons Unknown* [2020] EWCA Civ 9; [2020] 4 WLR 29 at [94]:

> *"... the disruption caused was not a side-effect of protest held in a public place but was an intended aim of the protest…this is an important distinction. ...intentional disruption of activities of others is not "at the core" of the freedom protected by Article 11 of the Convention .... one reason for this [is] that the essence of the rights of peaceful assembly and freedom of expression is the opportunity to persuade others… ...persuasion is very different from attempting (through physical obstruction or similar conduct) to compel others to act in a way you desire….;"*

58. But, in addition to this, in *DPP v Cuciurean* [2022] EWHC 736 (Admin); [2022] 3 WLR 446 at [45] the Divisional Court held that there is no basis in the caselaw of the European Court of Human Rights:

> *"to support the ... proposition that the freedom of expression linked to the freedom of assembly and association includes a right to protest on privately owned land or upon publicly owned land from which the public are generally excluded. The Strasbourg court has ... consistently said that Articles 10 and 11 do not "bestow any freedom of forum" in the specific context of interference with property rights ... There is no right of entry to private property or to any publicly owned property. The furthest that the Strasbourg court has been prepared to go is that where a bar on access to property has the effect of preventing any effective exercise of rights under Articles 10 and 11, or of destroying the essence of those rights, then it would not exclude the possibility of a state being obliged to protect them by regulating property rights."*

59. This means that in the present case the injunction sought by the Claimants does not engage Articles 10 and 11 ECHR or, if they are engaged, it would be compatible with these provisions for it to be granted because restraining trespass would obviously be

proportionate. Section 12(3) of the Human Rights Act 1998 is not engaged because it applies to interim injunctions.

60. The tort of trespass to land consists of any unjustified intrusion, whether by a person or an object, by one person upon land in the possession of another. It may also include intrusion into the airspace above land. There is no requirement that the intrusion be intentional or negligent provided it was voluntary. Trespass is actionable without proof of damage and by a person who is in possession i.e., who occupies or has physical control of the land. Proof of ownership is prima facie proof of possession but tenants and licensees will have rights of possession and be entitled to claim in trespass in order to secure those rights. In broad terms, entry onto another's land may be justified by proving a legal or equitable right to do so, or necessity to do so in order to preserve life or property. Justification therefore does not arise in the present case. (Clerk & Lindsell on Torts 23rd Edition, chapter 18).

Is relief just and convenient in principle?

61. In *Vastint Leeds BV v Persons Unknown* [2018] EWHC 2456 (Ch); [2019] 1 WLR 2 Marcus Smith J said this at [31(3)] in relation to final anticipatory injunctions:

> *"(3) When considering whether to grant a quia timet injunction, the court follows a two-stage test: (a) First, is there a strong probability that, unless restrained by injunction, the defendant will act in breach of the claimant's rights? (b) Secondly, if the defendant did an act in contravention of the claimant's rights, would the harm resulting be so grave and irreparable that, notwithstanding the grant of an immediate interlocutory injunction (at the time of actual infringement of the claimant's rights) to restrain further occurrence of the acts complained of, a remedy of damages would be inadequate?"*

62. He then went on to give guidance as to what may be relevant to the application of this approach in a given case.

63. With respect, I confess to some doubts about whether the two questions which he identified are part of a *"test"* or a *"two stage"* test. To my mind they are questions which the Court should consider in applying the test under section 37 Senior Courts Act 1981, namely what is *"just and convenient"* but they are not threshold tests. I also note that, even taking into account *Vastint*, the editors of Gee on Commercial Injunctions (7th Edition) say at 2-045:

> *"There is no fixed or 'absolute' standard for measuring the degree of apprehension of a wrong which must be shown in order to justify quia timet relief. The graver the likely consequences, and the risk of wrongdoing the more the court will be reluctant to consider the application as 'premature'. But there must be at least some real risk of an actionable wrong."*

64. Where the court is being asked to grant an injunction in circumstances where no tort has been committed or completed it will naturally need to be persuaded that the risks and consequences of not making such an order are sufficiently compelling to grant relief. Where, as in the present case, tortious conduct has taken place but the identity of the tortfeasors is unknown, and relief is sought on a final basis against future tortfeasors who

are not a parties and are identified only by description, again the court will be cautious. But it would be surprising if, for example, a court which considered that there was a significant risk of further tortious conduct, but not a strong probability of such conduct, was compelled to refuse the injunction no matter how serious the damage if that conduct then took place.

65. However, Marcus Smith J analysed the authorities carefully, successive cases have adopted his test and the matter was hardly argued before me. I therefore do not propose to depart from what he said. Nor do I need to. Bennathan J was satisfied that the *Vastint* test was satisfied in this case, and so am I in the light of the evidence before me: I am also satisfied that, having regard to the risks in the event that relief is refused, it is just and convenient to grant relief.

66. As noted above, this was the issue on which I pressed Mr Morshead bearing in mind that only some of the incidents in 2021/2022 involved trespass and only on some of the Sites. There has been compliance with the injunctions ordered by Ellenbogen and Bennathan JJ. Extinction Rebellion announced a change of tactics in January 2023 and a good deal of the evidence about protest activities since April 2022 is about activities of a different nature to those which led to the injunctions in this case. Where protesters have been identified in these proceedings, they have been prepared to give undertakings not to trespass on the Sites. All of these considerations could be argued to show something less than a strong probability of further trespassing on the Sites.

67. Having considered the evidence in the round, however, I was satisfied that the first limb of the *Vastint* test is satisfied. It would have been very easy for Extinction Rebellion or Just Stop Oil to give assurances or evidence to the court that there was no intention to return to their activities of 2021/2022, and no risk of trespass on the Sites or damage to property by protesters in the foreseeable future, but they did not do so. One is therefore left with the evidence relied on by the Claimants. This shows that they intend to continue to challenge the oil industry vigorously, including by causing disruption. As to the form that that disruption will take, it appears that the effect of the various injunctions which have been granted in this case and others has been to prevent or deter them from taking the steps prohibited by the orders of the court although, of course, not invariably so. If, therefore, an injunction is refused in the present case the overwhelming likelihood is that protests of the sort which were seen in 2021/2022 will resume, and that they will include acts of trespass of the sort to which I have referred.

68. As to the second limb of the *Vastint* test, I had little hesitation in holding that it is satisfied. Whatever the merits of the protesters' cause, and I make no comment on this, their activities in breaking into the Sites are highly disruptive and dangerous. These activities have significant financial and wider economic consequences which are unquantifiable in damages, and any award of damages would likely be unenforceable in any event. They also risk very serious damage to property and endanger the protesters and others.

69. I have considered Ms Pemberton's suggestion of a distinction between Extinction Rebellion and Just Stop Oil protesters but found this unconvincing in the absence of any assurance from Extinction Rebellion. As Mr Morshead pointed out, their strategy could change at any time. Given the risk posed by Just Stop Oil protesters, relief is appropriate and it would be naïve of the court to leave open the possibility of trespass on the Sites by protesters who said that they were acting under the Extinction Rebellion banner. If there

is no intention on the part of Extinction Rebellion protesters to trespass on the Sites, the injunction will not affect them anyway.

70. I have also considered whether relief should be limited to certain Sites and not others given that some had not been subjected to trespass but I agree with Ellenbogen J that the essence of anticipatory relief, where it is justified, is that the claimant need not wait until harm is suffered before claiming protection: see her judgment in these proceedings at [2022] EWHC 966 (KB) [29].

Canada Goose

71. Turning to the other considerations identified by the Court of Appeal in *Canada Goose UK Retail Limited v Persons Unknown* [2020] EWCA Civ 303; [2020] 1 WLR 2802 at [82], albeit in relation to interim injunctions:

    a. Those "persons unknown" (as defined) who can be identified have been and they have given assurances or undertakings. There were six of them. The four who gave assurances are therefore not named defendants. The Fourth and Fifth Defendants were joined to the proceedings by Order of Collins Rice J and have given separate undertakings and will be subject to a separate order ([82(1)] *Canada Goose)*.

    b. The "persons unknown" are defined in the originating process and the Order by reference to their conduct which is alleged to be unlawful i.e. they are people who enter or remain on the Sites without the consent of the Claimants for the purposes of the Extinction Rebellion and the Just Stop Oil campaigns ([82(2) and (4)]). People who have not entered the Sites will not be parties to the proceedings or subject to the Order.

    c. I have addressed the question of anticipatory relief, above, in relation to final injunctions ([83(3)]);

    d. The acts prohibited by the injunction correspond to the threatened torts and do not include lawful conduct given that they are all acts which take place in the context of trespass i.e., on the Sites delineated in the plans attached to the Order ([82(5)]).

    e. The terms of the injunction are clear and precise so as to ensure that those affected know what they can and cannot do. ([82(6)]).

    f. The injunction has clear geographical and temporal limits. The geographical limits are indicated on the plans attached to the Order and the duration of the injunction will be five years subject to a review following the handing down of the judgement of the Supreme Court in the *Wolverhampton* case and annually in any event ([82(7)]). I note that a five year term with annual reviews was ordered, for example, by Eyre J in *Transport for London v Lee* [2023] EWHC 1201 (KB) at [57]. There is also provision for applications on notice to vary or discharge the Order.

Service of the Order

72. I approve the terms of the draft Order as to service. There is good reason to permit alternative methods of service (see CPR rules 6.15 and 6.27), namely that standard methods of service in accordance with CPR rule 6 are not practicable. The arrangements in the draft Order are those which have been approved by Ellenbogen, Bennathan and Collins Rice JJ.

Conclusion

73. For all of these reasons I am satisfied that it is just and convenient to grant the Order which I have made.

Amended under the Slip Rule CPR 40.12 dated 21st July 2023 & approved by Mr justice Linden

IN THE HIGH COURT OF JUSTICE **CLAIM NO. QB-2022-001098**
KING'S BENCH DIVISION
Before the Honourable Mr Justice Linden
On 18 July 2023



B E T W E E N: **(1) ESSO PETROLEUM COMPANY, LIMITED**
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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

(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY 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 ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANT

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible.

If you disobey this Order you may be found guilty of contempt of court and you may be sent to prison or your assets seized.

You have the right to apply to the court to vary or discharge this Order (which is explained below).

RECITALS

FOLLOWING the Orders of Ellenbogen J dated 6 April 2022, Bennathan J dated 27 April 2022, Collins Rice J dated 30 March 2023 and Linden J dated 10 July 2023

UPON the hearing of the Claimants' claim issued on 4 April 2022

AND UPON the application dated 14 June 2023

AND UPON hearing Leading Counsel and Junior Counsel for the Claimants

AND UPON reading the evidence recorded in Schedule 1 to this Order

AND UPON the Claimants having received assurances from Paul Barnes and Diana Hekt that they do not intend to breach any injunction covering the Sites (as defined below)

AND UPON the Court handing down its judgment on 18 July 2023

IT IS ORDERED THAT:

NAMED DEFENDANTS

1. In view of the assurances given by them mentioned above, Paul Barnes and Diana Hekt are not to be subject to the injunctions set out in paragraphs 3, 4 and 5 below, without further order.

FURTHER EVIDENCE

2. The Claimants be permitted to rely on the Second Witness Statement of Martin Pullman dated 6 June 2023 and the Seventh Witness Statement of Nawaaz Allybokus dated 13 June 2023.

THE INJUNCTIONS

3. Until 11 July 2028, or further order in the meantime, the First Defendant must not:

    3.1 enter or remain upon any part of the First Claimant's properties ("the Sites") without the consent of the First Claimant at:

        (1) the Oil Refinery and Jetty at the Petrochemical Complex, Marsh Lane, Southampton SO45 1TH (as shown for identification edged red and green but excluding those areas edged blue on the attached 'Fawley Plan').

        (2) Hythe Terminal, New Road, Hardley, SO45 3NR (as shown for identification edged red on the attached 'Hythe Plan').

        (3) Avonmouth Terminal, St Andrews Road, Bristol BS11 9BN (as shown for identification edged red on the attached 'Avonmouth Plan').

(4) Birmingham Terminal, Wood Lane, Birmingham B24 8DN (as shown for identification edged red on the attached 'Birmingham Plan').

(5) Purfleet Terminal, London Road, Purfleet, Essex RM19 1RS (as shown for identification edged red and brown on the attached 'Purfleet Plan').

(6) West London Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ (as shown for identification edged red on the attached 'West London Plan').

(7) Hartland Park Logistics Hub, Ively Road, Farnborough (as shown for identification edged red on the attached 'Hartland Park Plan').

(8) Alton Compound, Pumping Station, A31, Hollybourne (as shown for identification edged red on the attached 'Alton Compound Plan');

3.2 damage any part of any of the Sites;

3.3 affix themselves or any person or object to any part of any of the Sites;

3.4 erect any structures on any part of any of the Sites;

4. Until 11 July 2028, or further order in the meantime, the Second Defendant must not without the consent of the First Claimant or Second Claimant:

4.1 enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH ("the Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

4.2 damage any part of the Chemical Plant;

4.3 affix themselves or any person or object at the Chemical Plant;

4.4 erect any structures on any part of the Chemical Plant.

5. Until 11 July 2028, or further order in the meantime, the Third Defendant must not enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

VARIATION OR DISCHARGE OF THIS ORDER

6. The Defendants may apply to vary or discharge this Order at any time upon giving not less than 3 clear days' notice to the Claimant's solicitors, Eversheds Sutherland (International) LLP, by emailing exxonmobil.service@eversheds-sutherland.com. Any evidence to be relied upon in support of such an application must be communicated in writing to the Claimants' solicitors at least 2 clear days before the hearing.

7. Any person applying to vary or discharge this Order must provide their full name and address, an address for service.

8. The Claimants have liberty to apply.

REVIEW HEARINGS

9. Within 14 days of the judgment of the Supreme Court in *Wolverhampton City Council v London Gypsies and Travellers* (2022/0046) being handed down, the Claimants will apply to the King's Bench Division for a review of this Order. Subject to the views of the judge who considers the matter, such review may be conducted on paper in the event that there is no material change in the law as stated by the Court of Appeal in *London Borough of Barking & Dagenham & Others v Persons Unknown* [2022] EWCA Civ 13; [2023] QB 295.

10. Subject to the paragraph above, the injunctions made herein shall be reviewed on each anniversary of this order (or so close thereto as is convenient having regard to the Court's list) with a time estimate of 2.5hrs (plus reading time). The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing.

11. The Claimants shall file and serve a trial bundle not less than 7 days before the review hearing.

12. Skeleton arguments on behalf of any represented party shall be lodged and exchanged, with bundle of authorities, not less than 3 days before the review hearing.

INTERPRETATION OF THIS ORDER

13. A Defendant who is ordered not to do something must not do it him/herself/themselves or in any other way. He/she/they must not do it through another acting on his/her/their behalf or on his/her/their instructions or with his/her/their encouragement.

SERVICE OF THIS ORDER

14. Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of this Order shall be effected on the First, Second and Third Defendants as follows:

14.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that a copy of the Order may be obtained from the Claimants' solicitors, Eversheds Sutherland (International) LLP, One Wood Street, London EC2V 7WS (Ref: Stuart Wortley tel: 020 7919 4500) email: exxonmobil.service@eversheds-sutherland.com and (b) that a copy of the Order may be viewed at the website referred to in Paragraph 13.2 of this Order;

14.2 posting the Order on the following website: https://www.exxonmobil.co.uk/Company/Overview/UK-operations;

14.3 fixing a minimum of four large warning notices in the forms annexed to this Order in conspicuous places around the perimeters of the Sites. Such notices must be a minimum of A2 size; and

14.4 sending an email to each of the following email addresses: (i) with the information that a copy of the Order may be viewed at the website referred to in Paragraph 14.2 of this Order; and/or (ii) enclosing a copy of this Order (whether by Mimecast link or otherwise):

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

15. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), this Order shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in Paragraph 14 above have been completed.

16. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 14 of this Order shall stand as good service of the Order on the First, Second and Third Defendants.

SERVICE OF OTHER DOCUMENTS

17. Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of any other applications and evidence in support by the Claimants ("the Further Documents"), shall be effected on the First, Second and Third Defendants as follows:

17.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that copies of the Further Documents may be obtained from the Claimants' solicitors, Eversheds Sutherland (International) LLP, One Wood Street, London EC2V 7WS (Ref: Stuart Wortley tel: 020 7919 0969) email: exxonmobil.service@eversheds-sutherland.com and (b) that copies of the Further Documents may be viewed at the website referred to in Paragraph 14.2 of this Order;

17.2 posting the Further Documents on the following website: https://www.exxonmobil.co.uk/Company/Overview/UK-operations; and

17.3 sending an email to each of the following email addresses: (i) with the information that copies of the Further Documents may be viewed at the website referred to in Paragraph 17.2 of this Order; and/or (ii) enclosing copies of the Further Documents (whether by Mimecast link or otherwise):

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

18. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the Further Documents shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in Paragraph 17 above have been completed.

19. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 17 of this Order shall stand as good service of the Further Documents on the First, Second and Third Defendants.

20. Pursuant to CPR 81.4(2)(c) and (d), the Court dispenses with the requirement for personal service in relation to the Fifth Defendant.

COSTS

21. No order as to costs.

THE COURT

22. The Court will provide sealed copies of this Order for service to the Claimants' solicitors, whose details are set out in Paragraphs 14.1 and 17.1 of this Order.

23. All communications to the Court about this Order should be sent to:
    - King's Bench Division, Royal Courts of Justice, Strand WC2A 2LL
    - The office are open between 10.00am and 4.30pm Monday to Friday (except Bank Holidays)
    - The telephone number is 020 3936 8957
    - The email address is kbjudgeslistingoffice@justice.gov.uk

SERVICE OF THE ORDER

24. This Order shall be served by the Claimants on the Defendants.

18 July 2023

SCHEDULE 1

The Judge read the following Witness Statements before making this Order:

(1) First Witness Statement of Stuart Sherbrooke Wortley dated 4 April 2022 together with the exhibits marked "SSW1" - "SSW9".

(2) First Witness Statement of Anthony Milne dated 3 April 2022 together with the exhibits marked "AM1" – "AM15".

(3) First Witness Statement of Nawaaz Allybokus dated 5 April 2022 together with the exhibit marked "NA1".

(4) Second Witness Statement of Nawaaz Allybokus dated 5 April 2022 together with the exhibit marked "NA2".

(5) First Witness Statement of Martin Pullman dated 27 February 2023 together with exhibits marked "MP1" and "MP2".

(6) Third Witness Statement of Nawaaz Allybokus dated 22 April 2022 together with the exhibit marked "NA3".

(7) Fourth Witness Statement of Nawaaz Allybokus dated 22 April 2022 together with the exhibit marked "NA4".

(8) Fifth Witness Statement of Nawaaz Allybokus dated 20 March 2023 together with the exhibit marked "NA5".

(9) Sixth Witness Statement of Nawaaz Allybokus dated 24 May 2023 together with the exhibit marked "NA6"

(10) Second Witness Statement of Martin Pullman dated 6 June 2023 together with the exhibits marked "MP3" – "MP5"

(11) Seventh Witness Statement of Nawaaz Allybokus dated 13 June 2023 together with the exhibits marked "NA7" – "NA8"

(12) Eighth Witness Statement of Nawaaz Allybokus dated 4 July 2023 together with the exhibit marked "NA9".

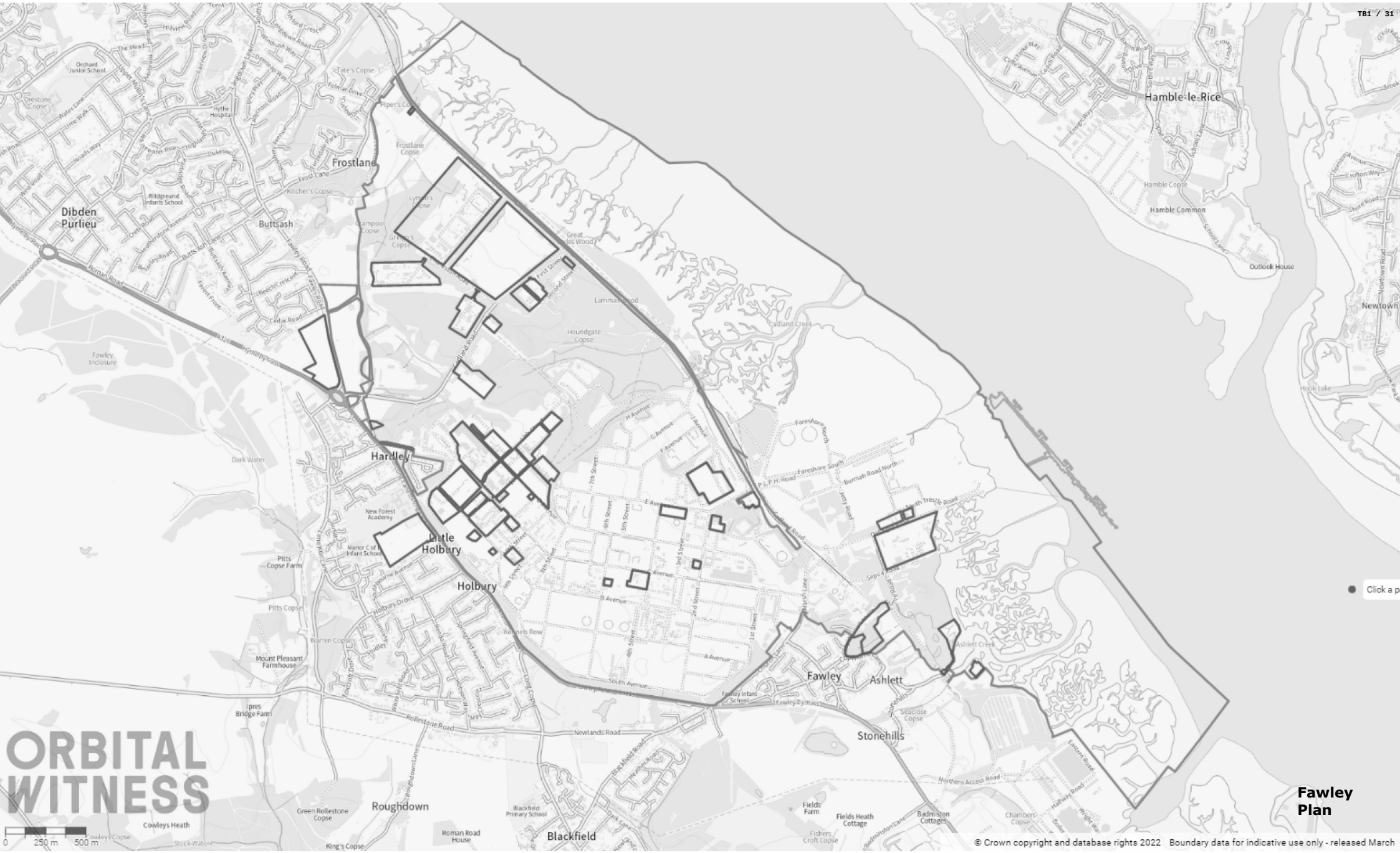
(13) Ninth Witness Statement of Nawaaz Allybokus dated 11 July 2023 together with the exhibit marked "NA10".

(14) Witness Statement of Sarah Pemberton dated 11 July 2023

(15) Tenth Witness Statement of Nawaaz Allybokus dated 12 July 2023.

SCHEDULE 2 - Plans

1. Fawley Plan
2. Hythe Plan
3. Avonmouth Plan
4. Birmingham Plan
5. Purfleet Plan
6. West London Plan
7. Hartland Park Plan
8. Alton Compound Plan


TB1 / 31
Hamble-le-Rice
Frostlane
Dibden Purlieu
Buttsash
Hardley
Little Holbury
Holbury
Fawley
Ashlett
Stonehills
Roughdown
Blackfield
Newtown
Fawley Plan
ORBITAL WITNESS
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TB1 / 32
Hardley Lane
Fawley Road
Hythe By Pass
A326
Cadland Road
New Road
Forest Lane
Roman Road
Long Lane
Religious Grounds
Old School Close
Click a point
ORBITAL WITNESS
0 25 m 50 m
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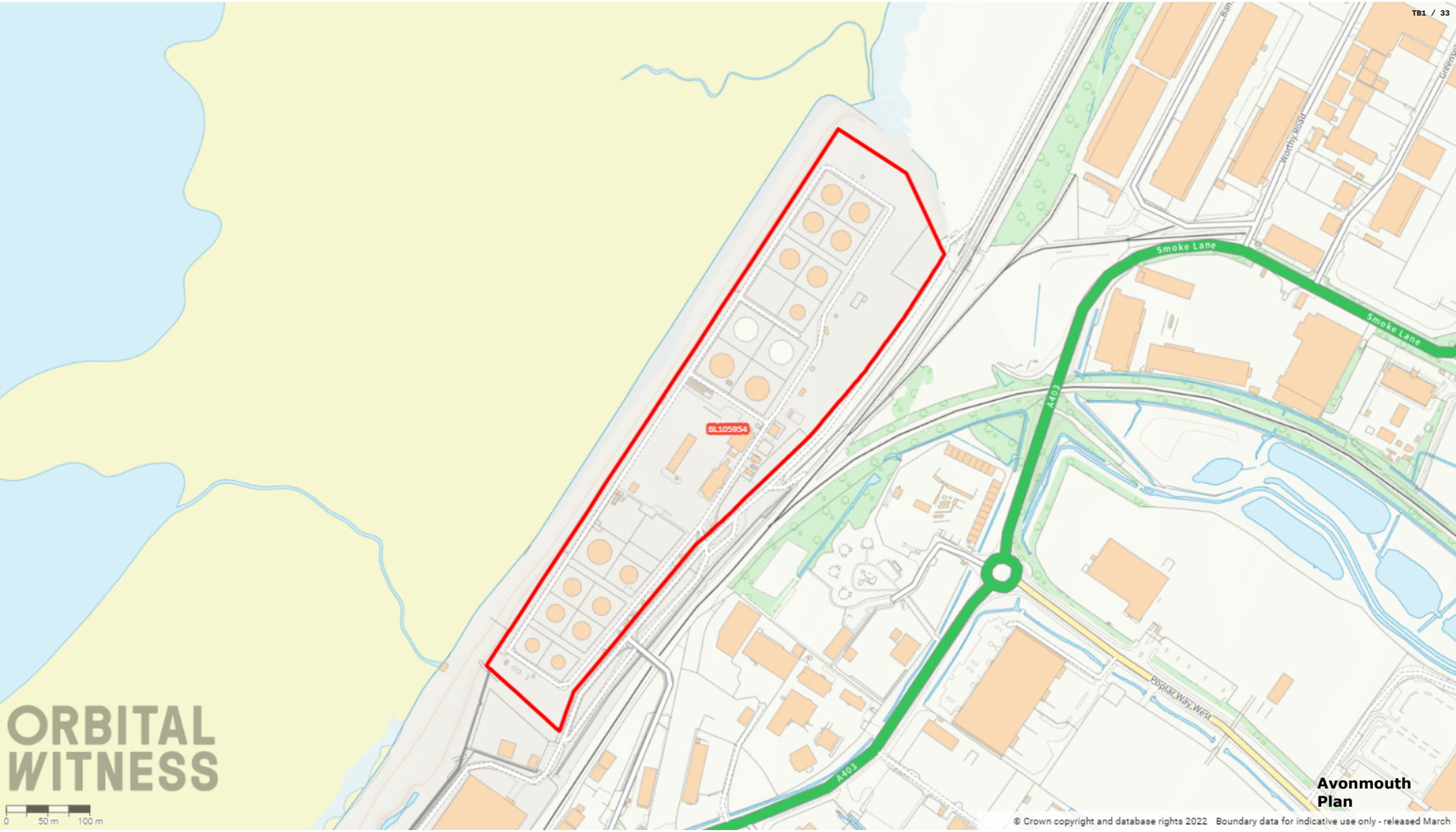
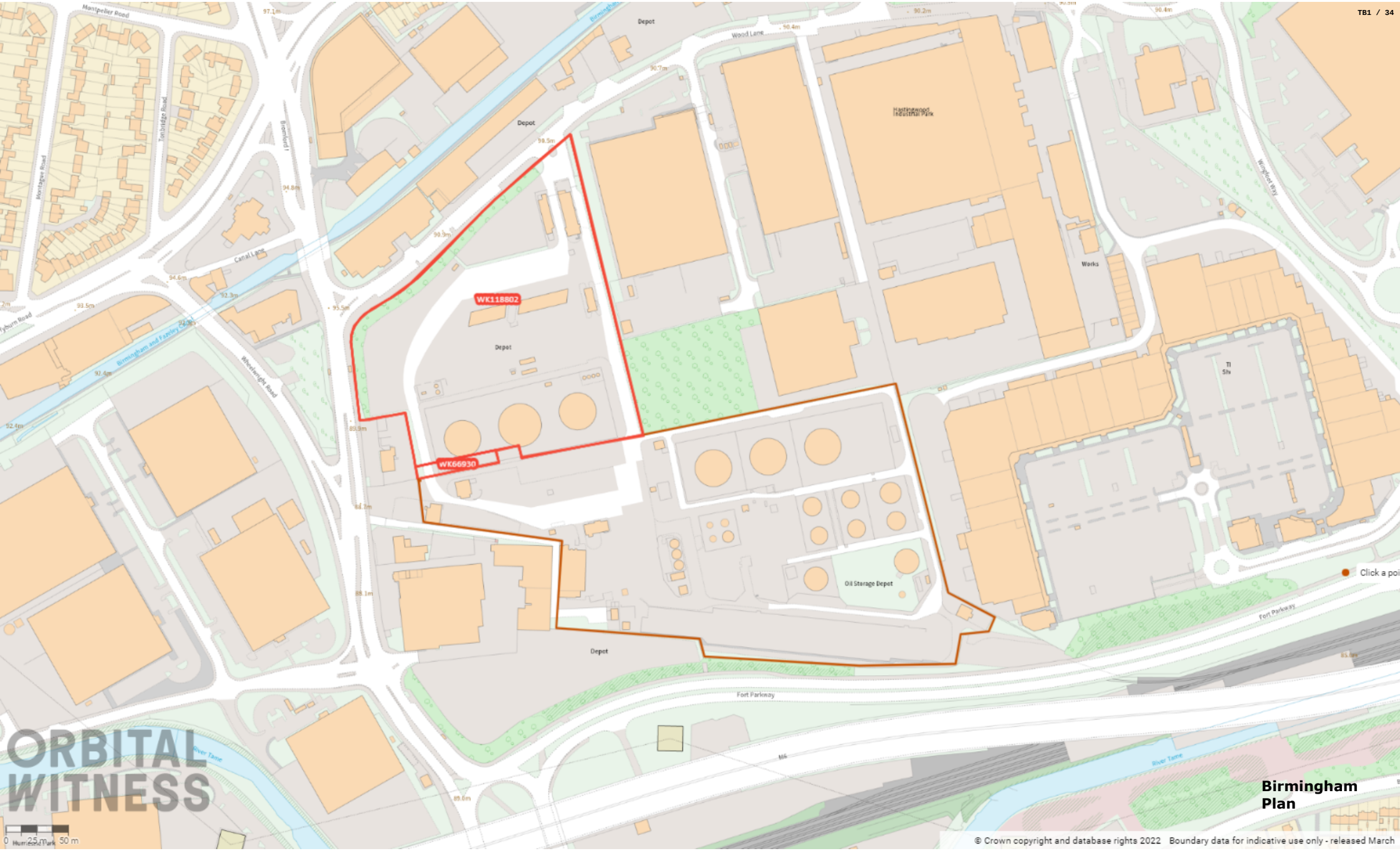
Hythe Plan


TB1 / 33
Smoke Lane
Smoke Lane
A403
A403
Worthy Road
Poplar Way West
BL105954
ORBITAL WITNESS
0
50 m
100 m
Avonmouth Plan
© Crown copyright and database rights 2022 Boundary data for indicative use only - released March


TB1 / 34
WK118802
WK66930
Depot
Depot
Depot
Depot
Oil Storage Depot
Hastingwood Industrial Park
Works
Wood Lane
Montpellier Road
Montague Road
Tenbridge Road
Bromford I
Canal Lane
Wheelwright Road
Birmingham and Fazeley Canal
Fort Parkway
River Tame
M6
Click a poi
ORBITAL WITNESS
0 25 m 50 m
Birmingham Plan
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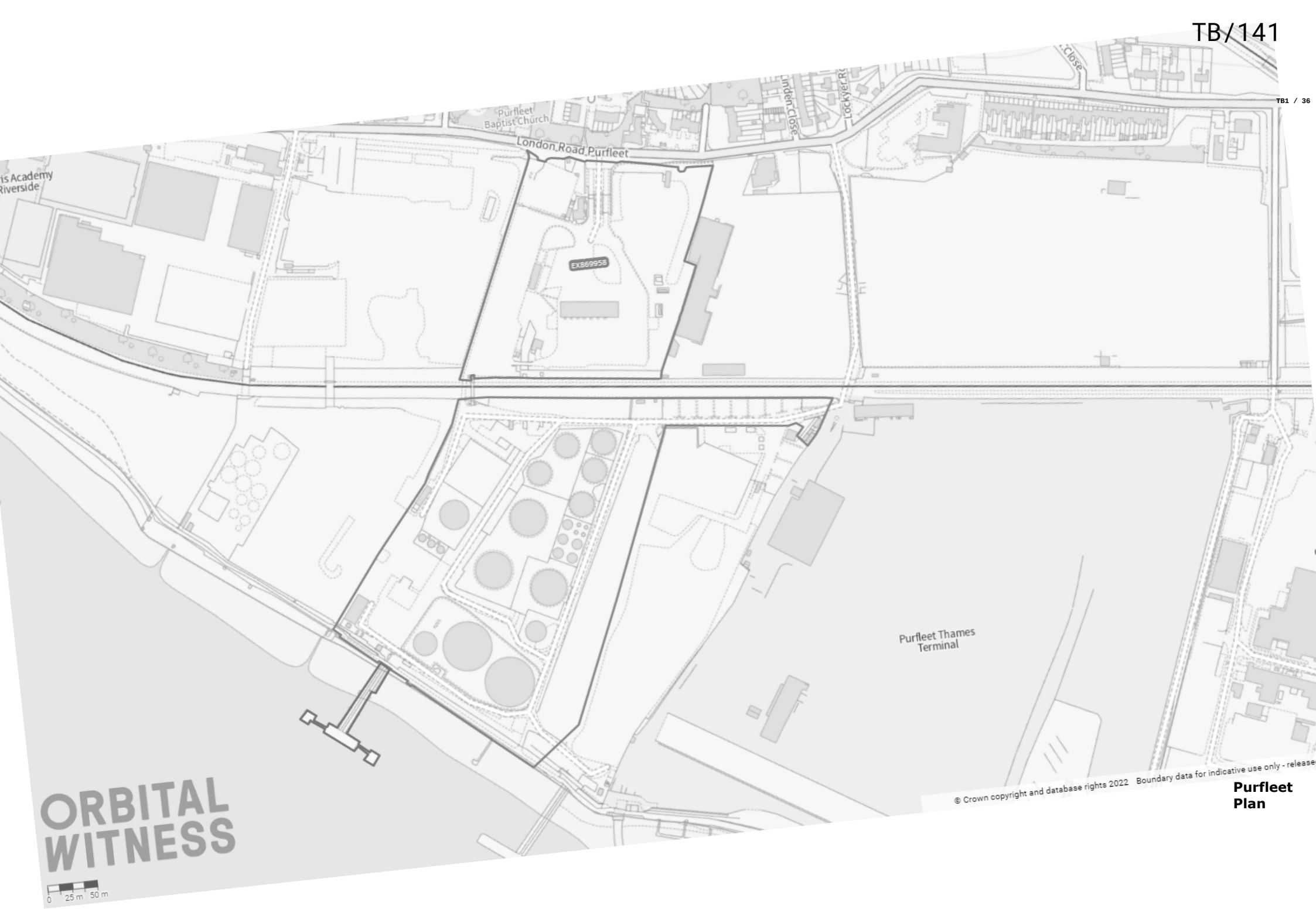
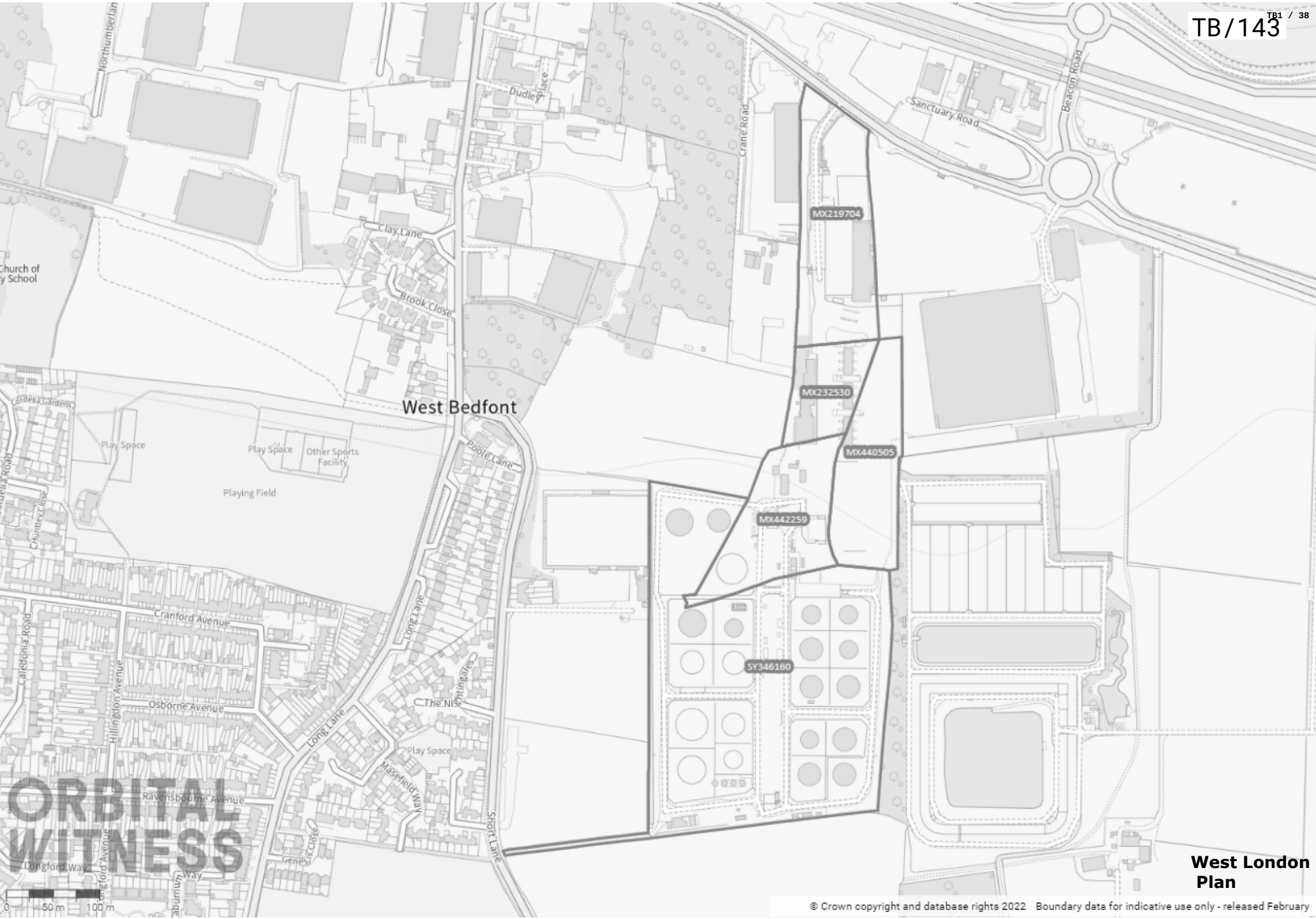


Purfleet Plan



Purfleet
Plan B

TB/143



West London Plan

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TB/144


ORBITAL WITNESS
0
50 m
100 m
Hartland Park Plan
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TB1 / 40
Pond
Track
Bonham's Farm
A 31
MP 47.0
Hopp
C
102.9m
WB
ESS
El Sub Sta
Tank
105.6m
Tank
Depot
Stone
Transformer Station
ESS
MP 0.25
ETL
Tanks
SL
100.0m
Weir
River Wey
MP 0.5
Issues
ORBITAL WITNESS
0
25 m
50 m
Alton Compound Plan
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Amended under the Slip Rule CPR 40.12 dated 16th October 2023 & approved by Mrs Justice Heather Williams DBE

IN THE HIGH COURT OF JUSTICE **CLAIM NO. QB-2022-001098**
KING'S BENCH DIVISION
Before the Honourable Mrs Justice Heather Williams DBE
On 16th October 2023



B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED

(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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

(5) DIANA HEKT

Defendants

ORDER

RECITALS

FOLLOWING the order of Linden J dated 18 July 2023 (as amended on 21 July 2023) (the "**Order**")

UPON the application of the Claimants dated 13 October 2023

AND UPON reading the first Witness Statement of Holly Stebbing dated 13 October 2023

AND UPON the notice of change of solicitors dated 2 October 2023 and effected by Norton Rose Fulbright LLP on the Defendants (the "**Notice**")

AND UPON the Court considering this application without notice to the Defendants pursuant to CPR 6.27 and 6.15(3)(b).

IT IS ORDERED THAT:

1. Service of the Notice on the First, Second and Third Defendants in the same manner as prescribed at paragraph 17 of the Order shall stand as good service and accordingly, pursuant to CPR 6.15 and 6.27, retrospective permission is granted to the Claimants to serve the Notice on the First, Second and Third Defendants in such alternative manner. Pursuant to CPR 6.15(3) and 6.27, the Notice shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in paragraph 17 of the Order were completed.

2. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), permission is granted to the Claimants to serve this order, its associated documents and any further documents in this claim by way of alternative method, such method as prescribed at paragraph 17 of the Order. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the order shall be deemed to be

served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in paragraph 17 of the Order were completed.

3. The Order shall be varied at follows:

At paragraph 6:

6. The Defendants may apply to vary or discharge this Order at any time upon giving not less than 3 clear days' notice to the Claimant's solicitors, Norton Rose Fulbright LLP, by emailing ExxonMobil.Service@nortonrosefulbright.com. Any evidence to be relied upon in support of such an application must be communicated in writing to the Claimants' solicitors at least 2 clear days before the hearing.

At paragraph 14:

14. Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of this Order shall be effected on the First, Second and Third Defendants as follows:

14.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that a copy of the Order may be obtained from the Claimants' solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email: ExxonMobil.Service@nortonrosefulbright.com; and (b) that a copy of the Order may be viewed at the website referred to in Paragraph 14.2 of this Order;

14.2 posting the Order on the following website: https://www.exxonmobil.co.uk/Company/Overview/UK-operations;

14.3 fixing a minimum of four large warning notices in the forms annexed to this Order in conspicuous places around the perimeters of the Sites. Such notices must be a minimum of A2 size; and

14.4 sending an email to each of the following email addresses: (i) with the information that a copy of the Order may be viewed at the website referred to in Paragraph 14.2 of this Order; and/or (ii) enclosing a copy of this Order (whether by Mimecast link or otherwise):

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

At paragraph 17:

17. Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of any other documents in these proceedings by the Claimants (the "Further Documents") shall be effected on the First, Second and Third Defendants as follows:

17.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that copies of the Further Documents may be obtained from the Claimants' solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email: ExxonMobil.Service@nortonrosefulbright.com; and (b) that copies of the Further Documents may be viewed at the website referred to in Paragraph 17.2 of this Order;

17.2 posting the Further Documents on the following website: https://www.exxonmobil.co.uk/Company/Overview/UK-operations; and

17.3 sending an email to each of the following email addresses: (i) with the information that copies of the Further Documents may be viewed at the website referred to in Paragraph 17.2 of this Order; and/or (ii) enclosing copies of the Further Documents (whether by Mimecast link or otherwise):

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

4. Pursuant to CPR 23.10, the First, Second and Third Defendants shall have the right to apply to have this order set aside or varied in accordance with the amended paragraph 6 of the Order. Any such application must be made within 7 days of this order.

5. There shall be no order as to costs.

16th October 2023

IN THE HIGH COURT OF JUSTICE **CLAIM NO. QB-2022-001098**
KING'S BENCH DIVISION
The Honourable Mr Justice Freedman
On 14 December 2023



B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED

(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

ORDER

UPON the Court reading an application notice of the Claimants dated 13 December 2023 for

(1) a review of the order of Mr Justice Linden dated 18 July 2023, as amended on 21 July 2023 and on 16 October 2023 ("the Order"), pursuant to paragraph 9 of the Order in the light of the decision of the Supreme Court decision in *Wolverhampton City Council and others v London Gypsies and Travellers and others* [2023] UKSC] 47 ("the Application")

(2) a variation of the Order (a) to remove the Hartland Park Site from the Order, and (b) to amend the area of the Birmingham Terminal in the Order.

AND UPON the Court reading an accompanying letter to the Court of Norton Rose Fulbright ("NRF") on behalf of the Claimants dated 13 December 2023 and an email sent to the Court of NRF dated 14 December 2023 in response to an email from the Court as regards directions for the disposal of the Application.

IT IS ORDERED THAT:

1. As soon as reasonably practicable and in any event by not later than Wednesday 20 December 2023, the Claimants do serve the Application and accompanying documents and this order on the Defendants in accordance with paragraph 17 of the Order.

2. By Monday 15 January 2024, any defendant and any other person affected by the Application (including but not limited to Mr Martin Marston-Patterson by Bindmans LLP on his behalf), may file and serve written representations and supporting documents in response to the application.

3. By Monday 22 January 2024, the Claimants do file any reply to any written representations filed in response to the Application.

4. After 24 January 2024, the papers will be referred to a Judge of the King's Bench Division to determine the application on the papers (or at a hearing if the Court determines that an oral hearing is required).

5. There be permission to apply to discharge or vary this order on application by the parties or any of them or any other person affected by this order on 48 hours' notice to the other parties.

Approved:

Mr Justice Freedman

14 December 2023

Amended under the Slip Rule CPR 40.12 dated 21st January 2025 and approved by Mrs Justice Ellenbogen

And further amended pursuant to the Order of Mr Justice Sweeting, dated 10 July 2025

IN THE HIGH COURT OF JUSTICE **CLAIM NO. QB-2022-001098**
KING'S BENCH DIVISION
BEFORE: THE HONOURABLE MRS JUSTICE ELLENBOGEN DBE
On 29 January 2024



B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED

(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) 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 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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

(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY 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 ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANT

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible.

If you disobey this Order you may be found guilty of contempt of court and you may be sent to prison or your assets seized.

You have the right to apply to the court to vary or discharge this Order (which is explained below).

RECITALS

FOLLOWING the order of Linden J dated 18 July 2023 (as amended under the Slip Rule on 21 July 2023 and 16 October 2023) (the **"Linden Order**")

AND FOLLOWING the judgment of the Supreme Court in *Wolverhampton CC v London Gypsies & Travellers* [2023] UKSC 47 being handed down on 29 November 2023

AND UPON the Claimants' application, dated 13 December 2023:

(1) pursuant to paragraph 9 of the Linden Order, for a review of that order in light of the above judgment of the Supreme Court; and

(2) for a variation of the Linden Order (a) to remove the Hartland Park site from the scope of that order, and (b) to amend the area comprising the Birmingham Terminal, as shown in the 'Birmingham Plan' attached to that order.

AND FOLLOWING the order of Freedman J dated 14 December 2023, subsequent to which no written representations have been received in accordance with paragraphs 2 and 3 of that order

AND UPON reading the Second Witness Statement of Holly Stebbing dated 13 December 2023

AND UPON reading the Claimants' skeleton argument dated 12 December 2023

AND UPON the Court being satisfied that it is appropriate to consider the Claimants' application on the papers

AND UPON the Court further being satisfied that:

(1) the judgment of the Supreme Court has marked no material change in the law in relation to injunctions of the nature granted by Linden J; and

(2) the removal of the Hartland Park site from the scope of the Linden Order and the amendment of the Birmingham Plan are appropriate, for the reasons set out by the Claimants

IT IS ORDERED THAT:

NAMED DEFENDANTS

1 In view of the assurances given by them to Linden J and recited in the Linden Order, Paul Barnes and Diana Hekt, respectively the Fourth and Fifth Defendants, are not to be subject to the injunctions set out in paragraphs 2, 3 and 4 below, without further order.

THE INJUNCTIONS

2 Until 11 July 2028, or further order in the meantime, the First Defendant must not:

2.1 enter or remain upon any part of the First Claimant's properties ("the Sites") without the consent of the First Claimant at:

(1) the Oil Refinery and Jetty at the Petrochemical Complex, Marsh Lane, Southampton SO45 1TX (as shown for identification edged red and green but excluding those areas edged blue on the attached 'Fawley Plan').

(2) Hythe Terminal, New Road, Hardley, SO45 3NR (as shown for identification edged red on the attached 'Hythe Plan').

(3) Avonmouth Terminal, St Andrews Road, Bristol BS11 9BN (as shown for identification edged red on the attached 'Avonmouth Plan').

(4) Birmingham Terminal, Wood Lane, Birmingham B24 8DN (as shown for identification edged red on the attached, revised 'Birmingham Plan').

(5) Purfleet Terminal, London Road, Purfleet, Essex RM19 1RS (as shown for identification edged red and brown on the attached 'Purfleet Plan').

(6) West London Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ (as shown for identification edged red on the attached 'West London Plan').

(7) Alton Compound, Pumping Station, A31, Hollybourne (as shown for identification edged red on the attached 'Alton Compound Plan')

all such plans comprising Schedule 1 to this Order. For the avoidance of doubt, the Sites no longer include Hartland Park Logistics Hub, Ively Road, Farnborough (as shown for identification edged red on the 'Hartland Park Plan' attached to the Linden Order);

2.2 damage any part of any of the Sites;

2.3 affix themselves or any person or object to any part of any of the Sites;

2.4 erect any structures on any part of any of the Sites;

3 Until 11 July 2028, or further order in the meantime, the Second Defendant must not without the consent of the First Claimant or Second Claimant:

3.1 enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TX ("the Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

3.2 damage any part of the Chemical Plant;

3.3 affix themselves or any person or object at the Chemical Plant;

3.4 erect any structures on any part of the Chemical Plant;

4 Until 11 July 2028, or further order in the meantime, the Third Defendant must not enter onto the Claimants' property and 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, or Hartland Park Logistics Hub) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

VARIATION OR DISCHARGE OF THIS ORDER

5 The Defendants may apply to vary or discharge this Order at any time upon giving not less than 3 clear days' notice to the Claimant's solicitors, Norton Rose Fulbright LLP, by emailing ExxonMobil.Service@nortonrosefulbright.com. Any evidence to be relied upon in support of such an application must be communicated in writing to the Claimants' solicitors at least 2 clear days before the hearing.

6 Any person applying to vary or discharge this Order must provide his or her full name and address, an address for service.

7 The Claimants have liberty to apply.

REVIEW HEARINGS

8 The injunctions made herein shall be reviewed on each anniversary of the Linden Order (that is, on 18 July each year, or so close thereto as is convenient having regard to the Court's list and the need for such review to take place on a working day) with a time estimate of 2.5hrs (plus reading time). The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing.

9 The Claimants shall file and serve a trial bundle not less than 7 days before the review hearing.

10 Skeleton arguments on behalf of any represented party shall be lodged and exchanged, with bundle of authorities, not less than 3 days before the review hearing.

INTERPRETATION OF THIS ORDER

11 A Defendant who is ordered not to do something must not do it him/herself/themselves or in any other way. He/she/they must not do it through another acting on his/her/their behalf or on his/her/their instructions or with his/her/their encouragement.

SERVICE OF THIS ORDER

12 Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of this Order shall be effected on the First, Second and Third Defendants as follows:

12.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that a copy of the Order may be obtained from the Claimants' solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email: ExxonMobil.Service@nortonrosefulbright.com; and (b) that a copy of the Order may be viewed at the website referred to in Paragraph 12.2 of this Order;

12.2 posting the Order on the following website: https://www.exxonmobil.co.uk/Company/Overview/UK-operations;

12.3 fixing a minimum of four large warning notices in the forms annexed to this Order at Schedule 2 in conspicuous places around the perimeters of the Sites. Such notices must be a minimum of A2 size; and

12.4 sending an email to each of the following email addresses: (i) with the information that a copy of the Order may be viewed at the website referred to in Paragraph 12.2 of this Order; and/or (ii) enclosing a copy of this Order (whether by Mimecast link or otherwise):

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

13 Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), this Order shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in Paragraph 12 above have been completed.

14 Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 12 of this Order shall stand as good service of the Order on the First, Second and Third Defendants.

SERVICE OF OTHER DOCUMENTS

15 Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of any other documents in these proceedings by the Claimants ("the Further Documents") shall be effected on the First, Second and Third Defendants as follows:

~~15.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that copies of the Further Documents may be obtained from the Claimants' solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email: ExxonMobil.Service@nortonrosefulbright.com; and (b) that copies of the Further Documents may be viewed at the website referred to in Paragraph 15.2 of this Order;~~

15.2 posting the Further Documents on the following website: https://www.exxonmobil.co.uk/Company/Overview/UK-operations; and

15.3 sending an email to each of the following email addresses: (i) with the information that copies of the Further Documents may be viewed at the website referred to in Paragraph 15.2 of this Order; and/or (ii) enclosing copies of the Further Documents (whether by Mimecast link or otherwise):

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

15.4 Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the Further Documents shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in Paragraph 15 above have been completed.

15.5 Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 15 of this Order shall stand as good service of the Further Documents on the First, Second and Third Defendants.

15.6 Pursuant to CPR 81.4(2)(c) and (d), the Court dispenses with the requirement for personal service in relation to the Fifth Defendant.

COSTS

16 No order as to costs.

THE COURT

17 The Court will provide sealed copies of this Order for service to the Claimants' solicitors, whose details are set out in Paragraphs 12.1 ~~and 15.1~~ of this Order.

18 All communications to the Court about this Order should be sent to:

- King's Bench Division, Royal Courts of Justice, Strand WC2A 2LL
- The office is open between 10.00am and 4.30pm Monday to Friday (except Bank Holidays)
- The telephone number is 020 3936 8957
- The email address is kbjudgeslistingoffice@justice.gov.uk

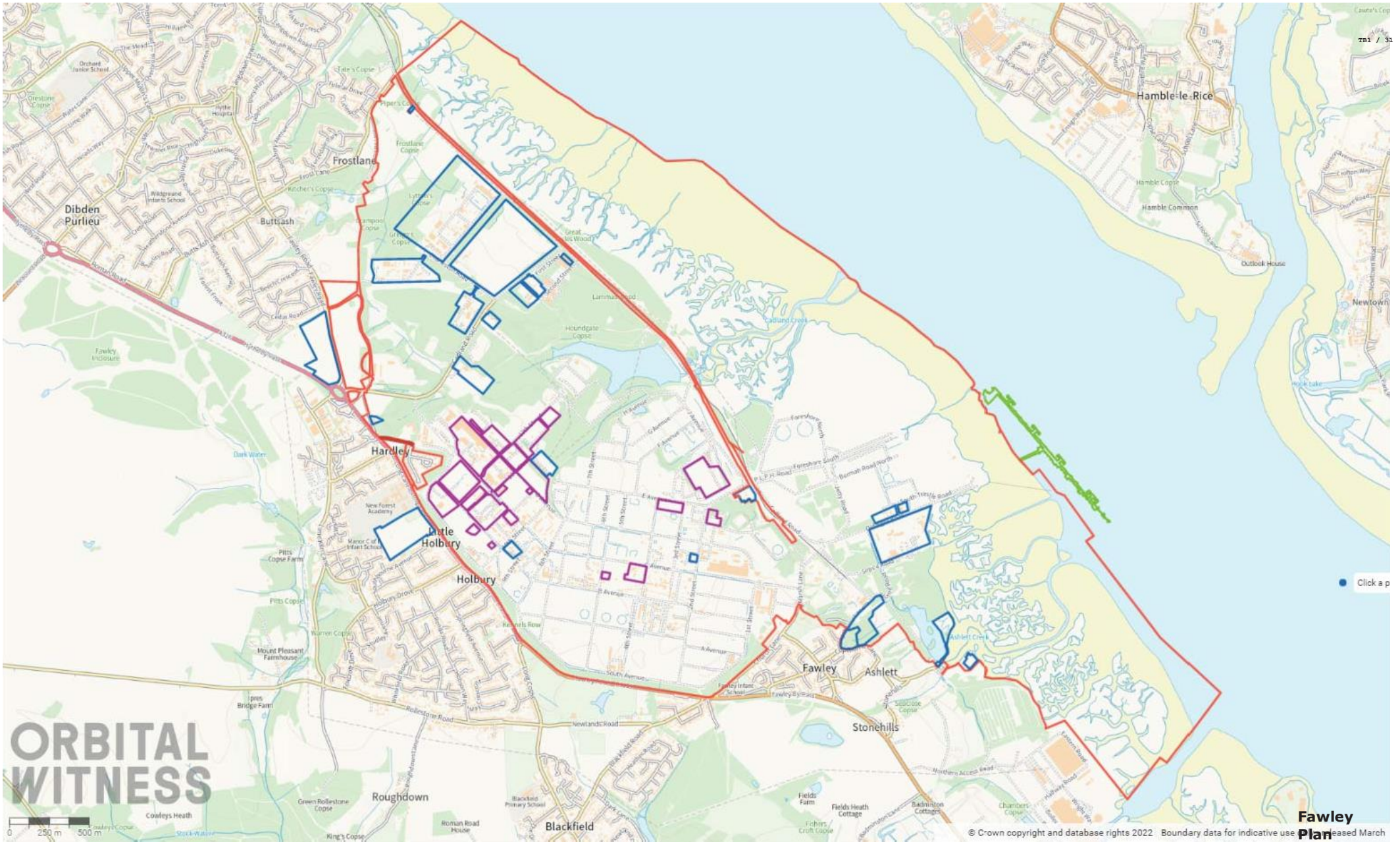
SERVICE OF THE ORDER

19 This Order shall be served by the Claimants on all Defendants.

29 January 2024

SCHEDULE 1 - Plans

1. Fawley Plan
2. Hythe Plan
3. Avonmouth Plan
4. Birmingham Plan
5. Purfleet Plan
6. West London Plan
7. Alton Compound Plan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Dibden Purlieu
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Hardley
Little Holbury
Holbury
Fawley
Ashlett
Stonehills
Newtown
Roughdown
Blackfield
ORBITAL WITNESS
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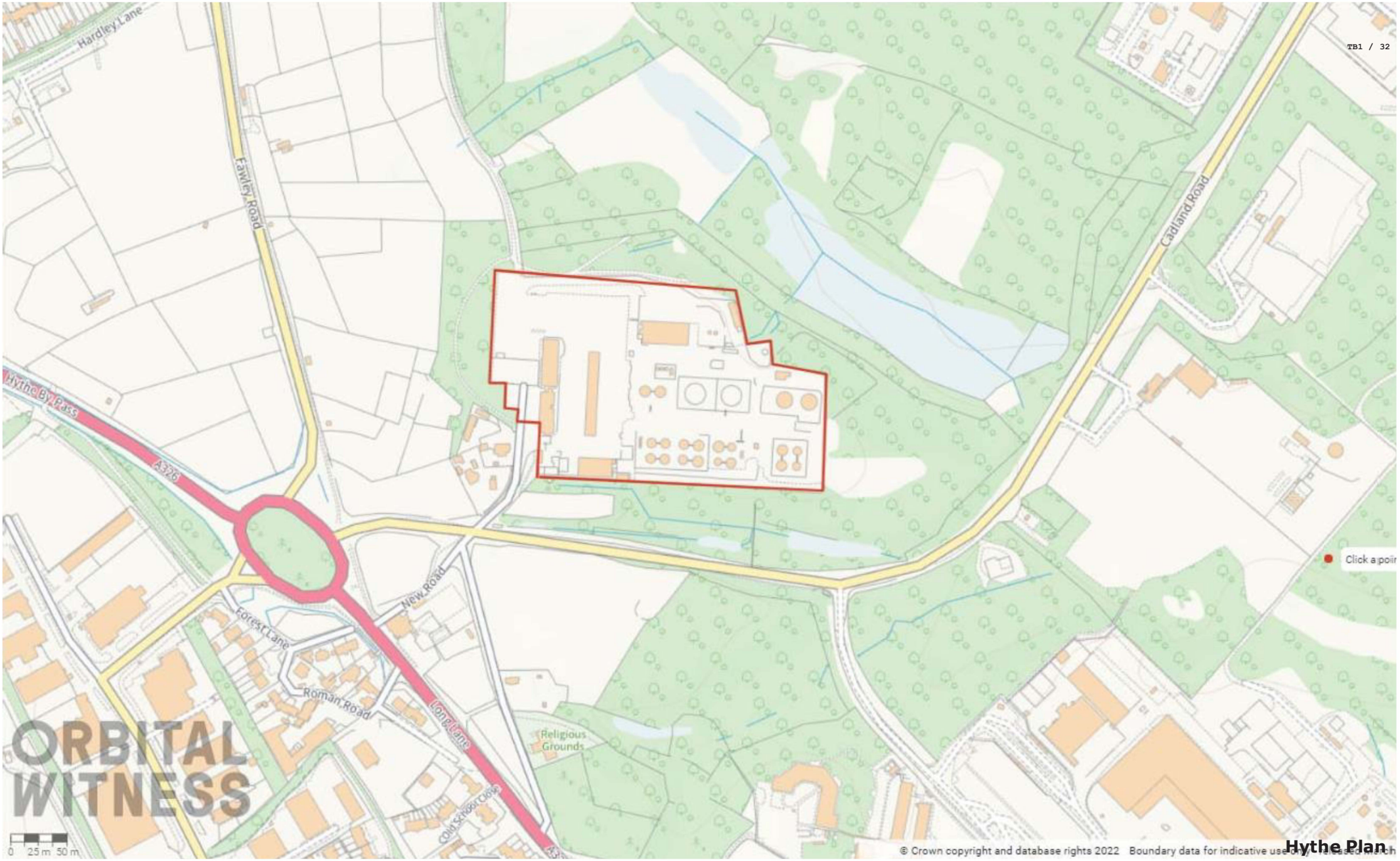
© Crown copyright and database rights 2022 Boundary data for indicative use
Fawley Plan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Cadland Road
Hythe By Pass
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New Road
Forest Lane
Roman Road
Long Lane
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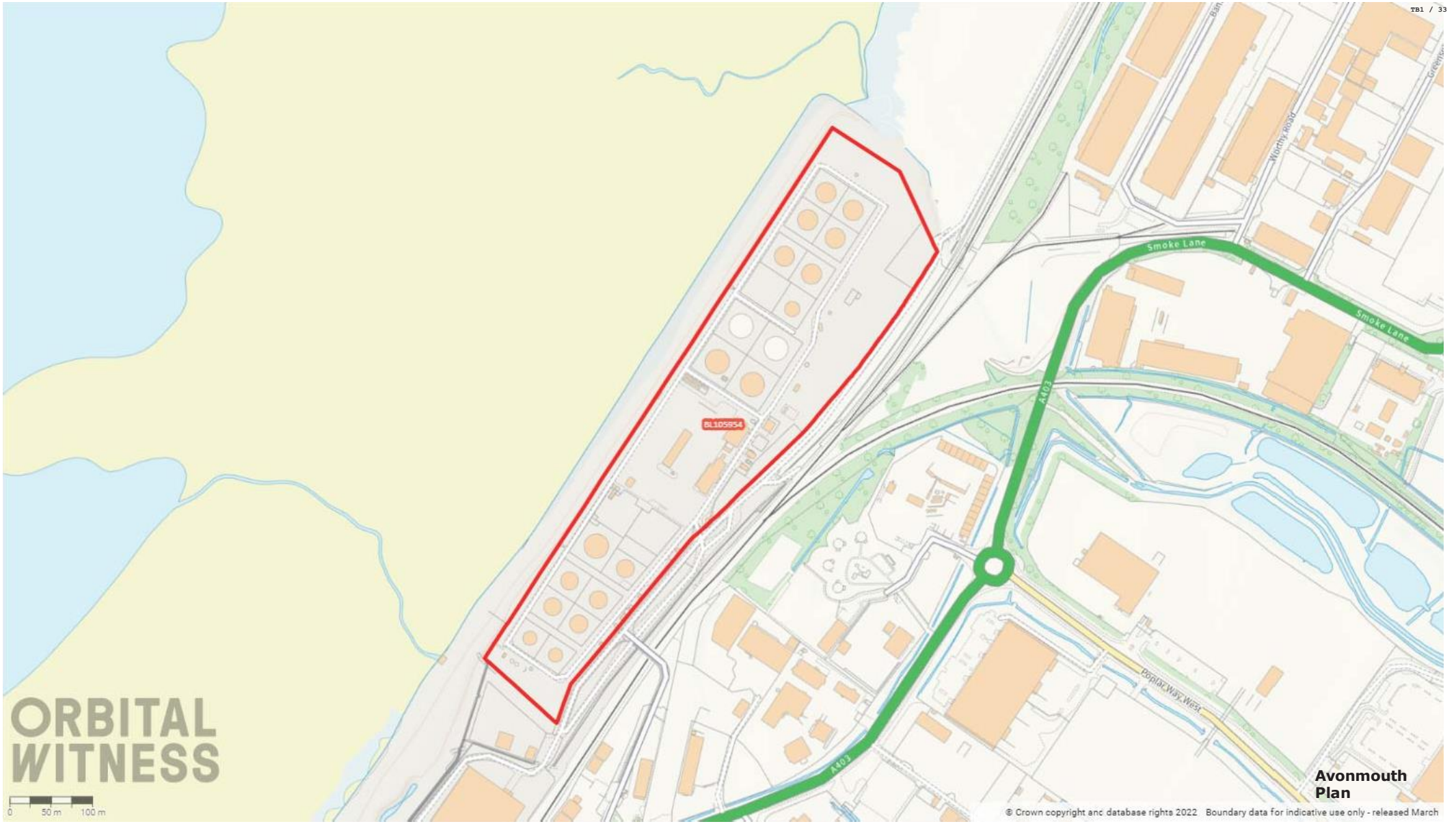
Hythe Plan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A403
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Avonmouth Plan
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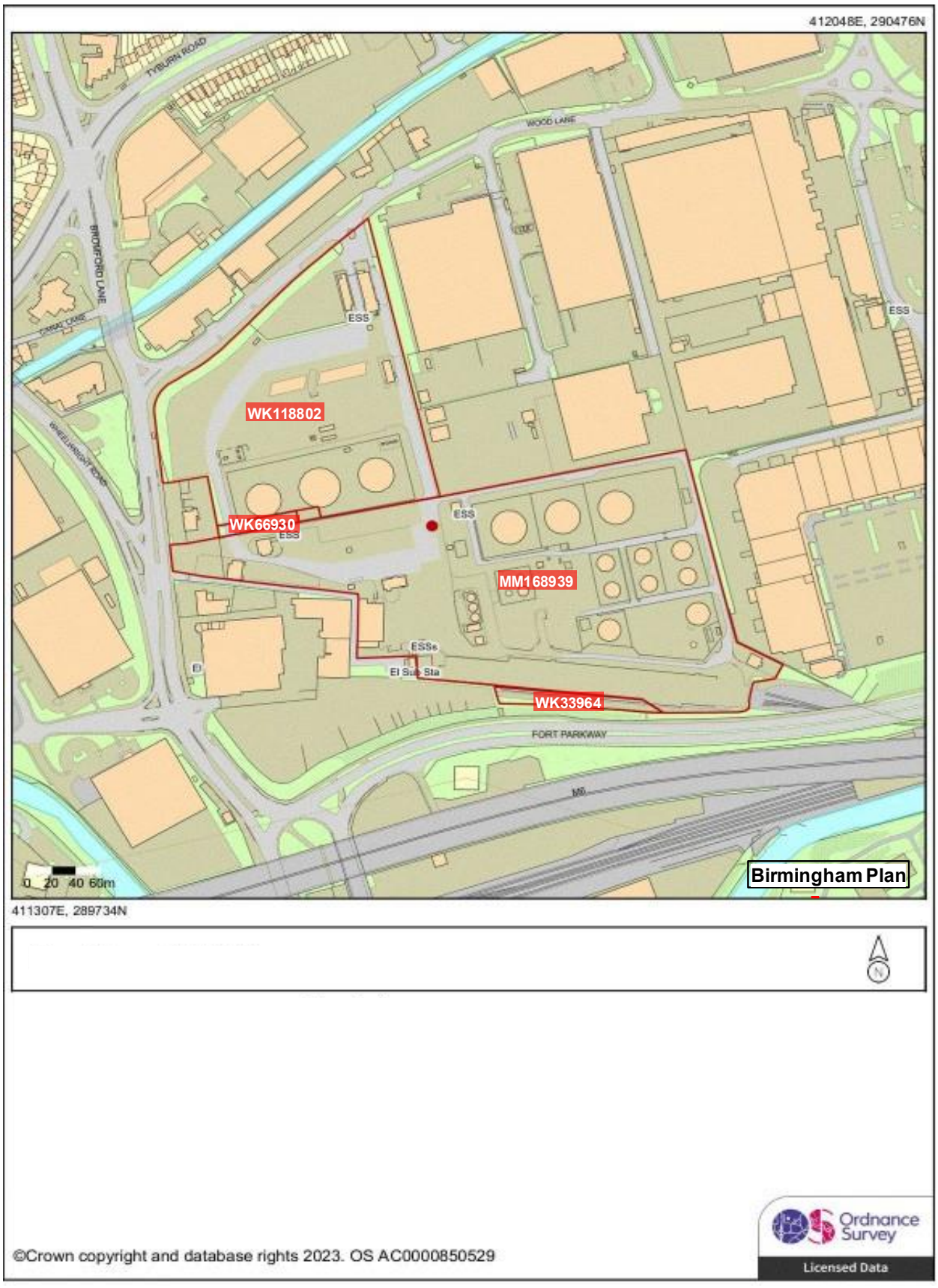
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Birmingham Plan
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©Crown copyright and database rights 2023. OS AC0000850529
Ordnance Survey
Licensed Data


TB1 / 36
Harris Academy Riverside
Purfleet Baptist Church
London Road Purfleet
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Purfleet Thames Terminal
ORBITAL WITNESS
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Purfleet Plan
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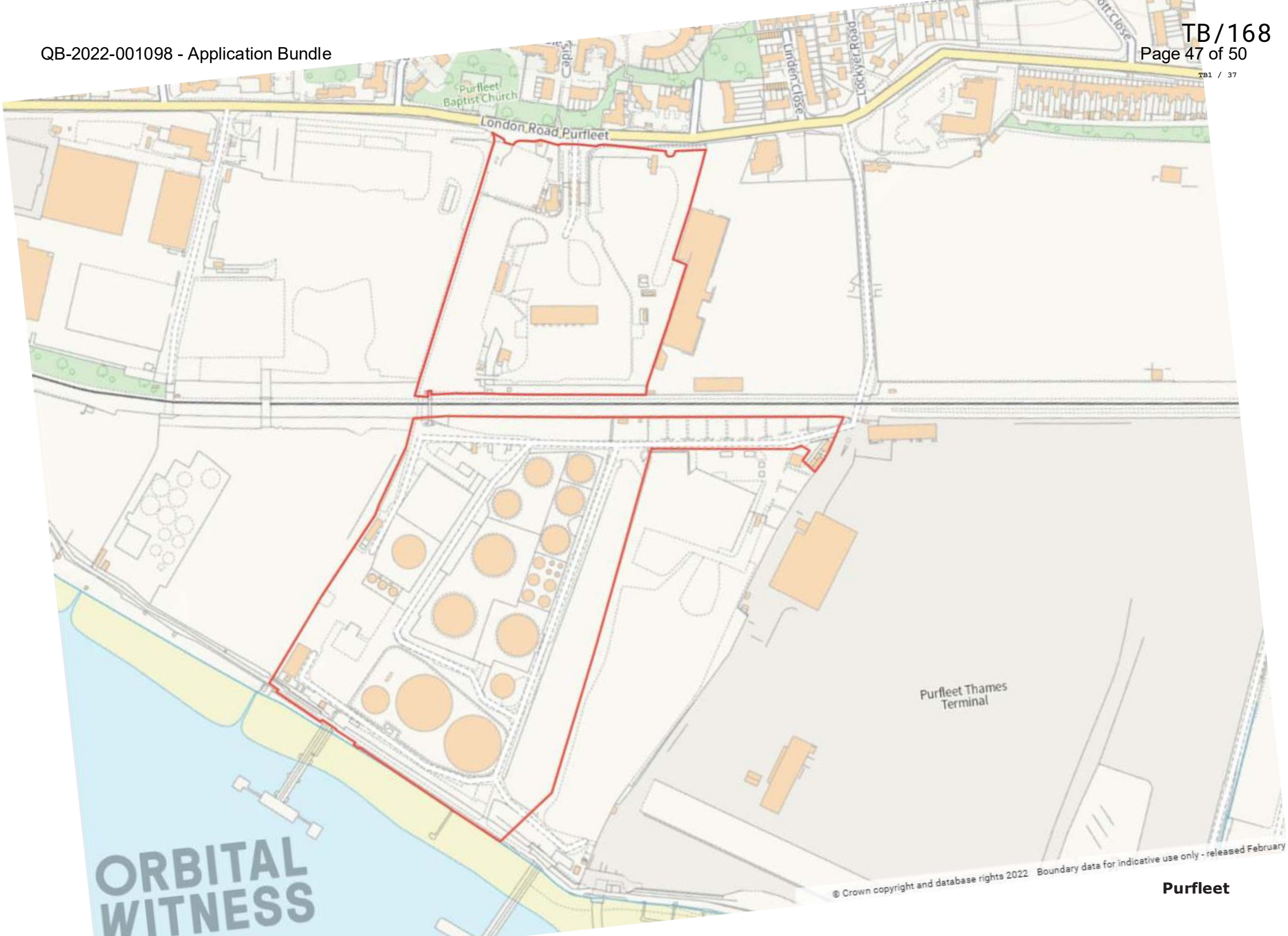
Purfleet Baptist Church
London Road Purfleet
Linden Close
Lockyer Road
Purfleet Thames Terminal
ORBITAL WITNESS
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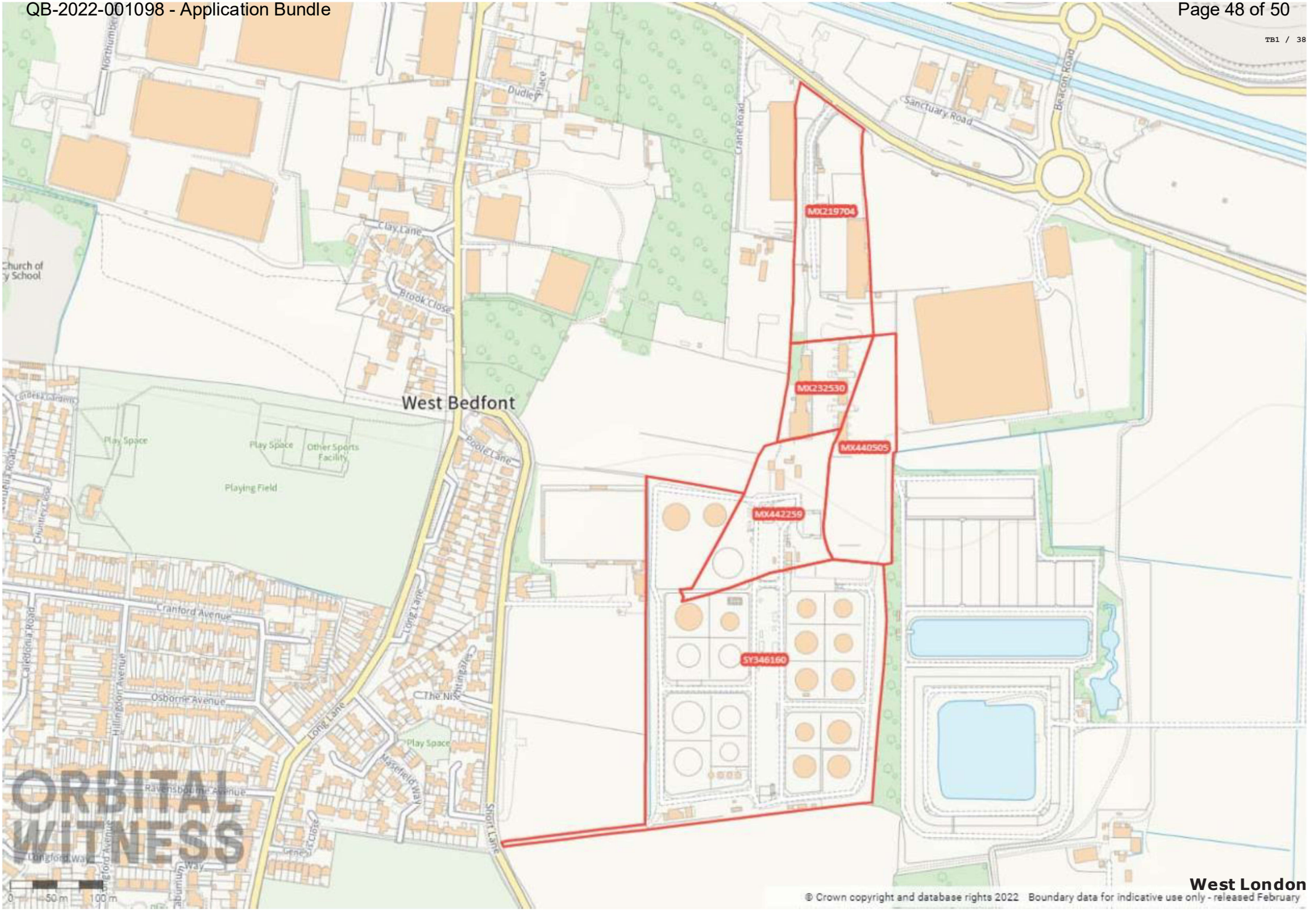
Purfleet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Long Lane
Short Lane
Play Space
Other Sports Facility
Playing Field
Cranford Avenue
Osborne Avenue
Hillingdon Avenue
Caledonia Road
Ravensbourne Avenue
Longford Way
Masefield Way
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Alton Compound Plan
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SCHEDULE 2 – Warning Notice

ESSO PETROLEUM COMPANY, LIMITED (First Claimant) EXXONMOBIL CHEMICAL LIMITED (Second Claimant)
Important Notice
High Court of Justice – Claim No QB-2022-001098

On 29 January 2024, an injunction was made by the High Court of Justice in the proceedings referred to above concerning this Site.

The Order prohibits entering or remaining, damaging, affixing any person or object, erecting structures and/or obstructing vehicular access.

The persons affected by the Order are Persons Unknown acting in connection with the Extinction Rebellion campaign and/or the Just Stop Oil campaign or other environmental campaign, (and other Defendants who are named in the proceedings).

Anyone in breach of the injunction will be in contempt of court and may be imprisoned, fined or have their assets seized. Any person who knows of this Order and does anything which permits the Defendant or any of them to breach the terms of the Order may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

This means that you must not go beyond this notice and enter this site without permission.
This also means that you must not obstruct any vehicular entrance or exit.
If you do, you may be sent to prison or have your assets seized.

Copies of the Court documents may be viewed at www.exxonmobil.co.uk/Company/Overview/UK-operations.

Copies may also be obtained from ExxonMobil.Service@nortonrosefulbright.com.

The injunction applies to the following Sites:-

- The Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Fawley, Southampton SO45 1TX
- Hythe Oil Terminal, New Road, Hardley SO45 3NR
- Avonmouth Oil Terminal, St Andrews Road, Bristol BS11 9BN
- Birmingham Oil Terminal, Wood Lane, Birmingham B24 8DN
- Purfleet Oil Terminal, London Road, Purfleet, Essex RM19 1RS
- West London Oil Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ
- Alton Compound, Pumping Station, A31, Holybourne

Amended by Mrs Justice Tipples under the slip rule (CPR 40.12) dated 10 July 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
Mrs Justice Tipples
Wednesday 10 July 2024
B E T W E E N:

CLAIM NO. QB-2022-001098



(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED

Amended by Mrs Justice Tipples under the slip rule (CPR 40.12) dated 10 July 2024

(G) RED ON THE ATTACHED 'WEST LONDON PLAN')

(H) ~~HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~

(I) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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

(5) DIANA HEKT

Defendants

O R D E R

Amended by Mrs Justice Tipples under the slip rule (CPR 40.12) dated 10 July 2024

RECITALS

UPON the Order of Linden J, dated 18 July 2023 (as amended on 21 July 2023 and 16 October 2023) granting the Claimants final injunctive relief until 11 July 2028 (the "**Linden Order**")

AND UPON the Order of Ellenbogen J, dated 29 January 2024, maintaining the relief granted in the Linden Order but superseding that Order following a review in light of the Supreme Court judgment in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45 (the "**Ellenbogen Order**")

AND UPON a review hearing being listed on 10 July 2024 for a review of the Linden Order, pursuant to paragraph 10 of Linden Order, and the Ellenbogen Order, pursuant to paragraph 8 of the Ellenbogen Order (the "**Review Hearing**")

AND UPON reading the evidence and the Claimants' skeleton argument

AND UPON hearing Timothy Morshead KC and Yaaser Vanderman for the Claimants and the Defendants not appearing

AND UPON the Court being satisfied that proper and effective service of the Ellenbogen Order, pursuant to paragraph 12 of the Ellenbogen Order, and the documents prepared for the Review Hearing, pursuant to the steps set out in paragraph 15 of the Ellenbogen Order, had been effected on all Defendants

AND UPON the Court reviewing the Linden and Ellenbogen Orders and being satisfied that, in respect of the First to Third Defendants, there had been no material change in circumstances warranting amendments to, or the setting aside of, the relief granted in the Linden and Ellenbogen Orders

AND UPON the Claimants having received assurances from Diana Hekt that she does not intend to breach any injunction covering the Sites (as defined in the Ellenbogen Order) but not having received any response from Paul Barnes

IT IS ORDERED THAT:

1. Subject to the below, no order be made as to the continuing effect of the Ellenbogen Order.

Amended by Mrs Justice Tipples under the slip rule (CPR 40.12) dated 10 July 2024

1. In view of the assurance given by her mentioned above, expiring on 30 June 2025, the Fifth Defendant (Diana Hekt) is not to be subject to the injunctions set out in the Linden and Ellenbogen Orders, without further order.

2. The Fourth Defendant (Paul Barnes) is not to be subject to the injunctions set out in the Linden and Ellenbogen Orders, but the Claimants have liberty to apply to make him subject to those injunctions in the absence of receiving assurances from him to like effect as those given by him in June 2023 and lasting until at least 30 June 2025.

3. This Order shall be served on the First to Third Defendants pursuant to paragraph 15 of the Ellenbogen Order.

4. This Order shall be served on the Fourth and Fifth Defendants by email, pursuant to paragraphs 2 and 3 of the Consent Order sealed on 19 July 2023.

Dated: 10 July 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BEFORE:
JUSTICE FARBEY

CLAIM NO. QB-2022-001098

B E T W E E N:



(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

DRAFT ORDER

PENAL NOTICE

If you the within named Fourth Defendant disobey the undertakings set out in this order or instruct (which includes training, coaching, teaching or educating) others to do the acts which you have undertaken not to do, 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 Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE FOURTH DEFENDANT

This order prohibits you from doing the acts set out in paragraphs 4, 5 and 6 below.

You should read it very carefully.

UPON the **Fourth Defendant** having agreed to an order in the terms set out below

AND UPON the **Fourth Defendant** giving undertakings to the Court as set out below

AND UPON the Order of Tipples J dated 10 July 2024 making no order as to the continuing effect of the Ellenbogen Order; and

IT IS ORDERED THAT:

1. There be no order as to costs.

2. Pursuant to CPR r.6.15, r.6.27 and r.81.4(2)(c)-(d), service of this Order and any subsequent court documents in these proceedings on the Fourth Defendant may be effected by alternative means by email to PBHPXR@protonmail.com, and/or by an email to PBHPXR@protonmail.com referencing that the documents can be found at https://www.exxonmobil.co.uk/company/overview/uk-operations, and such service shall be deemed to be good and sufficient service on the Fourth Defendant. Any such document shall be deemed served on the date the email is sent.

UNDERTAKINGS TO THE COURT

The **Fourth Defendant** undertakes to the Court promising as follows:

3. Not to:

(a) enter or remain on any part of the Sites (as defined above) without the Consent of the First Claimant.

(b) damage any part of any of the Sites;

(c) affix themselves or any person or object to any part of any of the Sites;

(d) erect any structures on any part of any of the Sites.

4. Not to:

(a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH (the "Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

(b) damage any part of the Chemical Plant;

(c) affix themselves or any person or object at the Chemical Plant;

5. Not to enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THESE PROMISES UNTIL 30 June 2025

STATEMENT

I understand the undertakings that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.

_____

Paul Barnes

Fourth Defendant

____ July 2024

We consent to an order in these terms

_____

Norton Rose Fulbright LLP

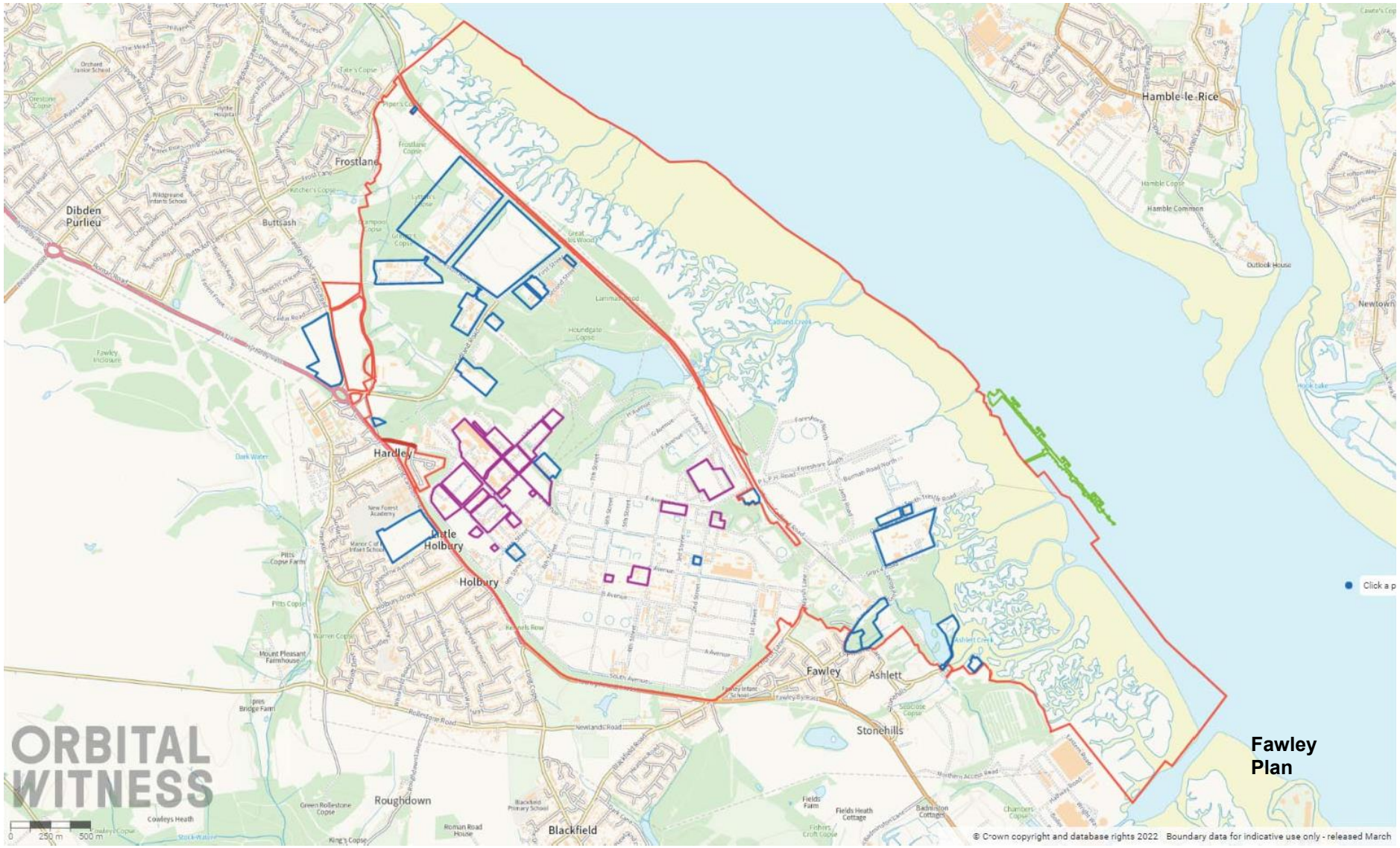
Solicitors for the Claimants

____ July 2024

THE HON MRS JUSTICE FARBEY 15/08/2024 (NB: SIGNATURE OF PAUL BARNES AND OF NORTON ROSE FULBRIGHT VIEWED ON PDF VERSION AND ACCEPTED)

QB-2022-001098

Fawley Plan

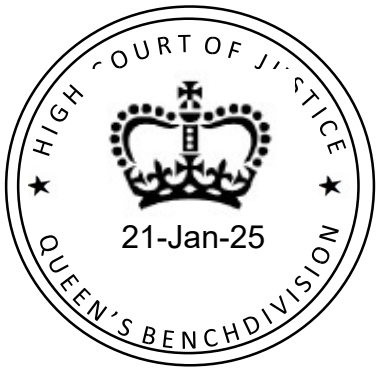


Amended by Mrs Justice Farbey under the slip rule (CPR 40.12) dated 21 JANUARY 2025

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BEFORE: JUSTICE FARBEY

CLAIM NO. QB-2022-001098

B E T W E E N:



QB-2022-001098

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')

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

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

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

(E) PURFLEET OIL TERMINAL, LONDON ROAD,

Amended by Mrs Justice Farbey under the slip rule (CPR 40.12) dated 21 JANUARY 2025

PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR

IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')

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

(G) ~~HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR~~ IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')

(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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

(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

Amended by Mrs Justice Farbey under the slip rule (CPR 40.12) dated 21 JANUARY 2025

If you the within named Fourth Defendant disobey the undertakings set out in this order or instruct (which includes training, coaching, teaching or educating) others to do the acts which you have undertaken not to do, 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 Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE FOURTH DEFENDANT

This order prohibits you from doing the acts set out in paragraphs 4, 5 and 6 below.

You should read it very carefully.

UPON the **Fourth Defendant** having agreed to an order in the terms set out below

AND UPON the **Fourth Defendant** giving undertakings to the Court as set out below

AND UPON the Order of Tipples J dated 10 July 2024 making no order as to the continuing effect of the Ellenbogen Order; and

IT IS ORDERED THAT:

1. There be no order as to costs.

2. Pursuant to CPR r.6.15, r.6.27 and r.81.4(2)(c)-(d), service of this Order and any subsequent court documents in these proceedings on the Fourth Defendant may be effected by alternative means by email to PBHPXR@protonmail.com, and/or by an email to PBHPXR@protonmail.com referencing that the documents can be found at https://www.exxonmobil.co.uk/company/overview/uk-operations, and such service shall be deemed to be good and sufficient service on the Fourth Defendant. Any such document shall be deemed served on the date the email is sent.

UNDERTAKINGS TO THE COURT

The **Fourth Defendant** undertakes to the Court promising as follows:

3. Not to:

Amended by Mrs Justice Farbey under the slip rule (CPR 40.12) dated 21 JANUARY 2025

(a) enter or remain on any part of the Sites (as defined above) without the Consent of the First Claimant.

(b) damage any part of any of the Sites;

(c) affix themselves or any person or object to any part of any of the Sites;

(d) erect any structures on any part of any of the Sites.

4. Not to:

(a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TX (the "Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

(b) damage any part of the Chemical Plant;

(c) affix themselves or any person or object at the Chemical Plant;

5. Not to enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THESE PROMISES UNTIL 30 June 2025

STATEMENT

I understand the undertakings that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.

Paul Barnes Fourth Defendant
_____July 2024

We consent to an order in these terms

Norton Rose Fulbright LLP Solicitors for the Claimants
---------- July 2024

Amended by Mrs Justice Farbey under the slip rule (CPR 40.12) dated 21 JANUARY 2025

THE HON MRS JUSTICE FARBEY 15/08/2024 (NB: SIGNATURE OF PAUL BARNES AND OF NORTON ROSE FULBRIGHT VIEWED ON PDF VERSION AND ACCEPTED)

NOTICE OF AMENDED ORDERS

CLAIM NO. QB-2022-001098

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

CLAIMANTS

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 1TX** (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')

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

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

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

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

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

~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~

(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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

(5) DIANA HEKT

DEFENDANTS

NORTON ROSE FULBRIGHT

29 January 2025

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

To whom it may concern

We enclose, by way of service:

(a) the amended orders of Mrs Justice Ellenbogen DBE dated 29 January 2024 (the **first Ellenbogen Order**), Mrs Justice Tipples DBE dated 10 July 2024 (the **Tipples Order**) and Mrs Justice Farbey DBE dated 15 August 2024 (the **Farbey Order**) (together, the **Orders**); and

(b) the Claimants' without notice application dated 13 December 2024 to correct the postcode for the Fawley site in each of the Orders (the **Application**)

in relation to the Operating Sites injunction that the Claimants have sought and been granted against various Defendants connected to the Extinction Rebellion or Just Stop Oil campaigns with claim number QB-2022-001098.

The Orders and the Application are being served in the same method as prescribed at paragraphs 12 to 15 of the first Ellenbogen Order and paragraph 5 of the Tipples Order, as varied by paragraph 2 of the Farbey Order.

Copies of the Orders and the Application may be obtained from Norton Rose Fulbright LLP at the address stated above (Ref: Holly Stebbing, tel: 020 7283 6000) or by emailing ExxonMobil.Service@nortonrosefulbright.com. This notice, the Orders and the Application can also be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Enc.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

Before Mr Justice Sweeting

Dated the 10th of July 2025



QB-2022-001098

B E T W E E N: **(1) ESSO PETROLEUM COMPANY, LIMITED**
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')

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

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

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

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

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

~~**(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')**~~

(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

ORDER

RECITALS

UPON the Order of Linden J, dated 18 July 2023 (as amended on 21 July 2023 and 16 October 2023) granting the Claimants final injunctive relief until 11 July 2028 (the "Linden Order")

AND UPON the Order of Ellenbogen J, dated 29 January 2024, maintaining the relief granted in the Linden Order but superseding that Order following a review in light of the Supreme Court judgment in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45 (the "Ellenbogen Order")

AND UPON the Order of Tipples J, dated 10 July 2024, following the first review hearing, making no order as to the continuing effect of the Ellenbogen Order

AND UPON a further review hearing being listed on 9 July 2025 for a review of the Ellenbogen Order, pursuant to paragraph 8 of the Ellenbogen Order (the "Review Hearing")

AND UPON hearing Timothy Morshead KC and Yaaser Vanderman for the Claimants and the Defendants not appearing

AND UPON the Court being satisfied that proper and effective service of the Ellenbogen Order, pursuant to paragraph 12 of the Ellenbogen Order, and the documents prepared for the Review Hearing, pursuant to the steps set out in paragraph 15 of the Ellenbogen Order, had been effected on all Defendants

AND UPON the Court reviewing the Ellenbogen Order and being satisfied that, in respect of the First to Third Defendants, there had been no material change in circumstances warranting the setting aside of the relief granted in the Ellenbogen Order

AND UPON the Claimants having received assurances from Diana Hekt that she does not intend to breach any injunction covering the Sites (as defined in the Ellenbogen Order) but not having received any response from Paul Barnes

IT IS ORDERED THAT:

1. Subject to the following provisions of this Order, including as to the description of the persons to be described as Defendants, the Ellenbogen Order shall continue.

2. In view of the assurance given by her mentioned above, expiring on 31 July 2026 or the date of the next annual review hearing, the Fifth Defendant (Diana Hekt) is not to be subject to the injunctions set out in the Ellenbogen Order, without further order.

3. The Fourth Defendant (Paul Barnes) is not to be subject to the injunctions set out in the Ellenbogen Order, but the Claimants have liberty to apply to make him subject to those injunctions in the absence of receiving assurances from him to like effect as those given by him in July 2024 and lasting until 30 June 2025.

4. The Claimants be permitted to amend the Re-Re-Amended Claim Form and Re-Re-Amended Particulars of Claim to change the description of the First to Third Defendants to the following:

"(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')

(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) 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 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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)"

5. Service and notification of the Re-Re-Re-Amended Claim Form and Re-Re-Re-Amended Particulars of Claim be dispensed with.

6. The Ellenbogen Order be amended (the "Amended Ellenbogen Order"):

    a. To reflect the amended description of the First to Third Defendants, as permitted in paragraph 4 above.

    b. To delete paragraph 15.1 and, consequently, any reference to paragraph 15.1.

7. Any requirement, whether imposed by a previous Order in this claim or otherwise, to continue to notify the First to Third Defendants of any document by way of fixing copies of that document in clear transparent sealed containers around the perimeter of the Sites be dispensed with.

8. The Amended Ellenbogen Order shall be notified to the First to Third Defendants pursuant to paragraph 12 of the Ellenbogen Order, except that in relation to paragraph 12.1 of the Ellenbogen Order copies of the Amended Ellenbogen Order may be fixed by a method other than in clear transparent sealed containers. This Order shall be notified to the First to Third Defendants pursuant to the steps in paragraph 15.2-15.3 of the Ellenbogen Order.

9. The Amended Ellenbogen Order and this Order shall be served on the Fourth and Fifth Defendants by email, pursuant to paragraphs 2 and 3 of the Consent Order sealed on 19 July 2023.

Dated 10 July 2025

Neutral Citation Number: [2025] EWHC 1768 (KB)

Case No: QB-2022-001098

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Royal Courts of Justice
Strand, London, WC2A 2LL

Date: 11/07/2025

Before:

THE HONOURABLE MR JUSTICE SWEETING

- - - - - - - - - - - - - - - - - - - -

Between:

(1) ESSO Petroleum Company, Limited	**Claimants**
(2) Exxonmobil Chemical Limited	
- and –	
(1) PERSONS UNKNOWN who, in connection with the 'Extinction Rebellion' campaign or the 'Just Stop Oil' campaign, enter or remain (without the Consent of the First Claimant) upon any of the Sites.	**Defendants**
(2) PERSONS UNKNOWN who, in connection with the 'Extinction Rebellion' campaign or the 'Just Stop Oil' campaign, enter or remain (without the Consent of the First Claimant or the Second Claimant) upon The Chemical Plant, Marsh Lane, Southampton S045 1TX.	
(3) PERSONS UNKNOWN who, in connection with the 'Extinction Rebellion' campaign or the 'Just Stop Oil' campaign, enter onto any of the Claimants' property and obstruct any of the vehicular entrances or exits to any of the Sites.	
(4) Paul Barnes	
(5) Diana Hekt	

- -
- -

Timothy Morshead KC and **Yaaser Vanderman** (instructed by **Norton Rose Fulbright LLP**) for the **Claimants**
The **Defendants** did not appear

Hearing dates: 09/07/2025

- -

Approved Judgment

This judgment was handed down remotely at 10.00am on 11.07.2025 by circulation to the parties or their representatives by e-mail and by release to the National Archives.

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THE HONOURABLE MR JUSTICE SWEETING

Mr Justice Sweeting:

Introduction

1. This is the second annual review of the injunction granted in this matter to Esso Petroleum Company, Limited and ExxonMobil Chemical Limited ("the Claimants"). They seek the continuation of the existing order with some amendments. The First, Second, and Third Defendants are identified as Persons Unknown who are connected with the 'Extinction Rebellion' ("XR") campaign or the 'Just Stop Oil' ("JSO") campaign. The Fourth Defendant ("D4"), Paul Barnes, and the Fifth Defendant ("D5"), Diana Hekt, are named individuals.

Background to the Case

2. The injunction was originally obtained by the Claimants in 2022 in response to environmental protest campaigns. The injunction protects various sites ("the Sites"), which include an oil refinery, fuel terminals, logistic hubs, and compounds across the United Kingdom. The Sites form a significant element of the national energy infrastructure. The Fawley site, for instance, is the largest oil refinery in the United Kingdom, providing 20% of the nation's refinery capacity.

3. The history of protest action at these Sites and elsewhere is well-documented in the evidence, including in the statements of Mr. Anthony Milne, Mr. Stuart Sherbrooke Wortley, Mr. Nawaaz Allybokus, and Mr. Martin Pullman. These statements describe the significant problems experienced by the Claimants, not as isolated events, but as part of a wider pattern of "direct action" at oil terminals across the country. The Sites are mainly complex industrial units which process or store substantial amounts of volatile and highly flammable material capable of being released in liquid or vapour form. The sites are secure and subject to stringent safety measures and protocols which would not be apparent to a member of the public. They therefore involve managed risk. The consequences of any of the risks involved eventuating present a clear and significant danger to those who work at or visit the Sites, anyone entering unlawfully or protesting at the Sites and, not least, the local population and environment.

4. On 19 July 2023, Linden J granted "final" relief, imposing an injunction effective for a period of five years, subject to annual review ("the Linden Order"). Subsequently, on 29 January 2024, Ellenbogen J reviewed the Linden Order, prior to its first annual review, to consider whether any changes were necessary in the light of the Supreme Court's judgment in *Wolverhampton CC v. London Gypsies & Travellers* [2024] AC 983 ("*Wolverhampton*"). Ellenbogen J concluded that no changes were required, granting similar relief with minor "tidying up" in relation to one area no longer requiring protection and another where previously unregistered land had become registered ("the Ellenbogen Order"). The first annual review hearing took place on 10 July 2024 before Tipples J, who concluded that there had been no material change in circumstances warranting the discharge or amendment of the injunction. She ordered that it continued unchanged. D4 and D5 were, as previously, "carved out" of the injunctions due to assurances they had provided.

Relevant Law

5. The purpose of a review hearing for an injunction, particularly one against Persons Unknown, was clearly articulated by the Supreme Court in *Wolverhampton*. At [225], the Court observed that a review:

> "…will give all parties an opportunity to make full and complete disclosure to the court, supported by appropriate evidence, as to how effective the order has been; whether any reasons or grounds for its discharge have emerged; whether there is any proper justification for its continuance; and whether and on what basis a further order ought to be made."

6. As Mr Morshead KC observed, this is an area of evolving jurisprudence so that it is also open to the Court to review the operation of continuing injunctive relief in the light of legal developments. That has already taken place in this case following the decision in *Wolverhampton*. I am satisfied that the Claimants have drawn to my attention all of the recent relevant case law in relation to the granting of similar injunctive relief.

7. In cases where the review is uncontested, the primary focus is not to revisit the merits afresh but rather to determine whether the injunction has outlasted the compelling need which led to its initial imposition, in view of any changed circumstances. This approach is consistent with the views expressed by Hill J in *Valero v Persons Unknown* (2025 review) [2025] EWHC 207 (KB) at [20-30], and by Garnham J in *Rochdale MBC v Persons Unknown* [2025] EWHC 1314 (hereafter "*Rochdale*") at [42-52].

8. I agree that this is the practical and proportionate way to approach a review ordered as part of the original grant of relief. Such a review is also an opportunity to make necessary adjustments in the light of experience of the practical operation of the injunction and changing circumstances. The Court should nevertheless be wary of embarking upon fundamental changes to the scope or nature of injunctive relief at a review hearing rather than requiring a further and full application to be made. I also bear in mind that there is no legal presumption of continuance.

Continued Threat of Direct Action

9. The evidence before me, particularly from the fifth and sixth witness statements of Ms Stebbing demonstrates that the threat of direct action at and against the Sites continues to be a real one.

10. First, there is direct evidence from JSO itself acknowledging the effectiveness of injunctions in deterring their actions. A tweet from 13 September 2023 stated, in relation to protests on highways:

> "Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that makes protests impossible at oil refineries, oil depots and even petrol stations…"

11. This strongly suggests that the injunctions covering oil refineries have compelled JSO to target other infrastructure and, conversely, that the removal of the injunction would

invite renewed activity of the sort that it was designed to prevent.

12. Secondly, other courts have also recently found there to be a continuing threat in cases similar to the present application (see *Valero* (above) and *Exolum Pipeline Systems Ltd v Persons Unknown* - 25 February 2025, Swift J reviewing the order made in that case in 2024 – see *Exolum Pipeline System Ltd & Ors v Persons Unknown* [2024] EWHC 1015 (KB)).

13. Thirdly, specific incidents indicate ongoing interest in the Sites. For example, in December 2023, an individual trespassed on the Fawley Site to film its layout by drone, subsequently publishing the footage online, which has gathered over 146,000 views to date. Whilst some time ago and not overtly a protest, the filming of the site and the high number of continuing views demonstrates a persistent interest in the Claimants' infrastructure. Broader interest in the Claimants' assets across England by environmental activists is also described in Ms Stebbing's evidence.

14. Fourthly, XR and JSO continue to focus their attention on the oil and gas sector. Recent examples include multiple environmental activist groups, including JSO, targeting airports in Europe in July-August 2024, with JSO stating that "areas of key importance to the fossil fuel economy will be declared sites of civil resistance around the world". In October 2024, XR activists blockaded the United Kingdom Oil & Gas plc production site in Surrey, and in January 2025, XR occupied the Manchester office of an insurance broker, because it was involved, it was said, in insuring fossil fuel projects. Direct action by other related groups, such as Shut the System and Youth Demand, also occurred in 2025.

15. Fifthly, whilst JSO issued a press release on 27 March 2025 stating it would be "hanging up the hi vis" at the end of April 2025, the evidence in Ms Stebbing's sixth witness statement casts significant doubt on the finality of this change in approach. The press release itself contained a "Note to Editors" that is hard to reconcile with an unequivocal renunciation of direct action. More significantly, undercover reporting on 16 May 2025 referred to an alleged recording of JSO indicating it had not disbanded, prompting JSO to email its mailing list on 21 May 2025 stating: "GB News was right for once. We are "plotting a very big comeback"". The email further suggested that this renewed campaign might operate under a new title albeit with the same aims and conducted by the same protesters:

> "Just Stop Oil was just the beginning. A new campaign is in the works—one that will build on our knowledge and success as Just Stop Oil and will face the grinding injustice of our political and economic system head on. We're just getting started."

16. Similar statements by XR in the past, that it was relinquishing particular forms of protest, have not been honoured. On 19 May 2025, JSO posted a social media photo stating "JUST GETTING STARTED". A Times report in June 2025 indicated JSO activists were recruiting for Youth Demand, with events advertised using the JSO logo, and an organiser quoted as saying,

> "This is an inhale before we breath out and expand into brand new territory, into something even bigger than we've tried before. This is the start of something genuinely thrilling".

17. As Linden J observed in his judgment in this matter [67]:

> "It would have been very easy for Extinction Rebellion or Just Stop Oil to give assurances or evidence to the court that there was no intention to return to their activities of 2021/2022, and no risk of trespass on the Sites or damage to property by protesters in the foreseeable future, but they did not do so."

18. It may of course be that any leadership or governance that exists within these campaigning movements is limited and that a binding assurance from the centre cannot in fact be given. That in itself would make it difficult to rely upon any announcement that there had been a cessation of the activities at which the injunction is aimed. Equally it continues to be the position that no assurances have been given which leads me to conclude that there remains a real risk of direct action from JSO or XR or those connected with their campaigns.

Service and Provision of Documents

19. I am satisfied that the hearing of this review was properly notified in accordance with paragraph 15 of the Ellenbogen Order. Ms Stebbing's seventh witness statement details the steps taken, including uploading documents to the webpage, placing copies in clear plastic containers at the Sites, and sending emails to relevant addresses for the First, Second, and Third Defendants. In relation to D4 and D5, service was by email, and where delivery failures occurred for D4, extra measures were taken to provide the information by first-class post.

20. Mr Morshead submitted that the provisions at paragraph 15.1 of the present Order were becoming unwieldy to operate in practice because of the accumulation of documentation produced as a result of the further hearings following the grant of relief. He suggested that if the order were to continue then it would be sensible and necessary to remove the requirement for full paper copies of documents to be deposited, other than the orders themselves (as provided for at paragraph 12), in favour of the links already given on the Warning Notices (see further below) which point to the relevant documents online by means of a link to a website. I agree that requiring the Claimants to maintain a growing library of material at the Sites, in ever larger plastic boxes, is unsatisfactory and may well prove unworkable in future. The solution suggested will meet the requirement to serve the material concerned in an effective way. Links to a website may indeed prove to be a more satisfactory arrangement.

Warning Notices

21. Photographic evidence of four Notices being displayed at all Sites was provided by 13 June 2024 for the annual review hearing. However, it was discovered that Avonmouth and Alton only had two Notices each, and Purfleet had a damaged Notice. These deficiencies had been promptly rectified by ordering new Notices on 11 June 2024.

22. While there was a period where some Sites may not have had the full complement of four Notices, the Claimants have explained that this confusion arose from changes to the wording of the Notices following court orders, and that at all times at least two

Notices were present. Furthermore, other methods of notification, such as website publication and email, were consistently used. I accept the Claimants' submission that this oversight did not cause prejudice to any Persons Unknown, given the other notification steps undertaken. I also note that the Claimants now conduct monthly checks to ensure Notices and containers are in place.

Fourth and Fifth Defendants

23. D4 and D5 remain carved out of the injunction due to their earlier undertakings and assurances. D5 has provided a signed copy of a further undertaking, effective until 31 July 2026 or the date of the next review hearing. However, D4 has not yet returned a signed copy of his undertaking, despite continued efforts by the Claimants to contact him, including through letters sent on 24 June 2025 and 3 July 2025. The Claimants propose a pragmatic course which is to allow them liberty to apply to make D4 subject to the injunctions in the absence of receiving further assurances of the same sort as were originally obtained from him, a course which has already been taken in earlier orders in these proceedings. I agree with that proposal.

Harm

24. The potential harm arising from direct action at the Sites remains substantial and, potentially, dangerous. The operations at the Sites involve hazardous substances, regulated under the Control of Major Accident Hazards Regulations 2015. Entry by untrained protesters who lack appropriate protective clothing or equipment poses significant risks to personal injury and health and safety. Moreover, such actions clearly risk disrupting the Claimants' operations and, consequently, the United Kingdom's downstream fuel resilience, impacting contractual obligations to customers essential for maintaining critical services, including road, rail, and air travel.

Discussion

25. I have to consider whether any reasons or grounds for the discharge of the injunction have emerged since the last review. The principal factual development has been JSO's announcement in March 2025 in relation to "hanging up the hi vis". However, as I have outlined above, the evidence shows, in my view, that this announcement cannot be taken as an unequivocal and final renunciation of direct action. The amorphous nature of the group, combined with the past experience of similar unfulfilled statements by XR, and JSO's subsequent communications and activities, mean that it would be premature to rely on this announcement as a basis for amending or discharging the injunction. The risk of direct action by those connected with the JSO campaign remains real and imminent.

26. In relation to legal developments, there have been discussions in recent cases concerning two procedural matters: (a) how "Persons Unknown" ought to be described; and (b) whether orders against them should include a requirement for permission before a contempt application may be brought.

27. As to the description of "Persons Unknown," the Supreme Court in *Wolverhampton* stated at paragraph 221:

> "…Even where the persons sought to be subjected to the injunction are newcomers, the possibility of identifying them as a class by reference to conduct prior to what would be a breach (and, if necessary, by reference to intention) should be explored and adopted if possible."

28. While Nicklin J in *MBR Acres Ltd v Curtin* [2025] EWHC 331 suggested it was "no longer necessary, nor appropriate" to restrain particular categories of defendants for contra mundum injunctions, and Fordham J adopted a similar approach in *University of Cambridge v Persons Unknown* [2025] EWHC 454, I note that Soole J subsequently doubted this position in *University of Cambridge v Persons Unknown* [2025] EWHC 724, reverting to the orthodox approach. I am told that Bourne J at the review hearing of an injunction relating to London City Airports, on 24 June 2025 preferred a more straightforward reading of *Wolverhampton* paragraph 221 and held that this point was procedural, not justifying re-writing orders on review. I find no compelling reason to amend the description of the Defendants in this case when considering it on review save in one respect (see further below). The current description best adheres to the guidance in *Wolverhampton* by identifying a class by reference to conduct notwithstanding the cogent reasons set out by Nicklin J for taking a different course in *MBR*. I do however consider that the prospect of JSO evolving, deliberately, into a differently named campaign essentially involving the same organisation, supporters and protesters is demonstrated on the evidence and requires an adjustment to the description of the Defendants to add "or other environmental campaign" so as not to, potentially, thwart the purpose of the injunction. This course was taken in the City Airport injunction proceedings. Any concern that this may involve a widening of the injunction is tempered by the fact that the description involves conduct that is on its face unlawful and where Convention rights are qualified so that the balancing exercise is heavily in favour of a restraint.

29. As to a requirement for permission before a contempt application may be brought, this measure was adopted in *MBR* and the *University of Cambridge* cases. It is apparent that Nicklin J in *MBR Acres* was significantly influenced by the particular claimants' conduct in that case, which involved trivial and inappropriate contempt applications. However, I observe that the suggestion of a blanket requirement for all newcomer injunctions in protest cases appears to have been made per incuriam given other relevant authorities, such as *AG v Times Newspapers Ltd* [1974] AC 273, *Sectorguard plc v Dienne plc* [2009] EWHC 2693 (Ch), and *PJSC Vseukrainskyi Aktsionernyi Bank v. Maksimov & Ors* [2014] EWHC 4370 (Comm). These cases suggest that the courts already possess adequate mechanisms to address disproportionate committal applications. In the present case, there is no evident need or justification, in my view, to impose a requirement for the Claimants to seek permission before commencing any committal applications. The Supreme Court in *Wolverhampton*, which carefully balanced the interests of landowners and Persons Unknown, did not impose such a requirement. There is no evidence before me that claimants are generally bringing trivial committal applications in cases of this nature. While the specific factual circumstances may have driven the decisions in *MBR Acres* and the *Cambridge* cases, those particular concerns are not present here. Imposing such a permission filter could lead to disproportionate burdens and complexities, potentially requiring multiple hearings and appeals, which would be more stressful for potential defendants and consume significant court resources. It is generally preferable for all matters to be

addressed in one committal hearing unless a specific factual reason necessitates otherwise.

30. I am satisfied that the injunction has been effective to date, as there has been no direct action at the Sites for some years. Indeed, the evidence from JSO itself supports this conclusion, indicating that the existence of injunctions at oil refineries has caused them to target other sites.

31. There remains a proper justification for the continuance of the injunction. A real and imminent risk of direct action at the Sites persists if they were to be left unprotected. This view has been consistently taken by multiple judges in this claim and in other similar claims. The substantial harm, particularly the health and safety risks, to those who are not trained to understand the many hazards at the Sites, underscores the necessity of the injunction. The Defendants have no lawful reason to enter or remain upon these restricted and fenced-off private lands for the purpose of direct action. The evidence has clearly demonstrated that the existence of criminal offences is insufficient to deter the Defendants.

Conclusion

32. I conclude that nothing material has changed since the Ellenbogen Order was made to warrant its discharge or amendment. The evidence demonstrates a continued threat of direct action at the Sites. The injunction has not outlasted its need.

33. It remains necessary for the injunction to continue in its present form subject to the limited amendments referred to above.

END

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Party: *Claimants*
Name: *A Milne*
Number: *First*
Exhibits: *"AM1" – "AM11"*
Date: *3.04.22*

CLAIM NO QB-2022-

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

- and -

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN EDGED RED ON THE ATTACHED 'FAWLEY PLAN')

(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN EDGED RED ON THE ATTACHED 'HYTHE PLAN')

(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')

(D) BIRMINGHAM OIL TERMINAL, TYBURN ROAD, BIRMINGHAM B24 8HJ (AS SHOWN EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')

(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN EDGED RED ON THE ATATCHED 'PURFLEET PLAN')

(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')

(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')

(H) ALTON COMPOUND (AS SHOWN EDGED RED ON THE ATTACHED "ALTON COMPOUND PLAN")

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES

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Defendants

WITNESS STATEMENT

OF

ANTHONY MILNE

I, **ANTHONY MILNE** of Ermyn House, Ermyn Way, Leatherhead, Surrey KT22 8UX WILL SAY as follows:-

1. I am employed by the First Claimant, Esso Petroleum Company, Limited ("**Esso**") as Global Security Advisor.

2. Where the facts contained in this witness statement are within my own knowledge, they are true; where the facts contained in this witness statement are not within my own knowledge I have provided the source of my information and those facts are true to the best of my knowledge and belief.

3. I have read a copy of the witness statement of Stuart Wortley which explains the Claimants' property interests in the Petrochemical Complex, the fuel terminals (at Avonmouth, Birmingham, Hythe, Purfleet and West London), the Hartland Park Logistics Hub and the Alton Compound and I adopt what he says therein.

4. I write this witness statement in support of the Claimants' claim for an injunction to restrain the direct action being committed by the Defendants, in particular following the co-ordinated campaign that took place on 1-3 April 2022.

5. In this witness statement, I explain:-

    5.1 the security measures at the Claimants' sites;

    5.2 some background to Extinction Rebellion ("**XR**"), Just Stop Oil and Youth Climate Swarm;

    5.3 the direct action that took place on 1 -3 April 2022;

    5.4 other indications that direct action will continue to occur at the Claimants' sites;

    5.5 The reasons for seeking an injunction;

    5.6 The urgency of the claim;

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5.7 The balance of convenience;

5.8 Cross-undertaking in damages;

5.9 Persons Unknown; and,

5.10 Alternative service.

6. **The Claimants' Security Measures**

6.1 The Petrochemical Complex and each of the oil Terminals are regulated under Control of Major Accident Hazards Regulations 2015 (COMAH) by the Health and Safety Executive. As one would expect, access to each of these sites is strictly controlled.

6.2 The Fawley refinery itself is classed as tier 1 Critical National Infrastructure (providing around 20% of UK refinery capacity).

6.3 All of the oil Terminals referred to in paragraph 3 of Mr Wortley's Statement and the Petrochemical Complex benefit from:-

- fully licensed security personnel;
- security barriers at the point of vehicular access;
- closed circuit television infrastructure linked to an Access Control system (with on-site monitoring suites); and
- fenced areas where active operations are undertaken.

6.4 The operational area of the Petrochemical Complex is protected by 2 fences (one of which is electrified). The area within this security fence is around 1,174 acres.

6.5 Notwithstanding these security measures, and as demonstrated by the incidents described in more detail below, an individual determined to carry out direct action (or group of such individuals) can gain unlawful access to these sites. In these incidents, members of Extinction Rebellion ("XR") have used bolt cutters to cut through:-

6.5.1 both security fences at the Petrochemical Complex;

6.5.2 the security fence at the First Claimant's compound in Alton; and

6.5.3 the security fences at the West London and Birmingham Terminals.

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7. **Extinction Rebellion, Just Stop Oil and Youth Climate Swarm**

7.1 XR was formed in around 2018. XR is a campaign group which promotes the use of civil disobedience (including obstruction of the highway) with a view to influencing government policy in relation to climate change.

7.2 A copy of XR's 2002 strategy document (as published on XR's website on 27 February 2022) is attached to this statement marked **"AM1"**. I would draw attention to the following paragraphs:-

7.2.1 paragraph 3.5 refers to XR's strategy of challenging the courts and the legal system in England and Wales. It includes links to legal guidance on how to deal with arrest, prosecution and prison sentences and explains the support which XR will provide "rebels" facing prosecution in the criminal courts and contempt of court proceedings in the High Court and other legal resources. It also includes the following:-

> *"Trials scheduled for 2022 include those for actions that targeted the Department of Transport, the Treasury, the Home Office, the Brazilian Embassy, HSBC, Barclays, and Morgan Stanley. We will develop complementary actions, press and support strategies around these trials (with consent), which we will share with the movement once dates are confirmed.*
>
> *…*
>
> ***"Disobey in the Dock**: Contempt of court actions have a place in our Magistrates Court strategy, in the form of livestreams, glue ons and other creative actions. Disobey could also be a refusal to engage at all with the process by ignoring charge notices, failing to appear in court, and refusing to pay court costs or fines. Disobey actions extend the non-cooperation strategy used on the streets (e.g. going floppy); they escalate disruption in the courts; and they provide preparation in the way of short prison sentences for those considering more high-risk actions. We will create a team to provide rebels with action design, messaging, practical and prison support."*

7.2.2 paragraph 3.11 refers to XR's next campaign of mass resistance in April 2022 commencing with a rally in Hyde Park on 9 April 2022. The target for this campaign will be the UK Government and "polluters" and encourages the following action:-

> ***"Overwhelm the state/police through mass resistance** and attrition tactics."*

7.3 In or around January 2022, a new campaign group called "Just Stop Oil" was formed alongside (for activists under the age of 30) "Youth Climate Swarm".

The target of these groups is to end the use of fossil fuels in the UK. Both groups are actively recruiting activists with a view to disrupting the oil industry in March 2022.

7.4 Copies of the pages on the website are attached to this statement marked **"AM2"**.

7.5 The first page of the Just Stop Oil website encourages individuals to provide their name and contact details and to sign up to the following pledge:-

> *"I formally pledge to take part in action which will lead to my arrest, at least once, in late March.*
>
> *In preparation for this action I will join my regional group to which I am allocated, and take part in a 1-day Nonviolence training.*
>
> *I understand the importance of this action in the context of the unimaginable horror that will occur if the climate and ecological crisis is not dealt with.*
>
> *Only a dramatic life event, such as a loss of a close loved one or illness, will prevent me from taking part in this action."*

8. **Direct Action on 1-3 April 2022**

8.1 On 1 April 2022, four of the First Claimant's Terminals (West London, Hythe, Purfleet and Birmingham) were subject to direct action as part of a wider campaign disrupting various oil terminals in the UK. A copy of various press articles outlining the extent of the activity in the UK is attached marked **"AM3".** Both XR and Just Stop Oil claimed involvement in this direct action on social media and their logos / banners were displayed during the incident. The direct action at the impacted Terminals included the following:

Birmingham Terminal

8.2 At around 4:00am, approximately 20 individuals blocked the entrance to the site, blocking vehicular access to the site and preventing the First Claimant's customers from collecting fuel in vehicle tankers from the site. A tanker was stopped at the entrance to the site, two individuals climbed onto the truck and others sat in front of it. A photograph of the activity is attached to this statement marked "**AM4**". One individual also glued themselves to the path outside the terminal. Police attended the site and, around 6 arrests were made. By approximately 5.30pm the Police had dispersed the protest and the site was re-opened to the First Claimant's customers. Those carrying out direct action wore orange jackets, some of which depicted the Just Stop Oil logo.

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West London Terminal

8.3 At around 4:00am, approximately 24 individuals blocked the entrance to the site by attaching barrels to the vehicular entrance gates (to weigh the gates down and prevent them lifting). The First Claimant's customers were prevented from collecting fuel from the site. Various individuals also erected tripods immediately outside the First Claimant's access gate further blocking the access. At approximately 6:45am, 4 individuals cut a hold in the access fence to the site and scaled one of the fuel storage tanks. Those individuals were subsequently arrested (in addition to around 8 other individuals) a few hours later by the Police. By around 3pm, and as a result of the arrests made by the Police, those responsible for the direct action had left the site and it was re-opened to the First Claimant's customers. As a consequence of the trespass activity on the site, the First Claimant initiatied its emergency site procedures, which included the temporary shut-down of the pumping of aviation and ground fuel from the Petrochemical Complex to the Terminal.

Hythe Terminal

8.4 At around 5:00am, 7 individuals blocked the access to the Hythe terminal using the Extinction Rebellion "pink boat". Photographs of the boat blocking the access to the Hythe terminal are exhibited at **"AM5".** The First Claimant's customers were unable to access the site. Police attended the site and at around 11:45am the boat was removed and those responsible for the direct action moved away. The site re-opened to the First Claimant's customers at around 12:45pm.

Purfleet Terminal

8.5 At around 6:30am, 20 individuals blocked the access road to the Purfleet Terminal and prevented the First Claimant's customers from accessing the site. 6 individuals climbed onto a truck delivering additives in a "Samat" vehicle to the site, a photograph of which is exhibited at **"AM6".** The Police attended the site. By 3pm, individuals remained on the truck, but others in attendance at the site had either been arrested or dissipated. The site opened to customers at around 5pm.

2 April 2022

8.6 At around 9.45am on 2 April 2022 approxiamtely 20 protestors blocked the entrance and exit to the Purfleet Terminal by a number of protestors locking themselves onto the access gates and others sitting in the access road. The Police attended the site, removed the protestors and a number of arrests were made. The site opened to customers at around 5.30pm. In addition to the

protest at the First Claimant's site, additional protests were conducted at other terminals in the UK, with the press reporting that around 80 arrests were made by the Police.

3 April 2022

8.7 At around 5am on 3 April 2022 approximately 20 protestors blocked the access to the Birmingham Terminal by sitting in the road. Some of the protestors also climbed onto a Sainsbury's fuel truck. One protestor cut through the security fence to the terminal, scaled one of the fuel storage tanks and displayed a Just Stop Oil banner. Photographs of the of the protest are exhibited at **"AM6a."** As a consequence of the trespass activity on the site, the First Claimant initiatied its emergency site procedures, which included the temporary shut-down of the pumping of ground fuel from the Petrochemical Complex to the Terminal. The Police attended the site, a number of arrests were made and the site re-opened to customers at around 4pm. Additional protests also occurred at other terminals owned by third parties on the same day.

8.8 The impact of the above activity has ceased operations and customer access at 4 of the First Claimant's Terminals and temporarily suspended the pipeline transportation of fuel from the Petrochemical Complex to West London Terminal for safety reasons on 1 April. On 2 April customer access was prevented to the Purfleet Terminal. On 3 April customer access was prevented to the Birmingham Terminal and the pipeline transporation of fuel from the Petrochemical Complex to Birmingham Terminal was temporarily suspended for safety reasons.

9. **Other indications that direct action will continue to occur at the Claimants' sites**

9.1 As well as the direct action that occurred on 1-3 April 2022, the Claimants have good reasons to believe that direct action will continue to be carried out by the Defendants at the Claimants' sites. This belief is based on the following incidents and information.

August 2020 – Ermyn House (Esso's UK Head Office)

9.2 On 28 August 2020, members of XR gathered at Ermyn House.

9.3 Approximately 15 individuals gathered outside the only access gates to the site and attached banners displaying the Extinction Rebellion logo to the gate and posted detail of their activity on social media.

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9.4 After approximately 1 hour they left under threat of arrest from the Police.

August 2021 - Hythe Terminal

9.5 On 19 August 2021, XR organised direct action at the Hythe Terminal.

9.6 A group of around 10 individuals erected 2 tripods on New Road preventing access to and from the terminal (including for fuel trucks) for around 8 hours.

9.7 Although police attended, those carrying out the direct action dissipated before any arrests were made.

9.8 Photographs of this incident and some media coverage of it are attached to this statement marked **"AM7"**.

October 2021 - Petrochemical Complex

9.9 On 28 October 2021, XR organised direct action at the Petrochemical Complex:-

9.9.1 at around 6:30am, a group of around 12 individuals gained access to this site by cutting through two layers of perimeter fencing (one of which was electrified) with bolt cutters and rubber matting;

9.9.2 at around the same time a second group of 3 individuals created a distraction by activating the alarms on the security fencing close to Gate 1;

9.9.3 some of the individuals from the first group climbed to the top of 2 petrol storage tanks and displayed XR banners. Images of this were uploaded to social media and via a live YouTube feed from a drone;

9.9.4 a third group of approximately 15 individuals blocked Gate 2 by standing in front of the gate and blocking the access with the "pink boat" belonging to XR mounted on a trailer. Again images were uploaded to social media;

9.9.5 at around 2:00pm, 6 of the individuals within the security fence left voluntarily;

9.9.6 at around 3:00pm, the other 6 individuals within the security fence left after the Police threatened to arrest them and those outside the front gate dissipated;

9.10 photographs of this incident and some media coverage of it are attached to this statement marked **"AM8"**.

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December 2021 - Alton Compound

9.10 Overnight on 19 December 2021, 4 members of XR cut through the fence at the First Claimant's compound in Alton where plant and equipment (required for the construction of the Southampton to London Pipeline) is stored.

9.11 These individuals caused extensive damage which included attempted destruction of the Perimeter Intrusion Detection security devices, smashing plant machinery windows, mirrors and lights on various vehicles. Those responsible left a poster on one of the vehicles which included the XR logo and stated:-

"WARNING
SABOTAGED !
DO NOT USE"

9.12 Photographs recording this damage are attached to this statement marked **"AM9"**.

February 2022 – Queen Elizabeth Park

9.13 On 2 February 2022, a group of individuals attended the Queen Elizabeth Park (QEP) in Surrey and staged a protest. This is one of the construction sites in relation to the Southampton to London Pipeline Project ("**SLP**"). This action was timed to coincide with the first day of ground clearing works. These individuals displayed XR banners and stood in the access to a car park area where the SLP contractor's vehicles were parked.

9.14 I am informed by Ian Game – in Esso's Security Team – that the SLP contractor suspended works for the day as they were concerned about the safety of their workers.

9.15 An XR spokesperson provided the following comment to the newspaper, Hampshire Live *"Let's stop the Southampton to London Pipeline. More action coming soon!"* XR also adopted the social media campaign slogan "#ResistSLP #StopExxon".

9.16 On 15 February 2022, a group of individuals attended QEP and staged another protest. They displayed XR banners and assembled close to the area where ground clearing works were underway. The police attended the scene. XR Fleet and XR South East UK posted the following comment on social media: *"this action is part of our #XRSouthEast ongoing campaign to #ResistSLP #StopExxon. More to follow."*

9.17 Photographs of these 2 incidents and some media coverage of them are attached to this statement marked **"AM10"**.

February 2022 – Hartland Park Logistics Hub

9.18 I am informed by Ian Game in Esso's security team that:-

9.18.4 on 22 February 2022 an individual visited the Hartland Park Logistics Hub in an Audi A6 car and appeared to be undertaking surveillance;

9.18.5 when challenged by the security team, the individual denied taking photographs and said that he could do whatever he liked;

9.18.6 when told that the police would be informed the individual left;

9.18.7 there had been 3 or 4 similar incidents prior to this one.

9.19 Photographs of the individual involved in the incident on 22 February 2022 are attached to this statement marked **"AM11"**.

Just Stop Oil – Planned Direct Action in March 2022

9.20 I understand from Tristan Lovering in Esso's security team that:-

9.20.1 the Just Stop Oil website originally included a live "counter" which recorded the number of individuals who had signed up to the pledge;

9.20.2 by 3 March 2022, this showed that that 744 individuals had signed up;

9.20.2 on or around 8 March 2022, the live "counter" was removed and so the current number of individuals who have signed up is unknown.

9.21 The Just Stop Oil website also includes the following information:-

> *"In March and April 2022, 100s of people all round the country will be taking action to force the Government to take action against the fossil fuel industry. Hundreds of meetings are happening and the whole thing is taking off"*

and refers to the following phases of activity:-

> *"March onwards:*
>
> *Phase 1: In March 2022 teams will block the oil networks to demand that the government Just Stop Oil. They will block oil refineries, storage units, and adjacent motorways.*
>
> *Phase 2A: Teams will block petrol stations in the South-East. Many people will do sit-ins, sitting on the ground in the forecourt. Others will do tanker-surfing and spray paint filling points.*
>
> *Phase 2B: High stakes resistance against oil."*

9.22 The link below is to a recording of a presentation which Dr Maxey gave to a Just Stop Oil in Falmouth in January 2022:-

Dr Larch Maxey | Civil Resistance in 2022 | Falmouth | Just Stop Oil - Bing video

9.22.1 around 53 minutes into the recording, Dr Maxey explains that Just Stop Oil would be training activists in civil resistance during February 2022;

9.22.2 around 58 minutes into the recording, Dr Maxey explains that Just Stop Oil will be encouraging disruption to the oil economy – using as their example the protests conducted by the haulage industry (against high fuel prices) in September and November 2000;

9.22.3 around 57 minutes into the recording, Dr Maxey explains that Just Stop Oil will be engaging in disruptive activity in March 2022 before handing over to XR which will continue the disruption in April 2022. Specifically he says:-

> *"So we're creating this broad coalition and all we're asking for people to join that coalition is that they - and other organisations - is that they support the commitment to non-violence and training up into that, that they share the same demand of no new licences. That's all we're asking – it's very simple and we've got elements of this coalition, I've just mentioned the youth element. We've got Extinction Rebellion are also going to be causing disruption with a similar focus on the oil industry in April. We're going in late March; they're going in April We're working together. As far as I'm concerned this is all part of the same thing. We're all in this together."*

9.23 I note from the mainstream media that on 14 February 2022, 2 representatives of Just Stop Oil (Louis McKechnie and Hannah Hunt) delivered an "ultimatum" in person to the UK Government stating that unless the UK Government ceases the licensing of oil projects by 14 March 2022, action would commence shortly thereafter.

9.24 Media reports relating to this incident are attached to this statement marked **"AM12"**.

XR – Planned Direct Action in April 2022

9.25 Dr Maxey's statement in the video referred to above that Just Stop Oil will commence its campaign of civil disobedience in March 2022 and that XR will take the campaign forward in April 2022 is consistent with the following page which appears on the XR website:-

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"NEXT UK REBELLION

As our planet passes multiple tipping points and the UK sleepwalks into authoritarianism, what XR does this year affects everything.

With a simple unstoppable rebellion design we will make space for thousands of new people to join us in April and tip the scales once again towards radical change on the climate and ecological emergency.

JOIN THE REBELLION IN LONDON

10AM ON 9TH APRIL @ HYDE PARK

In April, we call on everyone to ***take action and demand an end to the fossil economy****, for the UK Government to immediately stop the harm that is happening right now and end fossil fuel investments. We will facilitate a mass flood of people to grind the capital to a halt, causing maximum material disruption and making meeting the immediate demand politically unavoidable.*

Our disruption will not stop until the fossil fuel economy comes to an end.

THE PLAN

As said in the XR UK 2022 strategy, we will streamline our action plan under a clear united message, inviting everyone to come together under one aligned action plan, rather than having a scattergun approach across several different targets, in order to have the most impact.

Focused Economic Disruption

Laser focused action will take place at a single fossil fuel target – more info to come soon! Standing in solidarity with all people around the world who are defending their lives, land, wildlife and cultures in the face of the crisis, we will cause maximum material disruption and tell the story of the fossil fuelled corruption at the heart of our democracy.

Mass Rebellion in London

Longstanding rebels will step up into mentorship, guiding tactically smart, highly disruptive mass participation action designed to ***disrupt****,* ***engage*** *and* ***recruit*** *new rebels in Central London, with built-in options for level of risk. We'll be easy to find, easy to join, disruptive and impossible to ignore. We will create the most roadblocks we ever have with a new action design.*

A simple, agile, participation design enacted through new and revitalised affinity groups will allow us to stand together in all our diversity as people of all backgrounds and ages; as doctors, nurses, grandparents, students, lawyers. We are the public and we refuse to be bystanders.

Food, Accommodation & Transport

XR UK will provide food, accommodation & transport subsidies for rebels joining us on the streets during Rebellion. However, donations for all are welcomed and will be needed.

> ***Further information***
>
> *Further information on talks and trainings will be coming soon, make sure you are following the Rebellion Broadcast telegram channel.*
>
> ***WHAT NOW?***
>
> *Book time off work from April 9th to 17th and be ready to continue in civil resistance in London on at least the following three weekends:*
>
> - ***Sat/Sun 23rd-24th April***
> - ***Sat/Sun 30th-1st May***
> - ***Sat/Sun 7th-8th May"***

9.26 On 8 March 2022, XR delivered a letter to the Prime Minister demanding that the UK government *"… end to the fossil fuel economy before April, …".*

9.27 The letter also includes the following:-

> *"This is why Extinction Rebellion is returning to the streets on 9 April 2022, with an immediate demand to end the fossil fuel economy. Either you do what the entire scientific community and International Energy Agency is telling us we need to do to save humanity, and stop all new fossil fuel investments immediately, or we are going to do what you refuse to do. We are going to stop the UK oil flow, and bring the country with us."*

9.28 A copy of the XR letter dated 8 March 2022 is attached to this statement marked **"AM13"**.

9.29 On 9 March 2022, XR issued a press release in which they reinforced their message about plans to block major UK oil refineries in April 2022. An article appearing in the Daily Mail dated 9 March reported that:-

> *"[XR] looks set to heap yet more misery on the British public by today announcing plans to block major UK oil refineries and attempt to bring London to a standstill once again"*
>
> *…*
>
> *"From April 9, it will then flood the capital with activists and create the most roadblocks we ever have …"*
>
> *…*
>
> *"[XR] first revealed its plan for protests this April in a press release last year, vowing to mobilise two million protestors to launch what it says will be "the largest act of civil resistance in UK history".*

9.30 A copy of the Daily Mail article dated 9 March 2022 is attached to this statement marked **"AM14"**

10. **The reasons for seeking an Injunction**

10.1 The Claimants recognise the fundamental importance in this country of the basic rights protected by law by the Human Rights Act 1988 – including freedom of speech and freedom of assembly. The Defendants are free to express themselves in many different ways and by taking this action, the Claimants do not seek to stifle criticism or debate. However, in expressing their views it is not necessary for them to trespass on the Claimants' land, prevent normal operations from being conducted at the Claimants sites and / or engage in any unlawful activity.

10.2 After giving careful consideration to the matter, the Claimants have concluded that it is right to apply for an injunction for the following reasons:-

10.2.1 the Claimants' sites are used for the production and storage of highly flammable and otherwise hazardous substances. This is why access is so strictly controlled (and why the Petrochemical Complex has a double security fence). All of the Claimants' employees and contractors understand the hazards which they might encounter - they are trained and, where appropriate, provided with protective clothing and equipment. Those carrying out direct action on the other hand do not understand the hazards, are untrained and unlikely to have any protective clothing or equipment;

10.2.2 the Claimants wish to avoid any repeat of the direct action in August, October and December 2021 (at the Hythe Terminal, the Petrochemical Complex and the Alton compound respectively). Each of those incidents involved unlawful trespass on the First Claimant's property. The incidents in October and December 2021 also involved damage to property;

10.2.3 the First Claimant has important contractual obligations to customers which have to be fulfilled to keep the country moving – including road, rail and air travel;

10.3 the material provided in this witness statement demonstrates that those organising the Just Stop Oil and XR direct action are entirely open about the fact that they:-

10.3.1 intend to replicate the 2000 fuel protests (when the haulage industry set out to bring the country to a standstill);

10.3.2 are specifically threatening (as part of Phase 1 of their activities) to blockade oil refineries and storage units;

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10.3.3 are recruiting activists who are prepared to commit criminal offences (on signing up, individuals must pledge to be willing to be arrested *"at least once"*).

11 Urgency

11.2 The Claimants seek this injunction as a matter of urgency because of the significant consequences that further direct action would entail.

11.3 In particular, any attempt to trespass on the Claimants' sites or otherwise impede access to them with a view to disrupting the Petrochemical Complex or the oil Terminals would result in significant and unacceptable risks of serious:-

11.3.1 personal injury;

11.3.2 disruption to the Claimants' operations and subsequent impact on UK downstream fuel resilience.

11.4 The nature of those risks is substantial:

11.4.1 If the First Claimant is unable to access and fully operate or transport fuels from the refinery at Fawley and the Terminals the implications for the UK economy could be:-

11.4.1.1 Disruption to the production, transportation and storage of refined transport fuels (including road, heating, rail and aviation fuel).

11.4.1.2 Inability to supply wholesale customers which include national supermarkets, major aviation companies at Heathrow and Gatwick airport, Esso branded retail filling stations, other oil companies and rail companies.

11.4.1.3 Supply disruption and risk of local outages at retail filling stations.

11.5 The Second Claimant would be unable to manufacture and transport products from the chemical plant at Fawley, which may also have a consequential impact on refinery operations given the integrated nature of the Petrochemical Complex.

11.6 If the First Claimant is unable to access the Hartland Park Logistics Hub or the Alton Compound, the SLP construction programme could be delayed.

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12 The Balance of Convenience

12.2 In light of the co-ordinated campaign of direct action that took place on 1-3 April 2022, and having regard to what Just Stop Oil and XR themselves have said about their intentions in March and April 2022, each of the Claimants' sites in respect of which an injunction is being sought is an obvious target. It follows, in my respectful submission that:-

12.2.1 without an injunction, there is a genuine risk of activists trespassing on the Claimants' land or otherwise impeding access to it for which there is no effective deterrent. It is telling that no charges have been brought against any of the individuals involved in the incidents which took place in August, October and December 2021 (despite the first incident involving obstruction of the highway and the other 2 incidents involving criminal damage); and

12.2.2 the grant of an injunction to restrain trespass on the Claimants' land or otherwise impede access to it would provide an effective deterrent for activists who might otherwise be contemplating carrying out direct action (given that breach of the Order would carry the risk of imprisonment for contempt of court).

12.3 Damages would not be an adequate remedy because of the significant consequences of the direct action, as set out in section 11 above. For example, it could lead to an inability to supply wholesale customers such as Heathrow and Gatwick airport. Damages would also not be an adequate remedy because the Claimants have no reason to believe that the Defendants would be in a financial position to pay these damages (even if they could be identified).

12.4 Conversely, since the Order which the Claimants seek is only to prevent unlawful activity, there is no question of any of the Defendants suffering any actionable loss or needing compensation in damages.

13 Cross-Undertaking in Damages

13.2 Although I cannot foresee any way in which anyone affected by the injunction could suffer loss or damage, I am authorised on behalf of the Claimants to provide the necessary cross-undertaking to pay any sum which the Court considers appropriate to compensate the Defendants for any loss if it is subsequently determined that the Claimants are not entitled to the Order which they seek.

13.3 I am informed by Stuart Wortley of the Claimants' solicitors that for the year ending 31 December 2020:-

13.3.1 the First Claimant's accounts filed at Companies House show a balance sheet value of £1.779 billion;

13.3.2 the Second Claimant's accounts filed at Companies House show a balance sheet value of £355 million.

14 Persons Unknown

14.2 The Claimants do not know the names of any individuals who intend to trespass on the sites which are the subject of these proceedings. For any injunction to be effective it would need to be granted against each of the classes of Defendant named in the proceedings.

15 Alternative service

15.2 An individual within any one of those classes would only become a defendant to the proceedings if they knowingly breached the injunction. However, to ensure that there is no argument that regular service of the proceedings has occurred I ask the court to order substituted service of the Order and the documents comprising the Claim Form, the Particulars of Claim, Response Pack, the Application Notice dated 3 April 2022, the Witness Statement of Stuart Sherbrooke Wortley dated 3 April 2022, the Witness Statement of Anthony Milne dated 3 April 2022, an Application Notice in respect of the return date hearing (the "**Court Documents**") in the terms set out in the draft Order, pursuant to CPR 6.15 and 6.27.

15.3 As the Claimants have not been able to identify any individuals, they are unable to serve the claim documents and injunction on them in the usual way.

15.4 As such, the Claimants propose to serve the Court Documents and Order as follows:

15.4.1 fixing copies in clear transparent sealed envelopes at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states that copies of the Order and the Court documents may be (a) obtained from the Claimants' solicitors, Eversheds Sutherland (International) LLP, One Wood Street, London, EC2V 7WS (Ref: Stuart Wortley tel: 020 7919 0969) email: exxonmobil.service@eversheds-sutherland.com and (b) viewed at the website referred to below;

15.4.2 uploading a complete copy of the Order and Court Documents to the following website:

https://www.exxonmobil.co.uk/Company/Overview/UK-operations

15.4.3 fixing copies of large warning notices around the perimeter of each of the Claimants' sites explaining:-

- the existence and nature of the Order;
- the existence of the proceedings;
- the potential consequences of breaching the Order;
- the address at which copies of the proceedings can be obtained; and
- details of the website at which the injunction can be viewed.

15.4.4 sending an email to each of the following email addresses with the information that copies of the Order and the Court documents may be viewed at the website referred to in Paragraph 15.3.2 above:

(a) xr-legal@riseup.net

(b) juststopoil@protonmail.co.uk

15.5 I attach to this statement a suggested form of warning notice marked **"AM15"**.

15.6 I believe that alternative service by these methods can reasonably be expected to bring the proceedings to the attention of the Defendants for the following reasons:

15.6.1 The warning notices will be prominently displayed such that the Defendants will be in close proximity to them in order to carry out the direct action. Any individual who attempts to carry out direct action in the manner prohibited by the injunction will, therefore, be very likely to see those notices and be alerted to where they can access the documents.

15.6.2 XR and Just Stop Oil should draw the attention of their membership to the injunction.

I believe that the facts stated in this Witness Statement and Exhibits are true.

I understand that proceedings for contempt of court may be brought against anyone 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.

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I am duly authorised to make this statement on behalf of the Claimants.

DocuSigned by:
Anthony Milne
515934DBE47C4A2...

Anthony Milne

3 April 2022

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Party: Claimants
Name: S Wortley
Number: First
Exhibits: "SSW1" – "SSW9"
Date: 04.04.22

CLAIM NO QB-2022-
001098

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

- and -

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN EDGED RED AND GREEN ON THE ATTACHED 'FAWLEY PLAN')

(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN EDGED RED ON THE ATTACHED 'HYTHE PLAN')

(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')

(D) BIRMINGHAM OIL TERMINAL, TYBURN ROAD, BIRMINGHAM B24 8HJ (AS SHOWN EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')

(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN EDGED RED AND GREEN ON THE ATATCHED 'PURFLEET PLAN')

(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')

(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')

(H) ALTON COMPOUND, PUMPING STATION, A31, HOLYBOURNE (AS SHOWN EDGED RED ON THE ATTACHED "ALTON COMPOUND PLAN"

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES

Defendants

DRAFT

WITNESS STATEMENT

OF

STUART SHERBROOKE WORTLEY

I, STUART SHERBROOKE WORTLEY of One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a partner of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants.

2. The facts contained in this witness statement are within my own knowledge and are true to the best of my knowledge information and belief. The information I have provided concerning the Claimants' property interests is based on:-

   2.1 my consideration of the registered titles at HM Land Registry;

   2.2 copies of leases provided to me by the First Claimant; and

   2.3 the attached documents entitled *"Esso Wholesale Fuels"* and *"ExxonMobil in the UK – Factsheet"* which are now produced to me marked **"SSW1"**.

3. I make this witness statement in support of the Claimants' application for an injunction to restrain the Defendants from trespassing at the following properties:-

   3.1 the Esso oil refinery and chemical plant at Fawley on Southampton Water (the "Petrochemical Complex");

   3.2 the Esso fuel terminals at:-

      (a) Avonmouth near Bristol;

      (b) Birmingham;

      (c) Hythe near Southampton;

      (d) Purfleet, London;

      (e) West London; and

   3.3 2 Esso facilities which serve the Southampton to London Pipeline which is currently under construction namely the Hartland Park Logistics Hub and the

DRAFT

Alton Compound both of which serve the Southampton to London Pipeline which is currently under construction.

4. In respect of each of the sites referred to in paragraph 3, my firm has produced a plan which shows the extent of the First Claimants' property ownership.

Petrochemical Complex and Hythe Terminal

5 The "Esso Wholesale Fuels" document at **"SSW1"** records that the oil refinery at Fawley:-

5.1 is the largest in the UK processing around 270,000 barrels of crude oil every day;

5.2 handles around 2,000 ship movements every year;

5.3 processes around 22 million tonnes of crude oil and other products every year;

5.4 can supply approximately 50 tonnes of liquid propane gas (LPG) per hour to customers through loading facilities at the site.

6 The "ExxonMobil in the UK factsheet" at **"SSW1"** records that:-

6.1 the oil refinery at Fawley is the largest in the UK providing around 20% of the UK's refining capacity;

6.2 the chemical plant:-

9.2.1 is highly integrated with the refinery and produces around 670,000 tons of petrochemicals annually;

9.2.2 produces high value solvents, plasticisers, synthetic rubber and feedstock for alcohols and esters – key components of a multitude of finished products manufactured in the UK or elsewhere in Europe.

7 The Esso Wholesale Fuels document records that Hythe Terminal is located close to the Petrochemical Complex. It has 12 storage tanks in service with a capacity of 12,000m^3 and is operational 24 hours a day 7 days a week throughout the year.

8 The Petrochemical Complex and the Hythe Terminal are constructed on the same freehold title which is registered at HM Land Registry with title number HP528736.

9 The jetty which projects over the foreshore is not included in this freehold title. The First Claimant holds 4 leases of the jetty from Her Majesty the Queen each expiring in 2049. These leasehold interest is registered at HM Land Registry with title number HP528740.

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10 The Second Claimant holds a lease of the chemical plant from the First Claimant. This lease was granted on 28 August 1975 for a term of 99 years from 1 January 1971. The lease is unregistered (compulsory first registration for the New Forest District of Hampshire being 1 February 1978).

11 Attached to this statement marked **"SSW2"** are the following documents:-

11.1 the First Claimant's freehold title – HP528736 (excluding title plan which runs to 19 pages);

11.2 the First Claimant's leasehold title – HP528740;

11.3 the Second Claimant's lease dated 28 August 1975;

11.4 a plan which has been prepared by my firm using software known as Orbital Witness which shows:-

11.4.1 the First Claimant's freehold title edged red;

11.4.2 the First Claimant's leasehold title edged green;

11.4.3 the Second Claimant's leasehold land edged purple;

11.4.4 the land and buildings which are the subject of leases to third parties edged blue; and

11.5 an Orbital Witness plan which shows the Hythe Terminal;

11.6 a satellite image of the Petrochemical Complex on which the location of the 2 main gates have been marked with a "X".

11.7 a satellite image of the Hythe Terminal on which the location of the main gate has been marked with a "X".

12 Since the First Claimant granted the lease of the chemical plant to the Second Claimant in 1975, there have been a number of surrenders / grants. I am informed by James Taylor of the Claimants' legal department that the plan referred to at paragraph 11.4 above accurately represents the current position.

Avonmouth Terminal

13 The Avonmouth Terminal is located on the east bank of the Severn Estuary near Bristol.

14 The Esso Wholesale Fuels document records that this terminal:-

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14.1 can receive fuels by pipeline from the Fawley refinery and from ships discharging in the Bristol Port Company oil basin;

14.2 has 17 tanks in service with a combined capacity of approximately 50,000m^3

14.3 is operational 24 hours a day 7 days a week throughout the year save for Christmas Day.

15 The First Claimant holds a lease of the Avonmouth Terminal from First Corporate Shipping Limited which is registered at HM Land Registry with title number BL105954.

16 Although the lease expired on 1 January 2022, I am informed by Mr Taylor that:-

16.1 the First Claimant remains in occupation and therefore has a continuation tenancy pursuant to the Landlord and Tenant Act;

16.2 a renewal lease has been agreed and will be completed shortly.

17 Attached to this statement marked **"SSW3"** are the following documents

17.1 the First Claimant's leasehold title and title plan BL105954;

17.2 a copy of the lease dated 22 January 2008;

17.3 an Orbital Witness plan showing the First Claimant's leasehold title;

17.4 a satellite image of the terminal on which the location of the main gate has been marked with a "X".

Birmingham Terminal

18 The Birmingham Terminal is located on Wood Lane in Erdington in the north east of Birmingham.

19 The Esso Wholesale Fuels document records that this terminal:-

19.1 has 17 tanks in service with a combined capacity of approximately 50,000m^3;

19.2 is operational 24 hours a day 7 days a week throughout the year.

20 The First Claimant owns the freehold of the Birmingham Terminal including 2 registered titles – namely WK118802 and WK66930 which are shown on the Birmingham Plan attached the Particulars of Claim.

21 A significant part of this terminal is unregistered freehold land. The boundaries of this Terminal are shown on the UK Factsheet at exhibit **"SSW1"**. I am informed by

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Paul Masson, the Claimants' Midstream Operations Support Manager that the unregistered land at the Birmingham Terminal has been used by the First Claimant (and affiliate companies) since the 1960s. Attached to this statement at exhibit **"SSW4"** are a number of photographs of the boundaries of this site and a plan which shows the approximate position from which (and direction in which) each photograph was taken.

22 Attached to this statement marked **"SSW4"** are the following documents:-

22.1 the First Claimant's freehold titles and title plans;

22.2 an Orbital Witness plan showing the First Claimant's freehold titles edged red and the unregistered freehold land referred to above edged brown;

22.3 a second Orbital Witness plan (marked "Birmingham Plan B") which omits the unregistered freehold land referred to above; and

22.4 a satellite image of the terminal on which the location of the main gate has been marked with a "X".

Purfleet Terminal

23 The Purfleet Terminal is located on the river Thames east of London.

24 The Esso Wholesale Fuels document records that this terminal:-

24.1 can receive fuels by pipeline from the Fawley refinery and from ships at its own jetty ("the Purfleet Jetty");

24.2 has 13 tanks in service with a capacity of approximately 86,000m^3; and

25.3 is operational 24 hours a day, 7 days a week throughout the year.

25 The First Claimant owns the freehold of the Purfleet Terminal in 2 freehold titles namely EX869151 and EX869958.

26 During 2021, the First Claimant sold part of title number EX869958 to Purfleet Real Estate Limited. This transfer has not yet been registered at HM Land Registry.

27 I am informed by Mr Taylor that:-

27.1 the Purfleet Jetty has exclusively served this terminal for around 100 years;

27.2 title to the Purfleet Jetty is unregistered; and

27.3 the First Claimant has no record of any lease of the Purfleet Jetty.

DRAFT

28 Attached to this statement marked **"SSW5"** are the following documents:-

28.1 the First Claimant's freehold titles and title plans;

28.2 a copy of the transfer of part referred to above;

28.3 an Orbital Witness plan showing the First Claimant's freehold titles (excluding the land which has been sold) edged red and the Purfleet Jetty edged brown);

28.4 a second Orbital Witness plan (marked "Purfleet Plan B") which omits the unregistered land;

28.5 a satellite image of the terminal on which the location of the main gate has been marked with a "X";

28.6 photographs which demonstrate that the Purfleet Jetty exclusively serves the Purfleet Terminal and the high level of security which is attached to it.

West London Terminal

29 The West London Terminal is located close to the perimeter of Heathrow airport.

30 The Esso Wholesale Fuels document records that in this terminal:-

30.1 has 17 tanks in service with a capacity of approximately 100,000m^3;

30.2 in addition to ground fuels also supplies Jet Fuel (to Heathrow and Gatwick Airports);

30.3 is operational 24 hours a day 7 days a week throughout the year.

31 The First Claimant owns the freehold of the West London Terminal in 5 freehold titles namely MX232530, MX442259, MX440505, MX219704 and SY346160.

32 Attached to this statement marked **"SSW6"** are the following documents:-

32.1 the First Claimant's freehold titles;

32.2 an Orbital Witness plan showing the First Claimant's freehold titles;

32.3 a satellite image of the terminal on which the location of the main gate has been marked with a "X".

Hartland Park Logistics Hub

33 I am informed by Anthony Milne of Esso that:-

DRAFT

33.1 the First Defendant is currently constructing a replacement fuel pipeline between The Petrochemical Complex and the West London Terminal known as the Southampton to London Pipeline "SLP");

33.2 to support the SLP construction, the First Defendant has also taken a lease of around 5 acres of land at Hartland Park near Farnborough, Hampshire as a temporary logistics hub ("the Hartland Park Logistics Hub").

34 the Hartland Park Logistics Hub includes project offices, welfare facilities and car parking for staff and contractors together with storage of construction plant materials, machinery and equipment. Approximately 150 employees and contractors use the Hartland Park Logistics Hub site each day.

35 On 2 September 2021, SHE Manager Limited and SHE Nominee Limited granted a lease of the Hartland Park Logistics Hub to the First Claimant for a term commencing on 6 September 2021 and expiring on 30 September 2024.

36 Attached to this statement marked **"SSW7"** are the following documents:-

36.1 the First Claimant's lease dated 6 September 2021;

36.2 an Orbital Witness plan showing the First Claimant's leasehold land;

36.3 a satellite image of the compound.

Alton Compound

37 The First Claimant also has a compound at Alton in Hampshire which is used in connection with the construction of the SLP ("the Alton Compound").

38 The First Claimant owns the freehold of the Alton Compound in title number SH30798.

39 Attached to this statement marked **"SSW8"** are the following documents:-

39.1 the First Claimant's freehold title;

39.2 an Orbital Witness plan showing the First Claimant's leasehold land; and

39.3 a satellite image of the compound on which the location of the main gate has been marked with a "X".

4 April 2022

40 I have assisted Anthony Milne with the preparation of his witness statement dated 3 April 2022.

DRAFT

41 I am informed by Mr Masson that there were further demonstrations at the West London Terminal today. A group of around 20 protestors arrived at the West London Terminal at around 4.30 am. A number of photographs of this incident showing a structure which obstructs access to / egress from the West London Terminal are attached to this statement at the exhibit marked **"SSW9"**.

I believe that the facts stated in this Witness Statement and Exhibits are true.

I understand that proceedings for contempt of court may be brought against anyone 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 am duly authorised to make this statement on behalf of the Claimants.



Stuart Sherbrooke Wortley

4 April 2022

DRAFT

Party: *Claimants*
Name: *N Allybokus*
Number: *Third*
Exhibits: *"NA3"*
Date: *22.04.22*

CLAIM NO QB-2022-001098

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

- and -

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN EDGED RED ON THE ATTACHED 'FAWLEY PLAN')

(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN EDGED RED ON THE ATTACHED 'HYTHE PLAN')

(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')

(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')

(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN EDGED RED ON THE ATATCHED 'PURFLEET PLAN')

(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')

(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH […] (AS SHOWN EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')

(H) ALTON COMPOUND, PUMPING STATION, A31, HOLYBOURNE (AS SHOWN EDGED RED ON THE ATTACHED "ALTON COMPOUND PLAN"

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES

Defendants

THIRD WITNESS STATEMENT

OF

NAWAAZ ALLYBOKUS

I, NAWAAZ ALLYBOKUS of One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a Solicitor employed by Eversheds Sutherland (International) LLP ("**Eversheds**"), the Claimants' solicitors in these proceedings.

2. Where the facts contained in this witness statement are within my own knowledge they are true; where the facts contained in this witness statement are not within my own knowledge, they are true to the best of my knowledge and belief and I have provided the source of my information.

3. I make this witness statement in support of the Claimants' application to continue the injunction which restrains the Defendants from trespassing or causing nuisance at the Sites (as defined in the Particulars of Claim).

4. Attached to this witness statement marked NA3 is an exhibit of true copy documents. Numbers appearing after "**NA3/**" within this witness statement refer to pages within this exhibit.

Service of the Proceedings and the Order by Alternative Means

5. In order to comply with paragraph 9 of the Order dated 6 April 2022 ("**the Order**") service of the documents listed in the Schedule at **NA3/1** ("the Documents") were effected as follows:-

   a. I am informed by Richard Scrase, an employee of the Claimants, that on Wednesday 6 April he uploaded the Documents to the following webpage ("the Webpage"):-
   https:/www.exxonmobil.co.uk/Company/Overview/UK-operations

   b. on Wednesday 6 April 2022 I sent emails to:-
   enquiries@extinctionrebellion.uk
   xr-legal@riseup.net
   juststopoil@protonmail.co.uk

   explaining that copies of the Documents may be viewed on the Webpage; and

   c. The Claimants have confirmed to me, that by no later than Friday 8 April 2022 representatives of the Claimants had:-
      i. placed the Documents in clear plastic containers at each of the Sites; and
      ii. fixed a minimum of four warning notices (in the form attached to the Order) around the perimeter of each of the Sites.

6. Certificates of Service were completed and I am informed by Steve Martin, a court clerk at Eversheds, that these were lodged at Court on 11 April 2022. Copies of these certificates are produced at **NA3/2-57**.

7. On Thursday 7 April 2022, I received an email from Alice Hardy, a partner at Hodge Jones & Allen Solicitors. A letter attached to the email explained that Hodge Jones & Allen act for Jessica Branch, who is "associated" with Extinction Rebellion but who has not participated in any of the protests at the Sites and requested copies of various documents.

8. On Monday 11 April 2022, Stuart Wortley, a partner at Eversheds replied explaining that:-
   a. all of the documents on which the Claimants relied on at the hearing on 5 April 2022 had been uploaded to the Webpage;

   b. Eversheds would forward a copy of a transcript of the hearing on 5 and 6 April 2022 to Ms Hardy once received. This transcript has not yet been received.

9. A copy of this exchange is produced at **NA3/58-60.**

Correction of Just Stop Oil email address

10. On Sunday 10 April 2022, I received an "email delivery failure" notification indicating that the email addressed to Just Stop Oil (juststopoil@protonmail.co.uk) could not be delivered and the problem "appears to be – Recipient server unavailable or busy".

11. On Wednesday 13 April 2022, it was then brought to my attention that the email address included in the Order for sending the Documents to Just Stop Oil (juststopoil@protonmail.co.uk) might have been incorrect. This address was provided by a colleague at Eversheds but I have not yet been able to verify the origin of this.

12. The email address included on the Just Stop Oil website is juststopoilpress@protonmail.com. On 13 April 2022, I therefore sent copies of the Documents to this email address by email - a copy of this is produced at **NA3/61**.

Provision of Skeleton Argument

13. On Thursday 14 April 2022, copies of the Skeleton Argument relied upon by the Claimants at the hearing on 5 and 6 April 2022 were provided as follows:-

a. hard copies were placed in the clear plastic containers referred to at paragraph 5(c)(i) above;

b. a digital copy was uploaded to the Webpage;

c. digital copies were sent by email to:-

xr-legal@riseup.net
enquiries@extinctionrebellion.uk
juststopoilpress@protonmail.com

d. a digital copy was sent by email to Ms Hardy.

Birmingham Terminal – postal address

14. The postal address for Birmingham Terminal in the Claim Form (and subsequent court papers) is "Birmingham Oil Terminal, Tyburn Road, Birmingham B24 8HJ".

15. The correct address is "Birmingham Oil Terminal, Wood Lane, Birmingham B24 8DN".

16. Wood Lane appears to be a road which comes off Tyburn Road, and may have been inadvertently been used.

Birmingham Terminal – application for first registration

17. The Claimants have confirmed to me that an application to register the land which was conveyed to the First Claimant on 31 December 1957 (see paragraphs 4-8 of my Second Witness Statement) was submitted to the Land Registry on Thursday 21 April 2022.

18. A copy of the covering letter from the Claimants' solicitors, Messrs BDB Pitmans, dated 21 April 2022 to the Land Registry and the first registration application form is produced at **NA3/62-71**.

Claimant's email address

19. On or around 6 April 2022, Eversheds set up the following email address to enable anyone affected by the Order to correspond with the Claimants in connection with these proceedings:-
exxonmobil.service@eversheds-sutherland.com

20. At the time of making this witness statement no email messages have been received at this address.

Update of Just Stop Oil / Extinction Rebellion Direct Action

21. I have produced at **NA3/74-79** a media article which reports:-

a. as of 5 April 2022, 200 individuals have been arrested in Essex in relation to the direct actions on behalf of the Just Stop Oil movement;

b. a number of individuals have been hiding in underground tunnels in Essex next to an oil refinery in an attempt to stop the flow of oil traffic;

c. a further 20 individuals were arrested following direct action in Grays; and

d. a further 17 individuals were arrested on 4 April on suspicion of conspiracy to commit criminal damage.

22. Anthony Milne, an employee of the Claimants has confirmed: -

a. On 4 April 2022, fifteen individuals attended the West London Terminal. Two of these individuals climbed on top of tensegrity structures, which were set up on top of concrete blocks, in an attempt to block the entrance to the terminal.

b. On 6 April 2022:-

i. at 6:45am, a group of individuals blocked the Stonehouse roundabout (shown highlighted yellow on the plan at **NA3/72**) by jumping on a truck to stop traffic and gluing themselves to the road. This roundabout is the main entry / exit route for HVGs between the Purfleet Terminal and the M25 and London; and

ii. at around 3:23pm, a group of individuals blocked a roundabout (shown highlighted yellow on the plan at **NA3/73**) near the West London Terminal by jumping on trucks to stop traffic. This roundabout is the main entry / exit route for HVGs for the West London Terminal;

c. On 8 April 2022:-

i. around 10 individuals from Extinction Rebellion Trade Unionists joined with Unite and held an official picket. The individuals involved protested on the pavement/verge near the Fawley Refinery; and

ii. at around 8:00am, around 30 individuals blocked a key entry / exit route (known as London Road) between the Purfleet Terminal and the M25/East London.

d. On 13 April 2022, around 8 individuals blocked an access road near the Purfleet Terminal and 3 individuals climbed on top of a tanker. Tanker traffic was constrained as the alternative route were congested.

23. On 7 April 2022:-

a. an individual tied himself up to an oil depot; and

b. 25 individuals (identified as members of the Just Stop Oil group) were arrested following the direct action at Kingsbury oil terminal in Warwickshire

A copy of the media coverage of these incidents is at **NA3/80-86**.

24. On 15 April 2022, 12 individuals were arrested after blocking access to Kingsbury Oil Terminal, Navigator Terminal and Grays Oil Terminal. A copy of the media coverage of these incidents is at **NA3/87-90**.

25. On 18 April 2022, The Guardian produced an article stating:-

> " *Just Stop Oil said there had been nearly 1,000 arrests in connection with the campaign so far*"

This demonstrate the magnitude of the waves of direct action taking place and the number of individuals participating in those direct actions, which commenced in March / April this year. A copy of the media article from The Guardian is produced at **NA3/91-93**.

26. On 19 April 2022, Just Stop Oil announced that it had paused its campaign of the direct action until 25 April 2022 and provided the government an ultimatum to stop using fossil fuel.

27. In its letter of 19 April 2022 to the Government, Just Stop Oil stated:-

> *"The Just Stop Oil coalition has taken the decision to suspend activities until 25th April, to give you the opportunity to make a statement on behalf of the Government that it will immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK.*
>
> *If you do not fulfil your duty to the people we will be left with no choice but to escalate our campaign of civil resistance.*

We will not be bystanders."

28. A copy of this letter from the Just Stop Oil website is produced at **NA3/94-96**.

29. It is clear on close reading of the letter to the Government that there remains a threat of further action by Just Stop Oil.

Extinction Rebellion

30. Extinction Rebellion strategy for 2022 / 2023 is documented in a document labelled "XRUK Strategy 2022", accessible via their website:

> "*This strategy lays out the blueprint for how we will begin to achieve this vision as a movement over the course of 2022 and beyond*…
>
> *Local group actions are an essential part of every rebel's journey and a good way to retain and grow your group's membership. That's why there needs to be regular actions happening! This strategy invites local mobilisation actions from January - March, in the run-up to Mass Resistance in April and May - August in the run-up to September's Mass resistance and thereafter.*

31. The XRUK Strategy 2022 also contains a traffic light diary which illustrates a threat of further action throughout 2022 and up to April 2023.

32. A copy of the full XRUK Strategy 2022 is produced at **NA3/97-143** (the traffic light diary being at **NA3/133-134**.)

Just Stop Oil

33. The Just Stop Oil website states:-

> "*The new campaign JUST STOP OIL will mobilise 1000+ people from all walks of life to oppose the plans for new UK Oil fields during 2022…*
>
> *We are growing a movement, holding 20-30 public meetings per week, online and in person, across the UK*"

34. This indicates that Just Stop Oil continues to recruit individuals to participate in direct actions and that they intend to do so throughout 2022.

35. A full copy of the extract from the website is at NAS

I believe that the facts stated in this Witness Statement and Exhibit are true.

I understand that proceedings for contempt of court may be brought against anyone 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 am duly authorised to make this statement on behalf of the Claimants.



Signed: ……..

Nawaaz Allybokus

Associate Solicitor

Eversheds Sutherland (International) LLP

Party: *Claimants*
Name: *M Pullman*
Number: *First*
Exhibits: *"MP1" – "MP2"*
Date: *27.02.23*

CLAIM NO QB-2022-001098

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

- and -

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN EDGED RED ON THE ATTACHED 'FAWLEY PLAN')

(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN EDGED RED ON THE ATTACHED 'HYTHE PLAN')

(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')

(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')

(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN EDGED RED ON THE ATATCHED 'PURFLEET PLAN')

(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')

(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')

(H) ALTON COMPOUND (AS SHOWN EDGED RED ON THE ATTACHED "ALTON COMPOUND PLAN")

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES

Defendants

WITNESS STATEMENT

OF

MARTIN PULLMAN

I, **MARTIN PULLMAN** of Ermyn House, Ermyn Way, Leatherhead, Surrey KT22 8UX WILL SAY as follows:-

1. I am employed by the First Claimant as the European Midstream Manager. My responsibilities include the operational oversight of Esso's UK terminals.

2. I have read the Witness Statements of Anthony Milne (the Claimants' Global Security Adviser) dated 3 April 2022 and of Stuart Wortley (a partner with Eversheds Sutherland, the Claimants' solicitors) dated 4 April 2022.

3. Where the facts contained in this witness statement are within my own knowledge, they are true; where the facts contained in this witness statement are not within my own knowledge I have provided the source of my information and those facts are true to the best of my knowledge and belief.

BACKGROUND

4. Paragraph 8 of Anthony Milne's Witness Statement records incidents involving direct action by protestors opposed to the oil and gas industry including those at the First Claimant's oil terminal at Birmingham in April 2022.

5. The Claimant knows of the following individuals who have been convicted of aggravated trespass following direct action at the Birmingham terminal. In February 2023, each of them was given a conditional discharge for 12 months and ordered to pay prosecution costs. The names and home addresses below were provided to the First Claimant by West Midlands Police:-

   5.1 Paul Barnes of [redacted]

   5.2 Paul Fawkesley of 12 Lakeland Close, Liverpool, L1 5HY;

   5.3 Diana Hekt of [redacted]

   5.4 Oliver CLEGG of Whitworth Park Student Housing, Grove House, Oxford Road, Manchester M13 9NG;

5.5 Alan Woods of 14 Greenslate Road, Billinge, Wigan, Greater Manchester, WN5 7BG.

6. Paragraphs 9.1 to 9.19 of Mr Milne's Witness Statement record a number of other incidents in which the First Claimant's premises were targeted by anti-fossil fuel protestors.

7. Paragraphs 9.20 to 9.30 of Mr Milne's Witness Statement record the threats of direct action against the oil and gas industry which XR and JSO were making at that time.

8. The incidents and threats referred to in paragraphs 8 and 9 of Mr Milne's Witness Statement prompted the Claimants to commence these proceedings for an injunction to restrain protestors from engaging in unlawful conduct at the Sites.

9. On 7 April 2022, Mrs Justice Ellenbogen granted an interim injunction to restrain the Defendants from trespassing and / or causing a nuisance at the Sites.

10. On 27 April 2022, Mr Justice Bennathan extended this injunction until 27 April 2023.

11. I make this Witness Statement in support of the Claimants' application:-

11.1 to continue the injunction beyond 27 April 2023;

11.2 to join in the individuals named in paragraph 5 above as named Defendants to these proceedings.

OTHER INJUNCTIONS TO RESTRAIN PROTESTORS GRANTED IN 2022 / 2023

12. The Claimants were not alone in seeking injunctions to restrain the unlawful conduct of protestors opposed to the oil and gas industry.

13. I am informed by Stuart Wortley that each of the companies referred to in the first column of table below successfully applied for injunctions in similar terms to the one sought by the Claimants in these proceedings:-

Claimants	**Premises**	**Action No**	**Duration**
Shell International Petroleum Company Limited	Shell Centre Tower	QB-2022-001259	12 months expiring 22 April 2023
Navigator Terminals Thames BV Limited and others	Oil terminals at West Thurrock, Teeside and Penarth	QB-2022-001139	12 months expiring 27 April 2023
Shell UK Limited	Shell Haven Site	QB-2022-001241	12 months expiring 27 April 2023
Shell UK Oil Products Limited	Petrol filling stations	QB-2022-001420	12 months expiring 12 May 2023
Essar Oil (UK) Limited and others	Oil terminals at Stanlow, Ellesmere Port, Tranmere,	PT-2022-000326	12 months expiring 11 May 2023

	Birkenhead and Northampton		
Valero Energy Limited and others	Pembroke refinery and oil terminals at Manchester, Kinsbury, Plymouth, Cardiff, Pembrokeshire and Avonmouth	QB-2022-000904	Extended in January 2023 for 12 months and 3 weeks expiring 8 February 2024
Exolum Pipeline Systems Limited and others	Oil terminals at Grays, Bramhall, Seal Sands, Misterton, Hallen, Thetford and Saffron Walden	QB-2022-001142	Extended in January 2023 subject to a further review in February 2024

14. I am further informed by Stuart Wortley that:-

14.1 in August 2022, the First Claimant applied for an interim injunction to restrain interference with the construction of a pipeline (for the supply of aviation fuel to Heathrow Airport) between the First Claimant's oil refinery at Fawley and its West London terminal;

14.2 the action number for that action is QB-2022-002577;

14.3 on 16 August 2022, Mr Justice Eyre granted an interim injunction in that action;

14.4 on 21 October 2022, HHJ Lickley KC extended this injunction and gave directions for trial;

14.5 the trial was listed before Mr Justice Julian Knowles on 13 February 2023;

14.6 the trial was not contested; and

14.7 on 13 February 2023, Mr Justice Julian Knowles reserved judgment and further extended the injunction pending judgment being handed down.

15. The action referred to in the previous paragraph was prompted by a protest conducted by Scott Breen and others on land in Surrey close to the point at which the pipeline would pass below the M25. Mr Breen dug (and subsequently occupied) a pit on this land with the objective of obstructing specialist contruction equipment and delaying the project. Mr Breen's failure to leave this protest site in breach of the order of Mr Justice Eyre resulted in his committal for contempt of court and his imprisonment for 112 days (of which he served half) following a hearing before Mr Justice Ritchie in September 2022. Mr Breen unsuccessfully appealed against that sanction to the Court of Appeal (although a separate fine of £1,500 was cancelled).

16. I am further informed by Stuart Wortley that National Highways Limited (which has responsibility for the strategic road network in England and Wales) and 3 local

authorities sought injunctions to restrain protestors opposed to the oil and gas industry from obstructing motorways and roads in the vicinity of oil terminals (including a number of terminals referred to in paragraph 13):-

Claimants	**Motorways / Roads / Property**	**Action No**	**Duration of current Injunction**
North Warwickshire County Council	Kinsbury Oil Terminal	KB-2022-001236	Until further order
National Highways	M25, M25 feeder roads and Kent road	KB-2021-003576 KB-2021-003626 KB-2021-003737	12 months expiring 9 May 2023
Thurock Council Essex County Council	Roads in the vicinity of Navigator Terminals Thurrock terminal; Esso's Purfleet terminal; Exoleum's Grays terminal; and Oikos' Canvey Island terminal	KB-2022-001317	Until further order with provision for Claimants to inform the Court within 28 days of the Supreme Court judgment in Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors (UKSC/2022/0046)
National Highways	Activities involving gantries and other structures over, under or adjacent to the M25 Motorway	KB-2022-004333	12 months expiring 15 November 2023

EVIDENCE SUPPORTING THE VALERO INJUNCTION

17. In March / April 2022, the Kingsbury Terminal in Staffordshire (operated by Valero Energy Limited) was the subject of perhaps the most aggressive form of direct action by anti-fossil fuel protestors last year. This prompted Valero Energy Limited (and 2 group companies) to apply for an injunction to restrain unlawful behavious at its Pembroke refinery and its oil terminals (see the table at paragraph 13).

18. I am informed by Stuart Wortley that:-

    18.1 the evidence relied upon by the Claimants in the Valero case included a Witness Statement from Benjamin Smith (Assistant Chief Constable for Warwickshire Police) dated 10 April 2022;

    18.2 Mr Smith's Witness Statement refers to serious incidents involving obstruction of access to and from the Kingsbury Terminal (using a variety of tactics including individuals climbing on to the top of oil tankers, gluing themselves to road surfaces and using "lock-on" devices);

    18.3 Mr Smith's Witness Statement refers to more than 500 arrests having been made between 31 March and 10 April 2022:-

Date	Arrests
31 March – 1 April	42
2 April – 3 April	68
5 April	88
7 April	127
9 – 10 April	180

18.4 Mr Smith's Witness Statement includes the following text below a heading **"Police Operation"**:-

> *"The scale and duration of the policing operation has been one of the most significant that I have experienced in my career. Large numbers of officers, drawn from right across the force, have been deployed to Kingsbury day and night since the 1st April. This has meant that we have had to scale down some non-emergency policing services, including those that serve North Warwickshire. Although core policing services have been effectively maintained across the County during this period, the protests have undoubtedly impacted on the quality and level of the policing service that we are able to deliver. Officers who may have ordinarily been policing the communities of North Warwickshire have had to be redeployed to support the policing operation linked to Kingsbury. It has also meant that we have had to bring in additional officers from other regional forces, in addition to more specialist teams such as working at heights teams and protest removal teams. Al of these will come at significant additional cost to the force and ultimately the public of Warwickshire."*

18.5 Mr Smith's Witness Statement includes the following text below a heading **"Community Impact":-**

> *"The impact on the local community has been substantial. There have been almost daily road closures of the roads around the oil terminal which has created disruption and inconvenience. The M42 has also been disrupted on occasions as a result of the protest activity. There has been a significant policing presence since the 1st April which I am sure has created a level of fear and anxiety for the local community. The policing operation has also extended into unsociable hours with regular essential use of the police helicopter overnight disrupting sleep. The reckless actions of the protestor has also created increased risk of potential fire or explosion at the site which would likely have catastrophic implications for the local community including the risk of widespread pollution of both the ground, waterways and air. Finally, the actions of the protestors has impacted the supply of fuel to petrol forecourts in the region, leading to some shortages,*

impacting upon not only local residents but the broader West Midlands region."

19. A copy of Assistant Chief Constable Benjamin Smith's witness statement is now produced and shown to me marked **"MP1"**

20. On 20 January 2023, Mr Justice Soole extended this injunction until 8 February 2024.

REASONS FOR SEEKING THE INJUNCTION

21. In sub-paragraph 9.2 of Mr Milne's Witness Statement, he set out the Claimants' reasons for seeking an injunction in these proceedings. Those reasons may be summarised as follows:-

    21.1 the Sites are used for the production and storage of flammable and otherwise hazardous substances (para 10.2.1 of Mr Milne's Witness Statement);

    21.2 the incidents referred to in paragraphs 8 and 9 of Mr Milne's Witness Statement involved unlawful damage to property (para 10.2.2);

    21.3 the First Claimant has important contractual obligations to customers which have to be fulfilled to keep the country moving – including road, rail and air travel (para 10.2.3).

22. I confirm that each of these reasons remains valid at the time of making this Witness Statement.

CONTINUING THREAT

23. I am pleased to report that since the injunction granted on 7 April 2022 and continued on 27 April 2022, there have been no breaches of the injunction in these proceedings.

24. The fact that there were several incidents targeting the Sites before the injunction but none afterwards indicates to me that the injunction has created an effective deterrent.

25. The Claimants remain genuinely concerned about the threat posed by these protestors and believe that unless the injunction is continued, some or all of the Sites would again be targeted.

26. I am informed by Stuart Wortley that on 21 November 2022, XR conducted a protest outside the London office of Eversheds Sutherland. The protest involved a sit down protest obstructing the revolving doors and purple paint being thrown over the glass structure of the building. XR issued a press release which stated:-

> *"As solicitors for HS2 and Esso, Eversheds Sutherland have been forerunners in criminalising nonviolent environmental protest through the use of injunctions"*
>
> (page 1 of **"MP2"**)

27. Footnote 12 to this statement included a reference to an article appearing on Law360 (an online news services for the legal sector) dated 21 October 2022 which referred to these proceedings entitled *"Activists Banned From Disrupting New Esso Oil Pipeline".*

28. XR also tweeted the following message on Twitter (together with some photographs of this incident):-

> *"Eversheds Sutherland, are used by ecocidal companies like @ExxonMobil and @HS2ltd*
> *They're using the courts to criminalise and silence peaceful protestors. We're here to tell @ESgloballaw to #CutTheTies to the #FossilFuel industry."*
>
> (pages 2-3 of **"MP2"**)

29. In October 2022, JSO organised events which resulted in:-

    29.1 the obstruction of roads in central London (generally bringing traffic to a standstill) including:-

- on Westminster Bridge on 1 and 2 October;
- other roads in Westminster on 4 and 5 October;
- roads around Trafalgar Square on 6 October;
- roads leading to Vauxhall Bridge on 7 October;
- The Mall on 10 October;
- Downing Street on 12 October;
- Park Lane on 16 October;
- Talgarth Road (the A4) on 18 October;
- Cromwell Road / Exhibition Road on 19 October;
- Knightsbridge on 20 October;
- Holborn on 21 October;
- Abbey Road on 23 October;
- roads near Mansion House on 27 October;
- Islington Green on 22 October;
- Charing Cross Road, Kensington High Street, Kennington Road and Blackfriars Road on 29 October;
- Commercial Street and Hanbury Street (near Spitalfields Market) on 31 October;

29.2 throwing a can of tomato soup over the Van Gogh's painting the Sunflowers in the National Gallery on 14 October;

29.3 2 individuals climbing the QEII suspension bridge and unfurling a banner on 17 October (resulting in the bridge being closed for 2 days). I understand from Stuart Wortley that the 2 individuals have been remanded in custody and face a committal hearing on 14 March 2023 and a criminal prosecution on 27 March 2023;

29.4 spraying buildings with orange paint including:-

- New Scotland Yard on 14 October;
- the Aston Martin showroom on Park Lane on 16 October;
- Department for Business Energy and Industrial Strategy on 17 October;
- the entrance to Harrods on 20 October;
- the offices of lobbyists for the fossil fuel industry on 25 October;
- the Ferrari showroom on Park Lane and the Bentley showroom on Berkeley Square on 26 October;
- the Rolex store on Knightsbridge on 28 October;
- the MI5 Headquarters, the Home Office, the Bank of England and News Corp headquarters on 31 October.

30. A sample of on-line news articles concerning some of these incidents is attached to this statement at pages 2-37 **"MP2"**.

31. The JSO press release following the QEII bridge incident on 17 October is attached at pages 17-18 of **"MP2"** and included the following statement:-

> *"This is not a one day event, expect us every day and anywhere. This is an act of resistance against a criminal government and their genocidal death project. Our supporters will be returning – today, tomorrow and the next day – and he next day after that – and every day until our demand is met: no new oil and gas in the UK."*

32. The JSO protests continued into November 2022 with a number of individuals gluing themselves to the road outside Downing Street to prevent access on 1 November and others climbing gantries above the M25 on 4 consecutive days between 7-10 November (inclusive).

33. On 8 December 2022, JSO issued a press release reporting on the activity in October / November and stating:-

> *"six weeks of continuous disruption and civil resistance by supporters of Just Stop Oil during October and November resulted in over 700 arrests. Since the campaign began on April 1st, Just Stop Oil supporters have been arrested over 2,000 times, with 24 supporters currently in prison."*

(page 30 of **"MP2"**).

34. On 1 January 2023, XR publicly committed to moving away from campaigns involving civil disobedience and issued the following statement under a banner heading **"WE QUIT"**:-

> *"…*
>
> *"As we ring in the new year, we make a controversial resolution to temporarily shift away from public disruption as a primary tactic. We recognise and celebrate the power of disruption to raise the alarm and believe that constantly evolving tactics is a necessary approach. What's needed now most is to disrupt the abuse of power and imbalance, to bring about a transition to a fair society that works together to end the fossil fuel era. Our politicians, addicted to greed and bloated on profits won't do it without pressure.*
>
> *"We must be radical in our response to this crisis and determined in our efforts to address the climate and ecological emergency, even if it means taking a different approach than before. In a time when speaking out and taking action are criminalised, building collective power, strengthening in number and thriving through bridge-building is a radical act. XR is committed to including everyone in this work and leaving no one behind, because everyone has a role to play. This year, we prioritise attendance over arrest and relationships over roadblocks, as we stand together and become impossible to ignore.*
>
> *…"*

(pages 32-33 of **"MP2"**).

35. On 2 January 2023, an article in The Guardian reporting on the change in XR's strategy for 2023 stated:-

> *"…*
>
> *"It's 2023 and XR has quit ... But it's 2023, and we are barrelling down the highway to the loss of ordered civil society, as extreme weather impacts tens of millions, as our country becomes unrecognisable ... there is no a need to face reality.*
>
> *"We must move from disobedience into civil resistance …*

> *"In recent years, XR has led its supporters into blockading London streets and bridges for days, smashing bank headquarters' windows and spraying fake blook on the Treasury. But on Sunday, the group announced "we quit" in a new year resolution to "prioritise attendance over arrest and relationships over roadblocks.*
>
> *"Since its radical start, XR has become comparatively more moderate. It has called for 100,000 people to take to the streets of Westminster in April, but cancelled its last series of protests after the queen's death. Recent demonstrations at private airfields led to no arrests. Trials continue of XR supporters involved in direct actions over previous years.*
>
> *"On the other hand, over the past year, supporters of the Just Stop Oil campaign have smashed petrol pumps, blockaded oil terminals, glued themselves to the streets of London, zip tied their necks to goalposts at Premier League football matches and thrown tomato soup over one of the world's most famous oil paintings.*
>
> *"More than 2,000 arrests were made during JSO activities and 138 of its activists have been held behind bars either awaiting trial or while serving a sentence this year. According to the group 12 are still in jail."*
>
> (page 34 of **"MP2"**).

36. The Claimants believe that incidents above demonstrate that JSO remains committed to its campaign of disruptive direct action. This is consistent with other JSO messages:-

36.1 the website includes the following:-

> *"… we will not be intimidated by changes to the law, we will not be stopped by private injunctions sought to silence peaceful people. Our supporters understand that these are irrelevant when set against mass starvation, slaughter, the loss of our rights, freedoms and communities".*
>
> (page 37 of **"MP2"**).

36.2 a tweet on 28 October 2022:-

> *"Sign up for arrestable direct action at …"*
>
> (page 38 of **"MP2"**);

36.3 a tweet on 1 November 2022:-

> *"… we will escalate our legal disruption against this treasonous Govt."*
>
> (page 39 of **"MP2"**).

I believe that the facts stated in this Witness Statement and Exhibits are true.

I understand that proceedings for contempt of court may be brought against anyone 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 am duly authorised to make this statement on behalf of the Claimants.

DocuSigned by:
Martin Pullman
ED969EB9008C493...

Martin Pullman

27 February 2023

Party: *Claimants*
Name: *M Pullman*
Number: *Second*
Exhibits: *"MP3" - "MP5"*
Date: *06.06.23*

CLAIM NO QB-2022-001098

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

B E T W E E N

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

- and -

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN EDGED RED ON THE ATTACHED 'FAWLEY PLAN')

(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN EDGED RED ON THE ATTACHED 'HYTHE PLAN')

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(H) ALTON COMPOUND (AS SHOWN EDGED RED ON THE ATTACHED "ALTON COMPOUND PLAN")

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES

(4) PAUL BARNES

(5) DIANA HEKT

Defendants

WITNESS STATEMENT

OF

MARTIN PULLMAN

I, **MARTIN PULLMAN** of Ermyn House, Ermyn Way, Leatherhead, Surrey KT22 8UX WILL SAY as follows:-

1. I am employed by the First Claimant as the European Midstream Manager. My responsibilities include the operational oversight of Esso's UK terminals and pipelines.

2. Where the facts contained in this witness statement are within my own knowledge, they are true; where the facts contained in this witness statement are not within my own knowledge I have provided the source of my information and those facts are true to the best of my knowledge and belief.

3. This is my second witness statement in these proceedings. I make this statement:-

   3.1 to update the Court concerning relevant matters since my first witness statement dated 27 February 2023; and

   3.2 to provide some additional information concerning the Claimant's health and safety concerns.

4TH AND 5TH DEFENDANTS

4. At the last hearing before Mrs Justice Collins-Rice on 27 March 2023, Paul Barnes and Dian Hekt were joined as the 4th and 5th Defendants to these proceedings.

Paul Barnes

5. There are now produced and shown to me at the exhibit marked **"MP3"** copies of the email messages exchanged between Eversheds Sutherland (the Claimants' solicitors) and Paul Barnes.

6. In his email message to the Claimants' solicitors dated 25 April 2023, Mr Barnes indicated that he was willing to give an undertaking to the Court to avoid the need for the Court to grant an injunction against him. I understand from Stuart Wortley of the Claimants' solicitors that a draft Order is being prepared but that the terms of this Order have not yet been agreed.

Diana Hekt

7. There are now produced and shown to me at the exhibit marked **"MP3"** copies of the email messages exchanged between Eversheds Sutherland (the Claimants' solicitors) and Diana Hekt.

8. As at the date of this witness statement, Ms Hekt has not engaged with the Claimants solicitors and the Claimants therefore seek an injunction against her.

UPDATE ON OTHER INJUNCTION PROCEEDINGS

9. In paragraph 13 of my first witness statement, I provided a table which summarised the injunctions obtained by other oil and gas companies in response to the campaign of protest against fossil fuel companies which began in April 2022.

10. I have repeated the table below and updated it (using bold capital letters to show the additions) with information which has been provided to me by Stuart Wortley of the Claimants' solicitors. I understand from Mr Wortley that he has reviewed the orders which have been uploaded to the website for each action:-

Claimants	**Premises**	**Action No**	**Duration**
Shell International Petroleum Company Limited	Shell Centre Tower	QB-2022-001259	12 months expiring 22 April 2023 **ON 28.05.23, MRS JUSTICE HILL EXTENDED THE INTERIM INJUNCTION UNTIL 25.05.23** **ON 23.05.23, MRS JUSTICE HILL EXTENDED THE INTERIM INJUNCTION UNTIL 12.05.24**
Navigator Terminals Thames BV Limited and others	Oil terminals at West Thurrock, Teeside and Penarth	QB-2022-001139	12 months expiring 27 April 2023 **ON 28.04.23, MR JUSTICE GARNHAM EXTENDED THE INTERIM INJUNCTION AND DIRECTED THAT A FURTHER HEARING TAKE PLACE ON 07.06.23**
Shell UK Limited	Shell Haven Site	QB-2022-001241	12 months expiring 27 April 2023 **ON 28.04.23 MRS JUSTICE HILL**

			EXTENDED THE INTERIM INJUNCTION UNTIL 25.05.23 **ON 23.05.23, MRS JUSTICE HILL EXTENDED THE INTERIM INJUNCTION UNTIL 12.05.24**
Shell UK Oil Products Limited	Petrol filling stations	QB-2022-001420	12 months expiring 12 May 2023 **ON 28.04.23 MRS JUSTICE HILL EXTENDED THE INTERIM INJUNCTION UNTIL 25.05.23** **ON 23.05.23, MRS JUSTICE HILL EXTENDED THE INTERIM INJUNCTION UNTIL 12.05.24**
Essar Oil (UK) Limited and others	Oil terminals at Stanlow, Ellesmere Port, Tranmere, Birkenhead and Northampton	PT-2022-000326	12 months expiring 11 May 2023 **ON 11.05.23, HIS HONOUR JUDGE MONTY KC EXTENDED THE INTERIM INJUNCTION FOR 12 MONTHS UNTIL 11.05.24**
Valero Energy Limited and others	Pembroke refinery and oil terminals at Manchester, Kinsbury, Plymouth, Cardiff, Pembrokeshire and Avonmouth	QB-2022-000904	Extended in January 2023 for 12 months and 3 weeks expiring 8 February 2024 **UNCHANGED**
Exolum Pipeline Systems Limited and others	Oil terminals at Grays, Bramhall, Seal Sands, Misterton, Hallen, Thetford and Saffron Walden	QB-2022-001142	Extended in January 2023 subject to a further review in February 2024 **UNCHANGED**
UK OIL PIPELINES LIMITED	**OIL TERMINALS AT BUNCEFIELD AND KINGSBURY**	**PT-2022-000303**	**EXTENDED IN APRIL 2023 UNTIL 20.10.23**

11. In paragraph 16 of my first witness statement, I provided a table which summarised the injunctions granted to National Highways Ltd and 3 local authorities related to Extinction Rebellion, Just Stop Oil and Insulate Britain protests.

12. I have repeated that table below and added new information in bold capital letters. The table includes new entries for injunctions obtained by Transport for London which I was previously unaware of:-

Claimants	**Motorways / Roads / Property**	**Action No**	**Duration of current Injunction**
North Warwickshire County Council	Kingsbury Oil Terminal	KB-2022-001236	Until further order **UNCHANGED**
National Highways	M25, M25 feeder roads and Kent road	KB-2021-003576 KB-2021-003626 KB-2021-003737	12 months expiring 9 May 2023 **ON 05.05.23, MR JUSTICE COTTER RENEWED THE INTERIM INJUNCTION UNTIL 10.05.24 AND GAVE DIRECTIONS FOR A REVIEW HEARING ON 26 APRIL 2024**
Thurock Council Essex County Council	Roads in the vicinity of Navigator Terminals Thurrock terminal; Esso's Purfleet terminal; Exoleum's Grays terminal; and Oikos' Canvey Island terminal	KB-2022-001317	Until further order with provision for Claimants to inform the Court within 28 days of the Supreme Court judgment in Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors (UKSC/2022/0046) **UNCHANGED**
National Highways	Activities involving gantries and other structures over, under or adjacent to the M25 Motorway	KB-2022-004333	12 months expiring 15 November 2023 **UNCHANGED**
Transport for London	**17 roads, bridges and tunnels in London targeted by Insulate Britain protestors**	**QB-2021-003841 QB-2021-004122**	**FOLLOWING THE TRIAL OF THIS ACTION IN APRIL 2023, MR JUSTICE MORRIS GAVE JUDGMENT ON 03.05.23 GRANTING A FINAL INJUNCTION FOR 5 YEARS (SUBJECT TO ANNUAL REVIEWS)**
Transport for London	**14 roads, bridges and tunnels in London targeted by Just Stop Oil protestors**	**KB-2022-003542**	**ON 24.02.23, MR JUSTICE CAVANAGH EXTENDED THE INTERIM INJUNCTION UNTIL TRIAL**

			THE TRIAL OF THIS ACTION TOOK PLACE BEFORE EYRE J ON 04.05.23 **FOLLOWING THE TRIAL THE JUDGE EXTENDED THE INTERIM INJUNCTION PENDING JUDGMENT (WHICH HAS NOT YET BEEN HANDED DOWN)**

CONTINUING THREAT

13. In paragraphs 23 and 24 of my first witness statement, I recorded the fact that:-

    13.1 since the injunction granted on 7 April 2002 there had been no breaches of the injunction in these proceedings; and

    13.2 the injunction appears to have created an effective deterrent.

14. The exhibit marked **"MP2"** to my first witness statement included various news articles / press releases relating to incidents of direct action by XR and JSO since the proceedings were issued.

15. Since my First Witness Statement there have been no futher incidents of direct action targeting oil terminals in England (whether belonging to the Claimants or other oil and gas companies). However, the "Press Releases" section of the "News & Press" page of the Just Stop Oil website www.juststopoil.org records the following incidents:-

    15.1 on 15 April 2023, disruption at the Grand National horse race at Aintree racecourse;

    15.2 on 17 April 2023, disruption at the World Snooker Championship at The Crucible in Sheffield;

    15.3 on 24 April 2023, a number of Just Stop Oil and XR supporters marched to the Shell's global headquarter's office in Waterloo where they carried out a "sit down" protest. This incident followed a weekend of protest organised by XR across central London caused by XR;

    15.4 since 24 April 2023, Just Stop Oil supporters have been conducting a campaign of "slow marching" on major roads and bridges in central London at 7.00 am every weekday morning and on Saturday's at 12.00 noon. At the time of making this witness statement the campaign is into its sixth week;

15.5 in connection with the slow marching, on 3 May 2023 (the day on which the Public Order Act 2023 came into force), 23 Just Stop Oil supporters were arrested whilst marching from Downing Street to Parliament Square. Yesterday (31 May 2023) a further 10 Just Stop Oil supporters were arrested in Parliament Square;

15.6 on 25 May 2023, disruption at the Chelsea Flower Show;

15.7 on 27 May 2023, disruption at the Gallagher Premiership rugby union final at Twickenham;

15.8 earlier today (1 June 2023) disruption to the England cricket team whilst travelling to the test match against Ireland at Lords.

16. Copies of the Just Stop Oil press releases relating to each of these incidents are attached to this statement marked **"MP4"**.

17. Videos of some of these incidents can be seen on the "Images and Videos" section of the "News & Press" page of the Just Stop Oil website.

18. Since I signed my first witness statement, several Just Stop Oil supporters have been convicted of public order offences relating to direct action incidents during 2022. The "Court & Prison" page of the Just Stop Oil website records that these convictions include the following:-

18.1 on 8 March 2023, Chelmsford Magistrates found 9 supporters guilty of aggravated trespass and / or obstruction of the highway in relation to a protest at Navigator Fuel Terminal at Grays in April 2022. The Just Stop Oil press release includes the following:-

> *"We're done with begging. We are going to stop new fossil fuel projects whether those in power agree or not. As citizens, parents and children, we have every right under British law to protect ourselves and those we love.*
>
> *We are the last generation who can solve this. Will you step up? Join us and Just Stop Oil."*

16.2 on 13 March 2023, Chelmsford Magistrates found 3 supporters guilty of aggravated trespass and / or obstruction of the highway in relation to a protest at the Exolum Fuel Terminal in Grays in April 2022.

16.3 on 21 March 2023, Chelmsford Magistrates found 2 supporters guilty of obstructing the highway in relation to a protest at Navigator Terminals in Grays in April 2022.

18.2 on 13 April 2023, Judge Shane Collery KC in Basildon County Court found Morgan Trowland and Marcu Decker guilty of public nuisance and sentenced them to 3 years and 2.5 years respectively in relation to the protest which they conducted from the Queen Elizabeth II Bridge (which resulted in the bridge being closed to traffic for 2 days). In passing sentence, the Judge said:-

> *"You have to be punished for the chaos you caused and to deter others from copying you."*

19. The continuing threat of direct action at the Sites can also be demonstrated by the following:-

19.1 Immediately after the Messrs Trowland and Decker were sentenced on 13 April (referred to in the previous sub-paragraph), Stephanie Golder a JSO spokesperson made a statement outside court which included the following:-

> *"Nonviolent civil resistance is the answer. It's what the Suffragettes did, it's what the Civil Rights movements did. It's our best chance of getting the scale of change we need, in the time we need it."*
>
> *"Just Stop Oil will not be deterred by these draconian sentences. Where they imprison one of us, ten more will take their place. When the imprison ten of us, one hundred will stand to take their place. We must unit against this genocidal government and be brave."*

19.2 On 24 April 2023, XR co-founder Clare Farrell made a statement within an XR press release which included the following:-

> "*The government had a week to respond to our demands and they have failed to do so. Next we will reach out to supporter organisations to start creating a plan for stepping up our campaigns across an ecosystem of tactics that includes everyone from first-time protesters to those willing to go to prison*."

19.3 On 24 April 2023, another XR press release following a weekend of protests in London which they referred to as The Big One which included the following statements:-

> *"Effectively tens of thousands from different organisations have signalled that they are ready to move into a far more*

challenging and disruptive posture against a government that is gambling with our lives and futures."

"Over the next three months, we will be translating the appetite for action amongst people at The Big One into a whole new range of campaigns and action across the country."

20. Copies of the media coverage / press releases are included at the exhibit marked **"MP4"**.

21. The Claimants' security team has also recently drawn my attention to the following video uploaded by someone with a You Tube account in the name of DJ Audits. On 23 May 2023, a video was uploaded to this account which had been recorded outside the Birmingham Terminal. It can be found at this link - https://www.youtube.com/watch?v=r3Mi9s72Zpk.

22. The video was recorded from outside the perimeter fence. It shows copies of the warning notices on the perimeter fence and views of the terminal beyond the fence. It also includes conversations between the person recording the video and security staff in which the individual confirms he is not a protestor.

23. At 6 minutes and 20 seconds into the video, the individual records video footage from a drone which shows aerial views of the terminal. Whilst not entirely clear, it appears that the drone remains outside the terminal boundaries. At around 11 minutes into the video, the individual informs a police officer that he is filming and operating the drone to produce YouTube footage and that he is not a protestor.

24. Whilst the individual does not appear to have breached the injunction and does not claim to be an environmental protestor, in my view this:-

24.1 demonstrates the continuing interest with the Sites from 3rd parties; and

24.2 potentially encourages further protests as it provides protestors with a blueprint of the Sites' layout so they know exactly what to expect when entering the Sites, thereby making it easier for protestors to plan how / where to enter and remain on the Sites.

FURTHER EVIDENCE CONCERNING HEALTH & SAFETY ISSUES

25. In paragraph 6 of Anthony Milne's witness statement dated 03.04.22 he summarised the Claimants' security measures and in paragraph 10.2.1 he referred to the fact that access to the terminals, Alton pumping station and Fawley refinery is strictly controlled (given that they are used for the production and storage of flammable / hazardous substances). Given that not all of these risks will be immediately obvious it may be helpful for me to elaborate on some of these risks.

26. The reason access to the operating sites is restricted to authorised personnel is to protect individuals from being exposed to risks arising from hazards of which they may be unaware and may not understand. In addition unauthorised personnel represent a risk to our own employees and contractors present on site in what is a hazardous environment and to the wider community in the event of a major incident.

27. During last year's protests, unauthorized JSO / XR activists chained and / or glued themselves to some of the First Claimant's terminal entrances and exit gates with the intention of obstructing HGV fuel tanker trucks and preventing them from entering / exiting the terminal entrances. Had there been a major safety incident during one of these protests, their actions could have put lives (and assets) at risk by obstructing or preventing:-

    27.1 authorised personnel from evacuating the terminals; and

    27.2 emergency vehicles from entering the terminals.

28. All authorised visitors to the terminals and Fawley refinery are required to watch an induction safety video which highlights both the hazards and the emergency safety procedures (including site evacuation and muster stations). Given that unauthorized and untrained protestors have not seen this video they will be unaware of the hazards and emergency safety procedures. Knowledge of potential risks and our safety procedures is one of the major mitigations in place to allow us to operate these sites safely. Unauthorised visitors to site creates a risk not only for the unauthorised personnel but also our own staff or contractors who may be placed in harm's way attending to or managing such unauthorised personnel.

29. Most of the Sites include higher risk areas (such as a fuel tank farm or truck loading area) require additional safety precautions which have been determined to be necessary after careful assessment of the potential risks. Within these areas authorised personnel must wear Fire Retardant Clothing ("FRC") and the appropriate Personal Protective Equipment (hard hats, safety glasses, fire retardant gloves, safety shoes) ("PPE"). In some areas, devices which measure hydrocarbon vapour levels in the air (and which alert them to potentially dangerous situations) must be carried.

30. During last year's protests none of the individuals involved wore FRC / PPE – thereby breaching the Claimants' procedures and exposing themselves and others (including our employees and the wider community) to the risk of death or serious injury.

31. One of the most serious potential hazards inside our facilities is a vapour cloud. This can be caused from an unplanned release of hydrocarbon or biofuels. Such a release combined with an ignition source can be extremely hazardous. For this reason, potential ignition sources (smoking, using mobile phones or cameras and wearing clothes that accumulate static electricity (e.g., nylon)) are strictly prohibited within the higher risk areas.

32. During last year's protests some protesting individuals within higher risk areas (including on top of fuel storage tanks) carried iPhones, cameras, cigarette lighters and / or nylon sleeping bags – thereby breaching the Claimants' procedures and exposing themselves and others to the risk of death or serious injury.

33. It is a standard requirement that anyone engaged in working at height takes appropriaite steps to protect themselves and others against the risk of falling (for example by using a secure lanyard or harness). The Claimants' procedures also adopt these requirements which apply at all of the operating sites.

34. During last year's protests several individuals climbed on top of the First Claimant's fuel tanks (around 20 metres above ground) and HGV fuel tankers (around 3 metres above ground) without fall protection measures – thereby exposing themselves to the risk of death or serious injury

35. The issues which I have noted above are not exhaustive. At Fawley for example the use of heat is an inherent part of the refinery process. Whilst exposure to hot surfaces (and the steam which provides the heat source) is well-controlled, these pose a serious risk to the health and safety of anyone unfamiliar with the operation. Furthermore, the refinery processes are complex and depend upon a range of instrumentation for their safe, reliable operations. Interference with those instruments (whether or not intentional) would also create serious health and safety concerns.

DRAFT WARNING NOTICE

36. The Warning Notices which were posted at each of the Sites following the hearing before Mrs Justice Collins-Rice on 27 March 2023 included some typographic errors in the addresses for 3 of the Sites.

37. If the Court is willing to grant a final injunction following trial, I attach at the exhibit marked **"MP5"** a draft Warning Notice (on which the errors and the corrections are shown in red type) which the Claimants propose to post at each of the Sites.

I believe that the facts stated in this Witness Statement and Exhibits are true.

I understand that proceedings for contempt of court may be brought against anyone 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 am duly authorised to make this statement on behalf of the Claimants.

DocuSigned by:
Martin Pullman
ED969EB9008C493...

Martin Pullman

6 June 2023

Claimants
H Stebbing
THIRD
Exhibit HS3
20 June 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

THIRD WITNESS STATEMENT
OF HOLLY STEBBING

I, Holly Stebbing of Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ, United Kingdom, state as follows:

1 Introduction

1.1 I am a Partner at Norton Rose Fulbright LLP (**NRF**). I am duly authorised to make this witness statement on behalf of the Claimants.

1.2 The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

1.3 There is now produced and shown to me a paginated bundle of true copy documents marked ["**HS3**"]. All references to documents in this statement are to **Exhibit HS3** unless otherwise stated.

2 Background

2.1 I have read the Witness Statements of Anthony Milne (the Claimants' Global Security Adviser) dated 3 April 2022.

2.2 The incidents detailed at paragraphs 8 and 9 of Mr Milne's Witness Statement prompted the Claimants to commence proceedings for an injunction to restrain protestors from engaging in unlawful conduct at the Sites.

2.3 On 6 April 2022, Mrs Justice Ellenbogen granted an interim injunction to restrain the Defendants from trespassing and / or causing a nuisance at the Sites.

2.4 On 27 April 2022, Mr Justice Bennathan extended this injunction until 27 April 2023.

2.5 On 18 July 2023, Mr Justice Linden granted a final injunction to restrain the Defendants from trespassing and / or causing a nuisance at the Sites.

2.6 I firstly make this witness statement in connection with the annual review hearing of the injunctions set out in Mr Justice Linden's Order dated 18 July 2023 (as amended on 21 July 2023, 16 October 2023 and 29 January 2024) (the **Injunctions**) (the **Order**).

2.7 For the reasons set out below, the Claimants consider that the Injunctions should remain in place until 11 July 2028, subject to the built-in annual reviews described at paragraphs 8 to 10 of the Order (as amended on 29 January 2024).

2.8 I also make this witness statement to record service of:

(a) the Order; and

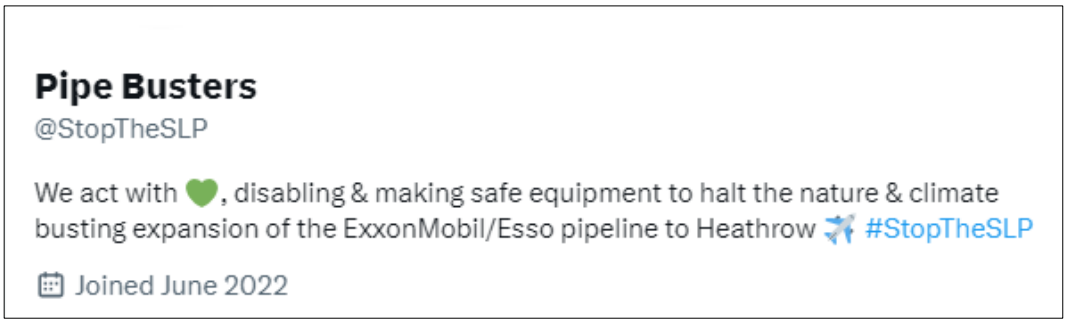
(b) the Notice of Annual Review Hearing on 10 July 2024 (the **Notice**).

3 Statement in support of application

3.1 The Claimants consider that there is an ongoing threat to the Sites which necessitates the continuation of the Injunctions. I have set out below a number of pertinent developments evidencing this continuing threat, details of which have been provided to me by the Claimants.

Pipe Busters activity

3.2 Pipe Busters is an X (formerly Twitter) account which was established in June 2022. There is no attribution to any named person. The X biography section states:



3.3 Pipe Busters is named in a separate injunction order granted by the High Court in favour of the First Claimant on 31 August 2023 barring unlawful protests against the Southampton to London Pipeline (**SLP**), a replacement fuel pipeline constructed by the First Claimant between the Fawley Petrochemical Complex (**Site A**) and the West London Oil Terminal (**Site F**) (Claim No. QB-2022-002577). The group is named in the Second Schedule to the injunction order which lists groups and/or individuals who had to be notified of the order by the First Claimant in order for service to be effected.

3.4 As at 30 May 2024, 40 posts had been shared by the Pipe Busters' X account, 14 of them encouraging direct action against the SLP. The posts include references to the Swedish academic Andreas Malm's publication *#How to Blow up a Pipeline* (Verso press, January 2021). While I understand this textbook does not specifically detail how to construct an explosive device, it does advocate acts of sabotage and criminal damage of fossil fuel related infrastructure (including pipelines). The description of the book on the publisher's website states, "*We need, he argues, to force fossil fuel extraction to stop--with our actions, with our bodies, and by defusing and destroying*

its tools. We need, in short, to start blowing up some oil pipelines" [**HS3/1-6**] and [**HS3/7**].

3.5 I am informed by the Claimants that between September and October 2023, a number of stickers bearing the Pipe Busters name and logo appeared at various junctures along the route of the SLP. The incidents are listed below, with corresponding references to images as included in HS3:

Incident	Date discovered	Location	Description
1	19/09/2023	Southwood Country Park, Farnborough	Sticker and graffiti on pipeline marker post [**HS3/8**]
2	21/09/2023	Hardwick Lane, Chertsey	Stickers on GVD site notice [**HS3/9**]
3	25/09/2023	Chertsey Bridge Rd, Chertsey	Stickers on front of pipeline valve and on adjacent pipeline marker post [**HS3/10**]
4	27/09/2023	Southwood Country Park, Farnborough	Stickers on front and rear of 10" pipeline [**HS3/11**]
5	03/10/2023	Lower Froyle, Alton	Sticker on construction welfare cabin [**HS3/12**]
6	04/10/2023	Naishes Lane SANG, Church Crookham	Sticker on fence of SLP construction compound [**HS3/13**]
7	04/10/2023	North Hardwick Lane, Chertsey	Stickers on a Pannels Farm pipeline marker post [**HS3/14**]

3.6 While the stickers appeared along the route of the SLP and not within the perimeters of the Sites, the incidents listed above demonstrate that the Claimants' assets have continued to be targeted by climate protesters since the date of the Order and that Pipe Busters wish to remind the Claimants of their ambition (as stated on their X account) of "*disabling…the Esso Pipeline to Heathrow*".

3.7 For completeness, I note that graffiti saying "*RIP*" was discovered on a cathodic protection bond box on 4 October 2023 serving the SLP at Pirbright Ranges, Lightwater [**HS3/15**]. It is unclear who is responsible for this graffiti.

DJE Media incident at the Fawley Petrochemical Complex (Site A)

3.8 The Fawley Petrochemical Complex and Hythe Oil Terminal are protected by the Order and referred to as Site A.

3.9 On 21 December 2023, an unauthorised individual trespassed at Site A and filmed his visit to Site A using a body camera and a drone. He subsequently posted the footage on YouTube under the heading "*the drone WILL be CRUSHED if you fly over the FUEL REFINERY*" using the account DJE Media (the **Video**). The Video, which lasts 50 minutes, can be found at the website https://www.youtube.com/watch?v=XWi2XqS1sfM.

3.10 I am informed of the following details relating to the incident by the Site Security Manager at the Fawley Petrochemical Complex and an employee of the Second Claimant. On 21 December 2023, the Site Security Manager was informed by gate staff at Site A that an unauthorised individual was trespassing and wished to use a drone. A Shift Security Manager at the site drove across Site A to find the individual and located him on the access road to Site A (which forms part of the First Claimant's land) close to the main access gates. The individual would have driven past multiple signs informing him that this was private property, including a sign stating, "*Private Road No Public Access or Right of Way*".

3.11 Within the first minute of the Video, the individual can be seen filming an injunction notice issued in these proceedings outside Site A. The individual notes that an injunction is in place to prevent protest activity.

3.12 The Video depicts the Shift Security Manager approaching the individual in a vehicle marked "*ExxonMobil Security Shift Manager*" and asking him what he was doing on Site A. The individual replied that "*he was making a video on different companies in the area*". In response, the Shift Security Manager stated that the land and the road were private. The individual replied, "*I get that*". The Shift Security Manager informed the individual that, if he continued to remain on the private land, the Claimants would need to contact the Police.

3.13 The Site Security Manager can be seen arriving at the scene at minute 21 of the Video. I am informed by the Site Security Manager that he used his mobile device to film the individual and asked him to leave the Site as he was on private property. The Site Security Manager informed the individual that there is a High Court injunction applicable to Site A. The individual replied that he "*understood*" there was an injunction "*for protestors and stuff*" and said that he was "*not a protestor*". He objected to the Site Security Manager filming him. The Site Security Manager requested that the individual leave Site A. The individual indicated that he would leave the boundaries of Site A but would then fly his drone over Site A. He remained on Site A, which is private land, with the Site Security Manager following him to monitor his movements and to ensure that the boundary of Site A was clear to the individual. The individual continued to film whilst trespassing on Site A. The Site

Security Manager requested that he ceased filming him personally, but the individual continued notwithstanding that request.

3.14 As is depicted in the Video, the police attended Site A after the Site Security Manager had left the scene and confirmed that whilst the individual could fly his drone, he could not trespass on Site A.

3.15 Whilst the individual was not overtly conducting any protest activity, his collection of evidence in relation to Site A, trespass on Site A and subsequent publication on YouTube of the Video, which included detail regarding security on the Site, demonstrates a continued interest in gathering information about Site A and disseminating that information publicly, which could be used by protestors in support of protest activity. As of 30 May 2024, the Video has received over 115,000 views.

Extinction Rebellion and Just Stop Oil protest and related activity

3.16 Extinction Rebellion and Just Stop Oil continue to focus their attention on protesting against oil and gas business:

(a) On 22 February 2024, Greenpeace UK's X account posted a video story alleging that oil and gas majors are contributing to global warming and the 'climate crisis'. The video includes a photograph of ExxonMobil CEO Darren Woods, shortly followed by an image of an extreme weather event. Greenpeace concludes the video with a number of questions including "*How long do we let them get away with this?*". Just hours after Greenpeace UK posted the video, a number of X accounts affiliated with Extinction Rebellion reposted the video, including XR Brighton, XR Grandparents and Elders, XR Surrey, XR South East, and XR South West. A screenshot of the video and evidence of engagement by the relevant XR accounts can be seen at [**HS3/16**].

(b) On 27 February 2024, Extinction Rebellion protesters stormed London's 'Walkie Talkie' building on Fenchurch Street and occupied the offices of five leading insurers. The protesters stated they were staging an "*indefinite occupation*" and demanded that the relevant companies talk to them about "*insuring climate-wrecking oil and gas*". A copy of a media report detailing the incident can be seen at [**HS3/17-18**].

(c) On 29 February 2024, Extinction Rebellion protesters infiltrated the London headquarters of global advertising and media agency McCann Worldgroup to "*protest against the company's reported bid for another stint as top greenwasher for fossil fuel giants Saudi Aramco*". A copy of a media report detailing the incident can be seen at [**HS3/19-22**].

(d) On 29 February 2024, Extinction Rebellion protested outside the offices of AXA UK's headquarters in London, to demand that the company stop insuring new fossil fuel projects. A copy of a media report detailing the incident can be seen at [**HS3/23-25**].

(e) On 1 March 2024, Extinction Rebellion protested outside the office of Tokio Marine HCC near Leicester to demand that the company stop insuring new fossil fuel projects. A copy of a media report detailing the incident can be seen at [**HS3/26-29**].

(f) On 1 March 2024, Extinction Rebellion and Just Stop Oil activists occupied the Colmore Building in Birmingham which is home to Allianz, Chubb and Zurich. The action was in solidarity with Students Against EACOP, an organisation which is resisting the construction of the East Africa Crude Oil Pipeline (**EACOP**). A copy of a media report detailing the incident can be seen at [**HS3/30-32**].

(g) On 1 March 2024, Extinction Rebellion and Just Stop Oil protestors took to the streets in Birmingham as part of a global week of action organised by the Insure Our Future Network . Three people were arrested at the protest. A copy of a media report detailing the incident can be seen at [**HS3/33-38**].

(h) On 2 March 2024, Extinction Rebellion protestors broke into a chemicals plant owned by chemical group Arkema near Lyon in south-eastern France to protest against the alleged discharge of non-biodegradable PFAS substances. The protestors wrote "*murderers*" in red paint on the walls and broke doors and materials. Eight people were arrested. A copy of a media report detailing the incident can be seen at [**HS3/39**].

(i) On 15 May 2024, 40 protestors from Extinction Rebellion, Fossil Free London, Christian Climate Action and other organisations gathered outside the Africa Energies Summit. The protestors held signs opposing what they called the "*scramble for Africa*" opposing any new project in Africa and directly criticising ExxonMobil and others of being "*fossil fuel crooks*". Extinction Rebellion published a report of the protest on their website, a copy of which can be seen at [**HS3/40-42**]. The same posters specifically naming ExxonMobil were used to publicise protests against the Energy Intelligence Forum from 17 to 19 October 2023. Copies of the posters from 2023 can be seen at [**HS3/43**].

(j) On 15 May 2024, Just Stop Oil, Friends of the Earth and other climate organisations held a day of action outside the annual British Insurance Broker's Association conference, calling on delegates not to insure fossil fuel

projects, specifically the EACOP and the West Cumbrian Coal Mine. A copy of a media report detailing this action can be seen at [**HS3/44-47**].

(k) On 2 June 2024, more than 100 Extinction Rebellion protestors blocked access to Farnborough airport, the biggest private jet terminal in the UK. The protest was part of a week of international action across eight countries demanding that governments ban private jets, tax frequent flyers and make polluters pay. A copy of a media report detailing this action can be seen at [**HS3/48-51**].

Other relevant activity

3.17 On 3 March 2024 the Telegraph reported that a leading Just Stop Oil campaigner had confirmed that the group intended "*to continue targeting businesses and MPs' homes despite Rishi Sunak warning against the rise of "mob rule" in Britain*". A copy of the Telegraph article can be found at [**HS3/52-54**].

3.18 In addition to the incidents referred to above, the Claimants would like to draw the Court's attention to the rising numbers of climate activists being referred to the UK's anti-terror scheme. On 23 December 2023, the BBC reported that "*the number of climate activists referred to the* [UK's] *Prevent anti-terrorism programme has increased following the emergence of disruptive environmental protests*". The BBC report, a copy of which can be found at [**HS3/55-59**], goes on to state:

"*The government groups "eco-terrorism" in a category of violent extremism motivated by ideas on "the extreme political left-wing". It says although this category does not represent a significant threat, some activity has met a terrorist threshold in recent years and security services continue to investigate such cases*."

3.19 A Force Management Statement published by the Metropolitan Police in December 2023 also refers to the potential for a rise in disruptive environmental protests:

"Terrorists and radicalisers will always look for opportunities to exploit in support of their ideology. There is the potential for this radicalisation to extend to environmentalism given the ever increasing sentiment within this lobby, and a sense of not being listened to by government. CTP [Counter Terrorism Policing] *is alive to this issue. There was a focus on reducing the exploitation of vulnerable people during the global pandemic, and recognising that the type of extremism concerned could be mixed, unstable or unclear. This work has continued to develop and we need to maintain a broad, multi-agency approach under 'Prevent', including safeguarding and mental health".* An extract of the statement can be seen at [**HS3/60**].

Plans to continue disruptive protests in 2024

3.20 It is Just Stop Oil's public position that it intends to cause further disruption to the oil and gas industry and connected business this year.

3.21 On 3 March 2024, Just Stop Oil set out its plan to bring about a "*democratic revolution*". In the press release announcing the "*revolution*", Just Stop Oil confirmed that, throughout 2024, "*nonviolent civil resistance to a harmful state will continue, with coordinated, radical actions that reach out to new people and capture the attention of the world. Alongside this, a new political project will be set up".* A copy of the press release can be seen at [**HS3/61-62**].

3.22 In the same press release, Just Stop Oil also set out a new, three-part demand: "*No New Oil, Revoke Tory Licenses and Just Stop Oil by 2030*". Just Stop Oil intend to achieve this through a campaign of "*high-level actions at sites of key importance to the fossil fuel industry – airports*".

3.23 I have also seen a video published by Just Stop Oil in 2024 stating that their message to the British government is that "*if you're not going to stop the oil, we're going to do it for you".* Above the video, Just Stop Oil wrote that they *"have declared airports a site of nonviolent civil resistance*". A link to the video can be found here: https://juststopoil.org/. These plans and statements show that Just Stop Oil and Extinction Rebellion continue in their intention to enter private land and to cause unlawful disruption to the oil and gas industry. I also note that Site F provides jet fuel to Heathrow airport (a previous target of Just Stop Oil) and therefore a protest against this site has the potential to impact that airport. A copy of a media report detailing this plan can be seen at [**HS3/63-67**].

Failure to provide assurances that no further direct action will occur

3.24 I refer to paragraph 67 of the judgment of Mr Justice Linden on 10 July 2023 where, in deciding to grant the Injunctions, it was stated that *"it would have been very easy for Extinction Rebellion or Just Stop Oil to give assurances or evidence to the court that there was no intention to return to their activities of 2021/2022, and no risk of trespass on the Sites or damage to property by protestors in the foreseeable future, but they did not do so*".

3.25 I am not aware that Just Stop Oil and Extinction Rebellion have since provided any assurances or evidence to the Court or to the Claimants that they do not intend to return to protesting at the sites in the foreseeable future. I believe that, when taken with the evidence outlined above, this suggests that there is a real risk of future unlawful activity at the Sites.

Other Injunctions to restrain protestors granted in 2023 / 2024

3.26 I note that the Claimants have not been alone in seeking to maintain injunctions that restrain the unlawful conduct of protestors opposed to the oil and gas industry. I am aware of the following injunctions:

Claim No.	Parties	Locations affected by order	Date and length of injunction
North Warwickshire			
QB-2022-001236	**Claimant:** North Warwickshire Borough Council **Defendants:** (1-18) Named Defendants (19) Persons Unknown (20-158) Named Defendants	Kingsbury Oil Terminal	Injunction, Power of Arrest on 14 April 2022 (as varied on 6 May 2022) Interim Injunction Order granted on 9 May 2022 until hearing of the claim Final hearing listed for 11 June 2024. Only 24 of the 157 named Defendants have offered to provide undertakings not to engage in further unlawful activity against the North Warwickshire Borough Council.
Shell			
QB-2022-001259	**Claimant:** Shell International Petroleum Company Limited **Defendants:** Persons Unknown in connection with Just Stop Oil, Extinction Rebellion and Youth Climate Swarm	Shell Centre Tower (office building)	Further interim injunction granted on 24 April 2024 until 12 November 2024 with directions for a final review hearing
QB-2022-001421	**Claimant:** Shell U.K. Limited **Defendants:** Persons Unknown in connection with Just Stop Oil, Extinction Rebellion and Youth Climate Swarm	Shell Haven Oil Refinery, Stanford-Le-Hope (oil refinery)	Further interim injunction granted on 24 April 2024 until 12 November 2024 with directions for a final review hearing

Claim No.	Parties	Locations affected by order	Date and length of injunction
QB-2022-001240	**Claimant:** Shell U.K. Oil Products Limited **Defendants:** Persons Unknown in connection with Just Stop Oil, Extinction Rebellion and Youth Climate Swarm	Any Shell Petrol Station in England and Wales	Further interim injunction granted on 24 April 2024 until 12 November 2024 with directions for a final review hearing
Thurrock Council and Essex County Council			
QB-2022-00317	**Claimant:** (1) Thurrock Council (2) Essex County Council **Defendants:** (1) Madeline Adams (2-222) Other Named Defendants (223-229) Persons Unknown	Roads within Thurrock and Essex Council boundaries Administrative areas of Thurrock and Essex Fuel Terminals: • The Navigator Fuel Terminal, West Thurrock • The Esso Fuel Terminal, Purfleet • Exolum Storage Ltd, Grays • Oikos Storage Limited, Essex	Original Injunction Order dated 1 June 2022 extend by order dated 27 January 2023 "*until and subject to any further order*". A review hearing has been scheduled for 12 July 2024 to review the injunction in so far as it relates to Persons Unknown.
UK Oil Pipelines Ltd and West London Pipeline and Storage Ltd			
PT-2022-000303	**Claimants:** (1) UK Oil Pipelines Ltd (2) West London Pipeline and Storage Ltd **Defendants:** Persons Unknown	Buncefield and Kingsbury Terminals	Final Injunction granted for 5 years until 20 October 2028 subject to annual review
Valero			
QB-2022-000904	**Claimants:**	Pembroke oil refinery, Pembroke	Final injunction granted for 5 years until 13 December 2028

Claim No.	Parties	Locations affected by order	Date and length of injunction
	(1) Valero Energy Ltd (2) Valero Logistics UK Ltd (3) Valero Pembrokeshire Oil Terminal Ltd **Defendants:** (1) and (2) Persons Unknown (3-19) Named Defendants	Pembroke oil refinery jetties, Pembroke Manchester oil terminal, Trafford Park Kingsbury oil Terminal, Tamworth Plymouth oil terminal, Plymouth Cardiff oil, Cardiff Avonmouth oil terminal, Avonmouth Pembrokeshire terminal, Milford Haven	
Exolum			
QB-2022-001142	**Claimants:** Exolum Pipeline Systems Ltd Exolum Storage Ltd Exolum Seal Sands Ltd **Defendants:** Persons Unknown	Various terminals and associated equipment	Final injunction granted for one year on 23 January 2023 and extended until 20 February 2025

3.27 In each of these annual reviews, the Court considered there to be a sufficient risk of direct action by protest groups against claimants' activities within the oil and gas industry (or related parties) to maintain the injunctions.

Effect of the Order

3.28 I believe that the Order continues to have a deterrent effect.

3.29 The impact of the Order and similar orders has been cited by Just Stop Oil when explaining its decision not to target sites such as those subject to this order. For example, on 13 September 2023 the Just Stop Oil X account posted explaining the reason behind disruptive protests in Portsmouth that involved blocking roads was "*injunctions that make protests impossible at oil refineries, oil depots and even petrol stations*". This can be seen at [**HS3/68**]. The post, together with Just Stop Oil's failure to provide assurances to the contrary and their planned disruption to airports this

year referred to in paragraphs 3.22 and 3.23 above, indicate that Just Stop Oil still have an interest in targeting and disrupting oil and gas production facilities and but for the Order would continue to do so.

4 Continuation of the Order

4.1 The Claimants are applying for the Order to remain in place in its current form until 11 July 2028, subject to the built-in annual reviews described at paragraphs 8 to 10 of the Order.

5 Service

Service on Defendants 1, 2 and 3

5.1 Service of the Order on the First, Second and Third Defendants was effected as follows:

(a) On or around 5 February 2024, the Order was uploaded to the following webpage (the **Webpage**):

https://www.exxonmobil.co.uk/Company/Overview/UK-operations

A copy of the Webpage (including links to the Order) can be seen at [**HS3/69-71**].

(b) I am informed by the Claimants that, by no later than 19 February 2024:

(i) copies of the Order were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites;

(ii) a notice which states that copies of the Order may be obtained from the Claimants' solicitors, NRF, and may also be viewed on the Webpage was added to each plastic container; and

(iii) four large warning notices, in the form annexed to the Order were fixed in conspicuous places around the perimeter of each of the Sites.

Sample photographs of the clear plastic containers, with the Orders placed in the plastic containers and the large warning notices can be seen at [**HS3/72-85**].

(c) On 16 February 2024, an associate at NRF sent emails enclosing copies of the Order and explaining that further copies may be obtained from NRF or viewed at the Webpage:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

juststopoilpress@protonmail.com

Copies of the emails sent by an associate at NRF can be seen at [**HS3/86-87**].

(d) Confirmation of delivery was received on 16 February 2024 in respect of each of the emails sent to the addresses listed at paragraph 5.1(c) above. Copies of the confirmation emails can be found at [**HS3/88-89**].

(e) In addition, automatic replies were received on 16 February 2024 from enquiries@extinctionrebellion.co.uk and xr-legal@riseup.net, which appear to be automatic responses to any emails received. A copy of the relevant emails can be seen at [**HS3/90-91**].

5.2 Service of the Notice on the First, Second and Third Defendants was effected as follows:

(a) On or around 11 April 2024, the Notice was uploaded to the Webpage.

A copy of the Webpage (including links to the Notice) can be seen at [**HS3/69-71**].

(b) I am informed by the Claimants that by, no later than 19 April 2024:

(i) copies of the Notice were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites; and

(ii) a notice which states that copies of the Notice may be obtained from NRF and may also be viewed on the Webpage was added to each plastic container.

Sample photographs of the clear plastic containers, with the Notices placed in the plastic containers can be seen at [**HS3/72-85**].

(c) On 25 April 2024, an associate at NRF sent emails enclosing copies of the Notice and explaining that further copies may be obtained from NRF or viewed at the Webpage to:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

juststopoilpress@protonmail.com

Copies of the emails sent by NRF can be seen at [**HS3/92-95**].

(d) Confirmation of delivery was received on 25 April 2024 in respect of each of the emails sent to the addresses listed at paragraph 5.2(c) above. Copies of the confirmation emails can be found at [**HS3/96-97**].

(e) In addition, automatic replies were received on 25 April 2024 from enquiries@extinctionrebellion.co.uk and xr-legal@riseup.net, which appear to be automatic responses to any emails received. A copy of the relevant emails can be seen at [**HS3/98-99**].

Service on Defendants 4 and 5

5.3 On 16 February 2024, NRF effected service of the Order on Defendants 4 and 5 by first class post. Copies of the covering letters and the envelopes with first class stamps can be seen at [**HS3/100-105**].

5.4 On 25 April 2024, NRF effected service of the Notice on Defendants 4 and 5 by first class post. Copies of the covering letters and the envelopes with first class stamps can be seen at [**HS3/106-109**].

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone 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.

Signed: 

HOLLY STEBBING

Date: 20 June 2024

Claimants
H Stebbing
THIRD
Exhibit HS3
20 June 2024

CLAIM NO. QB-2022-001098

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED
Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT) UPON ANY OF THE SITES
(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT
Defendants

THIRD WITNESS STATEMENT
OF HOLLY STEBBING

---

3 More London Riverside
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United Kingdom

+44 20 7283 6000
+44 20 7283 6500
DX 85 London

Claimants
H Stebbing
THIRD
Exhibit HS4
9 July 2024

IN THE HIGH COURT OF JUSTICE **CLAIM NO. QB-2022-001098**
KING'S BENCH DIVISION

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

FOURTH WITNESS STATEMENT
OF HOLLY STEBBING

I, Holly Stebbing of Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ, United Kingdom, state as follows:

1 Introduction

1.1 I am a Partner at Norton Rose Fulbright LLP (**NRF**). I am duly authorised to make this witness statement on behalf of the Claimants.

1.2 The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

1.3 There is now produced and shown to me a paginated bundle of true copy documents marked ["**HS4**"]. All references to documents in this statement are to **Exhibit HS4** unless otherwise stated.

1.4 I make this witness statement to confirm the steps taken to serve the various Defendants to these proceedings with documents in preparation for the review hearing on 10 July 2024 (the **Review Hearing**). In particular:

(a) my third witness statement dated 20 June 2024 (the **Witness Statement**) and the exhibits referred to in the Witness Statement (the **Exhibits** and, with the Witness Statement, the **Evidence**) which confirm the steps taken to serve the order of Mrs Justice Ellenbogen dated 29 January 2024 (the **Order**) and the notice of the Review Hearing;

(b) the trial bundle (the **Trial Bundle**); and

(c) the Claimants' skeleton argument and accompanying bundle of authorities (the **Skeleton Documents**).

1.5 In relation to the Skeleton Documents, we note that the Order does not expressly require service on the Defendants.

2 Service on the first, second and third Defendants

2.1 Paragraph 15 of the Order provides that documents in connection with these proceedings ("the Further Documents") should be served on the first, second and third Defendants by:

(a) fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that a copy of the Further Documents may be obtained from the Claimants' solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email:

ExxonMobil.Service@nortonrosefulbright.com; and (b) that a copy of the Further Documents may be viewed at the website referred to in Paragraph 15.2 of the Order;

(b) posting the Further Documents on the following website: https://www.exxonmobil.co.uk/Company/Overview/UK-operations;

(c) sending an email to each of the following email addresses: (i) with the information that a copy of the Further Documents may be viewed at the website referred to in Paragraph 15.2 of the Order; and/or (ii) enclosing a copy of the Further Documents (whether by Mimecast link or otherwise):

(i) xr-legal@riseup.net

(ii) enquiries@extinctionrebellion.uk

(iii) juststopoilpress@protonmail.com

Service of the Evidence

2.2 Service of the Evidence on the first, second and third Defendants was effected as follows:

(a) By 20 June 2024, the Evidence was uploaded to the Webpage.

A copy of the Webpage (including links to the Evidence) can be seen at [**HS4/4-8**].

(b) I am informed by the Claimants that by, no later than 21 June 2024:

(i) copies of the Evidence were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites; and

(ii) a notice which states that copies of the Evidence may be obtained from NRF and may also be viewed on the Webpage was added to each plastic container.

Photographs of the clear plastic containers containing the Evidence can be seen at [**HS4/9-15**].

(c) On 24 June 2024, an associate at NRF sent an email (timed at 18:19) explaining that copies of the Evidence may be obtained from NRF or viewed at the Webpage to:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

On the same day an associate at NRF sent the same email (timed at 18:19) to:

juststopoilpress@protonmail.com

Copies of the two emails sent by NRF can be seen at [**HS4/16-17**].

(d) Confirmation of delivery was received on 24 June 2024 in respect of each of the emails sent to the addresses listed at 2.2(c) above. Copies of the confirmation emails can be found at [**HS4/18-19**].

(e) In addition, automatic replies were received on 24 June 2024 from enquiries@extinctionrebellion.co.uk and xr-legal@riseup.net, which appear to be automatic responses to any emails received. A copy of the relevant emails can be seen at [**HS4/20-21**].

Service of the Trial Bundle

2.3 Service of the Trial Bundle on the first, second and third Defendants was effected as follows:

(a) On or around 28 June 2024, the Trial Bundle was uploaded to the Webpage.

A copy of the Webpage (including links to the Trial Bundle) can be seen at [**HS4/4-8**].

(b) I am informed by the Claimants that by, no later than 1 July 2024:

(i) copies of the Trial Bundle were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites; and

(ii) a notice which states that copies of the Trial Bundle may be obtained from NRF and may also be viewed on the Webpage was added to each plastic container.

Photographs of the clear plastic containers containing the Trial Bundle can be seen at [**HS4/22-28**].

(c) On 1 July 2024, an associate at NRF sent an email (timed at 16:19) explaining that copies of the Trial Bundle may be obtained from NRF or viewed at the Webpage to:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

On the same day an associate at NRF sent the same email (timed at 16:21) to:

juststopoilpress@protonmail.com

Copies of the two emails sent by NRF can be seen at [**HS4/29-30**].

(d) Confirmation of delivery was received on 1 July 2024 in respect of the email address listed for Just Stop Oil at paragraph 2.3(c) above. Copies of the confirmation email can be found at [**HS4/31**].

(e) Automatic replies were received on 1 July 2024 from enquiries@extinctionrebellion.co.uk and xr-legal@riseup.net, which appear to be automatic responses to any emails received. A copy of the relevant emails can be seen at [**HS4/32-33**].

Provision of the Skeleton Documents

2.4 Provision of the Skeleton Documents on the first, second and third Defendants was effected as follows:

(a) By 4 July 2024, the Skeleton Documents were uploaded to the Webpage.

A copy of the Webpage (including links to the Skeleton Documents) can be seen at [**HS4/4-8**].

(b) I am informed by the Claimants that by, no later than 4 July 2024:

(i) copies of the Skeleton Documents were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites; and

(ii) a notice which states that copies of the Skeleton Documents may be obtained from NRF and may also be viewed on the Webpage was added to each plastic container.

Photographs of the clear plastic containers containing the Skeleton Documents can be seen at [**HS4/34-40**].

(c) On 4 July 2024, an associate at NRF sent an email (timed at 11:53) explaining that copies of the Skeleton Documents may be obtained from NRF or viewed at the Webpage to:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

On the same day an associate at NRF sent the same email (timed at 11:54) to:

juststopoilpress@protonmail.com

Copies of the two emails sent by NRF can be seen at [**HS4/41-42**].

(d) Confirmation of delivery was received on 4 July 2024 in respect of each of the emails sent to the addresses listed at paragraph 2.4(c) above. Copies of the confirmation emails can be found at [**HS4/43-44**].

(e) In addition, automatic replies were received on 4 July 2024 from enquiries@extinctionrebellion.co.uk and xr-legal@riseup.net, which appear to be automatic responses to any emails received. A copy of the relevant emails can be seen at [**HS4/45-46**].

3 Service on the Fourth and Fifth Defendants

Service of Evidence

3.1 NRF effected service of the Evidence on the fourth and fifth Defendants by sending the Evidence by first class post on 21 June 2024. Copies of the covering letters and the envelopes with first class stamps, each dated 21 June 2024, can be seen at [**HS4/47-49**].

Service of the Trial Bundle

3.2 NRF effected service of the Trial Bundle on the fourth and fifth Defendants by sending the Trial Bundle by first class post on 29 June 2024. Copies of the covering letters and photos of the envelopes with first class stamps can be seen at [**HS4/50-52**].

Provision of the Skeleton Documents

3.3 Provision of the Skeleton Documents was effected on the Fourth and Fifth Defendants by instructing process servers employed by A.S.H. (UK) Process Servers Ltd (**Process Servers**) to leave the Skeleton Documents at the known addresses of the fourth and fifth Defendants. Copies of the covering letters addressed to the fourth and fifth Defendants and be seen at [**HS4/53-54**]. Copies of

the witness statements prepared by the Process Servers evidencing service can be seen at [**HS4/55-58**].

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone 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.

Signed: 

HOLLY STEBBING

Date: 9 July 2024

Claimants
H Stebbing
THIRD
Exhibit HS4
9 July 2024

CLAIM NO. QB-2022-001098

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED
Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT) UPON ANY OF THE SITES
(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT
Defendants

THIRD WITNESS STATEMENT
OF HOLLY STEBBING

---

3 More London Riverside
London SE1 2AQ
United Kingdom

+44 20 7283 6000
+44 20 7283 6500
DX 85 London

Claimants
H Stebbing
FIFTH
Exhibit HS5
20 June 2025

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')

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

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

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

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

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

~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~

(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

FIFTH WITNESS STATEMENT
OF HOLLY STEBBING

I, Holly Stebbing of Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ, United Kingdom, state as follows:

1 Introduction

1.1 I am a Partner at Norton Rose Fulbright LLP (**NRF**). I am duly authorised to make this witness statement on behalf of the Claimants.

1.2 The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

1.3 There is now produced and shown to me a paginated bundle of true copy documents marked [**HS5**]. All references to documents in this statement are to **Exhibit HS5** unless otherwise stated.

2 Background

2.1 I have read the Witness Statements of Anthony Milne (the Claimants' Global Security Adviser) dated 3 April 2022.

2.2 The incidents detailed at paragraphs 8 and 9 of Mr Milne's Witness Statement prompted the Claimants to commence proceedings for an injunction to restrain protestors from engaging in unlawful conduct at the Sites.

2.3 On 7 April 2022, Mrs Justice Ellenbogen granted an interim injunction to restrain the Defendants from trespassing and / or causing a nuisance at the Sites.

2.4 On 27 April 2022, Mr Justice Bennathan extended this injunction until 27 April 2023.

2.5 On 18 July 2023, Mr Justice Linden granted a final injunction to restrain the Defendants from trespassing and / or causing a nuisance at the Sites.

2.6 I make this witness statement in connection with the annual review hearing of the injunctions set out in Mr Justice Linden's Order dated 18 July 2023 (as amended on 21 July 2023 and on 16 October 2023) (the **Injunctions**) (the **Linden Order**).

2.7 On 29 January 2024, the Linden Order was reviewed by Mrs Justice Ellenbogen following the Supreme Court's judgment in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, in order to assess whether the decision in that case necessitated amendments to the Linden Order. She found it did not and granted the same relief (the **Ellenbogen Order**).

2.8 On 10 July 2024, at the first annual review hearing, Mrs Justice Tipples made no order as to the continuing effect of the Ellenbogen Order (the **Tipples Order**). The

Tipples Order also acknowledged the assurances that the Claimants had received from the Fifth Defendant not to breach the Injunctions.

2.9 Following the hearing, the Claimants and the Fourth Defendant entered into a consent order pursuant to which the Fourth Defendant gave undertakings to the Court not to protest at the Sites (the **Consent Order**). The Consent Order was sealed by the Court on 15 August 2024.

2.10 Pursuant to the Claimants' without notice application filed on 13 December 2024, the Ellenbogen Order, the Consent Order and the Tipples Order were amended under the slip rule on 21 January 2025 to correct a typographical error in the description of the sites referred to as the "Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Southampton" and the "Chemical Plant, Marsh Lane, Southampton". The orders amended under the slip rule are together the **Amended Orders**.

2.11 For the reasons set out below, the Claimants consider that the Injunctions should remain in place until 11 July 2028, subject to the built-in annual reviews described at paragraphs 8 to 10 of the Ellenbogen Order.

2.12 I also make this witness statement to:

(a) record service of the Tipples Order;

(b) record the steps taken to notify the Defendants of the Consent Order;

(c) record service of the Amended Orders;

(d) record the steps taken to notify the Defendants of the review hearing on 9 July 2025 (the **Review Hearing**); and

(e) record the steps taken to renew the undertaking provided by the Fourth Defendant in the Consent Order and the assurance provided by the Fifth Defendant acknowledged in the Tipples Order.

3 Statement in support of application

3.1 I have set out below a number of pertinent developments that evidence the continuing threat as well as evidence that shows the Injunctions have been restraining individuals from potentially causing disturbance on the Sites. These details have been provided to me by the Claimants and / or obtained from public sources. In light of the duty of full and frank disclosure, I have also set out evidence which may be interpreted as a reduction in this threat.

3.2 Overall, the Claimants consider that there remains an ongoing threat to the Sites which necessitates the continuation of the Injunctions, especially due to the hazardous nature of the Sites.

Extinction Rebellion and Just Stop Oil protest and related activity

3.3 Over the last year, Extinction Rebellion and Just Stop Oil continued to focus their attention on disruptive protest against the continued use of oil and gas and oil and gas businesses, like the Claimants:

(a) On 24 July 2024, multiple environmental activist groups (including Just Stop Oil, Last Generation, Oil Kills, Stay Grounded, and others) targeted airports in at least six different European countries. The targets included Heathrow Airport, London, UK (which I am informed by the Claimants Site F provides jet fuel to); Cologne-Bonn Airport and Frankfurt Airport, Germany; Oslo Gardermoen Airport, Norway; Vantaa Airport, Helsinki Finland; Barcelona Airport, Spain; and Zurich and Geneva Airports, Switzerland. The activists demanded an end to the extraction and burning of fossil fuels by year 2030. In Frankfurt the protest included protestors cutting a perimeter fence and heading onto the runway. This led to over 140 flights being cancelled and the airport described this protest as severely dangerous and possibly putting human life at risk. At Heathrow, seven members of Just Stop Oil were arrested and three others taken into custody to prevent similar disruption. [**HS5/6-9**]

(b) On 29 July 2024, Just Stop Oil Activists blocked the departures gates at Gatwick Airport in an attempt to disrupt members of the public from making their flights. In explaining this protest, Just Stop Oil declared *"areas of key importance to the fossil fuel economy will be declared sites of civil resistance around the world*". [**HS5/10-16**]

(c) On 30 July 2024, two Just Stop Oil protesters were arrested on suspicion of criminal damage after dousing parts of Heathrow Terminal 5 in orange paint. [**HS5/17-20**]

(d) On 1 August 2024, Just Stop Oil protesters blocked access to departure gates at Heathrow Terminal 5 as part of their campaign to disrupt airports in summer 2024 [**HS5/21-25**]. Seven of these protesters were arrested at the airport and a further ten protesters were arrested nearby based on the police suspecting that these activists would contribute to the disruption. [**HS5/26-27**]

(e) On 5 August 2024, four Just Stop Oil protesters were arrested at Manchester Airport on suspicion of planning to cause a public nuisance after being found

with items that the police verified would have caused "*damage and significant disruption*". [**HS5/28-29**]

(f) On 14 October 2024, ten activists from Extinction Rebellion blockaded the entrance to the UK Oil & Gas plc Horse Hill oil production site in Surrey, in protest against continued extraction. In its own press release, Extinction Rebellion stated it would "*stop any vehicles from entering the site*" and activists sat on the road directly outside the gate entrance. [**HS5/30-34**]

(g) On 8 January 2025 Extinction Rebellion occupied the Manchester office of Marsh the insurance broker. On the "XR North" (being Extinction Rebellion North) X social media account, it stated this was because it was "*"funding our destruction" by insuring fossil fuel projects*". [**HS5/35-36**]

Other relevant activity

3.4 On 20 January 2025, members of the activist group Shut the System sabotaged the fibre optic cables of major insurance companies in London, Leeds, Birmingham and Sheffield, causing disruption to their internet operations. These insurers were targeted due to their work underwriting oil and gas activities. [**HS5/37-41**]

3.5 In March 2025, members of the newly formed activist group Citizen's Arrest Network (**CAN**) targeted executives of oil and gas companies by accosting them on streets in the United Kingdom and confronting them with legal documents. These documents included draft "indictment papers" and "evidence dossiers" detailing crimes that CAN allege the executives have committed as leaders of their respective organisations. To date, targets have included the CEOs of Shell, EnQuest and Serica Energy - all of whom have been singled out because they work for notable oil and gas companies. As of today, CAN has over 15,000 followers across its social media profiles and is publicising direct altercations close to the workplaces of oil and gas employees. [**HS5/42-45**]

3.6 An offshoot of Just Stop Oil's youth wing is understood to have started "Youth Demand", a new activist organisation that blocked roads in central London in April 2025 in protest against fossil fuel companies and arms sales to the State of Israel. Youth Demand has threatened to take part in disruptive protests, including to "shut down" London (where one of the Claimants' sites protected by the Injunctions is located), until its climate goals are met. [**HS5/46-60**]

Plans to continue disruptive protests in 2025

3.7 On 27 March 2025, Just Stop Oil announced its plans to end disruptive protests and re-strategise their resistance efforts after a final demonstration on 26 April 2025.

[**HS5/61-63**] For the following reasons, I do not think the Court can, at this stage, consider that the announcement to end disruptive protests demonstrates there is no longer a continued threat to the Sites from Just Stop Oil or otherwise:

(a) Extinction Rebellion made a similar announcement on 31 December 2022 yet has since engaged in disruptive action as demonstrated by the evidence at paragraph 3.3(e) and (g) above. [**HS5/64-65**]

(b) The announcement by Just Stop Oil does not mean it or its members will not undertake further disruptive activity whether under the banner of Just Stop Oil or similar groups. On 28 April 2025, Just Stop Oil posted on its X social media account "*Just Stop Oil may have finished actions but we aren't going anywhere. People will continue their resistance in the courts, and something new is building*". [**HS5/66-67**]

(c) In fact, on 16 May 2025, it was reported that despite Just Stop Oil's previous announcement, its members still have strong intentions to seek public attention by using highly disruptive strategies. Audio recordings of an alleged private internal Just Stop Oil meeting record a co-ordinator summarising the views of the group to remain "*action based*", make sure they are "*not becoming something more like Greenpeace*" and to continue doing acts like "*Darwin's grave"* (this would appear to be a reference to two Just Stop Oil activists spray-painting Charles Darwin's grave at Westminster Abbey in January 2025) and "*citizens arrests*". Further it was "*very important to do the spicy stuff*" and that "*to do protest stuff you have to do naughty stuff*". The protester admitted Just Stop Oil had had conversations with CAN and were "*extremely jealous of the stuff they have been doing*" however, if CAN had been *"more spicy*" they would have gained more media attention. A "*rest*" and "*reset*" was needed before coming back and there was consensus that the group should "*carry on with civil disobedience, direct action, because it's the most effective thing to do*". Finally, in the "*second go around*" it was "*very much needed*" that they had to be so unpopular with the public. A transcription of this report can be seen at [**HS5/68-76**].

(d) On 19 May 2025, Just Stop Oil posted on its X account an image stating "*Just Getting Started*". [**HS5/77**]

(e) It has been reported that some members of Just Stop Oil and Extinction Rebellion have splintered off to join other activist groups such as CAN and Youth Demand. On 5 May 2025 Youth Demand posted on its X account that "*This summer Youth Demand and Just Stop Oil are running a joint 6-week training course to build the next generation of revolutionary organisers we*

need". [**HS5/78**]. The Guardian reported on 5 April 2025 that an activist involved in Extinction Rebellion "*helps run the Citizens Arrest Network*". [**HS5/79-85**]

(f) On 6 June 2025 the Times reported in relation to Youth Demand, "*Activists from the supposedly disbanded group* [Just Stop Oil*], however, were playing a central role in recruiting new members to Youth Demand to help its goal of bringing London to a halt. Events were even advertised using the JSO logo.*" The Times also quoted a Just Stop Oil activist as saying, "*This is an inhale before we breath out and expand into brand new territory, into something even bigger than we've tried before.*" [**HS5/86-93**]

(g) Though the names and tactics may evolve, the evidence in this statement demonstrates that for a number of the activists the primary objective remains disruptive demonstrations against organisations they believe stand opposed to their demands, which includes oil and gas companies.

Failure to provide assurances that no further direct action will occur

3.8 I refer to paragraph 67 of the judgment of Mr Justice Linden on 10 July 2023 where, in deciding to grant the Injunctions, he stated that:

"it would have been very easy for Extinction Rebellion or Just Stop Oil to give assurances or evidence to the court that there was no intention to return to their activities of 2021/2022, and no risk of trespass on the Sites or damage to property by protestors in the foreseeable future, but they did not do so".

3.9 I am not aware that Just Stop Oil and Extinction Rebellion have since provided any assurances or evidence to the Court or to the Claimants that they do not intend to return to protesting at the Sites in the foreseeable future. The Claimants have taken steps to notify the Defendants of this hearing and with the exception of the fifth Defendant (as explained below) the Claimants have had no response. I believe that, when taken with the evidence outlined above, this suggests that there remains a real risk of future unlawful activity at the Sites if the injunction is not renewed.

Other injunctions to restrain protestors granted in 2024/2025

3.10 The Claimants have not been alone in seeking to maintain injunctions that restrain the unlawful conduct of protestors opposed to the oil and gas industry. I am aware of the following injunctions:

Claim No.	Parties	Locations affected by order	Date and length of injunction
North Warwickshire			
QB-2022-001236	**Claimant:** North Warwickshire Borough Council **Defendants:** (1-18) Named Defendants (19) Persons Unknown (20-158) Named Defendants	Kingsbury Oil Terminal	Injunction, Power of Arrest on 14 April 2022 (as varied on 6 May 2022) Interim Injunction Order granted on 9 May 2022 until hearing of the claim. Final hearing listed for 11 June 2024. Only 24 of the 157 named Defendants have offered to provide undertakings not to engage in further unlawful activity against the North Warwickshire Borough Council. In the final judgment given on 6 September 2024, the Court considered that injunctive relief with a power of arrest attached was appropriate and the injunction should continue for 3 years from the date of the hearing subject to annual reviews.
Shell			
QB-2022-001259	**Claimant:** Shell International Petroleum Company Limited **Defendants:** Persons Unknown in connection with Just Stop Oil, Extinction Rebellion and Youth Climate Swarm	Shell Centre Tower (office building)	Further interim injunction granted on 24 April 2024 until 12 November 2024 with directions for a final review hearing In the final judgment given on 5 December 2024, the Court considered that injunctive relief was appropriate and granted a final order of 5 years relief from the date of the hearing subject to annual review.
QB-2022-001241	**Claimant:** Shell U.K. Limited **Defendants:** Persons Unknown in connection with Just Stop Oil, Extinction Rebellion	Shell Haven Oil Refinery, Stanford-Le-Hope (oil refinery)	Further interim injunction granted on 24 April 2024 until 12 November 2024 with directions for a final review hearing In the final judgment given on 5 December 2024, the Court considered that injunctive relief was appropriate and granted a

Claim No.	Parties	Locations affected by order	Date and length of injunction
	and Youth Climate Swarm		final order of 5 years relief from the date of the hearing subject to annual review.
QB-2022-001240	**Claimant:** Shell U.K. Oil Products Limited **Defendants:** (1) Persons Unknown in connection with Just Stop Oil, Extinction Rebellion and Youth Climate Swarm (2) 14 Named Defendants	Any Shell Petrol Station in England and Wales	Further interim injunction granted on 24 April 2024 until 12 November 2024 with directions for a final review hearing. Only one out of the 14 named Defendants agreed to an undertaking not to engage in relevant protest activities by the time of the final hearing. In the final judgment given on 5 December 2024, the Court considered that injunctive relief was appropriate and granted a final order of 5 years relief from the date of the hearing subject to annual review.
Thurrock Council and Essex County Council			
QB-2022-001317	**Claimant:** (1) Thurrock Council (2) Essex County Council **Defendants:** (1) Madeline Adams (2-222) Other Named Defendants (223-229) Persons Unknown	Roads within Thurrock and Essex Council boundaries Administrative areas of Thurrock and Essex Fuel Terminals: • The Navigator Fuel Terminal, West Thurrock • The Esso Fuel Terminal, Purfleet • Exolum Storage Ltd, Grays • Oikos Storage Limited, Essex	Original Injunction Order dated 1 June 2022 extended by order dated 27 January 2023 "*until and subject to any further order*". At the first annual review hearing on 12 July 2024, the court ordered that the injunctions should continue until and including 12 July 2029 subject to annual review hearings of the injunctions to the extent that they relate to Persons Unknown. At the final hearing on 9 October 2024, the court considered that injunctive relief was appropriate and the injunctions should continue for 5 years from the date of the hearing subject to annual reviews.

Claim No.	Parties	Locations affected by order	Date and length of injunction
UK Oil Pipelines Ltd and West London Pipeline and Storage Ltd			
PT-2022-000303	**Claimants:** (1) UK Oil Pipelines Ltd (2) West London Pipeline and Storage Ltd **Defendants:** Persons Unknown	Buncefield and Kingsbury Terminals	Final Injunction granted on 24 April 2022 for 5 years until 20 October 2028 subject to annual review.
Valero			
QB-2022-000904	**Claimants:** (1) Valero Energy Ltd (2) Valero Logistics UK Ltd (3) Valero Pembrokeshire Oil Terminal Ltd **Defendants:** (1) and (2) Persons Unknown (3-19) Named Defendants	Pembroke oil refinery, Pembroke Pembroke oil refinery jetties, Pembroke Manchester oil terminal, Trafford Park Kingsbury oil Terminal, Tamworth Plymouth oil terminal, Plymouth Cardiff oil, Cardiff Avonmouth oil terminal, Avonmouth Pembrokeshire terminal, Milford Haven	Final injunction granted on 24 January 2024 for 5 years until 13 December 2028. At the most recent review hearing on 24 January 2025, the Court upheld the injunction.
Exolum			
QB-2022-001142	**Claimants:** Exolum Pipeline Systems Ltd Exolum Storage Ltd Exolum Seal Sands Ltd **Defendants:** Persons Unknown	Various terminals and associated equipment	Final injunction granted for one year on 23 January 2023 and extended until 20 February 2025

3.11 In each of these annual reviews, heard recently, the Court considered there to be a sufficient risk of direct action by protest groups against claimants' activities within the oil and gas industry (or related parties) to maintain the injunctions.

Effect of the Ellenbogen Order

3.12 I believe that the Ellenbogen Order continues to have a deterrent effect: protecting the Sites from potentially dangerous activity.

3.13 The impact of the Ellenbogen Order and similar orders has been cited by Just Stop Oil when explaining its decision not to target sites such as those subject to this order. For example, on 13 September 2023 the Just Stop Oil X account posted that the reason behind disruptive protests in Portsmouth which involved blocking roads was "*injunctions that make protests impossible at oil refineries, oil depots and even petrol stations*" [**HS5/94**]. This post, together with Just Stop Oil's failure to provide assurances to the Claimants (or Court) that no further direct action will occur plus their disruptive airport protests and other activity as detailed above, indicate that Just Stop Oil still have an interest in targeting and disrupting oil and gas production facilities and but for the Ellenbogen Order would continue to do so.

4 Continuation of the Order

4.1 The Claimants are applying for the Ellenbogen Order (as amended on 21 January 2025) to remain in place in its current form until 11 July 2028, subject to the built-in annual reviews described at paragraphs 8 to 10 of the Order.

5 Service of the Tipples Order

Service on Defendants 1, 2 and 3

5.1 Service of the Tipples Order on the First, Second and Third Defendants was effected as follows:

(a) By no later than 25 July 2024, the Tipples Order was uploaded to the following webpage (the **Webpage**):

https://www.exxonmobil.co.uk/Company/Overview/UK-operations

A copy of the Webpage (including links to the Tipples Order) can be seen at [**HS5/96**].

(b) I am informed by the Claimants that, by no later than 23 July 2024:

(i) copies of the Tipples Order were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites; and

(ii) a notice which states that copies of the Tipples Order may be obtained from the Claimants' solicitors, NRF, and may also be viewed on the Webpage was added to each plastic container.

Photographs of the clear plastic containers, with the Tipples Order placed in the plastic containers, can be seen at [**HS5/97-104]**.

(c) On 19 July 2024, an associate at NRF sent emails enclosing copies of the Tipples Order and explaining that further copies may be obtained from NRF or viewed at the Webpage to the following email addresses:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

juststopoilpress@protonmail.com

Copies of the emails sent by an associate at NRF can be seen at [**HS5/105 and HS5/106**].

(d) Confirmation of delivery was received on 19 July 2024 in respect of each of the emails sent to the addresses listed at paragraph 5.1(c) above. Copies of the confirmation emails can be found at [**HS5/107 and HS5/108**].

(e) In addition, automatic replies were received on 19 July 2024 from enquiries@extinctionrebellion.co.uk and xr-legal@riseup.net, which appear to be automatic responses to any emails received. A copy of the relevant emails can be seen at [**HS5/109 and HS5/110**].

Service on Defendants 4 and 5

5.2 Pursuant to paragraph 4 of the Tipples Order, on 19 July 2024, an associate at NRF sent emails enclosing copies of the Tipples Order to the email addresses associated with the Fourth and Fifth Defendants. Copies of the emails sent by an associate at NRF can be seen at [**HS5/111-113 and HS5/114-117**].

5.3 Confirmation of delivery was received on 19 July 2024 in respect of the emails sent to the addresses associated with the Fourth and Fifth Defendants. Copies of the confirmation emails can be found at [**HS5/118 and HS5/119**].

6 Service of the Consent Order

6.1 The Claimants took the following steps to serve the First, Second and Third Defendants with the Consent Order:

(a) By no later than 21 August 2024, the Consent Order was uploaded to the Webpage.

A copy of the Webpage (including links to the Consent Order) can be seen at [**HS5/96**]

(b) I am informed by the Claimants that, by no later than 22 August 2024:

(i) copies of the Consent Order were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites; and

(ii) a notice which states that copies of the Consent Order may be obtained from the Claimants' solicitors, NRF, and may also be viewed on the Webpage was added to each plastic container.

Photographs of the clear plastic containers, with the Consent Order placed in the plastic containers and the large warning notices can be seen at [**HS5/120-126**].

(c) On 19 August 2024, an associate at NRF sent emails enclosing copies of the Consent Order and explaining that further copies may be obtained from NRF or viewed at the Webpage to the following email addresses:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

juststopoilpress@protonmail.com

Copies of the emails sent by an associate at NRF can be seen at [**HS5/127 and HS5/128**].

(d) Confirmation of delivery was received on 19 August 2024 in respect of each of the emails sent to the addresses listed at paragraph 6.1(c) above. Copies of the confirmation emails can be found at [**HS5/129 and HS5/130**].

(e) In addition, automatic replies were received on 19 August 2024 from enquiries@extinctionrebellion.co.uk and xr-legal@riseup.net, which appear to

be automatic responses to any emails received. A copy of the emails can be seen at [**HS5/131 and HS5/132**].

6.2 On 15 August 2024, an associate at NRF sent an email enclosing a copy of the Consent Order to the Fourth Defendant via the email address PBHPXR@protonmail.com. A copy of this email can be found at [**HS5/133**]. Confirmation of delivery was received the same day and can be seen at [**HS5/224**].

6.3 On 19 August 2024, an associate at NRF sent an email enclosing a copy of the Consent Order to the Fifth Defendant via the email address hekt@outlook.com,. A copy of this email can be found at [**HS5/134**]. Confirmation of delivery was received the same day and can be seen at [**HS5/135**].

7 Service of the Amended Orders

Service on Defendants 1, 2 and 3

7.1 The Claimants took the following steps to serve the First, Second and Third Defendants with the Amended Orders:

(a) By no later than 10 February 2025, the Amended Orders were uploaded to the Webpage.

A copy of the Webpage can be seen at [**HS5/96**].

(b) I am informed by the Claimants that, by no later than 14 February 2025:

(i) copies of the Amended Orders were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites;

(ii) a notice which states that copies of the Amended Orders may be obtained from the Claimants' solicitors, NRF, and may also be viewed on the Webpage was added to each plastic container; and

(iii) four amended large warning notices, in the form annexed to the Ellenbogen Order (as amended on 21 January 2025) were fixed in conspicuous places around the perimeter of each of the Sites.

Photographs of the clear plastic containers, with the Amended Orders placed in the plastic containers and the large warning notices can be seen at [**HS5/136-156**].

(c) On 10 February 2025, a trainee solicitor at NRF sent emails enclosing copies of the Amended Orders and explaining that further copies may be obtained from NRF or viewed at the Webpage to the following email addresses:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

juststopoilpress@protonmail.com

Copies of the emails can be seen at [**HS5/157 and HS5/158**].

(d) Confirmation of delivery was received on 10 February 2025 in respect of each of the emails sent to the addresses listed above. Copies of the confirmation emails can be found at [**HS5/159 and HS5/160**].

(e) In addition, automatic replies were received on 10 February 2025 from enquiries@extinctionrebellion.co.uk and xr-legal@riseup.net, which appear to be automatic responses to any emails received. A copy of the relevant emails can be seen at [**HS5/161 and HS5/162**].

Service on Defendants 4 and 5

7.2 A trainee solicitor at NRF sent emails enclosing copies of the Amended Orders to the email addresses of the Fourth and Fifth Defendants. Copies of the emails can be seen at [**HS5/163 and HS5/164**] and confirmation of delivery was received on 10 February 2025 [**HS5/165 and HS5/166**].

8 Notification of the Review Hearing

8.1 Although there is no express requirement in the Orders referred to above for notification of the Review Hearings, the Claimants, however, followed the steps for notice provided for in the Amended Orders. The Claimants took the following steps to notify the First, Second and Third Defendants of the Review Hearing:

(a) By no later than 1 April 2025, the notice and letter from NRF dated 3 April 2025 confirming the Review Hearing (the **Review Hearing Notice**) was uploaded to the Webpage.

A copy of the Webpage (including links to the Review Hearing Notice) can be seen at [**HS5/96**].

(b) I am informed by the Claimants that, by no later than 10 April 2025, copies of the Review Hearing Notice were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites. [**HS5/167-174**]

(c) On 10 April 2025, an associate at NRF sent emails enclosing copies of the Review Hearing Notice and explaining that further copies may be obtained from NRF or viewed at the Webpage to the following email addresses:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

juststopoilpress@protonmail.com

Copies of the emails sent by an associate at NRF can be seen at [**HS5/175-HS5/178**].

(d) Confirmation of delivery was received on 10 April 2025 in respect of each of the emails sent to the addresses listed at paragraph 6.1(c) above. Copies of the confirmation emails can be found at [**HS5/179 and HS5/180**].

(e) In addition, automatic replies were received on 10 April 2025 from enquiries@extinctionrebellion.co.uk and xr-legal@riseup.net, which appear to be automatic responses to any emails received. A copy of the emails can be seen at [**HS5/181 and HS5/182**].

8.2 On 10 April 2025, an associate at NRF sent emails enclosing copies of the Review Hearing Notice to the email addresses of the Fourth and Fifth Defendants to notify them of the Review Hearing. Copies of the emails can be seen at [**HS5/183-189 and HS5/190-196**] and confirmations of delivery were received on 10 April 2025 [**HS5/197 and HS5/198**].

9 Claimants' monitoring of documents served at the Sites

9.1 Since the last review hearing, the Claimants have carried out monthly checks to make sure the Warning Notices and plastic containers have remained in place at the Sites.

9.2 When arranging for service of the Amended Orders and amended Warning Notices in February 2025, I became aware that in February 2024 (i.e. the previous year) the Claimants had identified that some of the Sites only had two Warning Notices in place. They promptly rectified this. Paragraph 12.3 of the Ellenbogen Order requires four Warning Notices be fixed in conspicuous places around the perimeter of the Sites.

9.3 In my third witness statement in support of the 2024 annual review I stated I had been informed there were four Warning Notices at all the Sites. Photographic evidence of the four Warning Notices from all the Sites was provided. However, I now understand that as at February 2024 this was not the case for all Sites.

9.4 The Claimants appreciate that they are benefiting from injunctive relief, which has been granted at the Court's discretion and understand the importance of complying with the procedural steps required by the Court, especially as it relates to persons unknown. I apologise therefore that these procedural steps were not completed until February 2024 and that my third witness statement filed in support of the 2024 annual review hearing did not cover this. Steps to correct the omission were taken when the omission was appreciated. I do not consider that this has caused any prejudice to the Defendants in light of (i) the fact each site had at least two Warning Notices at conspicuous places around the perimeter, (ii) the other methods of notification that were completed – such as to inform any Defendant about the existence of the injunction – and (iii) there was no breach of the Ellenbogen Order during this period.

10 Renewal of Undertakings from Defendants 4 and 5

10.1 In July 2024, the Fourth Defendant provided undertakings to the Court through the Consent Order not to breach the Injunctions and the Fifth Defendant gave the Claimants the assurances acknowledged in the Tipples Order. These undertakings and assurances expire on 30 June 2025. The Claimants consequently sought to renew the Fourth and Fifth Defendants' undertakings/assurances for another year.

10.2 On 10 April, and 7 May 2025, an associate at NRF sent emails enclosing copies of new undertakings to the email addresses of the Fourth and Fifth Defendants respectively to invite them to give undertakings until next year (the **2026 Undertaking**). The 2026 Undertaking is materially identical to those previously given except it expires on the later of 31 July 2026 or the date of the next annual review hearing. [**HS5/183-204**]

10.3 On 15 June 2025, the Fifth Defendant returned a signed copy of the 2026 Undertaking via email to NRF, confirming her willingness to be subject to her undertaking for another year instead of to the Injunctions. **[HS5/217-223]** This was following further emails from NRF making clear which document the Claimants wished her to sign after the incorrect document was returned. Copies of the emails and delivery notices can be seen at [**HS5/205-211 and HS5/215-216**]

10.4 The Fourth Defendant has at the date of this statement not replied to the Claimants. On 12 June 2025 an associate from NRF sent a follow-up email to the Fourth

Defendant and received a delivery failure notification stating the mailbox was full. The previous two emails had been delivered. Copies of the emails and delivery receipts can be seen at [**HS5/212-214**]. The Claimants will continue to try to contact the Fifth Defendant up to the Review Hearing.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone 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.

Signed:



HOLLY STEBBING

Date: 20 June 2025

Claimants
H Stebbing
FIFTH
Exhibit HS5
20 June 2025

CLAIM NO. QB-2022-001098

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED
Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT) UPON ANY OF THE SITES
(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT
Defendants

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n

FIFTH WITNESS STATEMENT
OF HOLLY STEBBING

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3 More London Riverside
London SE1 2AQ
United Kingdom

+44 20 7283 6000
+44 20 7283 6500
DX 85 London

Claimants
H Stebbing
SIXTH
Exhibit HS6
1 July 2025

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')

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

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

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

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

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

~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~

(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

SIXTH WITNESS STATEMENT
OF HOLLY STEBBING

I, Holly Stebbing of Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ, United Kingdom, state as follows:

1 Introduction

1.1 I am a Partner at Norton Rose Fulbright LLP (**NRF**). I am duly authorised to make this witness statement on behalf of the Claimants.

1.2 The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

1.3 There is now produced and shown to me a paginated bundle of true copy documents marked [**HS6**]. All references to documents in this statement are to **Exhibit HS6** unless otherwise stated.

2 Warning Notices

2.1 On 20 June 2025 I provided my fifth witness statement in this case. In my fifth witness statement I stated at paragraph 9.2 that the Claimants had identified that some of the Sites only had two Warning Notices instead of the four required, but that all sites had four Warning Notices by February 2024.

2.2 This statement was based on the Claimants' understanding at that time based on internal emails that were also provided to my firm. An associate in my team tried to check the position with the Claimants before I signed my fifth witness statement but the individual who has been organising service at the Sites on behalf of the Claimants was on personal leave at the time and the associate was unable to reach her. She has now returned to the office and with greater access to the Claimants' documents we now understand the previous understanding was mistaken and the Sites likely did have four Warning Notices before February 2024 with some exceptions, as set out in this statement.

2.3 The Claimants provided to NRF by 13 June 2024 photographic evidence of four Warning Notices at all of the Sites, as described in my third statement and exhibited thereto. This was for the purpose of the 2024 annual review hearing.

2.4 Before this, the Claimants did not collect photographic evidence of the Warning Notices for the purpose of evidencing service. However, in the third witness statement of Nawaaz Allybokus dated 22 April 2022, Mr Allybokus states that he had been informed there were four Warning Notices in place at each of the Sites as of 22 April 2022 (although he did not provide photographic evidence).

2.5 The Claimants have evidence of 40 Warning Notices being purchased in July 2023 after the order of Linden J dated 18 June 2023 amended the wording of the Warning Notices. Five were sent to each of the then eight sites, 20 being sent directly to Hythe, with five to be transmitted onwards to each of Alton, Hartland Park and Fawley. **[HS6/5]**

2.6 When the wording of the Warning Notices was changed as part of the order of Ellenbogen J dated 29 January 2024, 28 new Warning Notices were ordered (four for each of the by-then seven Sites) and delivered to each of the Sites (with 12 Warning Notices being delivered directly to Hythe, with four to be transmitted onwards to each of Alton and to Fawley). **[HS6/16-17, 18]**

2.7 When the photographs were being taken ahead of the 2024 annual review the Claimants discovered that Avonmouth only had two Warning Notices, Alton only had two and Purfleet had a damaged Warning Notice. The Claimants therefore ordered seven new notices on 11 June 2024:

(a) Two Warning Notices were sent to Hythe for onward transmission to Alton as it is unstaffed.

(b) Four were sent to Avonmouth (two to replace the two that were missing and two as spares as Avonmouth is beside the sea and the Warning Notices were prone to being damaged).

(c) The final Warning Notice was sent to Purfleet. **[HS6/11-12]**

2.8 The previous confusion arose from emails that suggested new Warning Notices had been ordered because the Sites did not have enough Warning Notices in February 2024. However, upon further investigation it transpires these new Warning Notices were ordered because the wording of the Warning Notice changed as part of the order of Ellenbogen J dated 29 January 2024.

2.9 Based on the lack of photographic evidence before June 2024, the Claimants cannot definitively say if four Warning Notices were at the Sites at all times before June 2024 (otherwise than described above). As explained at paragraph 9.1 of my fifth witness statement, the Claimants now conduct monthly checks to make sure Warning Notices and containers are in place.

3 Additional evidence of continued threat

3.1 Since my fifth statement, I have become aware of further evidence that supports my fifth statement. At paragraph 3.7 (c) of my fifth statement I referred to undercover reporting by GB News of an alleged recording of Just Stop Oil saying in fact it had

not disbanded. This was reported on 16 May 2025 and on 21 May 2025 Just Stop Oil emailed its mailing list stating "*GB News was right for once. We are "plotting a very big comeback".*" It also suggested the comeback may not be in the name of Just Stop Oil but be closely aligned to the campaign, stating that:

"*Just Stop Oil was just the beginning. A new campaign is in the works—one that will build on our knowledge and success as Just Stop Oil and will face the grinding injustice of our political and economic system head on. We're just getting started*." **[HS6/23-24]**

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone 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.

Signed: 

HOLLY STEBBING

Date: 1 July 2025

Claimants
H Stebbing
SIXTH
Exhibit HS6
1 July 2025

CLAIM NO. QB-2022-001098

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED
Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT) UPON ANY OF THE SITES
(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT
Defendants

SIXTH WITNESS STATEMENT
OF HOLLY STEBBING

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United Kingdom

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Claimants
H Stebbing
SEVENTH
Exhibit HS7
8 July 2025

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')

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

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

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

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

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

~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~

(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

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(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

SEVENTH WITNESS STATEMENT
OF HOLLY STEBBING

I, Holly Stebbing of Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ, United Kingdom, state as follows:

1 Introduction

1.1 I am a Partner at Norton Rose Fulbright LLP (**NRF**). I am duly authorised to make this witness statement on behalf of the Claimants.

1.2 The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

1.3 There is now produced and shown to me a paginated bundle of true copy documents marked ["**HS7**"]. All references to documents in this statement are to **Exhibit HS7** unless otherwise stated.

1.4 I make this witness statement to confirm the steps taken to serve the various Defendants to these proceedings with documents in preparation for the review hearing on 9 July 2025 (the **Review Hearing**). In particular:

(a) my fifth witness statement dated 20 June 2025 (the **Witness Statement**) and the exhibits referred to in the Witness Statement (the **Exhibits** and, with the Witness Statement, the **Evidence**)

(b) the trial bundle (the **Trial Bundle**); and

(c) my sixth witness statement dated 1 July 2025 and the related exhibits (the **Supplemental Evidence**).

1.5 This statement also sets out the steps taken to provide the Claimants' skeleton argument and accompanying bundle of authorities (the **Skeleton Documents**). Paragraph 10 of the order of Mrs Justice Ellenbogen dated 29 January 2024 (the **Ellenbogen Order**) states the that the Skeleton Documents are to be lodged and exchanged.

2 Service and provision of documents on the first, second and third Defendants

2.1 Paragraph 15 of the Ellenbogen Order provides that service of documents in these proceedings (the **Further Documents**) should be served on the First, Second and Third Defendants by:

(a) fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a

notice which states (a) that a copy of the Further Documents may be obtained from the Claimants' solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email: ExxonMobil.Service@nortonrosefulbright.com; and (b) that a copy of the Further Documents may be viewed at the website referred to in Paragraph 15.2 of the Ellenbogen Order;

(b) posting the Further Documents on the following website (the **Webpage**): https://www.exxonmobil.co.uk/Company/Overview/UK-operations;

(c) sending an email to each of the following email addresses: (i) with the information that a copy of the Further Documents may be viewed at the website referred to in Paragraph 15.2 of the Order; and/or (ii) enclosing a copy of the Further Documents (whether by Mimecast link or otherwise):

(i) xr-legal@riseup.net

(ii) enquiries@extinctionrebellion.uk

(iii) juststopoilpress@protonmail.com

Service of the Evidence

2.2 Service of the Evidence on the First, Second and Third Defendants was effected as follows:

(a) By 23 June 2025, the Evidence was uploaded to the Webpage.

A copy of the Webpage (including links to the Evidence) can be seen at [**HS7/5-6**].

(b) I am informed by the Claimants that by, no later than 24 June 2025:

(i) copies of the Evidence were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites; and

(ii) a notice which states that copies of the Evidence may be obtained from NRF and viewed on the Webpage was added to each plastic container.

Photographs of the clear plastic containers containing the Evidence can be seen at [**HS7/6-13**].

(c) On 23 June 2025, an associate at NRF sent emails (timed at 17:44) explaining that copies of the Evidence may be obtained from NRF or viewed at the Webpage to:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

On the same day an associate at NRF sent materially the same email (timed at 17:45) to:

juststopoilpress@protonmail.com

Copies of the two emails sent by NRF can be seen at [**HS7/14-15**].

(d) Confirmation of delivery was received on 23 June 2025 in respect of each of the emails sent to the addresses listed at 2.2(c) above. Copies of the confirmation emails can be found at [**HS7/19-20**].

(e) In addition, an automatic reply was received on 23 June 2025 from xr-legal@riseup.net, which appears to be an automatic response to any emails received. A copy of the relevant email can be seen at [**HS7/18**].

Service of the Trial Bundle

2.3 Service of the Trial Bundle on the First, Second and Third Defendants was effected as follows:

(a) By 30 June 2025, the Trial Bundle was uploaded to the Webpage.

A copy of the Webpage (including links to the Trial Bundle) can be seen at [**HS7/5-6**].

(b) I am informed by the Claimants that by, no later than 1 July 2025:

(i) copies of the Trial Bundle were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites; and

(ii) a notice which states that copies of the Trial Bundle may be obtained from NRF and may also be viewed on the Webpage was added to each plastic container.

Photographs of the clear plastic containers containing the Trial Bundle can be seen at [**HS7/28-39**].

(c) On 30 June 2025, an associate at NRF sent an email (timed at 17:38) explaining that copies of the Trial Bundle may be obtained from NRF or viewed at the Webpage to:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

On the same day an associate at NRF sent the same email (timed at 17:37) to:

juststopoilpress@protonmail.com

Copies of the two emails sent by NRF can be seen at [**HS7/40-41**].

(d) Confirmation of delivery was received on 30 June 2025 in respect of each of the emails sent to the addresses listed in paragraph 2.3(c) above. Copies of the confirmation email can be found at [**HS7/44-45**].

(e) An automatic reply was received on 30 June 2025 from xr-legal@riseup.net, which appears to be an automatic response to any emails received. A copy of the relevant email can be seen at [**HS7/48**].

Provision of the Skeleton Documents and service of the Supplementary Evidence

2.4 Provision of the Skeleton Documents and service of the Supplementary Evidence on the First, Second and Third Defendants was effected as follows:

(a) By 3 July 2025, the Skeleton Documents and Supplementary Evidence were uploaded to the Webpage.

A copy of the Webpage (including links to the Skeleton Documents and Supplementary Evidence) can be seen at [**HS7/5-6**].

(b) I am informed by the Claimants that by, no later than 3 July 2025:

(i) copies of the Skeleton Documents and Supplementary Evidence were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites; and

(ii) a notice which states that copies of the Skeleton Documents and Supplementary Evidence may be obtained from NRF and may also be viewed on the Webpage was added to each plastic container.

Photographs of the clear plastic containers containing the Skeleton Documents and Supplementary Evidence can be seen at [**HS7/52-64**.

(c) On 3 July 2025, an associate at NRF sent an email (timed at 14:22) explaining that copies of the Skeleton Documents and Supplementary Evidence may be obtained from NRF or viewed at the Webpage to:

enquiries@extinctionrebellion.uk and xr-legal@riseup.net

On the same day an associate at NRF sent the same email (also timed at 14:22) to:

juststopoilpress@protonmail.com

Copies of the two emails sent by NRF can be seen at [**HS7/78-79**].

(d) Confirmation of delivery was received on 3 July 2025 in respect of each of the emails sent to the addresses listed at paragraph 2.4(c) above. Copies of the confirmation emails can be found at [**HS7/82-83**].

(e) In addition, an automatic reply was received on 3 July 2025 from xr-legal@riseup.net, which appears to be an automatic response to any emails received. A copy of the relevant email can be seen at [**HS7/86**].

3 Service on the Fourth and Fifth Defendants

3.1 Paragraphs 2 and 3 of the consent order of Mr Justice Linden sealed on 19 July 2024 (the **Consent Order**) entitles the Claimants to effect service on the Fourth Defendant by email to PBHPXR@protonmail.com and the Fifth defendant at hekt@outlook.com.

Service of Evidence

3.2 On 23 June 2025, an associate at NRF sent an email (timed at 17:49) explaining that copies of the Evidence may be obtained from NRF or viewed at the Webpage to:

PBHPXR@protonmail.com

On the same day an associate at NRF sent materially the same email (timed at 17:51) to:

hekt@outlook.com

Copies of the two emails can be seen at [**HS7/16-17**].

3.3 After effecting service on the Fourth Defendant, a delivery failure notification email was received. The Claimants took the extra measure to provide the link to the Webpage containing the Evidence through a letter sent by first class post on 24 June 2025 (noting service has already been effected). Delivery of the letter was confirmed on 25 June 2025 and signed for. Copies of the failure notification email, letter sent to the Fourth Defendant and proof of postage and delivery can be seen at [**HS7/23-27**].

Service of the Trial Bundle

3.4 On 30 June 2025, an associate at NRF sent emails (both timed at 17:47) explaining that copies of the Trial Bundle may be obtained from NRF or viewed at the Webpage to:

PBHPXR@protonmail.com

hekt@outlook.com

Copies of the two emails sent by NRF can be seen at [**HS7/42-43**].

3.5 After effecting service on the Fourth Defendant, a delivery failure notification email was received stating the inbox was full. The Claimants took the extra measure to provide the link to the Webpage containing the Trial Bundle through a letter sent by first class post on 1 July 2025 (noting service has already been effected). Delivery of the letter was confirmed and signed for on 2 July 2025. Copies of the failure notification email, letter sent to the Fourth Defendant and proof of delivery can be seen at [**HS7/49-51**].

Provision of the Skeleton Documents and service of Supplementary Evidence

3.6 On 3 July 2025, an associate at NRF sent emails (timed at 14:28) explaining that copies of the Skeleton Documents and Supplementary Evidence may be obtained from NRF or viewed at the Webpage to:

PBHPXR@protonmail.com

On the same day an associate at NRF sent materially the same email (timed at 14:26) to:

hekt@outlook.com

Copies of the two emails sent by NRF can be seen at [**HS7/80-81**].

3.7 After effecting service on the Fourth Defendant, a delivery failure notification email was received stating the inbox was full. The Claimants took the extra measure to provide the link to the Webpage containing the Skeleton Documents and Supplementary Evidence through a letter sent by first class post on 3 July 2025 (noting service has already been effected). Delivery of the letter was confirmed and signed for on 4 July 2025. Copies of the failure notification email, letter sent to the Fourth Defendant and proof of postage and delivery can be seen at [**HS7/87-92**].

4 Renewal of Undertakings from the Fourth Defendant

4.1 On 20 June 2025, I stated at paragraph 10.4 of the Witness Statement that the Fourth Defendant had not replied to the Claimants' request to renew his undertakings not to breach the Injunctions, which he provided to the Court last year.

4.2 The letters sent to the Fourth Defendant on 24 June 2025 and 3 July 2025 mentioned above each included another request for him to renew the undertakings [**HS7/24-25 and HS7/87-89**]. As at the date of this statement, however, the Fourth Defendant has not replied to the Claimants on this point.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone 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.

Signed: 

HOLLY STEBBING

Date: 8 July 2025

Claimants
H Stebbing
SEVENTH
Exhibit HS7
8 July 2025

CLAIM NO. QB-2022-001098

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED
Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT) UPON ANY OF THE SITES
(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT
Defendants

SEVENTH WITNESS STATEMENT
OF HOLLY STEBBING

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Claimants
H Stebbing
EIGHTH
Exhibit HS8
2 July 2026

IN THE HIGH COURT OF JUSTICE **CLAIM NO. QB-2022-001098**
KING'S BENCH DIVISION

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER (as defined below))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER)
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER)
(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 AMENDED ELLENBOGEN ORDER)
(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 AMENDED ELLENBOGEN ORDER)
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER)

(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE FAWLEY PLAN)

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

EIGHTH WITNESS STATEMENT
OF HOLLY STEBBING

I, Holly Stebbing of Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ, United Kingdom, state as follows:

1 Introduction

1.1 I am a Partner at Norton Rose Fulbright LLP (**NRF**). I am duly authorised to make this witness statement on behalf of the Claimants.

1.2 The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

1.3 There is now produced and shown to me a paginated bundle of true copy documents marked [**HS8**]. All references to documents in this statement are to **Exhibit HS8** unless otherwise stated.

2 Background

2.1 I have re-read the Witness Statement of Anthony Milne (the Claimants' Global Security Adviser) dated 3 April 2022 ("**Mr Milne's Witness Statement**").

2.2 The incidents detailed at paragraphs 8 and 9 of Mr Milne's Witness Statement prompted the Claimants to commence proceedings for an injunction to restrain protesters from engaging in unlawful conduct at the Sites.

2.3 On 6 April 2022, Mrs Justice Ellenbogen granted an interim injunction to restrain the Defendants from trespassing and / or causing a nuisance at the Sites.

2.4 On 27 April 2022, Mr Justice Bennathan extended this injunction until 27 April 2023.

2.5 On 18 July 2023, Mr Justice Linden granted a final injunction to restrain the Defendants from trespassing and / or causing a nuisance at the Sites until 11 July 2028.

2.6 I make this witness statement in connection with the annual review hearing of the injunctions set out in Mr Justice Linden's Order dated 18 July 2023 (as amended on 21 July 2023 and on 16 October 2023) (the **Injunctions**) (the **Linden Order**).

2.7 Following the hearing, the Claimants and the Fourth and Fifth Defendants entered into a consent order pursuant to which the Fourth and Fifth Defendants provided assurances to the Court that they would not protest at the Sites expiring on 30 June 2024 (the **Linden Consent Order**). The Linden Consent Order also provides that service of subsequent court documents on the Fourth or Fifth Defendants may be effected by email. The Linden Consent Order was sealed by the Court on 19 July 2023.

2.8 On 29 January 2024, the Linden Order was reviewed by Mrs Justice Ellenbogen following the Supreme Court's judgment in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, in order to assess whether the decision in that case necessitated amendments to the Linden Order. She found it did not and granted the same relief (the **Ellenbogen Order**).

2.9 On 10 July 2024, prior to the first annual review of the Injunction, the Fifth Defendant provided assurances, expiring on 30 June 2025, over email not to protest at any of the Sites.

2.10 On 10 July 2024, at the first annual review hearing, Mrs Justice Tipples made no order as to the continuing effect of the Ellenbogen Order (the **Tipples Order**). The Tipples Order also acknowledged the assurances that the Claimants had received from the Fifth Defendant not to breach the Injunctions.

2.11 Following the hearing, the Claimants and the Fourth Defendant entered into a consent order pursuant to which the Fourth Defendant provided assurances, expiring on 30 June 2025, to the Court that they would not protest at the Sites (the **Consent Order**). The Consent Order was sealed by the Court on 15 August 2024.

2.12 Pursuant to the Claimants' without notice application filed on 13 December 2024, the Ellenbogen Order, the Consent Order and the Tipples Order were amended under the slip rule on 21 January 2025 to correct a typographical error in the description of the sites referred to as the "Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Southampton" and the "Chemical Plant, Marsh Lane, Southampton". The orders amended under the slip rule are together the **Amended Orders**.

2.13 On 9 July 2025, at the second annual review hearing (the **2025 Annual Review Hearing**), Mr Justice Sweeting made no order as to the continuing effect of the Ellenbogen Order. The Sweeting Order, dated 10 July 2025 (the **Sweeting Order)**, also:

(a) Amended the Ellenbogen Order to (i) include *'or other environmental campaign*' in addition to the Extinction Rebellion and Just Stop Oil campaigns when describing persons unknown and (ii) to dispense with the service requirement to serve Further Documents in connection with the Injunctions in plastic containers at the Sites (the **Amended Ellenbogen Order**).

(b) Granted the Claimants permission to amend the Re-Re-Amended Claim Form and Re-Re-Amended Particulars of Claim to change the description of the First to Third Defendants to include "*or other environmental campaign*", producing a Re-Re-Re-Amended Claim Form (the **Re-Re-Re-Amended**

Claim Form) and Re-Re-Re-Amended Particulars of Claim (the **Re-Re-Re-Amended Particulars of Claim**).

(c) Acknowledged the assurances provided by the Fifth Defendant on 15 June 2025 not to protest at the Sites (the **Renewed Assurances**) and in light of those Renewed Assurances, ordered that the Fifth Defendant should not be subject to the Injunctions. The Renewed Assurances expire on 31 July 2026 or the date of the annual review hearing, whichever is later.

2.14 In the absence of similar assurances from the Fourth Defendant, it was ordered that the Fourth Defendant should not be subject to the Injunctions, but that the Claimants should have liberty to apply to make him subject to the Injunctions. In the absence of any evidence of direct threat from the Fourth Defendant, the Claimants have not applied to make him subject to the Injunctions to date.

2.15 For the reasons set out below, the Claimants consider that the Injunctions should remain in place until 11 July 2028, subject to the built-in annual reviews described at paragraphs 8 to 10 of the Ellenbogen Order.

2.16 I also make this witness statement to:

(a) record service of the Sweeting Order and the Amended Ellenbogen Order;

(b) record the steps taken to notify the Defendants of the Re-Re-Re-Amended Claim Form and Re-Re-Re-Amended Particulars of Claim;

(c) record the steps taken to notify the Defendants of the review hearing on 22 July 2026 (the **Review Hearing**);

(d) record the steps taken to renew the assurances provided by the Fourth Defendant in the Consent Order and the assurances provided by the Fifth Defendant in the Renewed Assurances; and

(e) inform the Court of a change in the boundary of the Avonmouth Plan.

3 Statement in support of application

3.1 I have set out below a number of pertinent developments which evidence that protestors have continued to target the oil and gas industry and that individuals have been deterred from potentially causing disturbance by the Injunctions. These details have been provided to me by the Claimants and / or obtained from public sources. In light of the duty of full and frank disclosure, I have also reconsidered evidence which may be interpreted as a reduction in this threat.

Steps taken to consider whether the Injunctions continue to be necessary

3.2 The Claimants consider that there remains an ongoing threat to the Sites which necessitates the continuation of the Injunctions, especially due to the hazardous nature of the Sites.

3.3 In paragraph 10.2 of Mr Milne's Witness Statement, Mr Milne set out the reasons why the Claimants concluded that it was appropriate to apply for an injunction. These include that:

(a) The Sites are used for the production and storage of highly flammable and otherwise hazardous substances, so that access to the Sites is strictly controlled.

(b) The Claimants wish to avoid incidents of unlawful trespass at the Sites, which had occurred previously and some of which resulted in damage to the Claimant's property at the Sites.

(c) The First Claimant has important contractual obligations to deliver fuel to customers which have to be fulfilled to allow road, rail and air travel throughout the country to operate as required.

3.4 Mr Milne expanded on the Claimants' reasoning for requiring an injunction in paragraph 11 of his Witness Statement. He explained that:

(a) Attempts to trespass or disrupt the Sites would result in significant and unacceptable risks of serious personal injury and disruption to the Claimants' operations and subsequent impact on the UK downstream fuel resilience.

(b) Implications of disruption at the Sites for the UK economy could involve:

(i) Disruption to the production, transportation and storage of refined transport fuels (including road, heating, rail and aviation fuel).

(ii) Inability to supply wholesale customers, including national supermarkets, major aviation companies at Heathrow and Gatwick airport, Esso branded retail filling stations, other oil companies and rail companies.

(iii) Supply disruption and risk of local outages at retail filling stations.

3.5 I have checked with the Claimants and they believe that the factors set out in paragraphs 3.3 and 3.4 continue to apply. I have also seen evidence that activists

continue to oppose oil and gas companies like the Claimants. I have included such evidence below in this Section 3.

Extinction Rebellion and Just Stop Oil protest and related activity

3.6 Over the last year and since I made my Sixth Witness Statement in support of the 2025 Annual Review Hearing, Extinction Rebellion and Just Stop Oil have continued disruptive protests against the ongoing use of oil and gas and oil and gas businesses in the UK, like the Claimants:

(a) In July 2025, around 15 Extinction Rebellion protesters staged a 'crime scene' at a newly opened Barclays Bank branch in Oxford in protest against Barclays's ties with the fossil fuel industry. The protesters placed police "crime scene" tape outside the premises and held up a banner stating "*Barclays funds climate chaos*". **[HS8/9-13]** TB/359-363

(b) On 20 January 2026, Cut the Ties to Fossil Fuels demonstrators held a protest outside the Macquarie Group headquarters in London, positioning themselves in front of the main entrance and holding banners that urge the company to cut ties with fossil fuels. Extinction Rebellion activists were present and at least 1 individual was arrested. **[HS8/14-17]** TB/364-367

Cut the Ties to Fossil Fuels began as an Extinction Rebellion campaign. Although it appears that Extinction Rebellion is no longer funding or financially supporting this initiative, **[HS8/18]** the presence of Extinction Rebellion activists at this protest and their publication of the protest described at paragraph 3.7(a) suggests that Cut the Ties to Fossil Fuels supporters continue to collaborate with Extinction Rebellion. TB/368

(c) On 23 April 2026, Extinction Rebellion UK sent an email to its members stating that "*XRUK has sprung into action*" and that XRUK groups are getting into "*marches…and protest camps*" and that "*actions help us…call out the climate criminals*". The email also describes the Earth Day rally held outside Parliament on 22 April 2026 and the Extinction Rebellion presence in the climate justice block of the Together march in London in March 2026. **[HS8/19-22]** TB/369-372

Other Environmental Campaign activity

3.7 Significant protest activity has also been carried out by environmental campaigns other than Just Stop Oil and Extinction Rebellion. In this paragraph, I set out examples of instances where splintered environmental campaigns have held disruptive demonstrations against oil and gas companies, and other companies

associated with them. In a number of cases, these activities have been undertaken in collaboration with other activist groups, including Extinction Rebellion and Just Stop Oil:

(a) On 25 June 2025, climate activists associated with Cut the Ties to Fossil Fuels occupied the headquarters of the advertising agency group WPP in London. The activists displayed a 15 metre banner on the Thameside embankment reading "*WPP = Climate Criminals, Ban Fossil Fuel Ads*." They also erected a steel oil rig in front of the building, and staged a 'die-in' wearing shrouds with the logos of WPP's 'Big Oil' clients The article publicising this protest on the Extinction Rebellion website names the Second Claimant as one of WPP's clients. **[HS8/23-29]** As described at paragraph 3.6(b) above, I understand that Cut the Ties to Fossil Fuels began as an Extinction Rebellion Campaign. TB/373-379

(b) On 28 July 2025, Fossil Free London activists staged a 'heist' outside the Bank of England to protest the development of the Rosebank oil field in the UK North Sea. The protesters were dressed as robbers and used a prop vault. They put fake cash bills into bags labelled "*UK Tax Payer Money*" and held up signs with messages including "*Rosebank is daylight robbery*" and "*Net loss for UK*". **[HS8/30-32]** TB/380-382

(c) On 13 August 2025, Greenpeace protesters targeted an offshore platform (the 'Skiff' rig) belonging to Shell in the UK North Sea. The protesters, in conjunction with the artist Anish Kapoor, installed a white canvas on the side of the platform and pumped red paint over the canvas. Greenpeace later stated that the canvas was a piece of art titled *Butchered* that symbolises the suffering and damage caused by the oil and gas industry. **[HS8/33-36]** TB/383-386

(d) On 6 September 2025, Fossil Free London held a protest outside the Holborn and St Pancras Council building (Prime Minister Keir Starmer's constituency office) in opposition to the development of the Rosebank oil field. It was reported that Extinction Rebellion joined the protest [**HS8/37**]. Further affiliated protests also took place across the UK in collaboration with groups including Stop Rosebank and Christian Climate Action **[HS8/38-42]**. TB/387 TB/388-392

(e) On 22 September 2025, 8 activists with Greenpeace UK scaled 2 75 metre high chimney stacks at RWE's Staythorpe gas power station in Nottinghamshire. The protesters climbed ladders and hung a banner reading "*The Great Gas Rip Off: Now on!*". **[HS8/43-47]** TB/393-397

(f) On 23 October 2025, Fossil Free London held a protest outside Shell's headquarters in London. Individuals dressed in blue overalls and carrying

banners gathered outside the HQ entrance, calling on Shell to pay financial reparations to the survivors of Storm Odette. The post publicising the protest states that "*Shell knew about climate change…yet they doubled down on oil and gas*". **[HS8/48-50]** TB/398-400

(g) On 4 November 2025, at least 2 activists from Fossil Free London disrupted a bp speaker on the panel of a discussion hosted by the Association of International Energy Negotiators at law firm Simmons & Simmons. **[HS8/51 and HS8/52-55]** TB/401 and TB/402-405

(h) Christian Climate Action regularly hold silent vigils outside Shell's headquarters and bp headquarters in London. **[HS8/56-64]** Christian Climate Action are also known to work alongside other climate protest groups, including Extinction Rebellion and Just Stop Oil. The group reported that they joined the protests at the Sites which led the Claimants to apply for an injunction. **[HS8/65-69]** TB/406-414 TB/415-419

(i) On 22 January 2026, climate protesters disrupted and caused an evacuation at the Fitch Ratings Insurance Insights 2026 conference in London. The protesters called on the UK insurance sector to stop supporting the fossil fuel industry and held up placards stating 'No New Workers for Fossil Fuel Insurers'. **[HS8/70-72]** TB/420-422

(j) In February 2026, Fossil Free London activists disrupted events held at 2 hotels and a bar hosting executives attending International Energy Week in London. **[HS8/73]** TB/423

(k) On 20 March 2026, I received the book "Why Daddy's Law Firm works with the Nice Oil Men" by Oli Frost & Ellen McGahey from an unknown sender. **[HS8/74-75]** According to an article on RollOnFriday, this was sent by Serious People, a climate change pressure group, to "*oil and gas lawyers across London*". **[HS8/76-77]** The targeting of lawyers in this way indicates that protesters perceive their work, such as that involved in obtaining injunctions, as obstructive to their campaigns. TB/424-425 TB/426-427

(l) On 20 and 24 March 2026, Greenpeace activists approached the *Petrojarl Rosebank* Floating Production, Storage and Offloading (FPSO) unit. On their second approach, the activists painted "*They Profit, We Pay*" on the hull, referencing higher oil prices resulting from the conflict in the Middle East.

Other activists surrounded the FPSO with banners opposing the project. **[HS8/78-81]** TB/428-431

(m) On 12 May 2026, environmental activists associated with the Organisation of Radical Cambridge Activists (**ORCA**) disrupted a conference organised by the UN Environment Programme in Cambridge. The protesters accused the event of hosting "*major polluters*" and criticised "*insurance companies profiting of oil, gas, and arms*", amongst others. **[HS8/82-86]** On 19 May 2026, ORCA also disrupted an event at Gates House in Cambridge at which Tyler Goodspeed, the Chief Economist at the Second Claimant, was speaking. The protesters held up banners with messages including "*Exxon complicit in Genocide*" and "*Exxon Lied Greed Kills*". **[HS8/87-88]** ORCA has previously protested alongside other activist groups including Extinction Rebellion and Greenpeace **[HS8/89-92]**. TB/432-436 TB/437-438 TB/439-442

Environmental campaign activity elsewhere

3.8 The incidents which I have described above demonstrate that environmental campaigners have continued to target the oil and gas industry and associated institutions. These activities occurred at locations which are not protected by injunctions, including industry events and conferences, the offices of energy companies and insurance companies and finance providers.

3.9 I also include below some examples of disruptive protests against the oil and gas industry and the ExxonMobil group abroad in jurisdictions where activists are not restricted by injunctions. I have also seen evidence that environmental protests can be influenced by tactics from protests in other countries and regions **[HS8/93-94]**: TB/443-444

(a) On 21 June 2025, Extinction Rebellion Nederland blocked the Afsluitdijk, a major dam carrying a motorway in the Netherlands, in protest against North Sea gas drilling. Approximately 150 protesters stood on the highway holding banners, calling on Energy Management Netherlands, the research organisation TNO, and the Mijnraad to issue negative recommendations on all current and upcoming permit applications. **[HS8/95-96]** The Second Claimant was specifically mentioned in the article by Extinction Rebellion Nederland that publicised this blockade. **[HS8/97-100 and HS8/101-104]** TB/445-446 TB/447-450 and TB/451-454

(b) On 1 August 2025, Extinction Rebellion protestors occupied the foyer of an ExxonMobil office building office building in Melbourne, Australia, **[HS8/105]** accusing ExxonMobil of climate change denial and of funding think tanks that promote climate change denial. Extinction Rebellion protestors returned to demonstrate at the building on 22 January 2026 **[HS8/106-107]**, and the TB/455 TB/456-457

Claimants inform me that they also occupied the foyer of the same building on 12 December 2025.

(c) During the week of 5 September 2025, Scientist Rebellion NL, part of Extinction Rebellion, joined a climate camp on the Wadden island of Borkum to oppose new gas drilling and gas drilling in the Wadden Sea by the Second Claimant and other oil and gas companies. **[HS8/108 and HS8/109]** TB/458 and TB/459

(d) On 21 and 22 November 2025, Extinction Rebellion Netherlands carried out 5 actions as part of "Operation Storm". Operation Storm consisted of multiple disruptive actions across the Netherlands over the course of 2 days that targeted industries that receive fossil fuel subsidies. **[HS8/110-111 and HS8/112-113]** TB/460-461 and TB/462-463 This was the second iteration of "Operation Storm", the first having taken place in March 2025, **[HS8/114-116 and HS8/117-119]** TB/464-466 and TB/467-469 and included the following activity:

(i) More than 70 activists sat on a road junction to block access to Shell's Pernis refinery site, which is immediately next to the Second Claimant's site; **[HS8/120-125 and HS8/126-131]** and TB/470-475 and TB/476-481

(ii) Extinction Rebellion Groningen protested at RWE in Eemshavencentrale, where activists gathered on the road nearby holding flags and banners. **[HS8/132-134 and HS8/135-137]** TB/482-484 and TB/485-487

(e) On 25 November 2025, activists associated with Extinction Rebellion Norway held a demonstration outside Equinor's Autumn Conference which took place at the Norway Theatre. There were clashes with the police, and the Theatre reported that they would not host the conference again in 2026. **[HS8/138, HS8/139-142 and HS8/143-146]** TB/488 and TB/489-492 and TB/493-496

(f) On 1 October 2025, around 70 Greenpeace activists from 17 countries blockaded the Zeebrugge LNG terminal in Belgium. This involved activists in kayaks holding banners, including a large banner reading "*Stop Fossil Gas*". Greenpeace's vessel *Witness* also supported the action. The blockade was ended by the Belgian Police after 29 hours. The protest forced the LNG tanker *Arctic Voyager* to change its course and delayed 3 other tankers from accessing the port. **[HS8/147-150]** TB/497-500

(g) On 10 October 2025, 100 activists associated with Geef Tegengas blocked roads leading to the Rotterdam World Gateway and APM Terminals by standing in the road with banners. **[HS8/151]** TB/501 Geef Tegengas was founded in 2024 by individuals associated with Fossielvrij NL and Extinction Rebellion. **[HS8/152-161 and HS8/162-171]** TB/502-511 and TB/512-521

(h) On 11 October 2025, masked activists blocked train tracks leading into Rotterdam Port, with some locking themselves onto the train tracks, and protested inside the harbour area. The activists accused the port of being complicit in wars, oppression and climate change. Geef Tegengas claim that over 800 activists took part, while the media reported 400. The police response resulted in over 200 arrests. **[HS8/172-179 and HS8/180-187]** TB/522-529 and TB/530-537

(i) On 13 January 2026, Extinction Rebellion protesters in Norway held a large banner and blocked access to the hotel in Sandefjord where a conference on oil extraction in the Norwegian Continental Shelf was being held. The activists were protesting against new oil licences being granted, many of which were to be in the Barents Sea. **[HS8/188 and HS8/189]** TB/538 and TB/539

(j) On 21 March 2026, Extinction Rebellion occupied 3 gas extraction sites in the Dutch provinces of Groningen and Friesland, at least 2 of which are operated by NAM, a joint venture between the Second Claimant and Shell. The activists used ladders to climb over gates and fences. The protesters demanded that the Dutch cabinet organises a quick and generous damage settlement, immediately closes all gas fields permanently, does not open any new gas fields, and puts a stop to further climate change. **[HS8/190-193 and HS8/194-196]** TB/540-543 and TB/544-546

(k) Less than a month later, on 13 April 2026, activists associated with Extinction Rebellion Netherlands targeted NAM again, blocking a road leading to a gas well in Warffum, which is operated by NAM, in an attempt to prevent NAM from reopening the site. **[HS8/197-199 and HS8/200-202]** On 15 April 2026, Extinction Rebellion Netherlands published a video to this blockade that showed plant vehicles being blocked from entering the site. It also showed activists climbing over spiked fences to access the site. **[HS8/203 and HS8/204**] TB/547-549 and TB/550-552 TB/553 and TB/554

(l) On 25 April 2026, activists from Extinction Rebellion blocked the A12 highway near De Meern in the Netherlands. The activists occupied the roadway in a protest against fossil fuel subsidies, with some activists chaining themselves to roadside barriers. Over 200 demonstrators were arrested. **[HS8/205-207]** TB/555-557

<u>Plans to continue disruptive protests in 2026</u>

3.10 On 27 March 2025, Just Stop Oil announced its plans to end disruptive protests and to re-strategise their resistance efforts after a final demonstration on 26 April 2025. **[HS8/208-210]** In my fifth witness statement dated 20 June 2025, in support of the 2025 Annual Review Hearing, I set out evidence for why I think the Court cannot TB/558-560

consider that this announcement to end disruptive protests demonstrates that there is no longer a continued threat to the Sites from Just Stop Oil or otherwise.

3.11 This evidence was considered by Sweeting J to cast "*significant doubt on the finality of this change in approach*" and to mean that Just Stop Oil's announcement "*cannot be taken as an unequivocal and final renunciation of direct action*" (*Esso Petroleum Co Ltd v. Persons Unknown* [2025] EWHC 1768 (KB)). Sweeting J's reasoning has since been considered and applied in at least 3 other cases, including as recently as 23 February 2026 in *Valero Energy Ltd & Ors v Persons Unknown & Ors* [2026] EWHC 397 (KB).

3.12 I believe this reasoning still applies. I include below additional evidence for why I continue to think that the Court cannot consider that this announcement to end disruptive protests demonstrates that there is no longer a continued threat to the Sites from Just Stop Oil or otherwise:

(a) Extinction Rebellion made a similar announcement on 31 December 2022 yet has since engaged in disruptive action as demonstrated by the evidence included at 3.6 above. **[HS8/211-212]** TB/561-562

(b) On 21 May 2025, the Metropolitan Police sent an email to the security team at London City Airport which included the following: *"…To remove an injunction now would open up to further protest and whilst JSO have stepped down there tends to be a cycle of new groups emerging and this can not be ruled out so maintaining it would be very much recommended*." **[HS8/213-215]** TB/563-565

(c) On 21 May 2025, Just Stop Oil sent an email to its members stating that they are "*plotting a very big comeback*" although they *"have stopped taking action as Just Stop Oil*". The email goes on to state that:

"*Just Stop Oil was just the beginning. A new campaign is in the works -- one that will build on our knowledge and success as Just Stop Oil and will face the grinding injustice of our political and economic system head on. We're just getting started*." **[HS8/216-217]** TB/566-567

(d) In May 2025, Just Stop Oil and Youth Demand advertised a 6 week training program "*to build the generation of revolutionary organisers we need*", suggesting a sustained focus on encouraging disruptive protest. **[HS8/218]** TB/568

(e) Just Stop Oil have also continued to demonstrate interest in anti-protest injunctions. In October 2025, 2 Just Stop Oil Supporters challenged the continuation of Shell's anti-protest injunctions, making submissions in Court at the annual review hearing for the injunctions that "*as long as climate*

criminals…are allowed to hide behind private laws…there will be resistance". **[HS8/219-223]** TB/569-573

(f) As at 1 June 2026, under the "Donate" page of the Just Stop Oil website, there are quotes from supporters. These include the following: "*more protests are coming, buckle up*", "*disruption is part and parcel of protest, it is how you get attention*", "*civil disobedience is our last and only hope*" and "*the next wave of the rebellion is coming*". **[HS8/224-234]** TB/574-584

(g) On 28 April 2026, Just Stop Oil sent an email to its members stating that "*Just Stop Oil may have hung up the hi-vis, but there's still plenty going on in the wider movement!*". The email also encourages Just Stop Oil members to attend the "Festival of Revolutions" on 9 May, which is "*creating spaces in which relationships can form, connections can strengthen, and new collaborations can emerge*" and that will "*help us build our collective power*". **[HS8/235-236]** TB/585-586

Increased protesting due to Middle East conflict

3.13 I am also aware of increased action against the oil and gas sector as a result of the conflict in the Middle East. I include examples of disruptive protests and publications that directly reference the oil and gas industry in the context of the conflict below:

(a) On 12 March 2026, activists from the Aberdeen Palestine Solidarity Campaign, with the apparent support of Extinction Rebellion, occupied the offices of Dana Petroleum in Aberdeen. This action was in opposition to Dana Petroleum continuing to explore for gas in the Eastern Mediterranean. **[HS8/237]** TB/587

(b) Activists have also projected messages onto oil and gas company head offices to protest against the profits made by the companies since the war in Iran has pushed up global oil prices. On 30 April 2026, Greenpeace U.K. activists projected messages about Shell's profits onto Shell's headquarters by the Thames in London. **[HS8/238-241]** Ahead of the Equinor AGM on 14 May 2026, Greenpeace Norway activists projected messages about Equinor's profits onto the Equinor head office in Stavanger, Norway. **[HS8/242-246]** TB/588-591 TB/592-596

Failure to provide assurances that no further direct action will occur

3.14 I refer to paragraph 67 of the judgment of Mr Justice Linden on 10 July 2023 where, in deciding to grant the Injunctions, he stated that:

"*it would have been very easy for Extinction Rebellion or Just Stop Oil to give assurances or evidence to the court that there was no intention to return to their activities of 2021/2022, and no risk of trespass on the Sites or damage to property by protesters in the foreseeable future, but they did not do so*".

3.15 I am not aware that Just Stop Oil and Extinction Rebellion have since provided any assurances or evidence to the Court or to the Claimants that they do not intend to return to protesting at the Sites in the foreseeable future. The Claimants have taken steps to notify the Defendants of this hearing and, with the exception of the Fifth Defendant (as explained below), the Claimants have had no response. I believe that, when taken with the evidence outlined above, this suggests that there remains a real risk of future unlawful activity at the Sites if the Injunctions are not renewed.

Other injunctions to restrain protesters granted in 2025/2026

3.16 The Claimants have not been alone in seeking to maintain injunctions that restrain the unlawful conduct of protesters opposed to the oil and gas industry. I am aware of the following injunctions:

Claim No.	Parties	Locations affected by order	Date and length of injunction
North Warwickshire			
QB-2022-001236	**Claimant:** North Warwickshire Borough Council **Defendants:** (1-18) Named Defendants (19) Persons Unknown (20-158) Named Defendants	Kingsbury Oil Terminal	Injunction, Power of Arrest on 14 April 2022 (as varied on 6 May 2022). Interim Injunction Order granted on 9 May 2022 until hearing of the claim. Final hearing listed for 11 June 2024. Only 24 of the 157 named Defendants have offered to provide undertakings not to engage in further unlawful activity against the North Warwickshire Borough Council. In the final judgment given on 6 September 2024, the Court considered that injunctive relief with a power of arrest attached was appropriate and the injunction should continue for 3 years from the date of the hearing subject to annual reviews.

Claim No.	Parties	Locations affected by order	Date and length of injunction
			The first annual review took place on 18 September 2025. In the judgment given on 23 September 2025, the Court upheld the injunction.
Shell			
QB-2022-001259	**Claimant:** Shell International Petroleum Company Limited **Defendants:** Persons Unknown in connection with Just Stop Oil, Extinction Rebellion and Youth Climate Swarm	Shell Centre Tower (office building)	Further interim injunction granted on 24 April 2024 until 12 November 2024 with directions for a final review hearing. In the final judgment given on 5 December 2024, the Court considered that injunctive relief was appropriate and granted a final order of 5 years relief from the date of the hearing subject to annual review. Following the first annual review hearing on 16 October 2025, the injunction was upheld.
QB-2022-001241	**Claimant:** Shell U.K. Limited **Defendants:** Persons Unknown in connection with Just Stop Oil, Extinction Rebellion and Youth Climate Swarm	Shell Haven Oil Refinery, Stanford-Le-Hope (oil refinery)	Further interim injunction granted on 24 April 2024 until 12 November 2024 with directions for a final review hearing. In the final judgment given on 5 December 2024, the Court considered that injunctive relief was appropriate and granted a final order of 5 years relief from the date of the hearing subject to annual review. Following the first annual review hearing on 16 October 2025, the injunction was upheld.
QB-2022-001240	**Claimant:** Shell U.K. Oil Products Limited **Defendants:** (1) Persons Unknown in connection with Just Stop Oil, Extinction Rebellion	Any Shell Petrol Station in England and Wales	Further interim injunction granted on 24 April 2024 until 12 November 2024 with directions for a final review hearing. Only 1 out of the 14 named Defendants agreed to an undertaking not to engage in relevant protest activities

Claim No.	Parties	Locations affected by order	Date and length of injunction
	and Youth Climate Swarm (2) 14 Named Defendants		by the time of the final hearing. In the final judgment given on 5 December 2024, the Court considered that injunctive relief was appropriate and granted a final order of 5 years relief from the date of the hearing subject to annual review. Following the first annual review hearing on 16 October 2025, the injunction was upheld.
Thurrock Council and Essex County Council			
QB-2022-001317	**Claimant:** (1) Thurrock Council (2) Essex County Council **Defendants:** (1) Madeline Adams (2-222) Other Named Defendants (223-229) Persons Unknown	Roads within Thurrock and Essex Council boundaries Administrative areas of Thurrock and Essex Fuel Terminals: • The Navigator Fuel Terminal, West Thurrock • The Esso Fuel Terminal, Purfleet • Exolum Storage Ltd, Grays • Oikos Storage Limited, Essex	Original Injunction Order dated 1 June 2022 extended by order dated 27 January 2023 "*until and subject to any further order*". At the first annual review hearing on 12 July 2024, the court ordered that the injunctions should continue until and including 12 July 2029 subject to annual review hearings of the injunctions to the extent that they relate to Persons Unknown. At the final hearing on 9 October 2024, the court considered that injunctive relief was appropriate and the injunctions should continue for 5 years from the date of the hearing subject to annual reviews. Following the first annual review hearing on 7 October 2025, the injunction against 26 named defendants was upheld.
UK Oil Pipelines Ltd and West London Pipeline and Storage Ltd			
PT-2022-000303	**Claimants:** (1) UK Oil Pipelines Ltd	Buncefield and Kingsbury Terminals	Final Injunction granted on 6 October 2023 for 5 years until 20 October 2028 subject to annual review.

Claim No.	Parties	Locations affected by order	Date and length of injunction
	(2) West London Pipeline and Storage Ltd **Defendants:** Persons Unknown		At the most recent review hearing on 13 November 2025, the Court upheld the injunction.
Valero			
QB-2022-000904	**Claimants:** (1) Valero Energy Ltd (2) Valero Logistics UK Ltd (3) Valero Pembrokeshire Oil Terminal Ltd **Defendants:** (1) and (2) Persons Unknown (3-19) Named Defendants	Pembroke oil refinery, Pembroke Pembroke oil refinery jetties, Pembroke Manchester oil terminal, Trafford Park Kingsbury oil Terminal, Tamworth Plymouth oil terminal, Plymouth Cardiff oil, Cardiff Avonmouth oil terminal, Avonmouth Pembrokeshire terminal, Milford Haven	Final injunction granted on 24 January 2024 for 5 years until 13 December 2028. At the most recent review hearing on 16 February 2026, the Court upheld the injunction.
Exolum			
QB-2022-001142	**Claimants:** Exolum Pipeline Systems Ltd Exolum Storage Ltd Exolum Seal Sands Ltd **Defendants:** Persons Unknown	Various terminals and associated equipment	Final injunction granted for 1 year on 23 January 2023 and was extended until 20 February 2025. Following the review hearing on 24 February 2025, the injunction was upheld. As of the date of this witness statement, I have been unable to locate any information regarding a 2026 review hearing.

3.17 As specified above, in each of these annual reviews heard recently, the Court considered there to be a sufficient risk of direct action by protest groups against claimants' activities within the oil and gas industry (or related parties) to maintain the injunctions.

Effect of the Ellenbogen Order

3.18 I have seen evidence which suggests that the Ellenbogen Order continues to have a deterrent effect.

3.19 The impact of the Ellenbogen Order and similar orders has been cited by Just Stop Oil when explaining its decision not to target sites such as those subject to this order. For example, on 13 September 2023 the Just Stop Oil X account posted that the reason behind disruptive protests in Portsmouth which involved blocking roads was "*injunctions that make protests impossible at oil refineries, oil depots and even petrol stations*". **[HS8/247]** More recently, 2 Just Stop Oil protesters challenged the continuation of Shell's anti-protest injunctions at their latest annual review hearing, as described above in paragraph 3.12(e). **[HS8/219-223]** This demonstrates Just Stop Oil's continued interest in the Injunctions. TB/597 TB/569-573

3.20 The continued interest in the Injunctions, together with Just Stop Oil's, Extinction Rebellion's and other environmental campaigns' disruptive protests and other activity as detailed above, indicate that Just Stop Oil, Extinction Rebellion and other environmental campaigns still have an interest in targeting and disrupting oil and gas production facilities.

4 Continuation of the Order

4.1 The Claimants are applying for the Ellenbogen Order (as amended on 21 January 2025 and 10 July 2025) to remain in place until 11 July 2028, subject to the built-in annual reviews described at paragraphs 8 to 10 of the Order and the amendment described in Section 10 below.

5 Service of the Sweeting Order, Amended Ellenbogen Order and amended Warning Notice

Service on Defendants 1, 2 and 3

5.1 Service of the Sweeting Order and the Amended Ellenbogen Order on the First, Second and Third Defendants was effected as follows:

(a) By no later than 1 August 2025, the Sweeting Order and Amended Ellenbogen Order were uploaded to the following webpage (the **Webpage**):

https://www.exxonmobil.co.uk/Company/Overview/UK-operations

A copy of the Webpage (including links to the Sweeting Order and the Amended Ellenbogen Order) can be seen at **[HS8/248-249]**. TB/598-599

(b) I am informed by the Claimants that, by no later than 6 August 2025 copies of the Amended Ellenbogen Order were laminated and clipped onto the fences at 4 locations on the perimeter of each of the Sites, pursuant to paragraph 8 of the Sweeting Order.

Photographs of the laminated copies of the Amended Ellenbogen Order around the Sites can be seen at **[HS8/250-265]**. TB/600-615

(c) I am informed by the Claimants that, by no later than 6 August 2025, 4 large warning notices of A2 size in the form annexed to the Amended Ellenbogen Order at Schedule 2 (the **Warning Notices**) were fixed in conspicuous places around the perimeter of the Sites. Photographs of the Warning Notices can be seen at **[HS8/250-265]**. TB/600-615

(d) On 1 August 2025, an associate at NRF sent emails enclosing copies of the Sweeting Order and the Amended Ellenbogen Order and explaining that further copies may be obtained from NRF or viewed at the Webpage to the following email addresses:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

juststopoilpress@protonmail.com

Copies of the emails sent by an associate at NRF can be seen at **[HS8/266 and HS8/267]**. TB/616 and TB/617

(e) Confirmation of delivery was received on 1 August 2025 in respect of each of the emails sent to the addresses listed at paragraph 5.1(d) above. Copies of the confirmation emails can be found at **[HS8/268 and HS8/269]**. TB/618 and TB/619

(f) In addition, an automatic reply was received on 1 August 2025 from xr-legal@riseup.net, which appears to be an automatic response to any email received. A copy of the relevant email can be seen at **[HS8/270]**. TB/620

5.2 I note that paragraph 12.1 of the Amended Ellenbogen Order, in conjunction with paragraph 8 of the Sweeting Order, requires that the Amended Ellenbogen Order should be accompanied on the fences of the Sites by a "*a notice which states (a) that a copy of the Order may be obtained from the Claimants' solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email: ExxonMobil.Service@nortonrosefulbright.com; and (b) that a*

copy of the Order may be viewed at the website referred to in Paragraph 12.2 of this Order".

5.3 In the context of preparations for this year's review hearing, it was identified that the notice described in paragraph 5.2 was not displayed on the fences at the Sites with laminated copies of the Amended Ellenbogen Order. As recorded in my fifth witness statement dated 20 June 2025 in support of the 2025 Annual Review Hearing, copies of such a notice were previously displayed at the Sites. However, I understand that these were removed along with the plastic boxes once the requirement to maintain those boxes was withdrawn. As soon as my firm became aware of this position, action was taken to display the notices, as described at paragraph 5.1(b) above. Photographs of the notices can be seen at **[HS8/271-297]**. TB/621-647

5.4 Although the notices did not accompany the Amended Ellenbogen Order at the Sites, all other service requirements were complied with, and an associate at NRF informed the Defendants that further copies of the notice described in paragraph 5.2 could be obtained by contacting NRF. Copies of these emails can be seen at **[HS8/266 and HS8/267]**, as referenced above in paragraph 5.1(d). The information required to be in the notice is also included in the copies of the Amended Ellenbogen Order, and partly on the Warning Notices. Copies of both documents were displayed at all times at 4 locations around the perimeter of each site from 6 August 2025. TB/616 and TB/617

5.5 The Claimants appreciate that they are benefiting from injunctive relief, which has been granted at the Court's discretion and understand the importance of complying with the procedural steps required by the Court, especially as it relates to persons unknown. I apologise that this procedural step was not complied with until May 2026 and confirm that steps were taken to correct the omission as soon as it was appreciated. I do not consider that this has caused any prejudice to the Defendants in light of (i) the fact that each site had 4 Warning Notices and 4 copies of the Amended Ellenbogen Order at conspicuous places around the perimeter, which together include the information required to be displayed in the notices (as described at paragraph 5.4 above), (ii) the Defendants were informed by email that they may obtain further copes of the Amended Ellenbogen Order by contacting NRF, and (iii) there was no breach of the Amended Ellenbogen Order during this period.

Service on Defendants 4 and 5

5.6 Pursuant to paragraph 9 of the Sweeting Order, on 1 August 2025, an associate at NRF sent emails enclosing copies of the Sweeting Order and Amended Ellenbogen Order to the email addresses associated with the Fourth and Fifth Defendants. Copies of the emails sent by an associate at NRF can be seen at **[HS8/298 and HS8/299-300]**. TB/648 and TB/649-650

5.7 Confirmation of delivery was received on 1 August 2025 in respect of the email sent to the address associated with the Fifth Defendant. A delivery failure notification was received on 1 August 2025 with respect to the email sent to the address associated with the Fourth Defendant, stating that the mailbox was full. Copies of the confirmation and delivery failure emails can be found at **[HS8/301, HS8/302 and HS8/303]**. TB/651, TB/652 and TB/653

5.8 Noting service to the Fourth Defendant had already been effected, a trainee at NRF sent a letter by first class post to the Fourth Defendant providing the link to the Webpage and stating that further copies may be obtained from NRF's address. A copy of the letter and proof of postage can be seen at **[HS8/304 and HS8/305]**. Proof of delivery can be seen at **[HS8/306]**. TB/654 and TB/655 TB/656

6 Steps taken to notify the Defendants of the Re-Re-Re-Amended Claim Form and Re-Re-Re-Amended Particulars of Claim

6.1 Although paragraph 5 of the Sweeting Order allowed service of the Re-Re-Re-Amended Claim Form and Re-Re-Re-Amended Particulars of Claim to be dispensed with, the Claimants nevertheless uploaded these to the Webpage by no later than 6 August 2025.

6.2 A copy of the Webpage (including links to the Re-Re-Re-Amended Claim Form and Re-Re-Re-Amended Particulars of Claim) can be seen at **[HS8/248-249]**. TB/598-599

7 Notification of the Review Hearing

7.1 Although there is no express requirement in the Amended Ellenbogen Order for notification of the Review Hearings, the Claimants took the following steps to notify the First, Second and Third Defendants of the Review Hearing:

(a) On 23 March 2026, an associate at NRF sent emails enclosing letters inviting the Defendants to confirm whether they will be instructing counsel or appearing as a litigant in person and whether there are any dates to avoid in July 2026 for the hearing to the following email addresses:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

juststopoilpress@protonmail.com

Copies of the emails sent by an associate at NRF can be seen at **[HS8/307-310]**. TB/657-660

(b) Confirmation of delivery was received on 23 March 2026 in respect of each of the emails sent to the addresses listed at paragraph 7.1(a) above. Copies of the confirmation emails can be found at **[HS8/311 and HS8/312]**. TB/661 and TB/662

(c) In addition, automatic replies were received on 23 March 2026 from enquiries@extinctionrebellion.uk and xr-legal@riseup.net, which appear to be automatic responses to any emails received. A copy of the emails can be seen at **[HS8/313 and HS8/314]**. TB/663 and TB/664

(d) By no later than 31 March 2026 copies of this correspondence were uploaded to the Webpage. A copy of the Webpage (including a link to this correspondence) can be seen at **[HS8/248-249]**. TB/598-599

(e) By no later than 28 April 2026, the notice from NRF dated 28 April 2026 confirming the date of the Review Hearing (the **Review Hearing Notice**) was uploaded to the Webpage. A copy of the Webpage (including a link to the Review Hearing Notice) can be seen at **[HS8/248-249]**. TB/598-599

(f) I am informed by the Claimants that, by no later than 7 May 2026, copies of the Review Hearing Notice were laminated and fixed to the fences at 4 locations on the perimeter of each of the Sites. **[HS8/315-342]** TB/665-692

(g) On 1 May 2026, an associate at NRF sent emails enclosing copies of the Review Hearing Notice and explaining that further copies may be obtained from NRF or viewed at the Webpage to the following email addresses:

xr-legal@riseup.net

enquiries@extinctionrebellion.uk

juststopoilpress@protonmail.com

Copies of the emails sent by an associate at NRF can be seen at **[HS8/343-346]**. TB/693-696

(h) Confirmation of delivery was received on 1 May 2026 in respect of each of the emails sent to the addresses listed at paragraph 7.1(g) above. Copies of the confirmation emails can be found at **[HS8/347 and HS8/348]**. TB/697 and TB/698

(i) In addition, an automatic reply was received on 1 May 2026 from xr-legal@riseup.net, which appears to be an automatic response to any emails received. A copy of the emails can be seen at **[HS8/349]**. TB/699

7.2 The Claimants took the following steps to notify the Fourth and Fifth Defendants of the Review Hearing:

(a) On 23 March 2026, an associate at NRF sent emails enclosing letters inviting the Defendants to confirm whether they will be instructing or appearing as a litigant in person and whether there are any dates to avoid in July 2026 for the hearing. Copies of the emails sent by an associate at NRF can be seen at **[HS8/350-353]**. Confirmation of delivery to the Fourth Defendant was received on 23 March 2026 and can be seen at **[HS8/354]**. TB/700-703 TB/704

(b) A delivery failure notification was received on 23 March 2026 with respect to the email sent to the address associated with the Fifth Defendant, stating that the mailbox was full. Copies of the confirmation and delivery failure emails can be found at **[HS8/355 and HS8/356-361]**. TB/705 and TB/706-711

(c) Although there is no service requirement in respect of these letters, an associate at NRF organised for the letter to be sent by special delivery to the Fifth Defendant on 23 March 2026 providing the link to the Webpage and stating that further copies may be obtained from Norton Rose Fulbright's address. A copy of the letter and proof of postage can be seen at **[HS8/362 and HS8/363]**. Proof of delivery can be seen at **[HS8/364-365]**. TB/712 and TB/713 TB/714-715

(d) On 1 May 2026, an associate at NRF sent emails enclosing copies of the Review Hearing Notice to the email addresses of the Fourth and Fifth Defendants to notify them of the Review Hearing. Copies of the emails can be seen at **[HS8/366-369]**. Confirmation of delivery to the Fourth Defendant was received on 1 May 2026 and can be seen at **[HS8/370]**. TB/716-719 TB/720

(e) A delivery failure notification was received on 1 May 2026 with respect to the email sent to the address associated with the Fifth Defendant, stating that the mailbox was full. Copies of the confirmation and delivery failure emails can be found at **[HS8/371 and HS8/372-377]**. TB/721 and TB/722-727

(f) Although there is no service requirement in respect of the Review Hearing Notice, an associate at NRF organised for a copy of the Review Hearing Notice to be sent by special delivery to the Fifth Defendant on 5 May 2026. A

copy of the letter and proof of postage can be seen at **[HS8/378 and HS8/379]**. Proof of delivery can be seen at **[HS8/380-381]**. TB/728 and TB/729 TB/730-731

8 Renewal of Assurances from Defendants 4 and 5

8.1 In June 2025, the Fifth Defendant provided assurances to the Court through the Renewed Assurances not to breach the Injunctions. These assurances expire on 31 July 2026. The Claimants consequently sought to renew the Fifth Defendant's assurances for another year and to obtain assurances from the Fourth Defendant.

8.2 On 3 June 2026, an associate at NRF sent emails enclosing copies of new assurances to the email addresses of the Fourth and Fifth Defendants to invite them to give renewed assurances not to breach the Injunctions for a further year (the **2027 Assurances**). The substance of the 2027 Assurances is the same as those previously given except that it expires on the later of 31 July 2027 or the date of the next annual review hearing and can be seen at **[HS8/382-385 and HS8/386-389]**. Copies of the emails can be seen at **[HS8/390 and HS8/391]**. Confirmation of delivery to the Fourth Defendant was received on 3 June 2026 and can be seen at **[HS8/392]**. TB/732-735 and TB/736-739 TB/740 and TB/741 TB/742

8.3 A delivery failure notification was received on 3 June 2026 with respect to the email sent to the address associated with the Fifth Defendant, stating that the mailbox was full. Copies of the confirmation and delivery failure emails can be found at **[HS8/393 and HS8/394-399]**. TB/743 and TB/744-749

8.4 An associate at NRF organised for a copy of the 2027 Assurances to be sent by special delivery to the Fifth Defendant on 5 June 2026, together with an explanatory letter and a stamped envelope addressed to NRF. A copy of the letter, proof of postage and the contents of the package can be seen at **[HS8/400-402]**. Proof of delivery can be seen at **[HS8/403-404]**. TB/750-752 TB/753-754

8.5 On 10 June 2026, the Fifth Defendant returned a signed copy of the 2027 Assurances via post to NRF using the provided stamped envelope, thereby providing an assurance that she would not breach the Injunctions for another year instead of becoming subject to the Injunctions **[HS8/405-406]**. TB/755-756

8.6 The Fourth Defendant has at the date of this statement not replied to the Claimants. An associate at NRF organised for a copy of the 2027 Assurances to be sent by special delivery to the Fourth Defendant on 17 June 2026, together with an explanatory letter and a stamped envelope addressed to NRF. A copy of the letter, proof of postage and the contents of the package can be seen at **[HS8/407-409]**. Proof of delivery can be seen at **[HS8/410-411]**. TB/757-759 TB/760-761

8.7 On 25 June 2026 an associate at NRF sent a follow-up email to the Fourth Defendant. A copy of this email can be seen at **[HS8/412-413]**. Confirmation of delivery to the Fourth Defendant was received on 25 June 2026 and can be seen at **[HS8/414]**. The Claimants will continue to try to contact the Fourth Defendant up to the Review Hearing. TB/762-763 TB/764

9 Claimants' monitoring of documents served at the Sites

9.1 Since the last review hearing, the Claimants have carried out monthly checks to make sure the Warning Notices and other laminated documents have remained in place at the Sites.

9.2 These checks have been evidenced using a monthly spreadsheet checklist that indicates when and by whom the checks were carried out that month. The spreadsheets evidencing these checks since the Warning Signs and laminated bundles were put up at the Sites in accordance with paragraphs 5.1(b)-5.1(c) above can be viewed at **[HS8/415-418]**. TB/765-768

10 Updated Avonmouth Plan

10.1 It has come to my attention as part of the preparations for this year's review hearing that the boundaries of the Avonmouth Site have changed.

10.2 When the Claimants sought the first interim injunction on 7 April 2022, the boundaries of the Avonmouth Terminal were as shown on the Avonmouth Plan included in the Amended Ellenbogen Order. **[HS8/419]** TB/769

10.3 On 10 August 2022, the leased area of the Avonmouth Terminal was reduced as the First Claimant no longer required some of the non-operational land outside of the fenceline. As a result, the Avonmouth Plan includes a section of land on the north-eastern boundary of the Site that no longer forms part of the leasehold title held by the First Claimant.

10.4 The Claimants therefore request that the Court amends the boundary line of the Avonmouth Plan in the Amended Ellenbogen Order to align with the boundary of the leasehold held by the First Claimant. A copy of the revised plan for the Avonmouth Terminal site showing the correct boundaries of the leasehold held by the First Claimant is attached to this witness statement at **[HS8/420]**. TB/770

10.5 The Claimants appreciate the importance of notifying the Court of any changes to the Sites which may impact the scope of the Injunctions. While the leased area of the Avonmouth Site was reduced in 2022, I was informed of this change this year when an associate at NRF enquired with the Claimants to confirm whether there had

been any changes to the Sites since the 2025 Annual Review Hearing. I apologise that the Court was not notified at an earlier date. I do not consider that this has caused any prejudice to the Defendants on the basis that (i) the area that is no longer leased by the First Claimant is both small, directly adjacent to the land that the First Claimant continues to occupy, as marked on **[HS8/420]**, and outside the fence line of the operational area of the Avonmouth Site, and (ii) there was no breach of the Ellenbogen Order in this period. TB/770

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone 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.

Signed: 

HOLLY STEBBING

Date: 2 July 2026

Claimants
H Stebbing
EIGHTH
Exhibit HS8
2 July 2026

CLAIM NO. QB-2022-001098

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(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 SITES
(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE FAWLEY PLAN)
(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

EIGHTH WITNESS STATEMENT
OF HOLLY STEBBING

---

3 More London Riverside
London SE1 2AQ
United Kingdom

+44 20 7283 6000
+44 20 7283 6500
DX 85 London

Claimants
H Stebbing
EIGHTH
Exhibit HS8
2 July 2026

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER (as defined below))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER)
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER)
(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 AMENDED ELLENBOGEN ORDER)
(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 AMENDED ELLENBOGEN ORDER)
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HARTLAND PARK PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER)~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE AMENDED ELLENBOGEN ORDER)

(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE 'FAWLEY PLAN')

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

EXHIBIT "HS8"

This is the exhibit marked "**HS8**" referred to in the Eighth Witness Statement of Holly Stebbing.

Holly Stebbing

Dated: 2 July 2026

S/N	Name	Date	Page(s)
	Evidence for Statement in Support of Application		
1.	Extinction Rebellion protest at Barclays	24 July 2025	HS8/9 - 10
2.	Oxford Mail Article, New Barclays branch opening date revealed for Oxford	04 April 2025	HS8/11 - 13
3.	Cut the Ties to Fossil Fuels / Extinction Rebellion protest at Macquarie headquarters	20 January 2026	HS8/14 - 17
4.	Cut The Ties To Fossil Fuels Funding	Undated	HS8/18
5.	Extinction Rebellion Email 23 April 2026	23 April 2026	HS8/19 - 22
6.	Cut the Ties to Fossil Fuels protest at WPP	25 June 2025	HS8/23 - 29
7.	Fossil Free London protest against Rosebank outside the Bank of England	29 July 2025	HS8/30 - 32
8.	The Guardian article, Huge 'Butchered' artwork installed on North Sea gas rig by Greenpeace activists	14 August 2025	HS8/33 - 36
9.	Fossil Free London protest oustide Holborn and St Pancras Council building	06 September 2025	HS8/37
10.	Canary article, Activists target Starmer's backyard over toxic fossil fuel project	07 September 2025	HS8/38 - 42
11.	Greenpeace activists scale chimney stacks at Staythorpe power station	22 September 2025	HS8/43 - 47
12.	Fossil Free London protest outside Shell Headquarters in London	23 October 2025	HS8/48 - 50
13.	Fossil Free London disrupt bp speaker at AIEN	05 November 2025	HS8/51
14.	Canary article, Fossil Free London confront perennial tax dodgers Shell and BP in the space of two days	06 November 2025	HS8/52 - 55
15.	Christian Climate Action Vigils	Undated	HS8/56 - 64
16.	Christian Climate Action support XR and JSO in 2022 in their action at the Sites	01 April 2022	HS8/65 - 69
17.	Insurance Times article, Climate protest forces evacuation at London market conference	23 January 2026	HS8/70 - 72
18.	Fossil Free London International Energy Week disruption	15 February 2026	HS8/73
19.	'Why Daddy’s Law Firm works with the Nice Oil Men’ book received	20 March 2026	HS8/74

20.	Package 'Why Daddy's Law Firm works with the Nice Oil Men' book was received in	20 March 2026	HS8/75
21.	RollonFriday article, Activists target lawyers with book 'Why Daddy's Law Firm works with the Nice Oil Men'	27 February 2026	HS8/76 - 77
22.	Greenpeace protest targeting PetroJarl Rosebank	25 March 2026	HS8/78 - 81
23.	ORCA disrupt environmental conference at Jesus College, Cambridge	16 May 2026	HS8/82 - 86
24.	ORCA disrupt event at Gates House in Cambridge	19 May 2026	HS8/87 - 88
25.	Extinction Rebellion hold funeral for Paris Agreement 1.5°C climate target	10 May 2025	HS8/89 - 92
26.	United for Rights article, Sharing experiences: How do activists from different countries learn from each other?	05 January 2026	HS8/93 - 94
27.	Extinction Rebellion block the Afsluitdijk in the Netherlands	21 June 2025	HS8/95 - 96
28.	Extinction Rebellion post announcing their blockade of the Afsluitdijk (Dutch)	15 May 2025	HS8/97 - 100
29.	Extinction Rebellion post announcing their blockade of the Afsluitdijk (English)	15 May 2025	HS8/101 - 104
30.	Extinction Rebellion protest at ExxonMobil offices in Melbourne on 1 August 2025	01 August 2025	HS8/105
31.	Extinction Rebellion protest at ExxonMobil offices in Melbourne on 22 January 2026	24 January 2026	HS8/106 - 107
32.	Scientist Rebellion NL climate camp on Borkum	05 September 2025	HS8/108 - 109
33.	Extinction Rebellion announce Operation Storm for November 2025 (Dutch)	17 November 2025	HS8/110 - 111
34.	Extinction Rebellion announce Operation Storm for November 2025 (English)	17 November 2025	HS8/112 - 113
35.	Extinction Rebellion Operation Storm (Dutch)	Undated	HS8/114 - 116
36.	Extinction Rebellion Operation Storm (English)	Undated	HS8/117 - 119
37.	Extinction Rebellion block Shell Pernis site (Dutch)	22 November 2025	HS8/120 - 125
38.	Extinction Rebellion block Shell Pernis site (English)	22 November 2025	HS8/126 - 131
39.	Extinction Rebellion protest at RWE in Eemshavencentrale (Dutch)	22 November 2025	HS8/132 - 134

40.	Extinction Rebellion protest at RWE in Eemshavencentrale (English)	22 November 2025	HS8/135 - 137
41.	Extinction Rebellion Norway post on their demonstration outside Equinor's Autumn Conference at The Norwegian Theatre	25 November 2025	HS8/138
42.	Article, The Norwegian Theatre breaks with Equinor: Victory for activists (Norwegian)	27 November 2025	HS8/139 - 142
43.	Article, The Norwegian Theatre breaks with Equinor: Victory for activists (English)	27 November 2025	HS8/143 - 146
44.	Marine Insight Article, Greenpeace blocks Zeebrugge LNG Terminal For 29 Hours, Forces Tankers To Change Course	04 October 2025	HS8/147 - 150
45.	Geef Tegengas block roads to Rotterdam World Gateway and APM Terminals	10 October 2025	HS8/151
46.	Article including details on the founding of Geef Tegengas (Dutch)	24 October 2025	HS8/152 - 161
47.	Article including details on the founding of Geef Tegengas (English)	24 October 2025	HS8/162 - 171
48.	Geef Tegengas block train tracks leading into Rotterdam Port (Dutch)	11 October 2025	HS8/172 - 179
49.	Geef Tegengas block train tracks leading into Rotterdam Port (English)	11 October 2025	HS8/180 - 187
50.	Extinction Rebellion protest outside conference in Sandefjord in Norway (Norwegian)	13 January 2026	HS8/188
51.	Extinction Rebellion protest outside conference in Sandefjord in Norway (English)	13 January 2026	HS8/189
52.	Extinction Rebellion occupy three gas extraction sites in the Netherlands (Dutch)	21 March 2026	HS8/190 - 193
53.	Extinction Rebellion occupy three gas extraction sites in the Netherlands (English)	21 March 2026	HS8/194 - 196
54.	Extinction Rebellion Netherlands block road to gas well in Warffum (Dutch)	13 April 2026	HS8/197 - 199
55.	Extinction Rebellion Netherlands block road to gas well in Warffum (English)	13 April 2026	HS8/200 - 202
56.	Extinction Rebellion Netherlands video of the Warffum blockade (Dutch)	15 April 2026	HS8/203
57.	Extinction Rebellion Netherlands video of the Warffum blockade (English)	15 April 2026	HS8/204
58.	Extinction Rebellion block A12 highway in the Netherlands	25 April 2026	HS8/205 - 207
59.	Just Stop Oil, Just Stop Oil is 'hanging up the hi vis'	27 March 2025	HS8/208 - 210

60.	Extinction Rebellion, WE QUIT	31 December 2022	HS8/211 - 212
61.	Metropolitan Police email to security team at London City Airport dated 21 May 2025	21 May 2025	HS8/213 - 215
62.	Just Stop Oil email dated 21 May 2025	21 May 2025	HS8/216 - 217
63.	Youth Demand post on X, Seeds for Revolution Training Programme with Just Stop Oil	05 May 2025	HS8/218
64.	Just Stop Oil challenge Shell injunctions	20 October 2025	HS8/219 - 223
65.	"Donate" page of the Just Stop Oil website	Undated	HS8/224 - 234
66.	Just Stop Oil email dated 28 April 2026	28 April 2026	HS8/235 - 236
67.	Aberdeen Palestine Solidary Campaign occupy offices of Dana Petroleum in Aberdeen	12 March 2026	HS8/237
68.	Greenpeace project messages onto Shell's headquarters in London	30 April 2026	HS8/238 - 241
69.	Greenpeace Norway project messages onto Equinor's head office in Stavanger, Norway	15 May 2026	HS8/242 - 246
70.	Just Stop Oil post on X, the effect of private injunctions on protests	13 September 2023	HS8/247
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71.	Esso Webpage - publication of injunction documents	Undated	HS8/248 - 249
72.	Amended Ellenbogen Order and Warning Signs Photos of Service at Sites	01 August 2025	HS8/250 - 265
73.	Email to JSO serving Sweeting Order and Amended Ellenbogen Order	01 August 2025	HS8/266
74.	Email to XR serving Sweeting Order and Amended Ellenbogen ORder	01 August 2025	HS8/267
75.	JSO proof of delivery of Sweeting Order and Amended Ellenbogen Order service	01 August 2025	HS8/268
76.	XR proof of delivery of Sweeting Order and Amended Ellenbogen Order service	01 August 2025	HS8/269
77.	XR Enquiries - Automatic Reply to Sweeting Order and Amended Ellenbogen Order	01 August 2025	HS8/270
78.	Notice accompanying the Amended Ellenbogen Order Photos of Service at the Sites	21 May 2026	HS8/271 - 297

79.	Email to D4 serving Sweeting Order and Amended Ellenbogen Order	01 August 2025	HS8/298
80.	Email to D5 serving Sweeting Order and Amended Ellenbogen Order	01 August 2025	HS8/299 - 300
81.	D4 proof of delivery of Sweeting Order and Amended Ellenbogen Order Service	01 August 2025	HS8/301
82.	D5 proof of delivery of Sweeting Order and Amended Ellenbogen Order Service	01 August 2025	HS8/302
83.	D4 delivery failure notification of Sweeting Order and Amended Ellenbogen Order	01 August 2025	HS8/303
84.	Letter from NRF to D4 regarding service of the Sweeting Order and Amended Ellenbogen Order	04 August 2025	HS8/304
85.	D4 proof of posting of Sweeting Order and Amended Ellenbogen Order	04 August 2025	HS8/305
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87.	Email to JSO enclosing letter regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/307
88.	Letter to JSO regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/308
89.	Email to XR enclosing letter regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/309
90.	Letter to XR regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/310
91.	JSO proof of delivery of email enclosing letter regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/311
92.	XR proof of delivery of email enclosing letter regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/312
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94.	XR Legal - Automatic Reply to email enclosing letter regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/314
95.	Notice of 2026 Annual Review Hearing Photos of Service at Sites	07 May 2026	HS8/315 - 342
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98.	Email to XR serving Review Hearing Notice	01 May 2026	HS8/345
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100.	JSO proof of delivery of Review Hearing Notice	01 May 2026	HS8/347

101.	XR proof of delivery of Review Hearing Notice	01 May 2026	HS8/348
102.	XR Enquiries - Automatic Reply to Review Hearing Notice	01 May 2026	HS8/349
103.	Email to D4 enclosing letter regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/350
104.	Letter to D4 regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/351
105.	Email to D5 enclosing letter regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/352
106.	Letter to D5 regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/353
107.	D4 proof of delivery of email enclosing letter regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/354
108.	D5 proof of delivery of email enclosing letter regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/355
109.	D5 delivery failure notification of email enclosing letter regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/356 - 361
110.	Letter posted to D5 regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/362
111.	D5 proof of posting of letter regarding arrangements for the Annual Review Hearing	23 March 2026	HS8/363
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118.	D5 proof of delivery of Review Hearing Notice	01 May 2026	HS8/371
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124.	D5 2027 Assurances (unsigned)	03 June 2026	HS8/386 - 389
125.	Email to D4 requesting renewed assurances	03 June 2026	HS8/390
126.	Email to D5 requesting renewed assurances	03 June 2026	HS8/391
127.	D4 proof of delivery of email requesting renewed assurances	03 June 2026	HS8/392
128.	D5 proof of delivery of email requesting renewed assurances	03 June 2026	HS8/393
129.	D5 delivery failure notification of email requesting renewed assurances	03 June 2026	HS8/394 - 399
130.	Letter posted to D5 to request renewed assurances	05 June 2026	HS8/400
131.	D5 proof of contents in the package requesting renewed assurances	05 June 2026	HS8/401
132.	D5 proof of postage of letter requesting renewed assurances	05 June 2026	HS8/402
133.	D5 proof of delivery of letter requesting renewed assurances	06 June 2026	HS8/403 - 404
134.	D5 Signed Undertaking	06 June 2026	HS8/405 - 406
135.	Letter posted to D4 to request renewed assurances	17 June 2026	HS8/407
136.	D4 proof of contents in the package requesting renewed assurances	17 June 2026	HS8/408
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140.	Confirmation of delivery for email to D4 following up on renewed assurances	25 June 2026	HS8/414
141.	Spreadsheets evidencing monthly checks of the Warning Signs and Ellenbogen Order at the Sites for 2025	31 December 2025	HS8/415 - 416
142.	Spreadsheets evidencing monthly checks of the Warning Signs and Ellenbogen Order at the Sites for 2026	10 June 2026	HS8/417 - 418
143.	Avonmouth Plan in Amended Ellenbogen Order	10 July 2025	HS8/419
144.	Updated Avonmouth Plan	Undated	HS8/420

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News



Image Credit: Stanley Smith for Cherwell

By **Stanley Smith and Arina Makarina**

24th July 2025

Extinction Rebellion Oxford (XR Oxford) organised a protest in front of Barclays Bank on Cornmarket Street on its first day of opening. The demonstrators called on Jesus College, who lease the premises to Barclays, to end their agreement with the bank. Approximately 15 people participated in the action.

The XR Oxford protestors placed police “crime scene” tape outside the Barclays branch and demonstrated. Two protestors staged a “die-in” inside the branch, but left after five minutes. Another pair held a “silent vigil”, remaining in the building for half an hour before choosing to leave when several police officers entered the premises.

The protestors targeted Barclays because of their ties with the fossil fuel industry. Steve Dawe, an XR activist, told *Cherwell*: “The public has a choice and can shut down accounts held with Barclays.”

“Barclays is not alone: HSBC, Lloyds and insurance company Howden – all present in central Oxford – are all involved in continuing the Climate Emergency by propping up fossil fuels.”

Several of the protestors were from Christian Climate Action (CCA), which organised the protest with XR Oxford. Rev. James Grote, a member of CCA, told *Cherwell*: “The climate crisis is happening. It’s not next year, it’s not in the next ten years, it is now happening [sic.].”

Both XR Oxford and CCA also cited Barclay’s financial ties to Israel and support of its military operation in Gaza as reasons for the protest.

Extinction Rebellion is an international activist group campaigning against inaction on climate change through non-violent direct action.

Barclays have been approached for comment.

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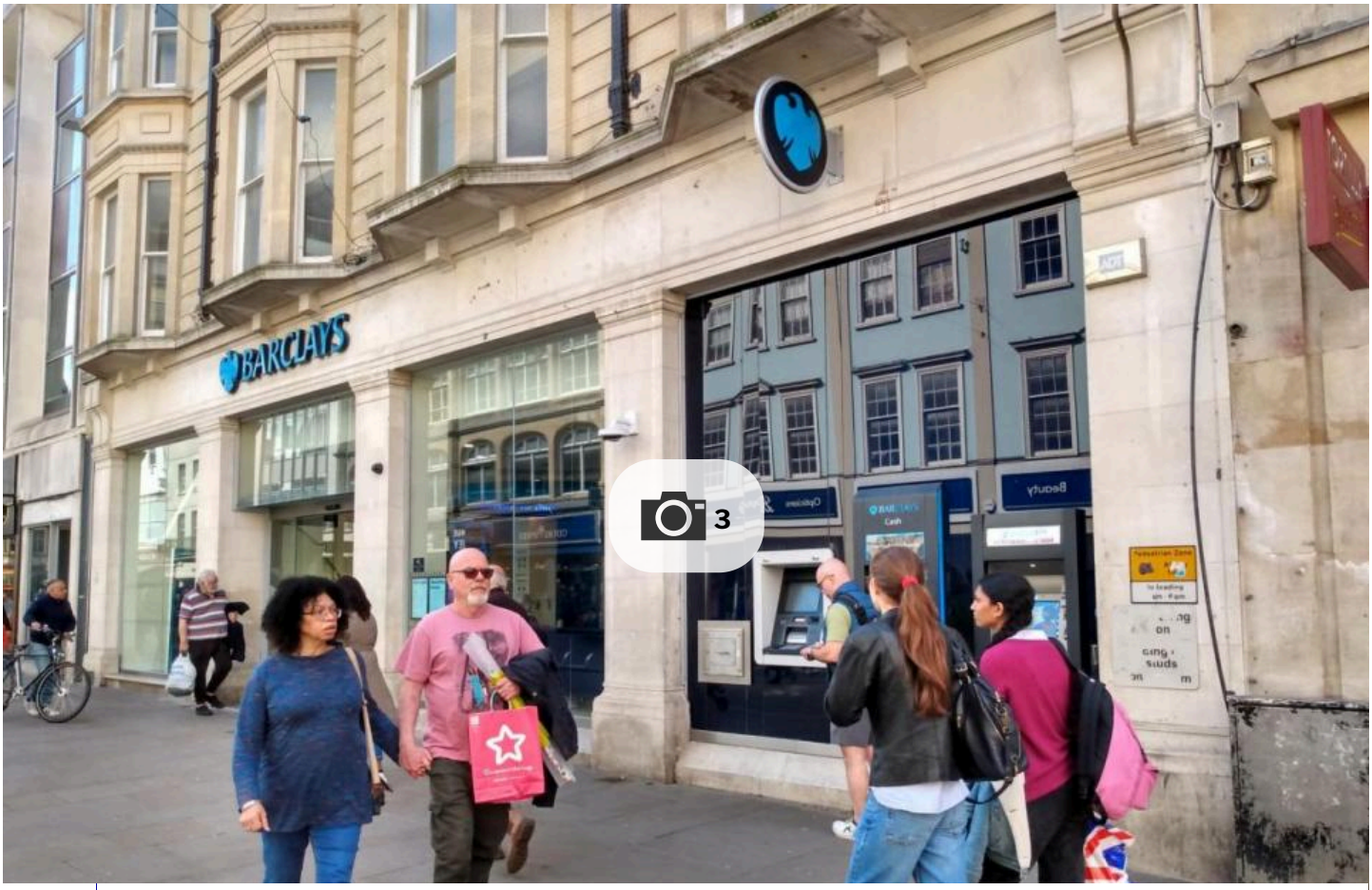
New Barclays branch opening date revealed for Oxford

4TH APRIL 2025 BUSINESS LOCAL GOVERNMENT





By Andrew Ffrench
Reporter

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A date has been announced for the opening of a new branch of Barclays Bank in Oxford city centre.



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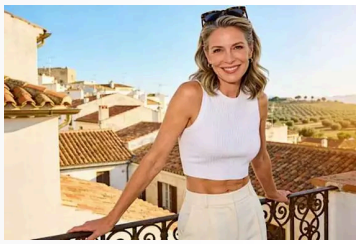
Barclays has had a branch in Cornmarket Street for many years and is about to move to a new space on the opposite side of the street.

The bank stated: "This branch will be relocating to a new address.





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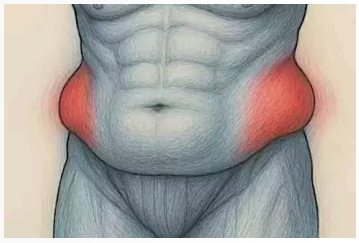

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"This branch will be closed from noon on Friday, July 11, and a new branch will open nearby at 13-15 Cornmarket Street, on Monday, July 21."

READ MORE: Bakery chain is urged to drop extra charge for plant milk

The bank applied for signs and and to occupy a unit in the Cheng Yu Tung Building in Cornmarket, which was opened by Jesus College in 2022.

Oxford City Council planning officers initially refused the plans saying they would have been "detrimental to the building's design and its appearance in the street scene".

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But last month the plans were approved and the bank is now preparing to make the move.

A new Korean food store Seoul Plaza opened at the Cheng Yu Tung building last year.

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Demonstration Cut The Ties To Fossil Fuels 2026 in London, UK

Source file resolution 1080p

Filmed on Tuesday 20th January 2026

Ropemaker Street, London, Greater London, United Kingdom

ID 830594

London, England, 20th January 2026: Activist arrested at the Demonstration: Cut the Ties to Fossil Fuels 2026 - Extinction Rebellion protests against the proposed expansion of Farnborough Airport to private jets and urges the 'Cut the Ties' investment in fossil fuels outside the Macquarie Group headquarters.

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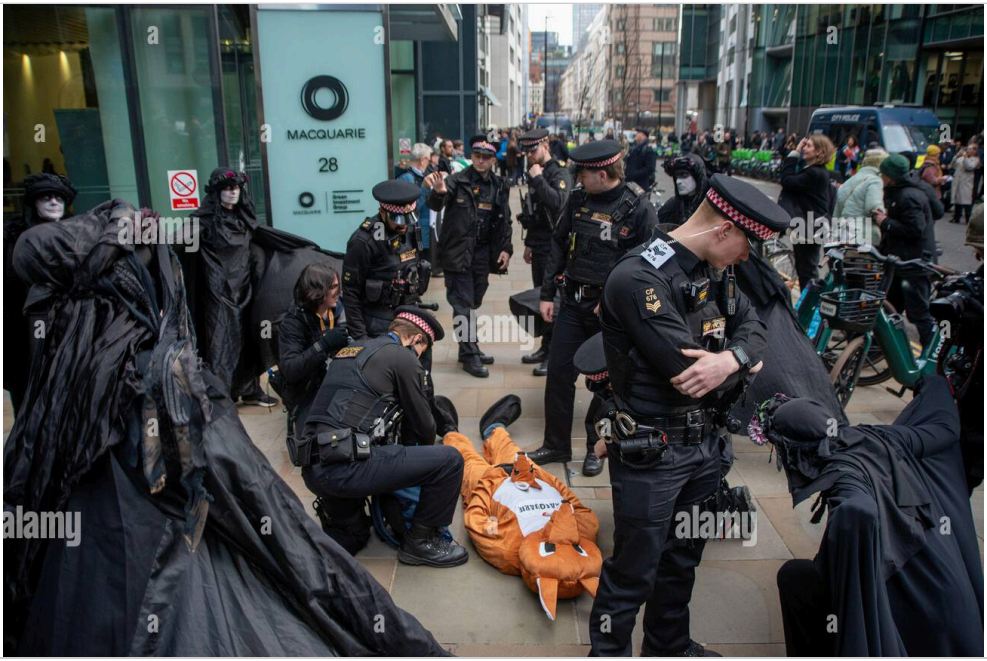
Oil slickers (slow motion performers) surrounded the police officers and a kangaroo dressed was arrested during the demonstration. Members of the Extinction Rebellion targeted the building of the Macquarie Group. It is an Australian multinational investment banking and financial services group in central London. The reason of the demonstration was because of the Macquarie is the owner of the Farnborough Airport which focusing on business aviation (serving private and business jets) and expansion. (Photo by Krisztian Elek/SOPA Images/Sipa USA)

Captions are provided by our contributors.



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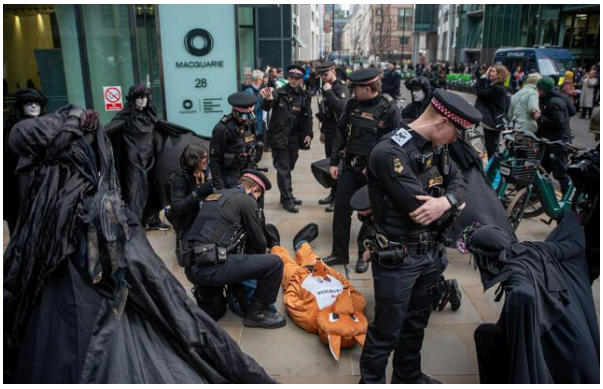

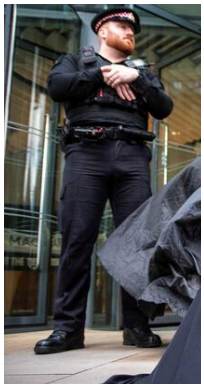


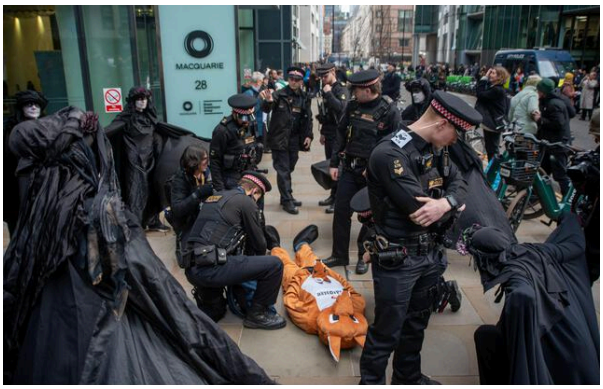





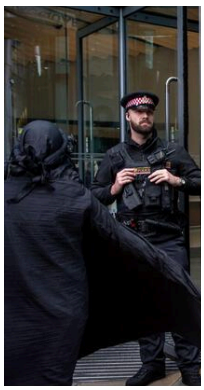



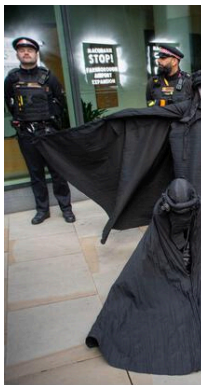



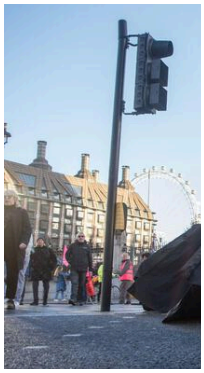

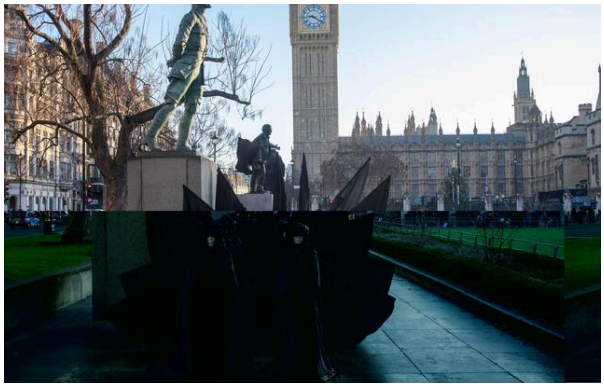

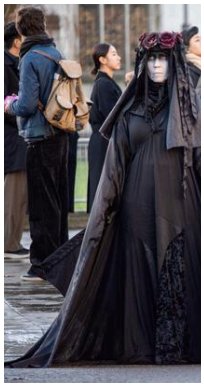





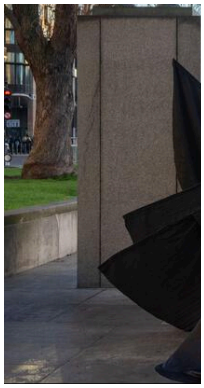







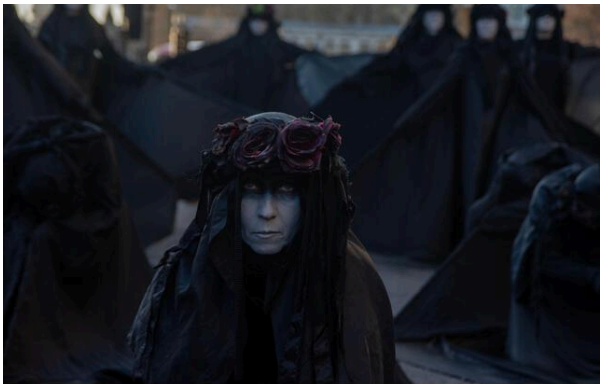


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Cut The Ties To Fossil Fuels 2026

By Cut The Ties To Fossil Fuels

United Kingdom

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Cut The Ties To Fossil Fuels began life as a campaign within Extinction Rebellion South East, targeting the enablers and greenwashers of the Fossil Fuel industry. We shine the light on the law firms, think tanks, insurers, media companies, advertising agencies, PR firms, engineering businesses etc, without whom Big Oil could not continue to put profit before planet and people. We expose the lies, greenwash, dark money and fake news as we demand targets Cut The Ties To Fossil Fuels.

Previous targets include GB News, BP, Coca Cola (London Fashion Week), The Policy Exchange, Worley Engineering, McKinsey & Co, The Wood Group, Marshall Wace, The Labour Party, INEOS & JP Morgan, to name but a few.

Now as an independent, autonomous campaign, Cut The Ties To Fossil Fuels will be able to work with a broader spectrum of other activist groups and movements, whilst remaining agile and focusing on our core belief in non violent direct action. We only do direct action.

Why do we need to raise money? Direct action protests cost money, and we no longer have the financial support of XR. We need to raise funds for materials for props, banners, flags patches and badges, print costs for stickers, flyers, posters, legal support and travel costs for court appearances.

No donation is too small; we make sure every little goes a long way in the fight to avert the worst of the unfolding climate and ecological emergency sponsored by Big Oil.
T you for your support.

£4,160
Raised of £10,000

Donate now

We don't store your card details. All donations are processed securely by our PCI-compliant payment partners, Stripe and PayPal.

Cut The Ties To Fossil Fuels will have quick and easy access to your donation.

We've helped empower over 50,000 campaigners like Cut The Ties To Fossil Fuels by helping them raise the funds they need.

Sam van Druten

From: XR UK <noreply@extinctionrebellion.uk>
Sent: 23 April 2026 18:04
To: LON ExxonMobil Service
Subject: Spring into action

External email

Hi NRF

XRUK has sprung into action.

It's the season of awakening, and XRUK groups are getting into vibrant marches, climate and nature ceremonies, and protest camps.

Actions help us build community, call out the climate criminals, and share our message: A Better World is Possible.

Here's just a few:

An Earth Day rally outside Parliament yesterday (Wednesday) declared the need to protect the climate and nature.



Water ceremonies, like this one in Brighton, took place at 11 locations on World Water Day this March, telling companies to stop dumping sewage in our seas and rivers.



XRUK brought vivid colour and loud voices to the climate justice block at the 500,000 strong Together march in London in March.



XR Peace protested against nuclear weapons, imperialist and genocidal wars at a Peace Camp at RAF Lakenheath this April.



Inspired to take action?

Join XR South West for a 'Protestival' camp near Bath, Somerset, from Friday May 29th to Sunday May 31st.

Get your

The camp is a chance to come together, make friends, take part in training and workshops, enjoy activities like yoga, Tai Chi and music, and prepare for Summer actions. Bring your tent and camping essentials. Everyone is welcome!

Love and Rage,
XRUK

PS. **Save the dates Sept 12th-14th** for a weekend of workshops and discussions with a creative finale. Join the telegram chat here.

Help amplify our content on social media

Instagram | Facebook | TikTok | Bluesky | YouTube

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Climate activists occupy WPP's HQ to demand global ad giant cuts its ties to Big Oil

June 25, 2025 by Extinction Rebellion

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OK

The activists, from climate campaign group Cut The Ties to Fossil Fuels, also call on Government to ban fossil fuel advertising

Today (25 June), climate activists have taken over the headquarters of advertising agency group WPP, occupying the lobby and dropping a huge 15m banner on the Thameside embankment, stating: "WPP are Climate Criminals, Ban Fossil Fuel Advertising."

In front of the building a grim reaper figure is sitting on top of a steel oil rig, attended by the Oil Slickers street theatre group, while others are staging a 'die in', their bodies wrapped in shrouds emblazoned with logos of WPP's 'Big Oil' clients and the world's biggest plastic polluter Coca-Cola, together spelling out the message that WPP's insistence on promoting fossil fuels in a climate and ecologic emergency makes them accomplices in the extinction of life on earth.

WPP owns around 90 advertising agencies, employing 13,000 people in 112 countries, making it the world's largest ad agency group. It has the most fossil fuel contracts on

Clean Creative's F-List, with at least 79 contracts in 2024. This is clearly at odds with WPP's own sustainability policy which states that it will "not take on any client work, including lobbying designed to frustrate the objectives of the Paris Agreement". In fact WPP promotes several fossil fuel lobby groups and has a client list that reads like the Who's Who of climate destruction including Adani, BP, ConocoPhillips, Equinor, ExxonMobil, Saudi Aramco, TotalEnergies, SLB (Schlumberger), Shell (since 1929) and many more.

One WPP agency enlisted social media influencers to promote TotalEnergies' controversial East Africa Crude Oil Pipeline, even as anti-pipeline campaigners suffered beatings and arrests by Ugandan police.

WPP offers greenwashing training so their employees can "make effective green claims that are not misleading in any way" and runs tokenistic 'green' campaigns as reputational cover, enough to win prizes at the 2023 Ad Net Zero awards, despite working on more fossil fuel contracts than any other advertising group in the world.

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WPP can no longer ignore the science. The writing is on the wall. Climate change is accelerating, with 2025 experiencing some of the hottest global temperatures ever recorded,leading to more and more extreme weather events this year, including longer and more intense wildfires, stronger hurricanes, faster glacier retreat, severe flooding, and drought and crop failures. Climate breakdown is not some vague and future threat —it's happening now and it's intensifying, pushing the boundaries of what we've seen in past decades. Cut The Ties To Fossil Fuels calls on WPP to stop enabling the fossil fuel industry and cut its ties NOW.

Taking action today Freya Chambers, 27, from Oxford said: "Working with Big Oil to increase emissions in a climate and ecological emergency is clearly immoral, yet WPP chooses to be complicit in causing existential harm to people and planet. We are here to demand that WPP ceases all work for fossil fuel companies, its lobbyists and the major plastic polluters. We join international calls for a complete ban on fossil fuel advertising".

Dorothea Hackman, 73, a retired lecturer from Camden, also present at the protest, said: "The UN Secretary-General Antonio Guterres called advertising and PR agencies 'enablers to planetary destruction' due to their work for fossil fuel clients. He said the fossil fuel industry has 'sought to delay climate action with lobbying, legal threats, and massive ad campaigns. "They have been aided and abetted by advertising and PR companies – Mad Men fuelling the madness.' We couldn't agree more, which is why we have come to WPP, the advertising industry's worst climate criminal, to demand it Cuts its Ties to Fossil Fuel."

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CUT THE TIES – FOSSIL FUEL ADVERTISING SHAMED BY PROTESTERS

World's largest advertising group targeted in call for advertising ban on fossil fuels

June 26, 2025

Yesterday, protesters from new climate group ***Cut The Ties To Fossil Fuels*** occupied the lobby of WPP, and dropped a huge banner on the Thameside embankment stating "WPP are climate criminals – Ban Fossil Fuel Advertising". They remained there through lunchtime and during the course of more than two hours they spoke to staff, many of whom were very receptive.



Photo: Will Colebourne / Cut The Ties

In front of the entrance, a grim reaper figure sat atop a model oil rig, while the *Oil Slickers* street theatre group prowled around, and other campaigners staged a die-in, wrapped in shrouds with logos of some of the world's biggest oil and plastic polluters – all clients of WPP.



Photo: Will Colebourne / Cut The Ties



Photo: Will Colebourne / Cut The Ties

WPP is an advertising agency group comprising around 90 advertising agencies around the world and boasting "*enduring relationships with leading global brands and organisations, including 300 of the Fortune 500*".

Clean Creatives is a research and pressure group of strategists, creatives and business leaders pushing for fossil fuel companies to be banned from advertising in a similar way that tobacco companies were in the past. They have built a directory of hundreds of oil and gas companies and then researched which advertising agencies, groups and holding companies hold contracts with them, to build what they called the F-list, updated annually.

For two years running, WPP has topped the list, having the largest number of fossil fuel contracts, including some of the worst polluters such as Adani, BP, TotalEnergies, Chevron, Saudi Aramco, Shell, ExxonMobil, and ADNOC.



Photo: Richard Bayfield / Cut The Ties

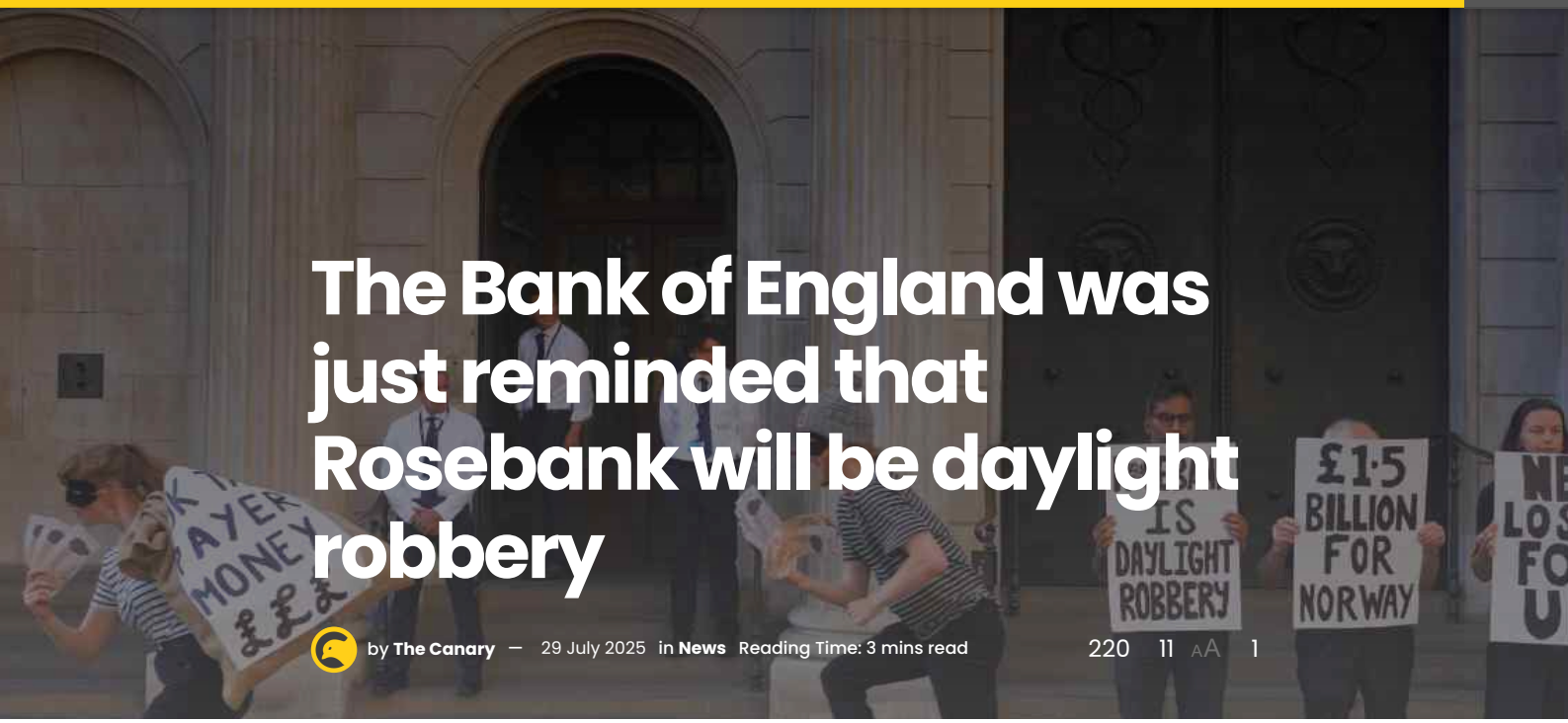
WPP's 2023 Sustainability Report claims that their policy is not to provide clients with advertising or lobbying which is "*designed to frustrate the objectives of the Paris Agreement*", but in reality they provide services for some of the biggest fossil fuel lobbyists such as the Oil and Gas Climate Initiative, American Petroleum Institute, the Australian Gas Infrastructure Group and the American Chemistry Council.

WPP also run courses so that their employees can learn to "make effective green claims that are not misleading", but 11 of their agencies represent BP and/or Shell – companies regularly accused of industrial scale greenwashing.

WPP won prizes at the 2023 Ad Net Zero awards, while working on more fossil fuel contracts than any other advertising group in the world – now that's greenwash!



Photo: Richard Bayfield / Cut The Ties



The Bank of England was just reminded that Rosebank will be daylight robbery

by **The Canary** — 29 July 2025 in **News** Reading Time: 3 mins read 220 11 AA 1

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Campaigners from Fossil Free London staged a demonstration outside the Bank of England on Monday 28 July, dressed as robbers emblazoned with the Norwegian flag in protest of the "daylight robbery" the Rosebank oil field would be for the UK public, if re-approved by the Labour government:



Rosebank: daylight robbery

Rosebank is the largest undeveloped oil field in the North Sea. If developed, it would release an HS8/30

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emissions equal to those produced by all 28 low-income countries in the world.



In January, a court overturned the 2023 approval of Rosebank, deeming it unlawful. The UK Government will now decide to re-approve or reject the field, once owner Equinor has re-applied for permission to develop the field.

Chanting "Rosebank Oil is a scam, Labour do you give a damn?", the campaigners carried loot bags labelled "UK Tax Payer Money" filled with fake money from a makeshift vault, holding placards stating "£1.5 Billion for Norway, Net Loss for UK":



The UK public is predicted to cover over 80% of the costs of developing Rosebank, due to generous tax reliefs that allow oil and gas companies to write off most of their development costs before profits are taxed. Norwegian state-owned oil company, Equinor – which owns the majority stake in Rosebank – is expected to profit up to £1.5 billion, along with its partner, Ithaca.



Despite some tax income from profits of Rosebank – most of which would come after 2030 – the UK Government is expected to incur a net loss of over £250 million.

The Norwegian government has a sovereign wealth fund that is largely funded by state-owned companies like Equinor, currently worth over $1.3 trillion that is reinvested towards the country's public environmental, social and governance issues.

A con

The profits from the prospective Rosebank oil field are expected to contribute to this, while the UK public are likely to be worse off from the deal. Rosebank's main offshore vessel will even be constructed in Dubai, reducing the potential for increased jobs from the field in the UK.

Robin Wells, Director of Fossil Free London said:

> *It's plain and simple, Rosebank is daylight robbery. If allowed, Equinor*

BY MOHAMAD KLEIT 29 MAY 2026

BY ROBERT FREEMAN 29 MAY 2026

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> *oil giant – will rob us blind, hoarding massive profits for themselves and leaving behind nothing but a trail of climate chaos and a net loss for us. The UK government needs to stop this carbon bomb, and act in the interests of the general public. Scrap Rosebank, and invest in a just transition.*

Featured image and additional images via Fossil Free London

Tags: climate crisis | fossil fuels | protest

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jeff3 10 months ago

Yet the greens are leading but they are a very small minority I wonder why we don't make more noise above their din at the moment we haven't the technology to do whot the greens want so on oil must go

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Greenpeace

This article is more than **9 months old**

Huge 'Butchered' artwork installed on North Sea gas rig by Greenpeace activists

Anish Kapoor work referring to 'butchering of our environment' believed to be first fine artwork exhibited from a working gas extraction platform



Greenpeace activists install giant Anish Kapoor artwork onto active Shell platform – video

Damien Gayle *Environment correspondent*

Thu 14 Aug 2025 12.27 BST

Prefer the Guardian on Google

Greenpeace activists have scaled a gas rig, stretched a 96 sq metre canvas across its side and stained it crimson, in a protest designed with Anish Kapoor.

The work, in the North Sea, is believed to be the first piece of fine art exhibited from a working gas extraction platform.

"I call it Butchered," the British sculptor told the Guardian. "I'm referring to the butchering of our environment. It is at the simplest level blood on a canvas. A reference to the destruction - the bleeding - of our globe of our state, of being.

Early on Wednesday, Greenpeace activists, who had waited for the most favourable weather conditions, sailed onboard the Arctic Sunrise to the Shell rig Skiff, 45 nautical miles off the coast of Norfolk.

Seven experienced climbers scaled the rig, hoisted a 12-metre by 8-metre truss on to its side and stretched the vast canvas across it. They then used a high-pressure hose to spray a deep-red stain on it.

The blood-like solution, designed specifically for the artwork, was a mix of seawater, beetroot powder and non-toxic, food-based pond dye, Greenpeace said.

The artwork, erected during the fourth heatwave this summer, was intended to convey "the vast suffering extreme weather is causing", a source at the environmental campaign group said.

Kapoor said he wanted the work to dispel the collective amnesia around the real causes of climate breakdown. "There seems to be, first of all, a collective will to not look at who are the real perpetrators of global warming," he said.



Activists created a vast crimson stain with 1,000 litres of blood-red non-toxic liquid. Photograph: Andrew McConnell/Greenpeace

"We seem to live in an age of denials - I mean [by] president of the US of bloody A, and the rest, and many others. And then there is the sense amongst us all that we are culpable, we, each individual. 'Oh I use that much less plastic, or if I switch the lights off, or if I whatever.'

"Our collective global witness, if you like, to global warming is less than 10% of the actual numbers. Most of it is caused by these big oil and gas companies."

Greenpeace has a long history of taking action on fossil fuel and other environmentally damaging installations at sea. Last year, Shell agreed to settle a controversial multimillion-dollar lawsuit against Greenpeace over an action the year before in which activists occupied a moving oil platform off the coast of the Canary Islands for 13 days.

Kapoor said he had been "deeply interested" in Greenpeace's "heroic" actions for some time, and for several years had been liaising with Greenpeace UK to find a way he could be more actively involved.

"And then there was this idea about a year ago to do something on the gas rig, oil rig," he said. "I thought about what one could do and came up with Butchered."

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There was no guarantee the work could be properly executed, and Wednesday's action had in fact been a second attempt, after an initial go at it had failed last year, Kapoor told the Guardian.

The artists called on "colleagues, friends, people of all kinds" to join in with protest.

"It is our duty as citizens to ... have at least some kind of political agenda," he said.

"It's tragic that governments all over the world are forbidding protests - not just forbidding it, actually arresting people. What's wrong with us? this is our right and duty as citizens to protest and keep our consciousness alive.

"If people wish to protest about Palestine, so they should, and much else. To say we're living in fascist times seems to be an underestimate of what levels of freedom the individual is allowed today."

A Shell UK spokesperson said: "Safety at sea is our priority. Greenpeace entered a restricted safety zone around the platform without permission, which is established under UK law to protect people and prevent collisions.

Their actions were extremely dangerous, involved illegally trespassing and put their own and others' lives at risk.

"We respect the right of individuals and organisations to protest, but it must be done safely and lawfully."

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London, Greater London, UK. 6th Sep, 2025. Members of the Fossil Free London and the Extinction Rebellion gathered outside the Holborn and St Pancras Council building where the British Prime Minister, Keir Starmer is the MP. Protesters demand from the ruling Labour Par ···

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Activists target Starmer's back yard over toxic fossil fuel project

by **Willem Moore** — 7 September 2025 in **News** Reading Time: 3 mins read

On Saturday 6 September, activists protested against Rosebank, the UK's largest untapped oil field. Describing it as "toxic", Fossil Free London (FFL) have warned that even ignoring the climate concerns, drilling Rosebank would be financially detrimental to UK citizens. They've also highlighted the links between the fossil fuel-hungry Norwegian company set to profit from Rosebank and an "Israeli fuel conglomerate".

#StopRosebank
@StopCambo · **Follow**

BREAKING 🚨: People across the UK are showing up to demand the UK Government #StopRosebank.

Rosebank is the UK's biggest undeveloped oil field, & it's a bad deal for all of us.

Take digital action now 👉stopcambo.org.uk/doa-digital



2:48 PM · Sep 6, 2025

UK-wide protests over fossil fuels

Fossil Free London drew attention to the protest in the London Borough of Camden, which is where you find Starmer's constituency of Holborn and St Pancras. The group said in a press release:

> *The action in Camden saw over a hundred activists gather outside council buildings in Sir Keir Starmer's constituency with a giant melting planet earth ice-cream, as part of a coordinated effort across the country to send a clear message to the Prime Minister: pull the plug on the toxic Rosebank field for good.*

In collaboration with groups like Mothers Rise Up, Stop Rosebank, and Christian Climate Action, protests actually took place across Britain:



GGEC
@ggectee · **Follow**

A damning reminder today from @patrickharvie at the excellent Stop Rosebank demo in Glasgow that @ScottishLabour shamefully abstained in a motion (still won) in the Scottish Parliament which included the Green amendment for boycott, divestment and sanctions against Israel.



11:11 PM · Sep 6, 2025

Sian H
@SianH263862 · **Follow**

Many Selly Oak constituents stated their objection to the potential new UK oilfield # Rosebank in Birmingham city centre protest today. @AlistairCarns @StopCambo



3:09 PM · Sep 6, 2025

Oceana UK
@OceanaUK · **Follow**

🌊 From the coast to the corridors of power, people are rising up to say STOP ROSEBANK✊

📢 The new oil field has a pipeline through the middle of a marine protected area. It would be a disaster for our ocean & climate - if it goes ahead.

For the sake of our seas #StopRosebank



8:08 AM · Sep 6, 2025

FFL highlighted that:

> *Rosebank, owned primarily by Norwegian state oil giant Equinor, would produce more CO2 than the annual emissions of the world's 28 lowest-income countries combined.*
>
> *The vast majority of its oil will be sold on the international market for export, doing nothing to lower energy bills or increase energy security here in the UK, with the taxpayer set to pick up the bill for most of its development costs. In fact, the vast majority of Rosebank's profits will flow towards Norway's immensely wealthy oil fund.*
>
> *Worse, the potential mega-polluter could send over £250 million towards Delek Group – an Israeli fuel conglomerate that has been flagged by the UN for human rights violations in Palestine. Equinor is currently under investigation by the Norwegian Consumer Authority for failing to conduct proper due diligence over these links.*

The *Canary* reported that a court overturned the 2023 approval of Rosebank, deeming it unlawful. The UK Government will now "decide to re-approve or reject the field". The piece added:

> *The UK public is predicted to cover over 80% of the costs of developing Rosebank, due to generous tax reliefs that allow oil and gas companies to write off most of their development costs before profits are taxed. Norwegian state-owned oil company, Equinor – which owns the majority stake in Rosebank – is expected to profit up to £1.5 billion, along with its partner, Ithaca.*
>
> *Despite some tax income from profits of Rosebank – most of which would come after 2030 – the UK Government is expected to incur a net loss of over £250 million.*
>
> *The Norwegian government has a sovereign wealth fund that is largely funded by state-owned companies like Equinor, currently worth over $1.3 trillion that is reinvested towards the country's public environmental, social and governance issues.*

Speaking on the latest fossil fuel protests, Lorna Power (co-director, Mothers Rise Up) said:

> *After a summer of record breaking heat and escalating extreme weather events across Europe, it is clear that the climate crisis has arrived at our door. The only way to protect our planet, our health and our communities is to stop burning fossil fuels and rapidly roll out clean energy infrastructure.*
>
> *The UK government is about to decide whether to allow drilling at Rosebank, Britain's largest undeveloped oil field. More North Sea oil and gas will do nothing to lower our bills or improve our energy security. Approving new fossil fuel projects like Rosebank in the context of an escalating, deadly climate crisis is simply unjustifiable.*

GREENPEACE



Oil and gas | Press Release

Greenpeace activists scale power station's 75-metre chimney stacks to protest 'The Great Gas Rip-Off'

Greenpeace UK Press Office
September 22, 2025

Campaigners demand energy reforms to stop expensive gas from setting electricity prices and pushing up bills

This morning eight climbers from Greenpeace UK have scaled two 75m-high chimney stacks at

England's largest gas-fired power station to expose the role expensive gas plays in setting electricity prices and pushing up bills.

The activists climbed the two chimney stacks at Staythorpe Power Station in Nottinghamshire – which is owned by the German energy giant, RWE – using the maintenance ladder rungs. They are now standing on gantries displaying a banner reading: '*The Great Gas Rip-Off: Now On!*'.

Even though gas supplied just 30% of the UK's electricity last year, gas-fired power stations – like Staythorpe – still set the price we pay for power almost all the time. In 2021, gas set the price 97% of the time.

That's because, under the UK's electricity pricing system, the most expensive source of power – usually gas – sets the price for all electricity.

Our gas-dependent power generation can also lead to extreme profiteering through balancing payments. Last winter, two gas plants were paid almost £18m for generating just three hours' worth of power alone, exploiting their ability to set high prices when supply is tight.

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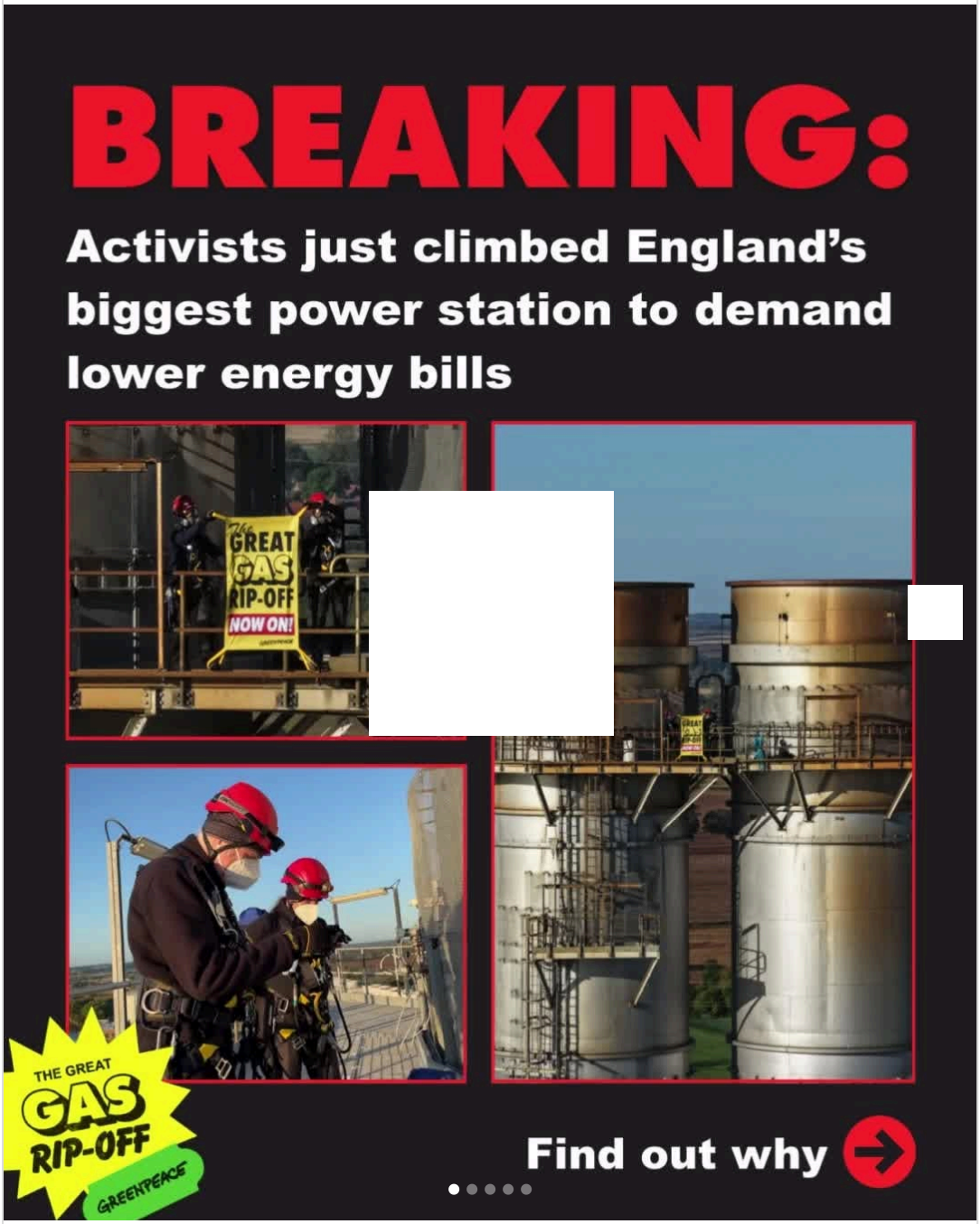

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🚨 The system is rigged. Private gas companies set the price of our electricity, keeping costs high to line their own pockets. Enough is enough.

Ultimately, we all want the same thing: cheaper electricity that doesn't pollute our air or damage the health of our children and communities. Renewable energy, like wind and solar, can offer that.

We have the solutions. Now we just need action. Sign the petition @greenpeaceuk to stop the #GreatGasRipOff

Link in bio @greenpeaceuk.
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“I shouldn’t be climbing on power stations. But something has to change.”

Speaking about his involvement in the protest, **Vincent McGoldrick, a 68-year-old retiree and former volunteer hospice driver, who is one of the activists on the chimney stacks, said:**

> **“I’m a pensioner – I shouldn’t be climbing on power stations. But something has to happen – something has to change. We’re all being ripped off by these greedy gas companies and it’s the poorest in society that are bearing the brunt of sky-high electricity prices.**
>
> **“Millions of families are struggling to keep the lights on or heat their homes. This has a knock-on effect on our health, our children’s education, and it’s costing the NHS millions. I have six grandchildren, I want a better future for them than what’s currently on offer – I can’t just sit by and do nothing.”**

Over the past five years, gas-driven electricity prices have averaged 130% higher than solar, 29% higher than onshore wind, and 13% higher than offshore wind. That’s meant bigger profits for gas generators and bigger bills for households and businesses.

During the recent energy crisis, the huge spike in global gas prices added an estimated £90 billion onto UK gas bills between 2021 and 2024, equivalent to £1,300 per person.

As a result, UK electricity prices are now among the highest in Europe – and far higher than in the US. For energy-intensive industries, they’re some of the highest in the world.

“The government could stop this today”

Greenpeace UK’s campaigner, Lily-Rose Ellis, said:

> **“Most people have absolutely no idea that expensive gas is still setting the price of electricity – it’s time they knew the truth.**

“Right across the country, people are struggling to pay their bills, while the gas giants running our power stations rake in huge profits.

“The government could stop this today – by ending the system that lets expensive gas set electricity prices. By taking control of our energy system we can lower bills, help tackle climate change, and make sure our power works for people, not for corporate greed.”

How to end the Great Gas Rip-Off

Earlier this month, Greenpeace UK published a report setting out how the government could save households and businesses £5.1 billion a year on their energy bills, by removing gas-fired power plants from the wholesale electricity to stop gas from setting prices.

The reforms would also shield British households and businesses from gas price volatility, like those experienced during the recent energy crisis.

Greenpeace’s approach to protest

In order to minimise any disruption caused, this protest is being executed at a time when there is plenty of supply on the energy system. The climbers also plan to stay on the chimney stacks for no longer than necessary to highlight the central role that gas-fired power stations play in driving up the cost of electricity for British households and businesses.

As well as industry-standard climbing safety gear, the activists are all wearing personal protective equipment (PPE) including facemasks and respirators, and are equipped with gas monitors to ensure their safety.

Contact: Greenpeace UK Press Office – press.uk@greenpeace.org or 020 7865 8255

Notes to editor:

- Photos and videos of the action are available here
- Interviews available with activists up the stacks at the power station, as well as Greenpeace campaigners – please contact press.uk@greenpeace.org or call 020 7865 8255 to arrange.



fossilfreelondon and **3 others**
Original audio

fossilfreelondon 26w
🚨 Breaking: We're surrounding Shell's global HQ this morning to demand justice for the Philippines.

Today, 67 claimants are suing Shell for the damage done to them by Typhoon Odette in 2021.

Over 400 people were killed and 1.4million homes were lost.

Shell knew about climate change - they knew this would happen because of their business model - yet they doubled down on oil and gas.

The Philippines has emitted only 0.21% of all emissions since records began, while Shell are one of the biggest historic emitters.

The people of the Philippines deserve

1.1K 25

October 23, 2025

 g in to like or comment.



fossilfreelondon and **3 others**
Original audio

Today, 67 claimants are suing Shell for the damage done to them by Typhoon Odette in 2021.

Over 400 people were killed and 1.4million homes were lost.

Shell knew about climate change - they knew this would happen because of their business model - yet they doubled down on oil and gas.

The Philippines has emitted only 0.21% of all emissions since records began, while Shell are one of the biggest historic emitters.

The people of the Philippines deserve justice ✊ Shell, pay your debt, for Typhoon Odette!

#TheOdetteCase #ClimateJustice #MakePollutersPay #ShellKnew

1.1K 25

October 23, 2025

Log in to like or comment.



fossilfreelondon and **2 others**
your movie soundtrack • where is my mi...

fossilfreelondon 30w
Yesterday activists surrounded Shell's HQ and delivered a letter, on behalf of 67 Filipino claimants, to let Shell know that they are being sued for the damage caused by super Typhoon Odette.

While the claimants were not able to be there in person, their presence was still felt
Their messages were played out loud to Shell as the letter was carried to the doors of Shell's global HQ.

The people of the Philippines deserve justice for the damage done to them - lost lives, livelihoods and homes - because of super emitters like Shell.

Unnatural disasters like Typhoon Odette will only be more likely while Shell continues to pursue its business model

459 8

October 24, 2025

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fossilfreelondon and 2 others
Mix: Novak • Work It | Taylor Swift • Anti-...

fossilfreelondon Edited • 24w

BREAKING 🚨: We disrupted BP on the day they announced £1.7BN in profits, after JUST 3 months, to call out the ludicrousness of them speaking at a decarbonising event.

BP's CEO said this year that they had gone 'too far, too fast,' on funding renewables...so instead they've doubled down on EVEN more oil and gas, in a climate crisis.

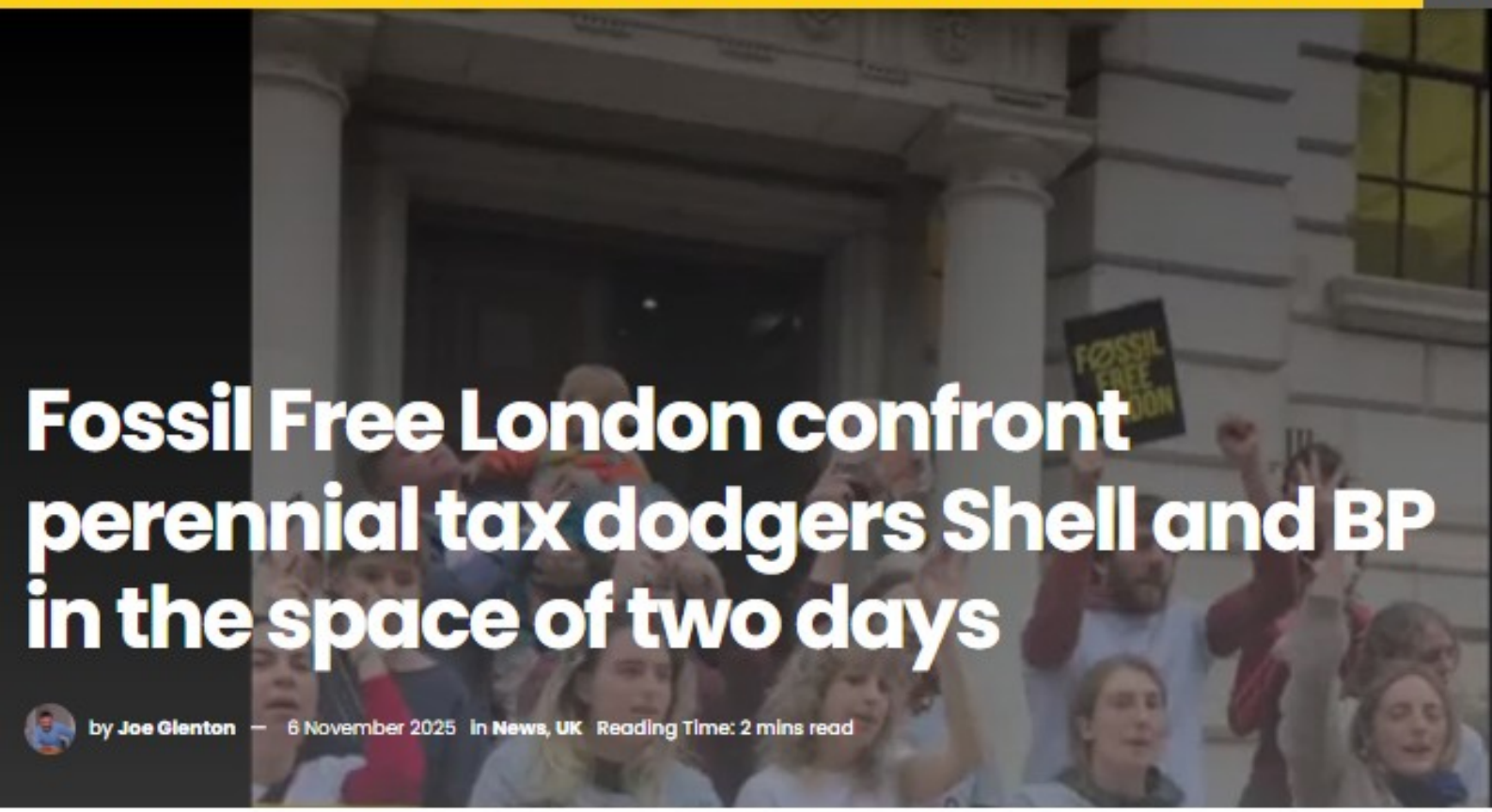
Hurricane Melissa, Typhoon Kalmaegi, and so many more, are the price we pay for BPs greed. And it's often the people who have done the least to cause the situation we're in.

Who is going to pay to rebuild Jamaica? Who is going to pay to rebuild the Philippines?

502 25

November 5, 2025

Log in to like or comment.



Fossil Free London confront perennial tax dodgers Shell and BP in the space of two days

by Joe Glenton — 6 November 2025 In News, UK Reading Time: 2 mins read

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Fossil Free London is calling for perennial tax dodger Shell to cough up the £1.3bn they owe.

Shell: under pressure

On Thursday 6 November they protested outside the Treasury. The campaign group say Shell's merger with Norwegian firm Equinor has allowed it to dodge a massive tax bill. In fact, they even claim the move got Shell a £12mn rebate! The companies want to exploit Rosebank, the biggest unexplored oil field in UK waters.

> **Fossil Free London**
> @fossilfreeLDN · Follow
>
> BREAKING 🚨: Activists are outside the Treasury calling out Shell's £1.3BN tax dodge through its new Adura merger with Equinor.
>
> Shell paid ZERO tax last year - and even got £12.4M back and now they're at it again.
>
> #StopAdura

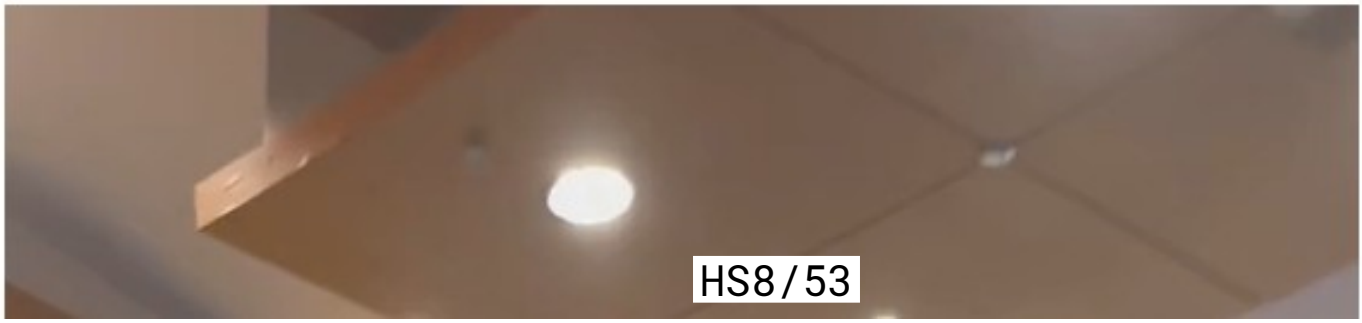


Fossil Fuel London has a specific campaign against the oil giant. It says:

> *Despite extreme weather ruining lives across the world, Shell remains committed to extracting more climate-wrecking oil and gas.*
>
> *Shell's own research shows that new oil and gas are incompatible with keeping global heating below the crucial 1.5C limit. Yet the company is investing billions in fossil fuel expansion – with as little as 1.5% of its spending going to solar & wind.*

BP: chewing down billions in profit

Meanwhile, on Tuesday 4 November Fossil Free London also targeted BP. The group disrupted a panel event featuring senior BP staff member Stewart Macfarlane. BP's quarterly profits were also announced:





Campaigners chanted 'as hurricane Melissa tears down lives, do your profits help you sleep at night?' as they were removed from the panel, hosted by the Association of International Energy Negotiators (AIEN) at Simmons & Simmons LLP's office.

BP reported an underlying profit of $2.2bn (£1.7bn) this quarter, beating analyst expectations of $1.98bb.

These profit figures come as just last week Jamaica suffered the 'storm of the century' in Hurricane Melissa, super charged by the climate crisis BP's fossil fuels have driven.

This February, BP announced they were slashing their targets, increasing its investment in oil and gas to $10bn a year while cutting more than $5bn from its low-carbon investment plans.

Robin Wells, director of Fossil Free London, said:

> *For a brief moment, BP pretended to push cleaner energy, but their green mask has slipped, to reveal the oily mouth behind. They're chewing down on billions in profit while Jamaica lies in tatters and Haitian villages mourn 25 people swept away in floods.*
>
> *Oil and gas companies are conspiring to burn down the house so a small number of rich men experience ever increasing oil wealth and raise the value of their shares. CEOs and shareholders wine and dine in luxury, we count the seconds until midnight as tipping points begin to cascade into action around us, soon impossible to stop. BP profits, we drown.*

Featured image via screengrab

Tags: climate crisis | fossil fuels | protest

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Chaotic Kent Council loses yet another Reform councillor

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Ian Hodson says "our class will stand up" to ensure Your Party "serves our interests"

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Comment *

DAILY ONLINE PRAYER



Everything we do in CCA is underpinned in prayer. Come and pray with us online!

You can join us online, every morning at 9am or every Monday and Friday at 6:30am.

Click here to register in advance (https://41cz9.r.a.d.sendibm1.com/mk/cl/f/aK5Z_8jRGXyn_WK6B3VLugt2CXXZekPwhBAy11zj2lrt-Cib2kU-dNWdwC0WM5SDh_e4HhcWEYHV-TbPCoE1NAMY1D1f6BlozykHLr4jmbB8H75ida34dgTSQF6-7HTn90YBby_Azbxp7v9YECjjaIs3qBKslOBsm4zRDK2pSYRU5nsEjPAgP3KS3S52moHcTVXL_VOBov1dfeT2iGDxAtlWvUDlyD1U5EHHUQBeSfi5OxrARI6WMfmJXXvfBBpimPZOKBUrZCUdFdxBEoS4B-8K)

Note – during holiday season (July and August), please contact us in case there are changes: **christianclimateaction@gmail.com** (mailto:christianclimateaction@gmail.com).

ONE OFF EVENTS

For details of our regular vigils, scroll down beyond our lists of one off events.

Rosebank Die-In



Wednesday 20th May, 12:15pm-1:45pm

Location: HM TREASURY

Meet at CCA Parliament Vigil (12.15) and then walk together to the Treasury.

Rosebank is the largest undeveloped oilfield in the North Sea. If extracted and burned, Rosebank's oil and gas would produce more CO2 than the 28 poorest countries do in a year.

The government (via OPRED) have recently asked for clarification on many of the details in the Environmental Assessment. It is currently believed that the earliest decision could be mid-June (but end July is more likely). There is a concern that Rachel Reeves may be attracted by the tax receipts that could be generated by Rosebank in the future. Therefore, CCA is organising a Die-In in front of the steps at the Treasury (on public land).

More information
(https://christianclimateaction.org/2026/05/14/%e2%9b%94%f0%9f%9b%a2%ef%b8%8f-stop-rosebank-%f0%9f%9b%a2%ef%b8%8f%e2%9b%94/)

Ethical Banking Vigils



We are taking forward our ethical banking campaign this spring with a series of vigils planned outside Church of England cathedrals. Anyone can join the campaign by holding a prayer vigil outside a cathedral or church building in their area.

Over the Spring and early Summer 2026, our CCA local groups will be holding vigils outside Church of England cathedrals.

More information (https://christianclimateaction.org/2026/04/15/join-an-ethical-banking-vigil-this-spring/)

REGULAR VIGILS

Very occasionally we have to cancel these vigils. If you are planning to attend one for the first time, please get in touch with us first: **christianclimateaction@gmail.com** (mailto:christianclimateaction@gmail.com)

Wednesday Silent Vigils – Shell, BP, Parliament and Rosebank



Every Wednesday, Central London,

8am-9am: CCA prayer vigil outside Shell HQ, Belvedere Road, SE1 7NA

10am-10:30am: CCA prayer vigil outside BP HQ, 1 St James's Square, SW1Y 4PD

11am-12.30pm: CCA, alongside those of other faiths, prayer vigil outside the Houses of Parliament, holding in mind Parliament and the challenges of the climate crisis.

12.45-1.45 CCA Rosebank vigil outside Department for Energy Security and Net Zero, 55 Whitehall, SW1A 2HP

For regular updates ask for the WhatsApp link.For more info contact **christianclimateaction@gmail.com** (mailto:christianclimateaction@gmail.com)

Edinburgh Vigil Outside Scottish Parliament



Last Tuesday of every month, Midday – 2pm, outside the Scottish Parliament, Edinburgh

Join us in prayer and reflection outside the parliament building.

We'd love to hear from you if you plan to come along. Email CCA Scotland: ScotlandCCA@gmail.com

Barclays Vigil, Liverpool



Third Saturday of every month, 12 – 1pm, Barclays bank, 48-50 Lord St, Liverpool, L2 1TD

CCA Liverpool hold a vigil outside their local Barclays.

For more info contact **nwchristianclimateactionnw@gmail.com (mailto:CCASurrey@gmail.com)**

CCA Brighton – Pause for the Planet Vigil



Third Friday of the month, 10:30am

The war memorial, Old Steine, Brighton

Followed by 11.15-11.45 outside Barclays bank on North Street.

Join us as we come together in silent prayer for our planet. We do this alongside XR Buddhists, who sit silently in meditation.

At 11:15 we move to holding another vigil outside Barclays bank, where we also do outreach, letting the public know that Barclays is the biggest funder of fossil fuels in Europe.

We'd love to hear if you plan to come along. Email CCA Brighton: **christiancabrighton@gmail.com (mailto:christianclimateactionkent@gmail.com)**

CCA Kent – Monthly Climate Vigil



Third Saturday of the month, 11.00am

Buttermarket, Canterbury (outside the main entranced to the Cathedral).
Join us as we come together in prayer and reflection for our planet.
We'd love to hear from us if you plan to come along. Email CCA Kent:
christianclimateactionkent@gmail.com (mailto:christianclimateactionkent@gmail.com)

Cardiff Silent Vigil for Climate Justice



Second Saturday of the month

12noon to 1pm

Outside Barclays Bank, Working Street (opposite St John's Gardens), Cardiff City Centre, CF101GN

Join us in silent vigil for climate justice, outside Barclays Bank, Cardiff .

We will gather for an hour of silence as an act of grief for those dying because of climate chaos and to pray that Barclays stops funding climate breakdown. Everyone of all faiths and none are welcome to join us in silence, meditation, or prayer.

Organised by Cymru Christian Climate Action, for more information contact **cymruCCA@gmail.com** (mailto:cymruCCA@gmail.com) or visit the **Facebook events page (https://www.facebook.com/share/bF8NzQS2E9FyvNwy/)**. Bring a chair if you can.

Christian Climate Action

Direct action, public witness for the climate



PRESS RELEASE: Clergy blocking oil facilities across the UK

April 1, 2022April 2, 2022

Friday 1st April 2022

For immediate release

Photos here (https://drive.google.com/drive/folders/1Dgcuv5vJjzfdSrdpX6HJEaayoidc08xy?usp=sharing)

Contact: christianclimateaction@gmail.com (mailto:christianclimateaction@gmail.com)

Members of the clergy and Christians are amongst those currently blocking 10 major oil facilities across the UK. They intend to continue to block the sites until the UK Government agrees to end all new fossil fuel investments immediately.

A number of Christians have joined supporters of Extinction Rebellion and Just Stop Oil at sites ranging from London and Southampton to Birmingham and Tamworth. Scores of people sat in the road to block oil tankers from leaving each site, while others climbed on top of oil tankers. Others are locked on at the entrances using large pink oil barrels filled with concrete, with the words 'END FOSSIL FUELS NOW' on them. The Southampton locations each have one of the iconic Extinction

Rebellion boats blocking the entrances with people locked to them. At the Esso terminal in London, four people have climbed on top of an oil silo and have hung large banners that say 'JOIN US – LONDON APRIL 9' and 'END FOSSIL FUELS'.



Revd Sue Parfitt and fellow CCA member, Ruth Jarman, getting into a police van during Just Stop Oil protests.

Rev Mark Coleman (https://christianclimateaction.org/2022/04/01/revd-mark-coleman-writes-on-why-he-has-committed-to-just-stop-oil/), 63 and retired as Vicar of Rochdale in in February 2020, said:

'Oil is killing us, it's time to stop our dependence on it. Ordinary people in our parishes are suffering the most from this cost-of-living crisis, while tyrants are making a killing. Literally. Now is the time for the government to signal its change of direction by refusing to develop new oil fields. It's a real no-brainer, so what are we waiting for?'

Rev Helen Burnett from Christian Climate Action and Extinction Rebellion, said:

'Compared to the horrific bloodshed in Ukraine, the fight for 1.5˚C may seem abstract, but it is, in reality, all too real. It is the fight for all those on the frontline of the climate crisis, in particular our children and our young people and the majority of the world's population in the Global South. It is the fight for a peaceful and organised international community, it is the fight for the story of humanity and the fight for all those whom we love.'

Rev'd Canon Jonathan Herbert, member of Hilfield Friary and Chaplain to Gypsies and Travellers in Salisbury Diocese, said:

'I'm taking part in civil disobedience with JUST STOP OIL as part of a long tradition of Christians engaging in non-violent direct action. In Baptism Christian are called to renounce evil; challenging this country's foolish dependence on fossil fuels is a way of renouncing an evil that is destroying our

planet and God's people. '

Claire Cooper, 64, said:

'There has never been a greater threat to human existence than the climate and ecological crisis. The Government fails to see this and has turned a blind eye to its genocidal path by refusing to give up subsidising and granting new licenses to fossil fuel companies. There is nothing so far that has persuaded them to change course. The only answer it seems, is nonviolent civil resistance, which is central to my faith. Christianity can claim a long history of nonviolent resistance, right back to Jesus turning the tables in the temple. Indeed, Christian ethics say we have a duty to protest against injustice – that is why I have joined in with Just Stop Oil.'



K*ate sitting in the road with other Just Stop Oil protestors*

Kate Chesterman, said:

'I'm supporting the Just Stop Oil because I believe that if Government were to stop granting licences for new fossil fuel exploration, this would be really meaningful action in the face of impending catastrophe. Oil is killing us, is fuelling war and creating a terrible cost of living crisis that leaves many behind. When people who have had enough take action, it destroys the façade that we can, or that we have the right to, live undisturbed, unperturbed lives based on a way of being that is inherently destructive. It is a call to stop pumping more oil and instead pursue the obvious things that would benefit everyone: building more renewables, insulating homes and providing good public transport'.

The action is taking place at a crucial time: the UK public is waking up this morning to a 54% rise in the energy price cap, which the Citizens' Advice charity say will leave millions of people unable to pay their bills. As war wages in Ukraine governments around the world are making plans to get off Russian oil and gas at speed. However, instead of doing what's necessary to move away from fossil fuels to align with Paris Climate pledges, world leaders are choosing to appease oil companies and pursue extraction elsewhere. This is despite the recent IPCC report stating that staying on fossil fuels means that half the population of the continent of Africa could be displaced within the next eight years. These are the people and nations who have done the absolute least to cause the crisis.

The blockades come just over a week before a Rebellion begins in London on 9th April. Christian Climate Action (https://christianclimateaction.org/2022/02/20/9th-april/) is calling on Christians from across the UK to come to Hyde Park at 10am on Saturday 9th April (https://christianclimateaction.org/2022/02/20/9th-april/) where they can gather with other Christians to worship pray, take part in workshops and protest the government's inaction on ending fossil fuel investment.

ENDS

Contact: christianclimateaction@gmail.com (mailto:christianclimateaction@gmail.com)

Notes for Editors:

1. **Christian Climate Action** is a community of Christians supporting each other to take meaningful action in the face of imminent and catastrophic anthropogenic climate breakdown. We are inspired by Jesus Christ and guided by the Holy Spirit. Following the example of social justice movements of the past, we carry out acts of public witness, non-violent direct action and civil disobedience to urge those in power to make the changes needed. Since November 2018 we have worked closely with Extinction Rebellion and have become known as the Christians in XR. www.christianclimateaction.org (http://www.christianclimateaction.org).
2. Blog from Rev Mark Coleman (https://christianclimateaction.org/2022/04/01/revd-mark-coleman-writes-on-why-he-has-committed-to-just-stop-oil/), written ahead of the action.
3. Extinction Rebellion press release (https://extinctionrebellion.uk/2022/04/01/end-fossil-fuels-now-extinction-rebellion-and-just-stop-oil-block-oil-facilities-across-the-uk/)
4. Just Stop Oil press release (https://juststopoil.org/2022/04/01/breaking-just-stop-oil-coalition-blocks-7-critical-oil-facilities-to-demand-an-end-to-new-oil-and-gas/)
5. Locations where action is taking place:

Just Stop Oil

- Inter Terminals UK Ltd, London Rd, Grays RM17 6YU
- Navigator terminals Thames, Oliver Rd, West Thurrock, Grays, RM20 3ED
- Buncefield Oil Depot, Hemel Hempstead HP2 7HZ
- Esso Petroleum Co Ltd, Wood Lane, Birmingham B24 8DN
- Purfleet Fuels Terminal, London Rd, Purfleet RM19 1RS
- Kingsbury Oil Terminal, Tamworth, B78 2HA
- BP Oil Depot, Kingsbury, Tamworth B78 2EF

Extinction Rebellion

- Esso West Terminal near Heathrow Airport
- Hamble Terminals in Southampton.
- Hythe Terminal, Fawley

6. Half the population of the continent of Africa could be displaced within the next eight years (https://www.climate-refugees.org/spotlight/2022/3/3/ipcc-africa#:~:text=For%20context%20the%20entire%20population,record%20breaking%20droughts%20even%20today.)

7. Christians invited to Rebel in London in April:

https://christianclimateaction.org/2022/02/20/9th-april/ (https://christianclimateaction.org/2022/02/20/9th-april/)

https://christianclimateaction.org/2022/02/21/rebel-with-us-in-london-9th-17th-april-2022/ (https://christianclimateaction.org/2022/02/21/rebel-with-us-in-london-9th-17th-april-2022/)

Posted in: Just Stop Oil, Press

BLOG AT WORDPRESS.COM.

Insurance Times

Climate protest forces evacuation at London market conference



By Harriet Scott | 23 January 2026

'We disrupted this conference because insurance professionals cannot keep discussing 'risk' in isolation from the risks they are actually creating', says activist

Young activists disrupted the Fitch Ratings Insurance Insights 2026 conference yesterday (22 January 2026), in protest of the London market's continued support for the fossil fuel industry.

The demonstration took place during the opening session of the conference in the City's Minster Building at 2pm.

Three protestors entered the conference venue posing as attendees before two demonstrators invaded the stage, unveiling placards reading 'No New Workers for Fossil Fuel Insurers' and calling on the UK insurance sector to stop enabling the expansion of oil, gas and coal.



Read: Dive In – Festival disrupted by protests

Read: Climate protesters list 2025 demands to insurance industry

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The activists included a 16 year old who urged companies to stop insuring fossil fuels, as young people will not work for them if they continue to do so.

After over 10 minutes of the protestors reaching the stage, attendees were evacuated from the conference room.

Previous action

This follows a series of protests including the recent S&P Ratings conference and a career conference at LLoyd's of London.

Read: Protesters project 'toxic' images onto insurers' City offices

Read: Warning as study claims Lloyd's of London insurers are biggest fossil fuel underwriters

Explore more sustainability stories here or discover other news content here

Campaigners said the acceleration of actions targeting the London insurance market was prompted by recent strategic shifts, the market's continued exposure to fossil fuels and Lloyd's of London's position that it is "apolitical".

The Fitch Ratings Insurance Insights 2026 conference addressed risk and opportunities for the insurance sector over the next year, with Lloyds of London's chief of market performance Rachel Turk presenting a session.

A spokesperson for No New Workers said: "We disrupted this conference because insurance professionals cannot keep discussing 'risk' in isolation from the risks they are actually creating.

"An industry that insures fossil fuel expansion is not managing climate risk – it is fuelling it. Their laissez-faire approach to fossil fuels amounts to a refusal to take responsibility for the damage the

market enables. When the world's largest hub for fossil fuel insurance chooses inaction, it is choosing climate chaos."

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MORE HARRIET SCOTT



ManyPets partners with healthtech for fully integrated veterinary advice



Woodgate and Clark hires client relationship manager to expand Manchester team

Cuvva signs multiyear partnership with premium finance provider



fossilfreelondon • Follow
Sia • Unstoppable

fossilfreelondon 14w
Our activist group disrupted not one but THREE oily parties on a single night this week 🎉

🪧

One of London's biggest oil and gas conferences - International Energy Week - is back in London for another year 😤 💥

So, what do we do when we find a list of the secret after parties?!

We crash them, and make sure we ruin every oil CEO in Mayfairs night, of course?! 🥂

We paid visit to The Marriott Grosvenor Square, The Peninsula London Hotel and Mr Fogg's Apothecary.

1

February 15

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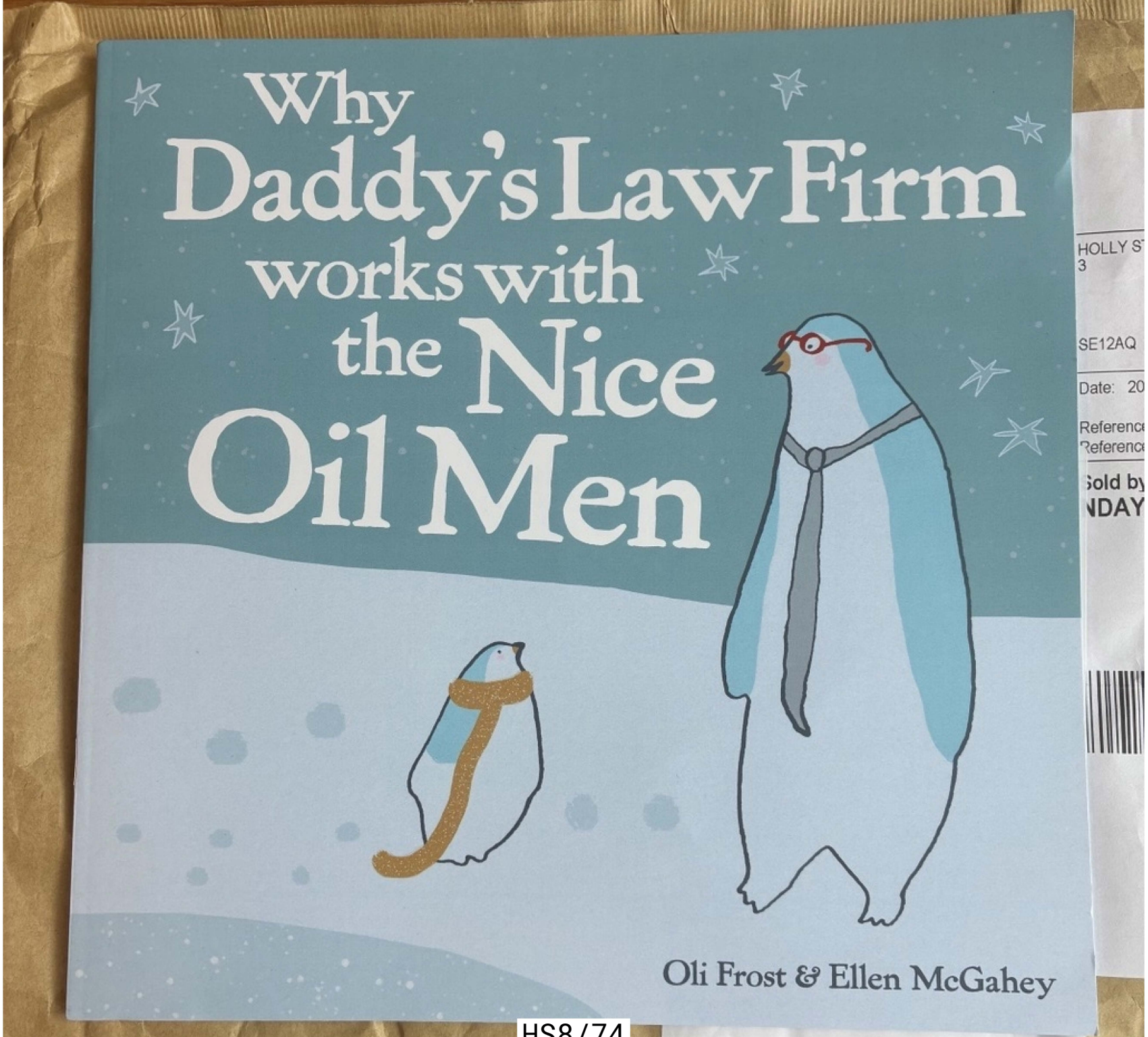
Why
Daddy's Law Firm
works with
the Nice
Oil Men
Oli Frost & Ellen McGahey


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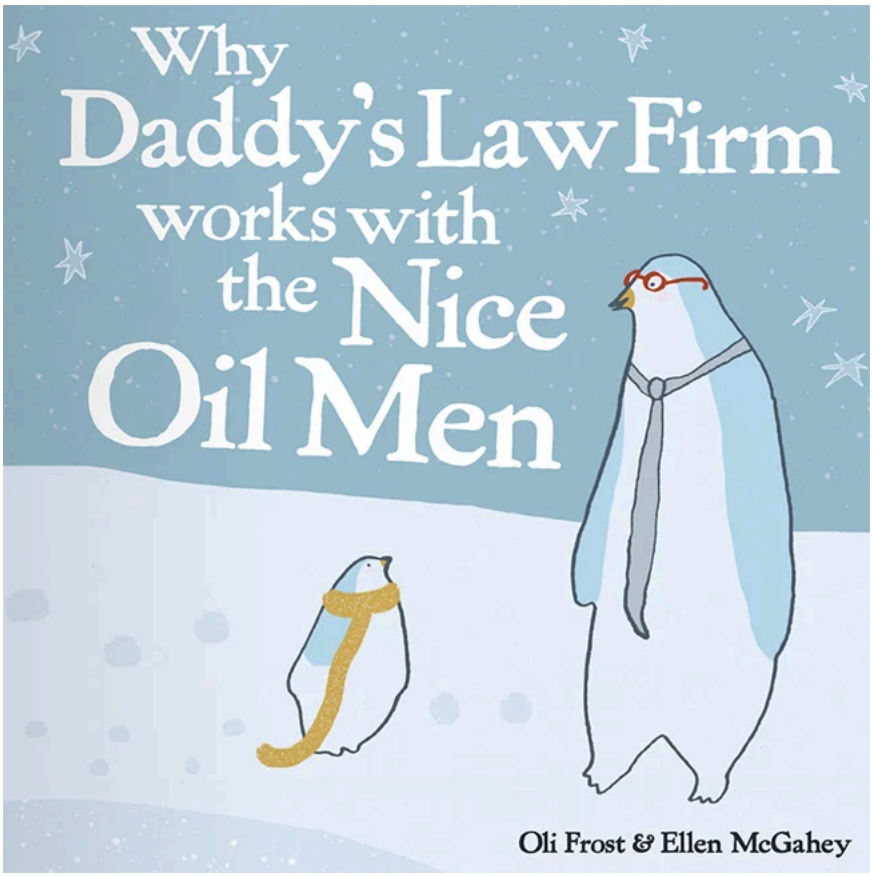
EXCLUSIVE Activists target lawyers with book: 'Why Daddy's Law Firm works with the Nice Oil Men' (/news-content/exclusive-activists-target-lawyers-book-why-daddys-law-firm-works-nice-oil-men)

By Jamie Hamilton (/readcontent/710489)
27 February 2026



Win a copy below.

A climate change pressure group has targeted lawyers with a satirical children's book intended to make them rethink their evil career choices.

Serious People is sending copies of *Why Daddy's Law Firm works with the Nice Oil Men* to "top oil and gas lawyers across London" today, it told RollOnFriday.

ROF's been treated to a preview copy and can confirm it's guaranteed to delight every child of a solicitor in the energy sector. Though mums may feel slighted by the insinuation they don't get instructions from BP as well.

Recipients expecting a valedictory story of a heroic energy lawyer earning the respect of his offspring will be disappointed. As the blurb explains, "On a chilly winter night, a little penguin dared to wonder: if Daddy loves me, why does his law firm facilitate fossil fuel expansion?"

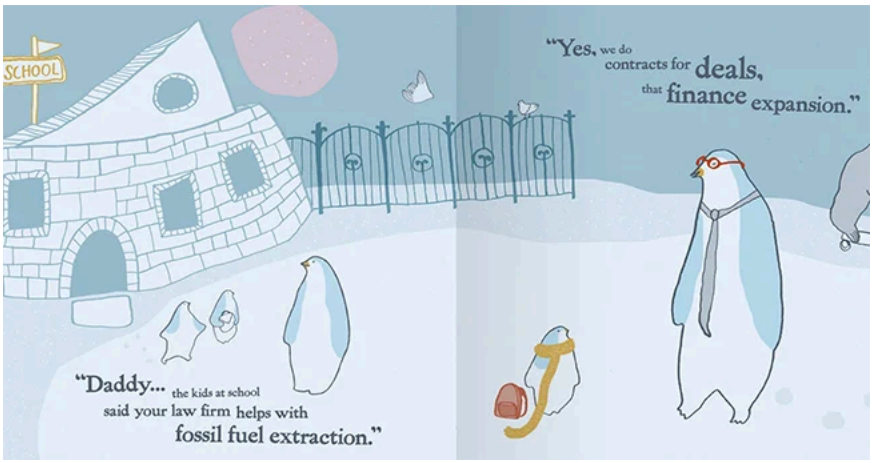
The book depicts a solicitor penguin getting badgered to change his ways by his idealistic brat of a child, who doesn't appreciate that although their antarctic habitat may get wiped out if dad carries on taking the oily dollar, the family can afford to relocate thanks to his hard work.



ROF prediction: these will become prized collector's items in energy practices across the land.

A couple of passages stretch credulity, as when the little penguin asks, "Would you help make bombs, or help sell cigars?" and his father claims, "Of course not, that's taking it too far".

The solicitor is also depicted with enough free time to put his child to bed ("Good night. Sleep well. Daddy has to get up early to do paperwork for Shell"), imputing an enviable work/life balance which risks tempting lawyers into the oil sector, not encouraging them out of it.



'You go to an expensive private school in London, my son. Daddy's tanker leases are nothing compared to what the other parents have done.'

A cheeky book mass-dropped on lawyers represents a change of tactics for climate change campaigners, who previously stormed A&O Shearman's London office (https://www.rollonfriday.com/news-content/five-arrested-storming-ao-shearman-climate-protest) and sprayed fake oil on the windows.

Legal children's books have featured before, however. During the Covid pandemic, offshore law firm Harneys produced an activity book (https://www.rollonfriday.com/news-content/exclusive-offshore-law-firm-makes-puzzle-book-quarantined-kids) to pump the next generation of tax exiles full of subliminal advertising, and a few years ago ROF unearthed plans around 1st April for numerous firms (https://www.rollonfriday.com/news-content/exclusive-law-firms-release-branded-childrens-stories)to release branded versions of kids' classics.

Talking to ROF, Serious People campaigner Jamie Inman suggested there was a "sense of tension between equity partners who are making money off oil and gas work and junior solicitors who may be very uncomfortable with the work, sometimes forced to do it against their preferences and certainly not profiting in any way from it".

"Oil and gas lawyers trade on the ethos and respectability of the wider profession to shirk responsibility for the world they are building", he said.

Oli Frost, the book's author, said, "Lawyers sometimes tell fairy tales to justify their fossil fuel work. We're merely helping by having it illustrated and published".

It remains to be seen how many lawyers will quit after reading *Why Daddy's Law Firm works with the Nice Oil Men*, but it could certainly wind up a loved one. To that end, ROF has several copies to give away. Simply email news@rollonfriday.com with the heading 'PINGU' and your suggested title for a sequel. We'll send books to the best entries, so don't forget to include an address.

UPDATE: Winners announced (https://www.rollonfriday.com/feature-content/daddys-law-firm-childrens-book-competition-winners), comp over!



Activism | Press Release

'THEY PROFIT, WE PAY': Rosebank production ship pursued and painted by Rainbow Warrior



Graham Thompson
March 25, 2026

Pictures, video footage, drone and phone footage of the protest are all available here.

As the Rosebank oil field was being discussed in Parliament yesterday in an Opposition Day debate[1], Greenpeace ship the Rainbow Warrior III caught up with the PetroJarl Rosebank, the huge oil industry ship heading to the field near the Shetland Islands, as it left Walvis Bay in

Namibia after refuelling. Activists from the Warrior in RHIBs (rigid hulled inflatable boats) and kayaks protested the Rosebank's plans for the second time in five days.

Four activists from the Warrior managed to reach the PetroJarl Rosebank in a RHIB and paint 'THEY PROFIT, WE PAY' down the side of the hull.

Six more activists in kayaks and RHIBs surrounded the Rosebank with banners protesting their plans, reading 'OIL WAR PROFITEERS', 'STOP ROSEBANK' and 'SHELL + EQUINOR PROFIT, WE PAY', while the Warrior displayed a giant banner hung between its masts reading 'STOP ROSEBANK'.

Shell, Equinor and Ithaca, the three oil companies behind the project, have seen their combined market value soar by billions of pounds since the US-Israeli attacks on Iran.[2]

Angharad Hopkinson, a campaigner from Greenpeace UK currently aboard the Warrior, said:

> ***"These oil companies think they can carry on ignoring the reality of climate change and profiteering from disastrous oil wars as their industry always has. But their time dominating global politics is coming to an end. We have the technologies needed for real energy security and independence. Renewables are already providing far more of our electricity than fossil fuels and as the economy electrifies the role and influence of companies like Shell and Equinor will continue to shrink.***

> ***"But we're still paying over the odds for our energy because we still let fossil fuels set our prices. To protect bill payers, as well as the climate, we need to quit our oil and gas addiction as quickly as possible. The government must stick to their guns on Rosebank and refuse to allow these climate vandals to bounce them into making a big, dirty and very expensive mistake."***

The PetroJarl Rosebank is a 95,000-tonne 'floating production, storage and offloading' (FPSO) vessel operated by Adura, a Shell and Equinor joint venture based in Aberdeen. The ship was renamed the 'PetroJarl Rosebank' and reflagged to the UK in January while being refitted in Dubai, having previously been the 'PetroJarl Knarr' and flagged to the Bahamas. It is being towed to UK waters by large ocean-going tugs. All this activity has taken place despite the Rosebank oilfield not having final permission to operate from the UK government.

The oil and gas resources in the North Sea have been thoroughly explored and around 90% of them have already been extracted and used[3]. What remains is difficult and expensive to extract. But the UK can replace dwindling North Sea fossil fuel supplies with renewable energy more quickly and cheaply than with new drilling licenses. By 2030 the renewable sources

commissioned in the last auction round alone should be supplying nearly six times more energy than the extra domestic gas production in 2030 if new licences are issued for North Sea drilling. [4]

Equinor had to submit a revised Environmental Impact Assessment for Rosebank including carbon emissions from burning the field's oil (scope 3 emissions) after the permission given by the last government was judged unlawful in a 2025 court case brought by Greenpeace and Uplift. The estimated scope 3 emissions of the field are 249 million tonnes of CO2e – more than the combined annual emissions of Ireland, Belgium and Greece.

Ed Miliband, Secretary for Energy Security and Net Zero, described the last government's decision to give permission to drill in the Rosebank field as 'colossal waste of taxpayer money and climate vandalism'[5]. This chimes with the views of the UK public where, according to polling from YouGov, 54% of UK voters think that increasing renewables is the best way to ensure energy security, while only 25% think it is drilling for new oil and gas.[6]

Pictures, video footage, drone and phone footage of the protest are all available here.

Spokespeople are available for interview.

ENDS

Contact

Please call 07801 212 960 for queries or interviews.

Greenpeace UK Press Office – press.uk@greenpeace.org or 020 7865 8255

Pictures, video footage, drone and phone footage of the protest are all available here.

Notes

1. MPs voted against a Conservative opposition day motion to end the UK Government's ban on new oil and gas licences for the North Sea, end the windfall tax on energy giants and approve the Rosebank and Jackdaw fields by 297 to 108 votes. https://www.scotsman.com/news/politics/mps-vote-against-tory-motion-on-new-north-sea-oil-and-gas-projects-6220509
2. https://www.theguardian.com/business/2026/mar/15/oil-company-shares-soar-to-all-time-highs-as-middle-east-war-turbocharges-price-per-barrel https://www.ft.com/content/e37bed88-adfa-472d-a86b-2167dc7ca705
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Protesters disrupt environmental conference at Jesus

Activists from ORCA accused the UN conference of hosting 'major pollutors'



Protesters picketed the entrance to the event
RYAN TEH FOR VARSITY

by **Maddie Harding**
Saturday May 16 2026, 3:52pm

Updated: Monday May 18 2026, 9:53pm

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Environmental activists disrupted a conference held at Jesus College on Tuesday (12/05), organised by the UN Environment Programme to "build relationships" between "business, finance and conservation leaders".

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The Organisation of Radical Cambridge Activists (ORCA) accused the event of hosting "major polluters, multinational mining giants, companies accused of indigenous rights violations, and insurance companies profiting off oil, gas, and arms".

Picketing the entrance, a group of protesters from the organisation described the conference as "greenwashing". Demonstrators shouted slogans and handed out leaflets to passers-by – others unfurled a giant red web.

Activists dressed as miners entered the conference area in Jesus' West Court during the lunch break, and played loud noises to disrupt the event.

The Nature Action Dialogues conference is an annual collaboration between the UN Environment Programme World Conservation Monitoring Centre (UNEP-WCMC) – which is based in Cambridge – their Proteus Partnership, and the Jesus College Intellectual Forum.

It describes itself as a "forum where business, finance and conservation leaders meet as peers to advance collaboration at the nexus of biodiversity, climate, water, and health," with an aim to "build relationships [...] to scale impact and influence collective action".

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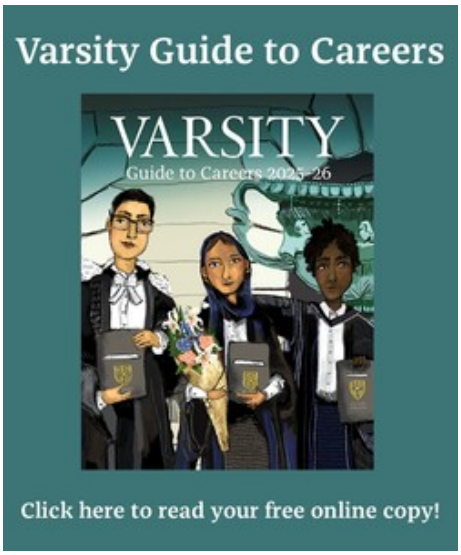



ORCA claims that "one fifth of the speakers at the conference came from companies with serious records of pollution, over-extraction, or violence against indigenous populations". It said these included speakers from Nestlé, Brazilian wood pulp supplier Suzano, mining company Teck, and conservation charity WWF, which it accuses of violating the rights of indigenous people.

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Speakers also included the director of UNEP-WCMC, the founder of non-profit 'Global Canopy', the sustainability director for Lloyds Banking Group, and academics from LSE and the University of Oxford.

One protester told *Varsity*: "We think it's really hypocritical to call this a green thing while bringing together the funders of genocide and the people who are mining and extracting us into this crisis in the first place."

A spokesperson for Jesus College said: "Jesus College strongly supports freedom of speech; at no point was it restricted during the protest."

Passers-by initially assumed the demonstration was a pro-Palestine protest, with activists shouting related slogans. In response, a protester said: "We recognise the interconnectedness of different struggles. When people are together from these big corporations, they get together and they decide how to slice up the planet.

"This is the way that imperialism carves up resources and the world, and so we have to connect all of these issues together if we're going to fight them."

The WWF told *Varsity* it "strongly disputes" ORCA's claims against it, adding: "Indigenous peoples and local communities are at the heart of conservation, bringing deep knowledge, care, and connection to the natural world. WWF is committed to working alongside them with respect and to protecting their rights."

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Graduation ceremony disrupted by pro-Palestine student protester

Approached for comment, Suzano referred *Varsity* to its "long term collaboration" with Jesus College, which involved a £10 million donation to "support education and research" into environmental issues in 2024.

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A spokesperson for Nestlé told *Varsity*: "Nestlé engages in forums like this to share our approach to sustainability, backed by our Net Zero Roadmap to reduce greenhouse gas emissions 50% by 2030 (vs 2018) and reach net zero by 2050 at the latest."

Teck and UNEP-WCMC were contacted for comment.

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Varsity is the independent newspaper for the University of Cambridge, established in its current form in 1947. In order to maintain our editorial independence, our print newspaper and news website receives no funding from the University of Cambridge or its constituent Colleges.

We are therefore almost entirely reliant on advertising for funding and we expect to have a tough few months and years ahead.

In spite of this situation, we are going to look at inventive ways to look at serving our readership with digital content and of course in print too!

Therefore we are asking our readers, if they wish, to make a donation from as little as £1, to help with our running costs. Many thanks, we hope you can help!





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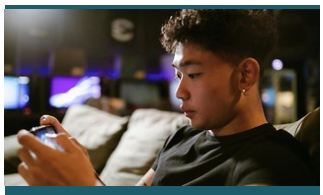

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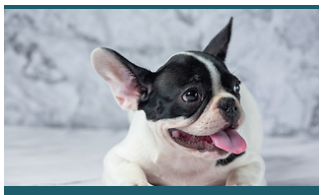

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VARSITY

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orca_4_el and 4 others

orca_4_el 5w
EXXON OUT!
Yesterday, the chief economist of Exxon, Tyler Goodspeed (also a big pal of Trump) came to speak at Gates House in Cambridge. Thankfully, we were there with our friends to give him a big Cambridge welcome, reminding the audience that not only did Exxon lie about climate science and mass pollute the oceans, they have also fuelled Israeli jets since 2001.

After holding participants in a courtyard for half an hour, the event went ahead

145 3

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jets since 2001.

After holding participants in a courtyard for half an hour, the event went ahead in a smaller room, with a big chunk of the audience turned away for "security reasons". If you're complicit in ecocide and genocide and you're planning to come and swish around at Cambridge, we've got one message for you — we'll be there.

145 3

May 19

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Extinction Rebellion hold funeral for Paris Agreement 1.5°C climate target

May 10, 2025 by Extinction Rebellion

Contact: info@xrcambridge.org | press@extinctionrebellion.uk | +44(0)7756136396

Early images | Best images

This afternoon (1:30pm–4pm, Saturday 10 May) Extinction Rebellion Cambridge and other activist groups – including Extinction Rebellion UK, Cambridge Greenpeace, Cambridge Stop the War and ORCA (Organisation of Radical Cambridge Activists) – are holding a mock funeral for the 1.5°C target international policymakers signed up to in the Paris Agreement of 2015.

A solemn procession around Cambridge city centre is being led by 50 'Red Rebels' – silent performers dressed strikingly in red with their faces painted stark white. On its journey, the procession – complete with a black funeral casket representing the death of the 1.5°C target – will pass through the Lion Yard, where a banner reading "'No future on a dead planet" will be lowered from the first floor as the march passed underneath. The procession will end on Christ's Pieces where participants will gather to hear speeches, poetry, readings and songs.

In 2015, politicians from around the world agreed to limit global average temperature rises to "well below" 2°C above pre-industrial levels by the end of the century, aiming for 1.5°C if possible. In 2015, temperatures had already risen by 1°C above pre-industrial levels, due to the burning of fossil fuels and the release of greenhouse gases. Policymakers agreed to these limits in the Paris Treaty, in order to prevent us from hitting Earth-system tipping points that would unleash climate chaos.

Despite these promises, global average temperatures smashed through the 1.5°C target in 2024 – just a quarter of a way through the century. The breach needs to be sustained for a decade or more for politicians to agree that 1.5°C has been exceeded – but many scientists say that the target has now been missed, with one describing it as 'deader than a doornail'.

Alex Martin of Extinction Rebellion Cambridge said: *"The mock funeral idea grew out of the need to process the enormity and sadness of this moment. While many people are distracted by 1001 things on their phones, we felt we needed a physical space where we could grieve together for what we are losing, and reflect on how to respond to the challenge now in front of us."*

The devastating impacts of global temperature rises were already being felt long before 1.5 degrees centigrade had been breached. From wildfires in Australia and the United States, to catastrophic flooding in Pakistan and Valencia, extreme heat in Europe (including temperatures smashing through 40C in the UK in July 2022), and extreme hunger in the Horn of Africa, extreme climate-induced weather events are rarely out of the headlines. Time and again, scientists warn that the speed of warming is faster than expected, and the effects more severe – yet governments urge us to wait decades before acknowledging they have broken their promise, imperilling communities around the world, particularly in Global South nations least responsible for climate-heating emissions.

While sounding the death knell of the 1.5°C target, participants in today's funeral procession will pledge to step up where politicians have failed, and will issue a powerful rallying cry to the public to join the many organisations and groups striving to limit temperature rises and prevent the worst effects of climate collapse. The groups will

highlight that while it can feel overwhelming to act alone, coming together as part of a supportive community can be a powerful force for change.

Zoe Flint, a spokesperson for Extinction Rebellion Cambridge said: *"Politicians have broken their promises to keep global temperature rises to a liveable 1.5°C. For decades, people around the world have been resisting environmental devastation in their own communities and beyond – often facing state repression and violence as a result. With dozens of political protesters now in prison in this country, that repression has come to the UK too. But when those least responsible for climate breakdown suffer the worst effects, we can't afford to give up the fight.*

"Every fraction of a degree of warming we can prevent will save lives. Politicians have endangered us all by allowing temperatures to burst through 1.5°C just a decade after the Paris pledge – and we are here today because we refuse to give in. We call on everyone to do what they can to protect people and planet, while there is still time to prevent the worst harm."

Olympic gold medallist and a spokesperson for XR UK, Etienne Stott said: *"Crossing 1.5°C for a whole calendar year is a wake up call for the world. If we want to avoid crossing further tipping points we need a complete transformation of society. There are levers policymakers can pull to rapidly phase out fossil fuels but this requires standing up to powerful interests. Activists need to build power, resilience and the world we want to see in our communities; but we also need to keep seeking the spark that will cause the worldwide transformation we need to see."*

About Extinction Rebellion

Extinction Rebellion (XR) is a decentralised, international and politically non-partisan movement using nonviolent direct action and civil disobedience to persuade governments to act justly on the Climate and Ecological Emergency.

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Time has almost entirely run out to address the climate and ecological crisis which is upon us, including the sixth mass species extinction, global pollution, and increasingly rapid climate change. If urgent and radical action isn't taken, we're heading towards 4 ° C warming, leading to societal collapse and mass loss of life. The younger generation,

racially marginalised communities and the Global South are on the frontline. No one will escape the devastating impacts.

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Sharing experiences: how do activists from different countries learn from each other?

January 5, 2026 0



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In a globalized world where challenges often ignore national borders, activists from different corners of the planet are increasingly coming together as a single learning community. The exchange of experiences between them has long ceased to be just formal summits; it is a permanent, dynamic ecosystem of mutual learning, where tactics, strategies and emotional support circulate at the speed of an Internet connection. This process is much deeper than simply copying successful cases. It is based on adaptation, critical understanding of the context and co-creation of new approaches. First of all, digital space has become the main arena for such exchange. Social networks, specialized platforms and closed chats allow for instant sharing of video instructions on safety at protests, templates of legal documents, successful campaigns on social networks or psychological practices of resilience. When activists in one country develop an effective tool for monitoring police violence, within a week its adapted versions can be tested on another continent. Importantly, digital connectivity overcomes isolation and provides a sense of belonging to a global movement.

However, the most important lessons ar ed

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through screens, but through lived stories and informal connections. International networks and organizations that organize exchange programs, workshops, and internships play a key role here. An activist from a developing country can spend several months in Europe learning about lobbying, and then, upon returning home, not blindly import the model, but "winterize" it to the local realities of the political system and cultural peculiarities. Similarly, Western activists are increasingly traveling, for example, to countries of the Global South to learn how to work under severe resource constraints, to understand community organizing at a deep level, and to learn the methods of creative resistance that arise from the impossibility of using expensive technologies.

A critical element of learning is the analysis not only of successes, but also of mistakes. Progressive communities increasingly value frank discussions of failed campaigns, tactical failures, or internal conflicts. Such discussions, often held in trusted circles, help avoid repeating paths that have already proven dead ends for others. It is learning through shared vulnerability that builds deeper solidarity than simply celebrating victories together.

It is important to understand that effective exchange is not about importing ready-made solutions, but rather a process of "knowledge translocation." Tactics of peaceful protest that are effective in one society may prove dangerous in another political regime. Therefore, the most valuable outcome of exchange is often not a specific tool, but the development of strategic thinking, the ability to analyze power lines in society, and the improvement of one's own facilitation, communication, and movement-building skills. Activists learn not "what to do," but "how to think" about their own struggles, while gaining an invaluable resource—a network of trusted allies around the world.

Thus, contemporary activism is a permanent global laboratory. From Kyiv's Maidan to the protests in Hong Kong, from the environmental movements of Latin America to the fighters for racial equality in the United States, each struggle generates unique knowledge. Activists who are able to listen, adapt, and respect the context become true citizens of the world, collectively weaving the fabric of global change, thread by thread, experience by experience.

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SATURDAY, 21 JUNE 2025 - 16:25

Climate activists block Afsluitdijk in protest against North Sea gas drilling

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Climate activists from Extinction Rebellion and Scientist Rebellion blocked the Afsluitdijk (A7) near Den Oever on Saturday, stopping all traffic between Noord-Holland and Friesland, NH (https://www.nhnieuws.nl/nieuws/349794/extinction-rebellion-blokkeert-deel-van-de-afsluitdijk) reported. Drivers were forced to detour via the Enkhuizen–Lelystad causeway, causing short traffic jams on the route between Sneek and Lelystad, according to an ANWB spokesperson.

About 150 protesters stood on the highway holding banners. Earlier in the afternoon, a group of roughly 15 youths threw eggs at the demonstrators, a photographer from ANP reported.

The activists protested new natural gas drilling projects in the North Sea. They called on Energy Management Netherlands (EBN), research organization TNO, and the Mijnraad to issue negative recommendations on all current and upcoming permit applications, which they say threaten the Wadden Sea and the planet's livability.

Rijkswaterstaat said it remains unclear how long the highway closure will last.



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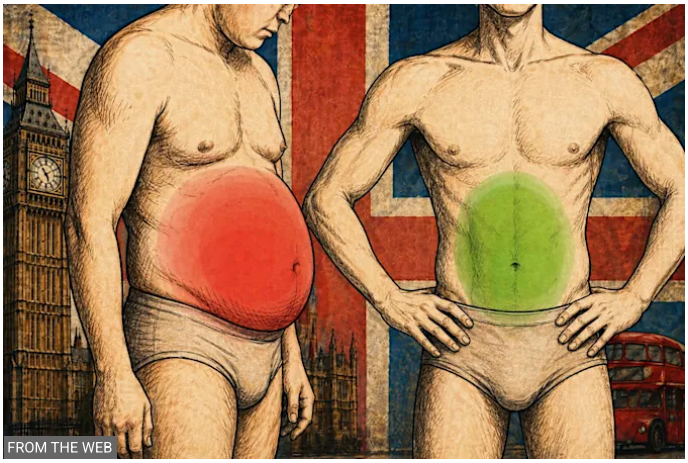

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Persberichten

AANKONDIGING BLOKKADE AFSLUITDIJK: ‘RED DE WADDENZEE, STOP NIEUW FOSSIEL’

15 mei 2025

Op 21 juni blokkeren Extinction Rebellion en Scientist Rebellion de Afsluitdijk uit protest tegen nieuwe gasboringen onder de Waddenzee en de Noordzee. Daarbij roepen de rebellen EBN, TNO en de Mijnraad op om deze plannen af te wijzen.



Op zaterdag 21 juni zullen rebellen van Extinction Rebellion (XR) en wetenschappers van Scientist Rebellion (SR) samen met rebellen van XR Fryslan en XR Groningen de Afsluitdijk blokkeren in een massaprotest tegen nieuwe gasboringen onder de Waddenzee en in de Noordzee. Ze roepen overheidsadviseurs EBN, TNO en de Mijnraad op om negatief te adviseren over alle lopende en aankomende vergunningsaanvragen die het Wad en de leefbaarheid van de aarde bedreigen.

XR-woordvoerder Guus Dix: “De klimaatdoelen raken steeds verder uit zicht, terwijl we midden in een escalerende klimaatcrisis zitten. Toch kondigt de minister van Klimaat en Groene Groei juist nu nieuwe gasboringen aan. Tegelijkertijd heeft Shell nog altijd ruim zevenhonderd olie- en gasvelden op de balans staan. Het is ronduit stuitend dat zowel de overheid als de fossiele industrie geopolitieke spanningen aangrijpen om verdere boringen te rechtvaardigen. Daarom heeft Milieudefensie eergisteren een rechtszaak tegen Shell aangekondigd, met een duidelijke eis: een onmiddellijke stop op alle nieuwe fossiele projecten. Ook wij komen in actie. Vlak voor de NAVO-top blokkeren we de Afsluitdijk – met dezelfde dringende oproep aan alle overheidsadviseurs: stop deze desastreuze fossiele plannen.” [1]

Winst boven werelderfgoed: de Waddenzee wordt opgeofferd voor twee maanden gas

De Nederlandse Aardolie Maatschappij (NAM) – een samenwerkingsverband tussen Shell en ExxonMobil – wil boren onder de Waddenzee voor de opbrengst van slechts twee maanden

Want wanneer de bodem zakt terwijl de zeespiegel stijgt, valt de Waddenzee niet meer droog en dat kan zomaar de ondergang van dit UNESCO-werelderfgoed tot gevolg hebben [4]. Ook waarschuwen wetenschappers al jaren voor de ecologische gevolgen van gasboringen onder het Wad [5]. Dix: “Wij blokkeren straks de Afsluitdijk omdat deze grenst aan de Waddenzee die wij beschermen. Met de recent aangekondigde snelheidsverhoging staat deze snelweg ook symbool voor het beleid van dit fossiele kabinet, dat met 130 km per uur op een blinde muur afrijdt. Wij komen op voor het leven en eisen een einde aan alle nieuwe fossiele projecten.”

Oproep aan jaknikkers: stop nieuwe fossiele projecten

De wetenschap is helder: om zicht te houden op een planeet die leefbaar is voor iedereen moeten fossiele brandstoffen zoveel mogelijk onder de grond blijven [7]. Goed klimaatbeleid begint volgens wetenschappers dan ook met een nieuwe norm: een verbod op nieuwe fossiele projecten [8]. Voor elk nieuw fossiel project wordt de Nederlandse overheid bijgestaan door adviseurs als Energie Beheer Nederland (EBN), TNO en de Mijnraad. “Nu het kabinet het af laat weten, moeten zij zich keren tegen de Hollandse variant van Trump’s *drill, baby, drill*. Helaas gedragen deze adviseurs zich vooralsnog als jaknikkers van de minister. Pun intended. Maar de tijd van slaafse volgzaamheid is voorbij. Wij blijven actievoeren totdat ze zich publiekelijk hebben uitgesproken tegen nieuwe gasboringen,” aldus Dix.

Heldere eisen van de campagne Stop Nieuw Fossiel

De XR-campagne Stop Nieuw Fossiel richt zich al anderhalf jaar op de fossiele adviseurs waarmee de minister zich omringt. De campagne stelt daarbij vijf overkoepelende eisen aan de Nederlandse overheid:

1. Stop met nieuwe boringen naar gas op land, in de Noordzee en onder de Waddenzee,
2. Stop met de uitbreiding van de fossiele infrastructuur, zoals de geplande LNG terminals in Rotterdam en de Eemshaven,
3. Stap samen met de Europese Unie definitief uit het Energy Charter Treaty, waarmee fossiele bedrijven overheden hier en in het Mondiale Zuiden financieel kunnen straffen voor het beëindigen van fossiele projecten,
4. Teken het Fossil Fuel Non-Proliferation Treaty, een bindend plan om de uitbreiding van nieuwe gas-, kolen- en olieprojecten internationaal een halt toe te roepen, als eerste stap in het rechtvaardig uitfaseren van fossiele brandstoffen,
5. Stel via een burgerberaad een noodplan op voor fossiele afbouw, om te zorgen dat Nederland geen nieuw fossiel nodig heeft.

Bronnen

[1] https://www.rijksoverheid.nl/actueel/nieuws/2025/04/23/akkoord-voor-verantwoorde-

[2] www.nrc.nl/nieuws/2024/10/11/strijd-over-gas-uit-het-wad-verre-van-voorbij-a4869095
[3] www.sodm.nl/actueel/nieuws/2024/03/05/sodm-adviseert-negatief-over-aardgaswinning-waddenzee
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[5] https://scientists4future.nl/nl/nieuws/persbericht-gasextractie-waddenzee en www.trouw.nl/duurzaamheid-economie/gaswinning-geen-effect-op-de-natuur-vertel-dat-de-scholekster-maar-die-haar-nest-ziet-wegdrijven~bc0423801/?referrer=https%3A%2F%2Fwww.google.com%2F en
[6] https://www.nature.com/articles/s41586-021-03821-8
[7] https://www.science.org/doi/10.1126/science.adn6533

MEER PERSBERICHTEN



27 mei 2026

Persberichten

MANIFESTATIE TEGEN GEWELD OP DEMONSTRANTEN BIJ RECHTSZAAK VAN TIGGELEN



Press releases

ANNOUNCEMENT BLOCKADE AFSLUITDIJK: 'SAVE THE WADDEN SEA, STOP NEW FOSSILS'

May 15, 2025

On 21 June, Extinction Rebellion and Scientist Rebellion will block the Afsluitdijk in protest against new gas drilling under the Wadden Sea and the North Sea. In addition, the rebels EBN, TNO and the Mining Council call for these plans to be rejected.



On Saturday 21 June, rebels from Extinction Rebellion (XR) and scientists from Scientist Rebellion (SR) will block the Afsluitdijk together with rebels from XR Fryslân and XR Groningen in a mass protest against new gas drilling under the Wadden Sea and in the North Sea. They call on government advisors EBN, TNO and the Mining Council to advise negatively on all current and upcoming permit applications that threaten the Wadden Sea and the quality of life of the earth.

XR spokesperson Guus Dix: "The climate goals are getting further and further out of sight, while we are in the middle of an escalating climate crisis. Nevertheless, the Minister of Climate and Green Growth is now announcing new gas drilling. At the same time, Shell still has more than seven hundred oil and gas fields on its balance sheet. It is downright shocking that both the government and the fossil fuel industry are seizing on geopolitical tensions to justify further drilling. That is why Milieudefensie announced a lawsuit against Shell the day before yesterday, with a clear demand: an immediate stop to all new fossil projects. We are also taking action. Just before the NATO summit, we are blocking the Afsluitdijk – with the same urgent appeal to all government advisors: stop these disastrous fossil plans." [1]

Profit over World Heritage: the Wadden Sea is sacrificed for two months of gas

The Dutch Petroleum Company (NAM) – a partnership between Shell and ExxonMobil – wants to drill under the Wadden Sea for a yield [illegible] months of Dutch gas consumption [2].

according to the State Supervision of Mines [3]. Because the soil subsides while the sea level rises, the Wadden Sea no longer dries up and that can just result in the demise of this UNESCO World Heritage Site [4]. Scientists have also been warning for years about the ecological consequences of gas drilling under the Wadden Sea [5]. Dix: "We will soon block the Afsluitdijk because it borders on the Wadden Sea that we protect. With the recently announced speed increase, this highway also symbolizes the policy of this fossil cabinet, which is driving towards a blank wall at 130 km per hour. We stand up for life and demand an end to all new fossil projects."

Call to yes-men: stop new fossil projects

The science is clear: in order to keep an eye on a planet that is livable for everyone, fossil fuels must remain underground as much as possible [7]. According to scientists, good climate policy therefore starts with a new norm: a ban on new fossil projects [8]. For every new fossil project, the Dutch government is assisted by advisors such as Energie Beheer Nederland (EBN), TNO and the Mining Council. "Now that the cabinet has failed, they have to turn against the Dutch version of Trump's *drill, baby, drill*. Unfortunately, for the time being, these advisors are behaving like yes-men of the minister. Pun intended. But the time of slavish docility is over. We will continue to campaign until they have publicly spoken out against new gas drilling," says Dix.

Clear requirements of the Stop New Fossil

campaign The XR campaign Stop New Fossil has been focusing on the fossil advisors with whom the minister surrounds himself for a year and a half. The campaign makes five overarching demands to the Dutch government:

1. Stop new drilling for gas on land, in the North Sea and under the Wadden Sea,
2. Stop the expansion of fossil infrastructure, such as the planned LNG terminals in Rotterdam and Eemshaven,
3. Together with the European Union, definitively withdraw from the Energy Charter Treaty, which allows fossil fuel companies to financially punish governments here and in the Global South for ending fossil projects,
4. Sign the Fossil Fuel Non-Proliferation Treaty, a binding plan to halt the expansion of new gas, coal and oil projects internationally, as a first step in the equitable phase-out of fossil fuels,
5. Draw up an emergency plan for fossil phase-out through a citizens' assembly, to ensure that the Netherlands does not need new fossil fuels.

Sources

[1] https://www.rijksoverheid.nl/actueel/nieuws/2025/04/23/akkoord-voor-verantwoorde-winning-van-laatste-nederlandse-aardgas-op-zee

[3] www.sodm.nl/actueel/nieuws/2024/03/05/sodm-adviseert-negatief-over-aardgaswinning-waddenzee
[4] www.iucncongress2020.org/motion/133 and https://nos.nl/artikel/2489414-waddenzee-kan-unesco-status-verliezen-bij-doorzetten-gas-en-zoutwinning and https://open.rijkswaterstaat.nl/open-overheid/onderzoeksrapporten/@261752/zeespiegelmonitor-2022/
[5] https://scientists4future.nl/nl/nieuws/persbericht-gasextractie-waddenzee and www.trouw.nl/duurzaamheid-economie/gaswinning-geen-effect-op-de-natuur-vertel-dat-de-scholekster-maar-die-haar-nest-ziet-wegdrijven~bc0423801/?referrer=https%3A%2F%2Fwww.google.com%2F and
[6] https://www.nature.com/articles/s41586-021-03821-8
[7] https://www.science.org/doi/10.1126/science.adn6533

MEER PERSBERICHTEN



27 mei 2026

Persberichten

MANIFESTATIE TEGEN GEWELD OP DEMONSTRANTEN BIJ RECHTSZAAK VAN TIGGELEN

Extinction Rebellion VIC
1 August 2025 ·

Extinction Rebellion Vic occupying the foyer of the building where Exxon Mobil have their head office in Naarm/Melbourne, on unceded, stolen Wurundjeri country.

Exxon Mobil are one of the worlds biggest climate criminals, their own internal scientists have known about the crisis for decades, and despite this they have chosen to double down on their business model, and fund denialist think tanks and lobbyists with tens of millions of dollars.

Exxon Mobil have no social licence, their business model is death and destruction.

#ExxonKnewAndExxonLied #NoNewGasNoNewOil #StopBurningFossilFuels #FreePalestine #DefendDissent #ProtectProtest #ClimateJustice #Nature #AusPol #ClimateEmergency #Environment #ExtinctionRebellion #Science #NoConsent #CapitalismIsADeathCult #ActNow #NatureLovers #EarthCareNotWarfare #AlwaysWasAlwaysWillBe



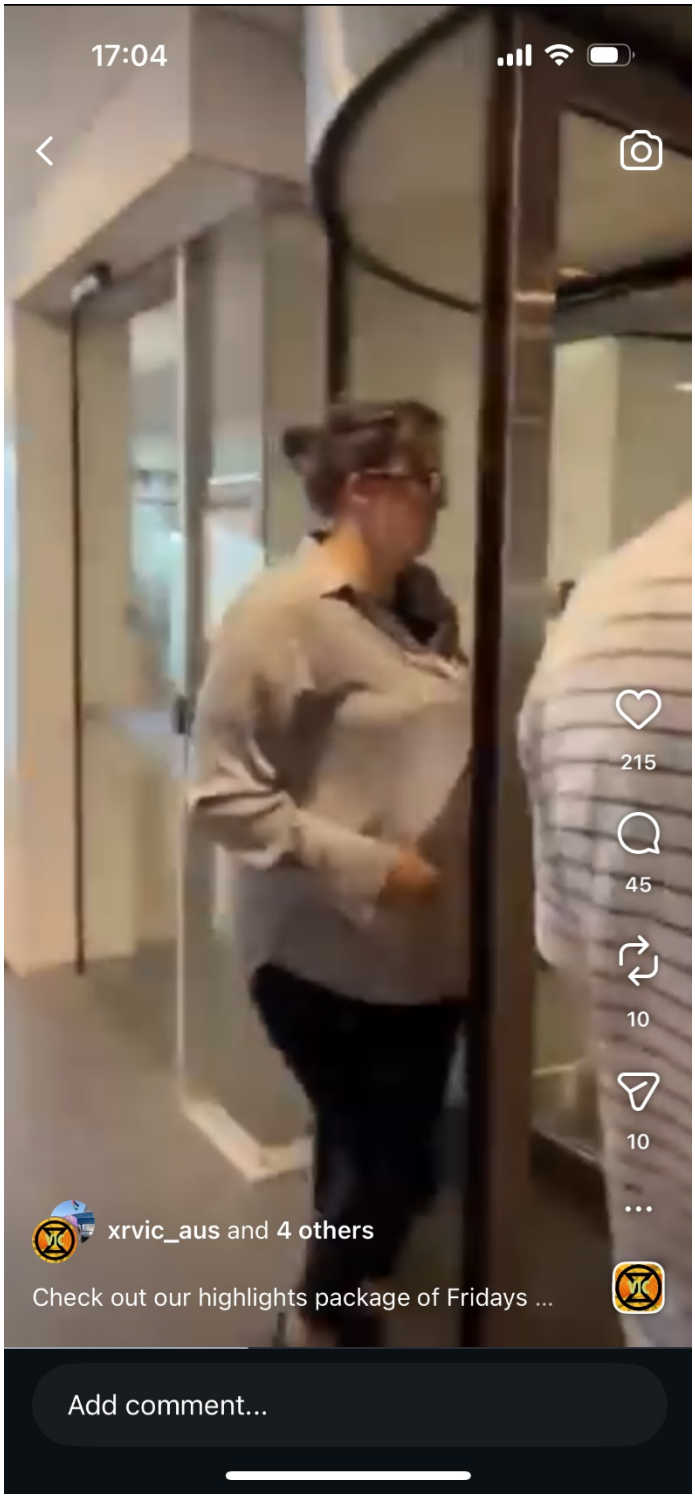









Extinction Rebellion VIC
Public
LOOK!
MORE FRIENDS!
DO WE NEED TO GET
THE POLICE?
Check out our highlights package of Fridays action, as we disrupted business as usual at Exxon Mobil HQ, level 9, 664 Collins st, Naarm/Melbourne. Because business as usual equals death. #ExxonKnewAndExxonLied See less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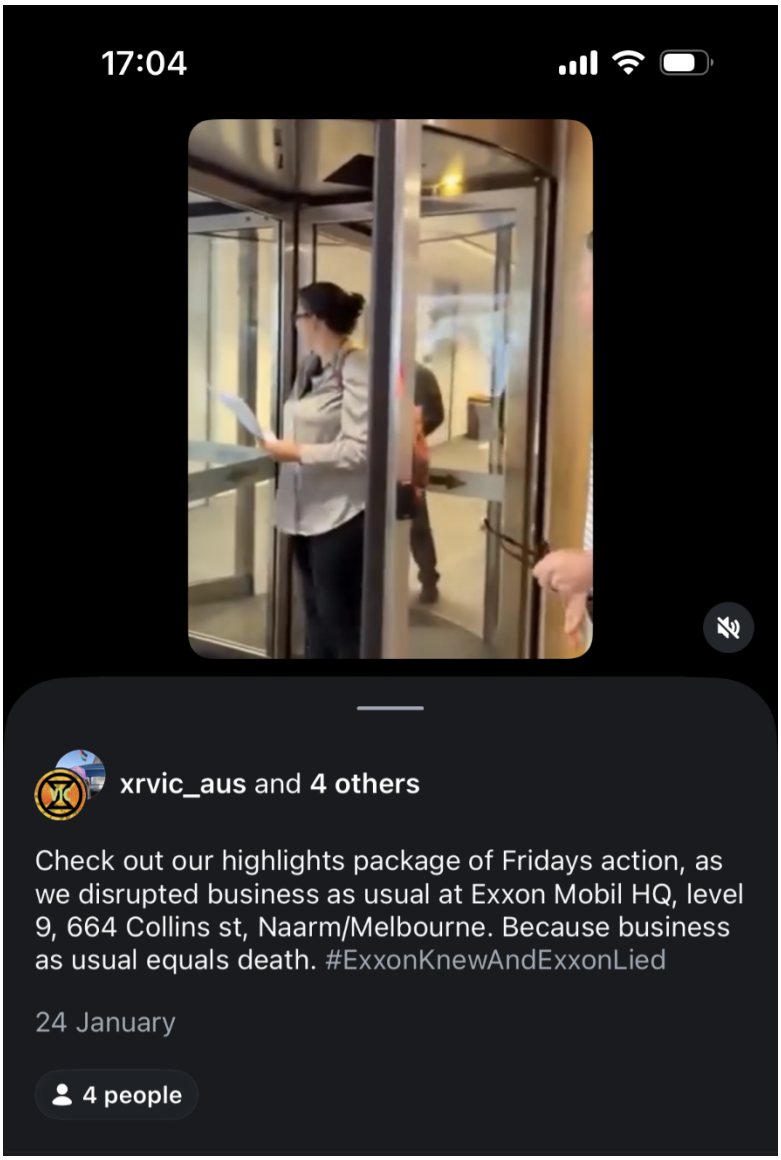
xrvic_aus and 4 others
Check out our highlights package of Fridays ...
Add comment...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xrvic_aus and 4 others
Check out our highlights package of Fridays action, as we disrupted business as usual at Exxon Mobil HQ, level 9, 664 Collins st, Naarm/Melbourne. Because business as usual equals death. #ExxonKnewAndExxonLied
24 January
4 people



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This week, academics from Scientist Rebellion NL joined the climate action camp on the Wadden island of Borkum, standing in solidarity with local communities and German organisations like @fridaysforfuture.de , @umwelthilfe and Saubere Luft Ostfriesland.

The camp brings together people from Germany and the Netherlands to raise concerns about new gas drilling plans in the North Sea. Scientists warn that emissions from existing fossil fuel

15

September 5, 2025

Log in to like or comment.



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emissions from existing fossil fuel projects are already pushing us past the 1.5°C threshold — leaving no room for new extraction if we want to avoid the worst impacts of climate change.

Instead of expanding gas infrastructure, we should be focusing on renewables, energy efficiency, and electrification.

📸 First photo: the mayor of Borkum had just delivered an emotive speech, thanking everyone for being at the camp and speaking up for the future of our children and grandchildren.

15

September 5, 2025

Log in to like or comment.



Persberichten

EXTINCTION REBELLION ZORGT VOOR STORMACHTIG WEEKEINDE IN HEEL NEDERLAND

17 november 2025

Vrijdag 21 en zaterdag 22 november zullen rebellen van Extinction Rebellion (XR) op diverse plekken in het land actievoeren tegen grote vervuilende bedrijven. Hiermee vraagt XR aandacht voor het aandeel van deze vervuilers in de klimaat- en ecologische crisis.

XR wil niet alle bedrijven waar een actie plaatsvindt onthullen. Zeker is wel dat er zaterdag om 14.00 uur in Groningen bij de Eemshavenlocatie van RWE een rouwceremonie plaatsvindt voor alle natuur die door RWE vernietigd is. Ook Chemours in Dordrecht kan bezoek verwachten. Activisten zullen op vrijdag rond 11:00 uur gif gaan ruimen aan de poort van dit vervuilende bedrijf. Andere bedrijven die mogelijk bezoek

vervuilers zijn, maar ook nog eens ieder jaar fossiele subsidies ontvangen.

Woordvoerder Puk van Noort: “We brengen deze herfst onze boodschap naar de bedrijven toe. Het zal er onstuimig aan toegaan en op sommige locaties kunnen ze zich schrap zetten voor een windkracht 10. Waar precies is nog een verrassing.”

Miljarden voor vervuilers, klimaat op drift

Iedereen weet inmiddels wat fossiele subsidies zijn, namelijk belastingvoordelen voor vervuilende bedrijven, maar niet iedereen weet welke bedrijven er vele miljoenen en soms zelfs miljarden euro’s voordeel bij hebben. Deze bedrijven konden de afgelopen decennia ongestoord hun gang gaan, maar zijn een gevaar voor de ecologie, het klimaat en de volksgezondheid. Met enorme belastingvoordelen, die Nederlandse burgers niet hebben, hebben deze grote vervuilers op andere plekken in de wereld al duizenden doden op het geweten. Een erfenis van uitbuiting die we hier verpakken als economische vooruitgang. Zij vergiftigen de wereld en burgers betalen mee. Door de smerige praktijken van deze grote vervuilers koerst de wereld op dit moment af op een opwarming van 2,8 tot 3 graden [1],[2] tegen het einde van deze eeuw. Dit heeft catastrofale gevolgen voor mens, dier en natuur, denk aan wereldwijde crises in voedselproductie en massale migratiegolgen. De jaarlijkse VN Klimaatconferentie (COP, Conference of the parties) vergaderingen zijn niet voldoende om de grootvervuilers op koers te krijgen richting een CO2-neutrale en schone productie.

Genoeg van winst boven welzijn

“Het is tijd dat de aandacht op deze bedrijven wordt gericht. Want te lang laten we bedrijven wegkomen terwijl ze grote winsten maken, die vaak belastingvrij in de zakken van miljardairs verdwijnen terwijl de regio achterblijft met overlast en schade aan omgeving en gezondheid” aldus van Noort.

Dit is de tweede keer dat XR operatie Storm uitvoert, begin dit jaar zijn gedurende drie dagen diverse acties uitgevoerd bij onder andere RWE, Uniper, Shell, Tata en Yara.Ook nu weer zullen de verschillende acties live gestreamd worden op xrtv.nl.

Bronnen:

[1] https://www.bnnvara.nl/joop/artikelen/aarde-stevent-af-op-opwarming-met-28-graden
[2] https://www.change.inc/klimaatverandering/beperking-opwarming-tot-2-graden-blijft-haalbaar-volgens-topexpert-kornelis-blok-die-hoofdauteur-is-van-nieuw-ipcc-rapport



Press releases

EXTINCTION REBELLION CAUSES STORMY WEEKEND THROUGHOUT THE NETHERLANDS

November 17, 2025

On Friday 21 and Saturday 22 November, rebels from Extinction Rebellion (XR) will take action against large polluting companies in various places in the country. With this, XR draws attention to the role of these polluters in the climate and ecological crisis.

XR does not want to reveal all the companies where an action takes place. What is certain is that on Saturday at 14:00 in Groningen at the Eemshaven location of RWE, a mourning ceremony will take place for all nature that has been destroyed by RWE. Chemours in Dordrecht can also expect visitors. Activists will clean up poison at the gate of this polluting company on Friday around 11:00 am. Other companies that may

major polluters, but also receive fossil subsidies every year.

Spokesperson Puk van Noort: "We will bring our message to the companies this autumn. It will be turbulent and in some locations they can brace themselves for a wind force 10. Where exactly is still a surprise."

Billions for polluters, climate adrift

Everyone now knows what fossil subsidies are, namely tax breaks for polluting companies, but not everyone knows which companies benefit from them by many millions and sometimes even billions of euros. These companies have been able to operate undisturbed in recent decades, but are a danger to ecology, the climate and public health. With enormous tax benefits, which Dutch citizens do not have, these major polluters have already caused thousands of deaths in other places in the world. A legacy of exploitation that we package here as economic progress. They poison the world and citizens pay for it. Due to the dirty practices of these major polluters, the world is currently heading for a warming of 2.8 to 3 degrees [1],[2] by the end of this century. This has catastrophic consequences for humans, animals and nature, such as global crises in food production and mass migration. The annual UN Climate Change Conference (COP) meetings are not enough to get the major polluters on course towards CO2-neutral and clean production.

Enough of profit over well-being

"It is time to focus attention on these companies. Because for too long we let companies get away while they make large profits, which often disappear tax-free into the pockets of billionaires while the region is left with nuisance and damage to the environment and health," says van Noort.

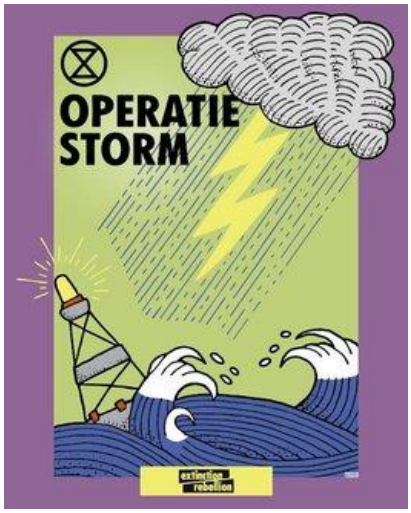
This is the second time that XR has carried out Operation Storm, at the beginning of this year various actions were carried out over three days at RWE, Uniper, Shell, Tata and Yara, among others xrtv.nl.

Sources:

[1] https://www.bnnvara.nl/joop/artikelen/aarde-stevent-af-op-opwarming-met-28-graden
[2] https://www.change.inc/klimaatverandering/beperking-opwarming-tot-2-graden-blijft-haalbaar-volgens-topexpert-kornelis-blok-die-hoofdauteur-is-van-nieuw-ipcc-rapport

Operatie Storm

Operatie Storm richt zich op de meest vervuilende bedrijven in Nederland. Bedrijven die miljarden aan fossiele subsidies ontvangen ten koste van onze gezondheid, de natuur, het klimaat en daarmee de toekomst.



Op 13, 14 en 15 maart en 21 en 22 november 2025 voerden honderden rebellen van Extinction Rebellion Operatie Storm uit: meerdere grote verstorende acties bij bedrijven die fossiele subsidies ontvangen, verspreid over Nederland. Wij eisen dat deze bedrijven klimaatrechtvaardigheid centraal stellen en per direct alle fossiele subsidies weigeren.

Operatie Storm - Uniper Kappen met Kole
Arnhems Peil

Watch on

De ontvangers van fossiele subsidies krijgen miljarden van de Nederlandse staat. Belastinggeld dat de gewone burgers wél betalen, maar deze bedrijven niet. Een bedrijf dat afhankelijk is van fossiele brandstoffen heeft geen toekomst. Deze bedrijven moeten nu kiezen; het is buigen of barsten. Richt nu je bedrijfsproces zo in dat je zonder fossiel kunt. Dat begint bij het weigeren van de fossiele subsidies. Zolang bedrijven niet erkennen dat zij enorme schade aanrichten en geen serieuze stappen zetten om te hervormen, is het nodig dat wij in actie komen.

Operatie Storm bestaat uit verschillende acties, op verschillende plaatsen in het land. De acties worden afzonderlijk georganiseerd door lokale groepen en gecoördineerd door het campagneteam Stop Fossiele Subsidies. Drie acties zijn vooraf aangekondigd: op 14 maart om 12.00 uur bij het hoofdkantoor van de NAM in Assen, op 14 maart in de avond bij RWE in Geleen, en op 15 maart vanaf 12.00 uur bij energiebedrijf Uniper in Capelle aan den IJssel.

MEER INFO CHEMELOT NAM RWE TATASTEEL UNIPER

Klimaatrechtvaardigheid

In 2024 overschreed de wereldwijde temperatuur 1,5 graad verhitting, met dodelijke klimaatrampen tot gevolg. De wereld ligt door het gebrek aan scherp klimaatbeleid op koers naar 3 graden verhitting aan het einde van de eeuw, waarna de verhitting verder stijgt. Risicomanagement experts van het Insitute and Faculty of Actuaries berekenden recent dat een dergelijke verhitting in 2050 tot 4 miljard doden kan leiden.

Chemelot,draai je gif- en CO_2-kraan dicht

Op zaterdag 22 november waren we mee met de Operatie Storm Chemelot klimaatactie. Chemelot zit in de top 3 grootste vervuilers van Nederland met ruim 4 miljoen ton CO2-uitstoot per jaar. Terwijl politici blijven praten en bedrijven blijven vervuilen, stijgt de zeespiegel — én onze woede. Over de hele wereld slaan klimaatrampen toe, maar in Nederland blijft de overheid fossiel geld pompen in de ondergang van onze toekomst.



Maak jij je ook zorgen over je gezondheid, de natuur, het klimaat en daarmee de toekomst van onze kinderen en kleinkinderen? Kom dan ook in actie en **meld je aan >>>**

Hieronder een aantal feiten over de schade die Chemelot veroorzaakt:

- € 581 miljoen per jaar maatschappelijke schade
- Lozingen van honderden giftige stoffen in de Maas
- Fossiele subsidies: SABIC ± €1,5 miljoen per jaar aan kostencompensatie voor stroom
- Alle andere fossiele regelingen en subsidies voor de bedrijven op Chemelot zijn tot nu toe niet inzichtelijk maar gezien de 40 miljard aan belastingkortingen per jaar voor bedrijven die veel olie, gas, biomassa en kolen gebruiken zal het om een zeer aanzienlijk bedrag gaan.

MEER INFO

Operatie Storm - Uniper actie

De demonstraties van vrijdag 14 en zaterdag 15 maart en 21 en 22 november vonden plaats bij Uniper. Dit energiebedrijf heeft gezegd in 2035 CO2-neutraal te willen zijn, maar heeft dit doel bijgesteld naar 2040. Uniper investeert voornamelijk in fossiele- en biobrandstoffen. Zo hebben ze in 2016 nog een nieuwe kolen- en biomassacentrale gebouwd en zijn ze een van de investeerders van de gasleiding Nordstream 2.



Uniper stoot miljoenen tonnen CO uit en sleept zelfs de overheid voor de rechter om langer kolen te mogen stoken. In plaats van belastinggeld te verspillen aan klimaatverwoestende bedrijven, moet de overheid deze subsidies onmiddellijk stoppen en investeren in een eerlijke transitie naar duurzame energie.

De kolencentrale van Uniper op de Maasvlakte is één van de laatste drie kolencentrales in Nederland. Gezamelijk zijn deze centrales verantwoordelijk voor zo'n 7% van de totale CO uitstoot van Nederland. Uniper ontvangt jaarlijks een bedrag van maar liefst 1,2 miljard (!) euro aan fossiele subsidies. Het stoken van kolen is niet van deze tijd, deze centrales hadden allang gesloten moeten zijn, maar de overheid blijft deze beslissing uitstellen. Zo lang de overheid zijn verantwoordelijkheid niet neemt, blijven wij terugkomen.

Onze boodschap aan bedrijven zoals Uniper is glashelder: zet klimaatrechtvaardigheid centraal. Weiger alle fossiele- en biomassasubsidies van de overheid. Stop met het beschadigen van mens, dier en planeet.

MEER INFO

EDSP TV verzorgt de nieuwsberichten op de website en mediakanalen en is verantwoordelijk voor de (video) publicaties van Arnhems Peil.

Privacy beleid

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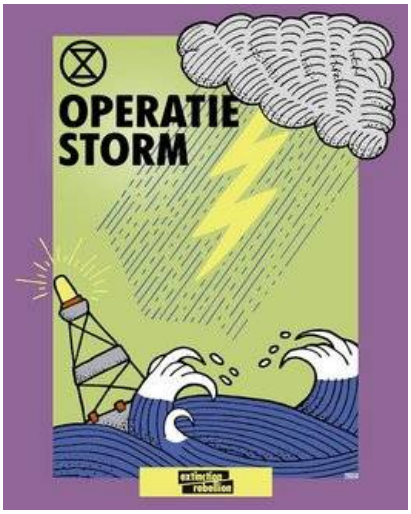
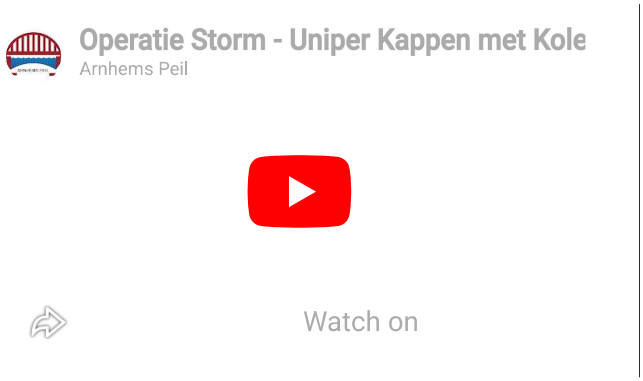
Operation Storm

Operation Storm focuses on the most polluting companies in the Netherlands. Companies that receive billions in fossil subsidies at the expense of our health, nature, the climate and therefore the future.



On 13, 14 and 15 March and 21 and 22 November 2025, hundreds of Extinction Rebellion rebels carried out Operation Storm: several major disruptive actions at companies that receive fossil subsidies, spread across the Netherlands. We demand that these companies put climate justice at the heart of their business and immediately refuse all fossil subsidies.



The recipients of fossil subsidies receive billions from the Dutch state. Tax money that ordinary citizens pay, but these companies do not. A company that depends on fossil fuels has no future. These companies now have to choose; it's bend or break. Set up your business process now in such a way that you can do without fossil fuels. That starts with the refusal of fossil subsidies. As long as companies do not recognise that they are causing enormous damage and do not take serious steps to reform, we need to take action.

Operation Storm consists of various actions, in different places in the country. The actions are organized separately by local groups and coordinated by the Stop Fossil Subsidies campaign team. Three actions have been announced in advance: on 14 March at 12:00 at the NAM head office in Assen, on 14 March in the evening at RWE in Geleen, and on 15 March from 12:00 at energy company Uniper in Capelle aan den IJssel.

Climate justice

In 2024, the global temperature exceeded 1.5 degrees of warming, resulting in deadly climate disasters. Due to the lack of a sharp climate policy, the world is on course for 3 degrees of warming by the end of the century, after which the heating will continue to rise. Risk management experts from the Institute and Faculty of Actuaries recently calculated that such heating could lead to 4 billion deaths by 2050.

Chemelot, turn off your poison and CO_2 tap

On Saturday, November 22, we participated in the Operation Storm Chemelot climate action. Chemelot is in the top 3 largest polluters in the Netherlands with more than 4 million tons of CO2 emissions per year. While politicians keep talking and polluting companies, the sea level is rising — and our anger. Climate disasters are striking all over the world, but in the Netherlands the government continues to pump fossil money into the downfall of our future.



Are you also concerned about your health, nature, the climate and therefore the future of our children and grandchildren? Then take action and **sign up >>>**

Below are some facts about the damage caused by Chemelot:

- €581 million per year in social damage
- Discharges of hundreds of toxic substances into the Meuse
- Fossil subsidies: SABIC ± €1.5 million per year in cost compensation for electricity
- All other fossil schemes and subsidies for the companies at Chemelot are not transparent so far, but given the 40 billion in tax rebates per year for companies that use a lot of oil, gas, biomass and coal, it will be a very significant amount.

Operation Storm - Uniper action

The demonstrations of Friday 14 and Saturday 15 March and 21 and 22 November took place at Uniper. This energy company has said it wants to be CO2 neutral by 2035, but has adjusted this goal to 2040. Uniper invests mainly in fossil and biofuels. For example, they built a new coal and biomass power plant in 2016 and are one of the investors in the Nordstream 2 gas pipeline.



Uniper emits millions of tons of CO_2 and is even taking the government to court to be allowed to burn coal for longer. Instead of wasting taxpayers' money on climate-destroying companies, the government should immediately stop these subsidies and invest in a fair transition to sustainable energy.

Uniper's coal-fired power plant on the Maasvlakte is one of the last three coal-fired power stations in the Netherlands. Together, these plants are responsible for about 7% of the total CO_2 emissions of the Netherlands. Uniper receives an annual amount of no less than 1.2 billion (!) euros in fossil subsidies. The burning of coal is not of this time, these power stations should have been closed a long time ago, but the government continues to postpone this decision. As long as the government does not take its responsibility, we will keep coming back.

Our message to companies like Uniper is crystal clear: put climate justice at the center. Refuse all fossil and biomass subsidies from the government. Stop damaging people, animals and the planet.

MORE INFO

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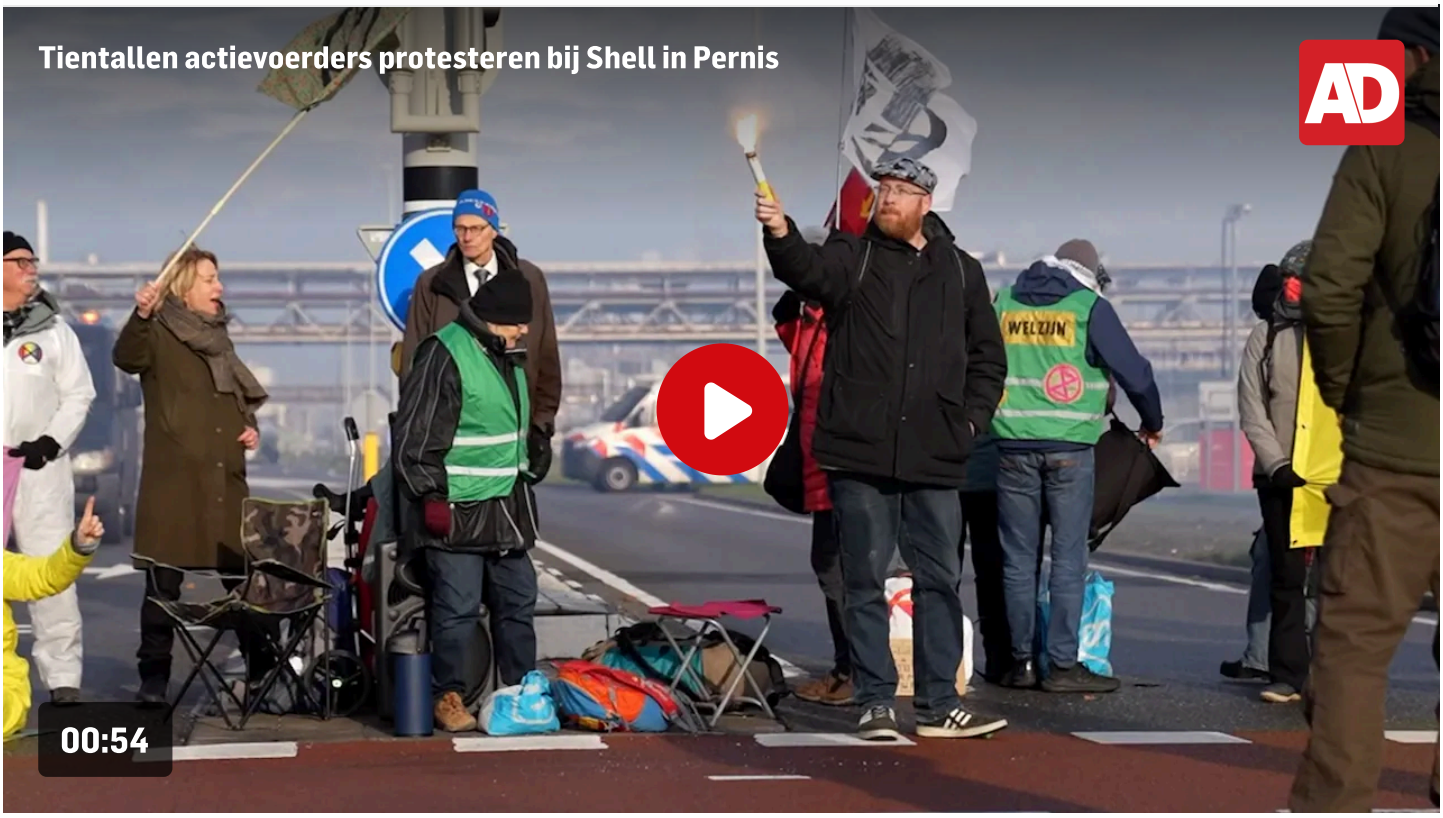

MET VIDEO

Tientallen actievoerders blokkeren toegang tot Shell Pernis: ‘Het is een vervuiler, ze misleiden het publiek’

Tientallen demonstranten van Extinction Rebellion hebben zaterdag actie gevoerd voor het terrein van Shell in Pernis, aan de rand van Rotterdam. Ze blokkeerden de toegang tot het bedrijf, dat bekendstaat als de grootste raffinaderij van Europa.

Theo Teitsma, Rianne Smit

22 november 2025, 09:50 • **Laatste update: 22 november 2025, 17:25**

Ruim zeventig actievoerders hadden zich zaterdagochtend verzameld voor het bedrijf. Op de Petroleumweg en de Vondelingenweg worden ze om half elf afgezet met twee busjes en blokkeren de toegangen naar het Shell-terrein.

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De demonstranten dragen spandoeken bij zich waarop teksten te lezen zijn als 'geen vergunning voor vervuiling', 'geen toekomst in fossiel' en 'nul uitstoot nu'. Ook zwaaien ze met vlaggen. Ze blijven uiteindelijk tot drie uur 's middags en al die tijd is de sfeer vreedzaam.

Vastgeketend met buizen

'Hoewel de gevoelstemperatuur rond de nul graden is, zitten en liggen sommigen op de weg. Vier hebben zich aan elkaar vastgeketend met stalen buizen. „Daar kunnen we zo uit loskomen als het nodig is, hoor", zegt Swerre uit Utrecht. Hij zit hier omdat hij wil dat de wereld voor volgende generaties ook nog leefbaar is, legt hij uit.

Mis nooit meer het laatste nieuws

Krijg een melding bij belangrijk nieuws over Rivierenland.

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▲ **Activisten van Extinction Rebellion hebben zich aan elkaar vastgetekend met buizen.** © AD

Vanwege het koude weer zit Swerre op een vuilniszak. Onder zijn kleding heeft hij een extra warme sportbroek aangetrokken. Hij is hier met de trein en metro naartoe gekomen. „Ja, het laatste stukje moest wel met een dieselbusje, anders kun je hier niet komen."

Sfeer ontspannen

De sfeer onder de warm aangeklede demonstranten is ontspannen. XR-band Block Brass staat te spelen en er worden liederen over het redden van de aarde gezongen. Soms heeft het wel iets weg van gezang bij een kampvuur, zij het dat de demonstranten hier zijn omdat ze willen dat Shell stopt met milieuvervuiling.

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of werken

Actievoerder

In een toespraak wordt dat ook benadrukt. „Shell doet of ze groen is, maar is dat niet", verduidelijkt medeorganisator Waakvlam ('Ja, we hebben allemaal bijnamen). „Wij protesteren niet tegen mensen die bij Shell tanken of tegen werknemers van Shell, maar tegen het beleid. Shell presenteert zich milieuvriendelijker dan het is, het is een vervuiler. Ze misleiden het publiek."

Dat wordt later in een toespraak nog eens herhaald. Met een versterker kan iedereen tot in de wijde omtrek horen dat de inwoners van het Rijnmondgebied door de uitstoot van de raffinaderijen gemiddeld tien maanden korter leven. Dat wordt gevolgd door het scanderen van de 'clubliederen' van Extinction Rebellion.

Politie hoeft niet in te grijpen

De politie is in groten getale aanwezig om in te grijpen als dat nodig is. Maar de politiemacht die toekijkt, heeft geen enkele reden dat te doen. Er komt deze zaterdag namelijk geen enkele wagen of vrachtwagen naar het bedrijfsterrein gereden. Evenmin gaan er werknemers naar huis.

Ja, eentje, die wat was vergeten. Hij mag van de politie het terrein niet af, totdat de actievoerders weg zijn. Om het een beetje warm te houden heeft de politie een eigen koffiebus neergezet, waar menig agent even een bakkie doet.

Shell heeft in Pernis een terrein met meer dan zestig fabrieken. Er wordt ruwe olie omgezet in producten als benzine, kerosine, diesel en grondstoffen voor de chemische industrie.

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▲ **XR heeft verschillende spandoeken bij zich.** © MediaTV

De demonstratie bij Shell komt zo'n zes weken na een grote actie in een ander deel van de Rotterdamse haven. Half oktober blokkeerden ruim zeshonderd actievoerders een havenspoorlijn. Driehonderd van hen werden gearresteerd.

Drie agenten raakten gewond bij dat protest: een door een klap in het gezicht door een actievoerder, een tweede werd gebeten en een derde geslagen. Volgens de politie raakte het spoor beschadigd. Ook de bussen waarin activisten werden vervoerd, liepen flinke schade op.

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Actievoerders maken hun boodschap duidelijk. © MediaTV



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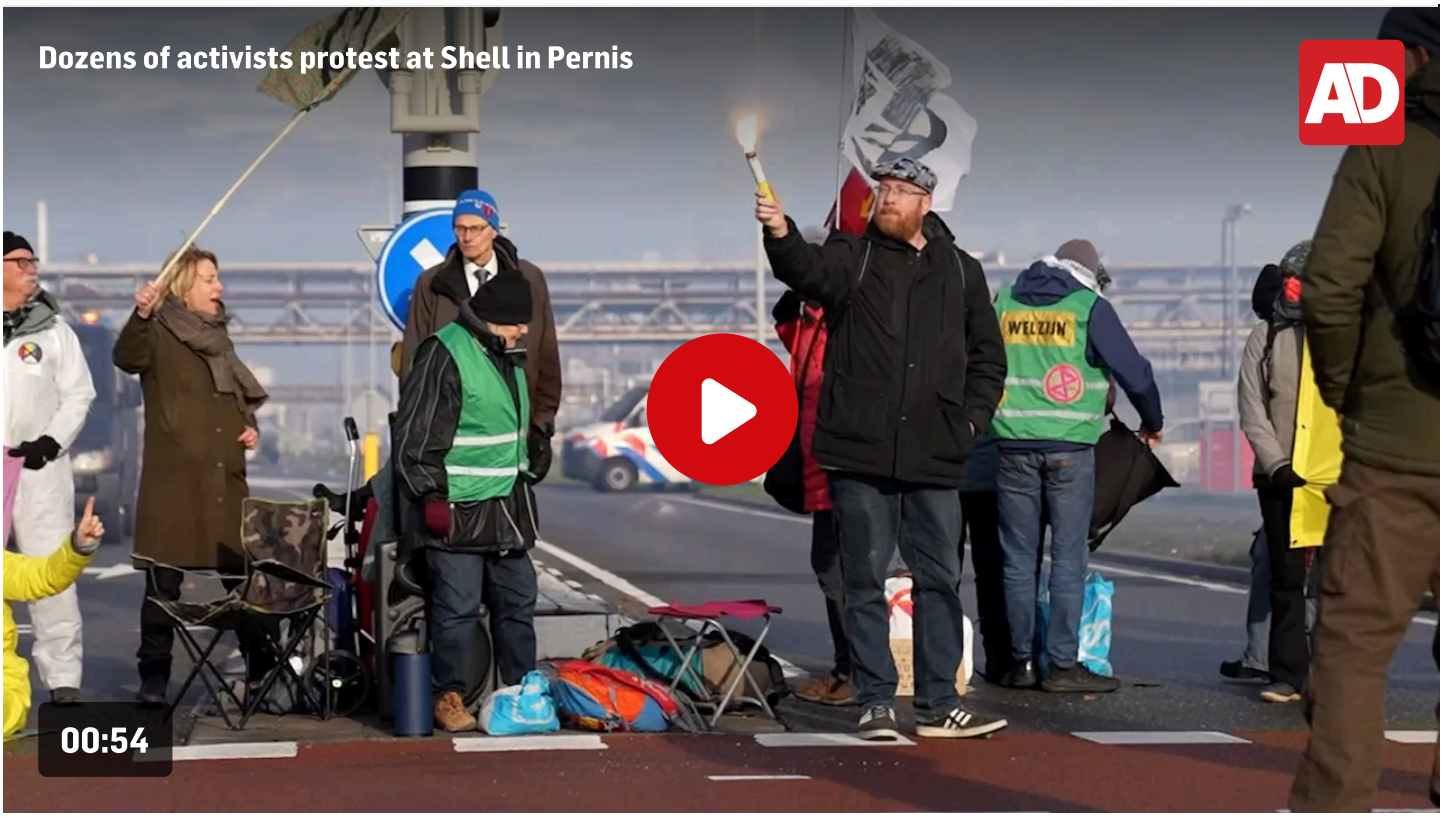

WITH VIDEO

Dozens of activists block access to Shell Pernis: 'It's a polluter, they mislead the public'

Dozens of Extinction Rebellion protesters took action on Saturday in front of the Shell site in Pernis, on the outskirts of Rotterdam. They blocked access to the company, which is known as the largest refinery in Europe.

Theo Teitsma, Rianne Smit

22 November 2025, 09:50 • **Last update: 22 November 2025, 17:25**

More than seventy activists had gathered in front of the company on Saturday morning. On the Petroleumweg and the Vondelingenweg, they are dropped off at half past ten with two vans and block the entrances to the Shell site.

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The protesters carry banners with them on which texts can be read such as 'no permit for pollution', 'no future in fossil fuels' and 'zero emissions now'. They also wave flags. They end up staying until three o'clock in the afternoon and all that time the atmosphere is peaceful.

Chained with tubes

'Although the wind chill is around zero degrees, some are sitting and lying on the road. Four have chained themselves together with steel pipes. "We can get out of that if necessary," says Swerre from Utrecht. He is here because he wants the world to be livable for future generations, he explains.

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▲ **Extinction Rebellion activists have attached themselves to each other with tubes.** © AD

Because of the cold weather, Swerre is sitting on a garbage bag. Under his clothes he has put on extra warm sports pants. He came here by train and metro. "Yes, the last part had to be done with a diesel van, otherwise you can't get here."

Relaxed atmosphere

The atmosphere among the warmly dressed protesters is relaxed. XR band Block Brass is playing and songs about saving the earth are being sung. Sometimes it resembles singing by a campfire, albeit that the protesters are here because they want Shell to stop polluting the environment.

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at Shell

Campaigner

This is also emphasized in a speech. "Shell pretends to be green, but it isn't," explains co-organizer Waakvlam ('Yes, we all have nicknames). "We are not protesting against people who refuel at Shell or against Shell employees, but against the policy. Shell presents itself as more environmentally friendly than it is, it is a polluter. They mislead the public."

This is repeated later in a speech. With an amplifier, everyone can hear for miles around that the inhabitants of the Rijnmond area live an average of ten months shorter due to emissions from the refineries. This is followed by the chanting of the 'club songs' of Extinction Rebellion.

Police do not have to intervene

The police are present in large numbers to intervene if necessary. But the police force that is watching has no reason to do so. Not a single car or truck will drive to the company site this Saturday. Nor do any employees go home.

Yes, one, who had forgotten something. The police do not allow him to leave the site until the activists have left. To keep it a bit warm, the police have set up their own coffee bus, where many officers have a cup of coffee.

Shell has a site in Pernis with more than sixty factories. Crude oil is converted into products such as petrol, kerosene, diesel and raw materials for the chemical industry.

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▲ **XR has several banners with them.** © MediaTV

The demonstration at Shell comes about six weeks after a major action in another part of the port of Rotterdam. In mid-October, more than six hundred activists blocked a port railway line. Three hundred of them were arrested.

Three officers were injured in that protest: one by a slap in the face by an activist, a second was bitten and a third beaten. According to the police, the track was damaged. The buses in which activists were transported also suffered considerable damage.

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▲ **Activists make their message clear.** © MediaTV



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Extinction Rebellion houdt rouwceremonie bij de RWE centrale in de Eemshaven

22 november 2025 18:48 Leestijd: 1 minuten om te lezen AA



Deel op Facebook Deel op Whatsapp Deel op Telegram



Eemshaven – Extinction Rebellion (XR) heeft zaterdagmiddag bij de RWE Eemshavencentrale een rouwceremonie gehouden. De actie begon om 14.00 uur en was bedoeld om aandacht te vragen voor wat de groep ziet als de bijdrage van RWE aan klimaat- en milieuschade.

De demonstratie maakte deel uit van ‘Operatie Storm’, een landelijke actiedag waarbij op verschillende locaties in Nederland acties werden gevoerd tegen bedrijven die volgens XR profiteren van fossiele subsidies.

Voor de poort van de centrale voerden actievoerders een ceremonie op met muziek, gedichten en speeches. Daarbij waren ook performers aanwezig die in zwarte kleding de verwoesting door de fossiele industrie verbeeldden. Verder plantten demonstranten symbolisch jonge boompjes voor de ingang van het terrein.

Volgens XR-woordvoerder Cornelie van Kampenhout draagt RWE met het verbranden van kolen en biomassa bij aan schade aan ecosystemen en luchtkwaliteit. De actiegroep zegt daarnaast dat de inzet van biomassa leidt tot verlies van natuurgebieden.

De politie was aanwezig om toezicht te houden, maar meldde geen incidenten.




SLUIT DE EEMSHAVENCENTRALE


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Extinction Rebellion holds mourning ceremony at the RWE power plant in Eemshaven

November 22, 2025 6:48 PM Reading time: 1 minute to read AA



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Eemshaven – Extinction Rebellion (XR) held a mourning ceremony at the RWE Eemshaven power plant on Saturday afternoon. The action started at 14:00 and was intended to draw attention to what the group sees as RWE's contribution to climate and environmental damage.

The demonstration was part of 'Operation Storm', a national day of action in which actions were held at various locations in the Netherlands against companies that, according to XR, benefit from fossil subsidies.

In front of the gate of the plant, activists performed a ceremony with music, poems and speeches. Performers were also present in black clothing who depicted the destruction caused by the fossil fuel industry. Furthermore, protesters symbolically planted saplings in front of the entrance to the site.

According to XR spokesperson Cornelie van Kampenhout, RWE contributes to damage to ecosystems and air quality by burning coal and biomass. The action group also says that the use of biomass leads to the loss of nature reserves.

The police were present to supervise, but did not report any incidents.




SLUIT DE EEMSHAVENCENTRALE


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REBELLION





DON'T
BE
FOSSIL





Extinction Rebellion Norway
@XR_Norway

Nov 25, 2025

Thank you to all the people who showed up, to make their voice heard and to confront the criminal behaviour of oil companies.
You were inspiring.

And thank you to Det Norske Teateret for finally throwing out oil lobbyists from our theatre.

As you know, we'll be back around 1200 to wave bye bye to Equinor one last time!

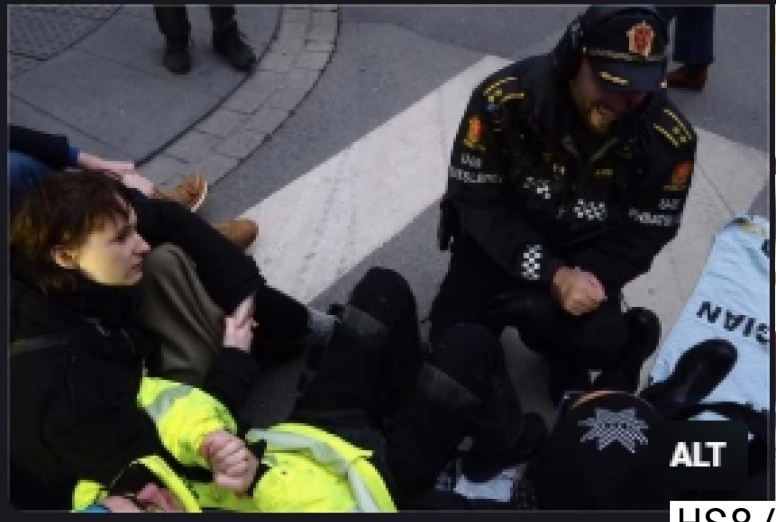
The future belongs to everyone,
And it's everyone's right to fight for it!

#klimakrisa #aktivisme #oslo #planforutfasingnå #activism #climatechange

vartoslo.no/anders-opedal-byde...











Kloden
27. november 2025

Det Norske Teatret bryter med Equinor: Seier for aktivister

På tirsdag holdt Equinor sin årlige høstkonferanse på Det Norske Teatret for aller siste gang. Dette skjer etter press fra egne skuespillere og aktivister som i årevis har ønsket grønnvasking ut av kultursektoren.

Aktivister utenfor Equinor sin høstkonferanse ved Det Norske Teatret. Foto: Jannik Abel


Cathrine Moe
Prosjektleder og ansvarlig redaktør

Læsetid 4 min.

Å rope høyt i fellesskap, kreve endringer, og sette stopper for flyt på konferanser, kan være katalysatorer for å skape debatt. Samfunnsendringer blir på mange måter til med aktivister på frontlinja.

Det så vi i Oslo på tirsdag utenfor Det Norske Teatret som for aller siste gang holdt Equinor sin høstkonferanse. Den nye teatersjefen Kjersti Horn har nemlig nå sagt opp leieavtalen, som bryter det 20 års lange forholdet.

Når ord og handlinger ikke samsvarer

I 20 år har Equinor brukt Det Norske Teatret som scene for sin årlige høstkonferanse. Offisielt for å skape dialog om energi og fremtid. Men som Extinction Rebellion sin talsperson Milla Haugen påpeker, er dette like mye en grønnvaskingsarena der investering i fossilt brensel pakkes inn i et bilde av ansvarlighet og bærekraft.

– Vi er utrolig glade for at Det norske teateret ikke lenger vil være med på å grønnvaske norsk olje og gass, sier Milla Haugen i Extinction Rebellion i en pressemelding.

Equinor sine ord om å skape dialog om fornybar energi og en grønnere fremtid står i kontrast til hva som gjøres i realiteten per idag. I likhet med flere store aktører, slik Stockholm Environment Institute sin rapport om et produksjonsgap fremhever, investerer de i fossil brensel til tross for ord om en grønnere fremtid. Investering i fossilt brensel er uforenelig med tiltak som skal få verden til å nå Paris-avtalens mål om å begrense global oppvarming til 1,5 grader.

Et av flere eksempler på slike investeringer er det omtalte Rosebank-feltet utenfor Skottland. Rosebank er det største uåpnede feltet i den britiske Nordsjøen, som ligger an til å kunne bli Storbritannias største oljefelt. Equinor eier 80 prosent av feltet, og de resterende 20 prosentene tilhører det israelsk-eide Ithaca Energy.

Ifølge Greenpeace er Rosebank anslått å slippe ut nesten 250 millioner tonn CO_2. Det er mer enn fire ganger Norges årlige utslipp.

Men olje- og gassprosjektet Rosebank er dømt ulovlig. Det meldte Høyesteretten i Skottland tidligere i år, begrunnet med at Equinor ikke har utredet tilstrekkelig for klimakonsekvensene.

Til tross for motstanden Equinor møter, fortsetter utviklingen av Rosebank-prosjektet. Pressetalsperson for leting og produksjon internasjonalt i Equinor, Ola Morten Aanestad, fortalte tidligere i år til Framtida at feltet er forventet å starte opp i 2026 til 2027.

Men meldingen er tydelig fra Haugen i Extinction Rebellion,

– Equinor både kan og bør trekke seg fra Rosebank.

- Grønnvasking brukes om virksomheter som forsøker å fremstå som bærekraftige gjennom markedsføring, pengebruk eller strategi uten at praksisen deres faktisk er miljøvennlig. Begrepet beskriver aktører som gir inntrykk av at produkter eller merkevaren deres er bra for miljøet, samtidig som virksomheten i realiteten bidrar til miljøskade.

The Production Gap 2025

LES RAPPORTEN HER



"Olje dreper" lyder ordene på en plakat som ble holdt opp på tirsdag utenfor Det Norske Teatret. Foto: Thomas Wiken.

Aktivisme setter grønnvasking på dagsorden

Aktivister fra Extinction Rebellion, Greenpeace, Spire og Palestina-bevegelsen blokkerte inngangen til Equinor sin årlige høstkonferanse ved Det Norske Teatret på tirsdag denne uken.

De stod opp mot grønnvasking av kunst-og kulturlivet, og de står ikke alene.

Beslutningen fra Det Norske Teatret om å droppe samarbeidet med Equinor kommer etter år med press fra både miljøbevegelsen og teatrets egne skuespillere.

Likevel forteller den nye teatersjefen Kjersti Horn til Aftenposten at bruddet med Equinor handler om sikkerhet. Den årlige høstkonferansen med Equinor krever nemlig store sikkerhetsoppbud – nettopp på grunn av stort oppmøte fra aktivister.

Det kan derfor bli sett på som en seier kjempet frem av aktivister at det anerkjente teatret trekker seg ut av avtalen med olje- og gassgiganten, ifølge Extinction Rebellion og skuespillere ved Det Norske Teatret.

– Eg er letta og stolt over at samarbeidet med Equinor avsluttast. Equinor er i konflikt med klimaforskarar, samiske menneskerettar og miljørørsle. Ein institusjon som Det Norske Teateret kan ikkje ukritisk gje støtte til eit skadeleg produkt utan at det samtidig utfordrar vår tillit og samfunnsansvar, sier skuespiller Iselin Shumba.

Det er altså en seier der aktivisme har spilt en nøkkelrolle ved å blokkere innganger, stanse konferanser, og holde appeller. De gjør alt det som mange rister på hodet av, men som faktisk virker.

Tirsdag kan være en påminnelse om hvilke sektorer det kreves at tar et standpunkt til grønnvasking. Extinction Rebellion krever at kultursektoren tar et oppgjør med grønnvasking, og det vil trolig skape ringvirkninger innen næringsliv, politikk og offentlig debatt.

For når aktivister fysisk forsøker å stoppe konferanser og prøver å rive ned fasaden til fossil industri, får de politikere, næringslivsledere og internasjonale gjester til å konfrontere realitetene.



Her står aktivistene utenfor Det Norske Teatret. Foto: Mirijam Stenevik.

En liten seier med stor betydning

Fra et ungt perspektiv, og som en som tenker at det å nå Paris-avtalens klimamål bør være et minimumskrav, er ukens hendelse en viktig milepæl. Det er en liten, men viktig, seier.

Equinor og Det Norske Teatret sitt brudd viser at aktivisme kan føre til konkrete endringer. Dette viser god grunn til å fortsette og presse på for en grønnere fremtid.

Det Norske Teatret har snudd. De har blitt presset til å gå ut av et samarbeid de i lang tid har kommet finansielt godt ut av.

Det er lett å avfeie demonstranter som bråkmakere. Men ser vi på hva de faktisk oppnår, er det vanskelig å komme til noen annen konklusjon enn denne:

Aktivisme funker.

16 Fred, rettferdighet og velfungerende institusjoner | 17 Samarbeid for å nå målene | 13 Stoppe klimaendringene



Cathrine Moe
Prosjektleder og ansvarlig redaktør

Cathrine Moe har en mastergrad i kjønn, utvikling og globalisering fra London School of Economics and Political Science, og en bachelorgrad i global kommunikasjon og ledelse. Hun har arbeidserfaring innen markedsføring, og matprogrammer, kjønn og utvikling i grasrotorganisasjonen ORAP i Zimbabwe. Cathrine er dedikert til LHBTQIA+ rettigheter, migrasjon, miljø og global utvikling fra et feministisk perspektiv.

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Cathrine Moe



Siste



The globe
27. november 2025

The Norwegian Theatre breaks with Equinor: Victory for activists

On Tuesday, Equinor held its annual autumn conference at The Norwegian Theatre for the very last time. This is happening after pressure from their own actors and activists who for years have wanted greenwashing out of the cultural sector.

Activists outside Equinor's autumn conference at The Norwegian Theatre. Photo: Jannik Abel



Cathrine Moe
Project manager and editor-in-chief

Reading time 4 min.

Shouting loudly together, demanding changes, and putting an end to the flow at conferences can be catalysts for creating debate. In many ways, social change is brought about with activists on the front line.

We saw this in Oslo on Tuesday outside The Norwegian Theatre, which held Equinor's autumn conference for the very last time. The new theatre director Kjersti Horn has now terminated the lease, which breaks the 20-year long relationship.

When words and actions don't match

For 20 years, Equinor has used The Norwegian Theatre as a stage for its annual autumn conference. Officially to create dialogue about energy and the future. But as Extinction Rebellion's spokesperson Milla Haugen points out, this is just as much a greenwashing arena where investments in fossil fuels are wrapped up in an image of responsibility and sustainability.

"We are incredibly happy that The Norwegian Theatre will no longer be involved in greenwashing Norwegian oil and gas," says Milla Haugen in Extinction Rebellion in a press release.

Equinor's words about creating dialogue about renewable energy and a greener future are in contrast to what is being done in reality today. Like several major players, as highlighted by the Stockholm Environment Institute's report on a production gap, they are investing in fossil fuels despite words of a greener future. Investing in fossil fuels is incompatible with measures to get the world to achieve the Paris Agreement's goal of limiting global warming to 1.5 degrees.

One of several examples of such investments is the Rosebank field off Scotland. Rosebank is the largest unopened field in the British North Sea, which is set to become the UK's largest oil field. Equinor owns 80 per cent of the field, and the remaining 20 per cent belongs to the Israeli-owned Ithaca Energy.

According to Greenpeace, Rosebank is estimated to emit almost 250 million tonnes of CO_2. That is more than four times Norway's annual emissions.

But the Rosebank oil and gas project has been ruled illegal. This was announced by the Supreme Court in Scotland earlier this year, on the grounds that Equinor has not sufficiently investigated the climate consequences.

Despite the resistance Equinor is facing, the development of the Rosebank project continues. Earlier this year, Equinor's press spokesperson for Exploration and Production International, Ola Morten Aanestad, told Framtiden that the field is expected to come on stream in 2026 to 2027.

But the message is clear from Haugen in Extinction Rebellion,

"Equinor can and should withdraw from Rosebank.

- Greenwashing is used for companies that try to appear sustainable through marketing, spending money or strategy without their practices actually being environmentally friendly. The term describes actors who give the impression that their products or brand are good for the environment, while in reality their activities contribute to environmental damage.

The Production Gap 2025

READ THE REPORT HERE



"Oil kills" are the words on a poster that was held up on Tuesday outside The Norwegian Theatre. Photo: Thomas Wiken.

Activism puts greenwashing on the agenda

Activists from Extinction Rebellion, Greenpeace, Spire and the Palestine movement blocked the entrance to Equinor's annual autumn conference at The Norwegian Theatre on Tuesday this week.

They stood up against the greenwashing of art and cultural life, and they are not alone.

The decision by The Norwegian Theatre to drop the collaboration with Equinor comes after years of pressure from both the environmental movement and the theatre's own actors.

Nevertheless, the new theatre director Kjersti Horn tells Aftenposten that the break with Equinor is about safety. The annual autumn conference with Equinor requires large security measures – precisely because of the large turnout from activists.

It can therefore be seen as a victory fought for by activists that the renowned theatre pulls out of the agreement with the oil and gas giant, according to Extinction Rebellion and actors at The Norwegian Theatre.

– Eg er letta og stolt over at samarbeidet med Equinor avsluttast. Equinor er i konflikt med klimaforskarar, samiske menneskerettar og miljørørsle. Ein institusjon som Det Norske Teateret kan ikkje ukritisk gje støtte til eit skadeleg produkt utan at det samtidig utfordrar vår tillit og samfunnsansvar, sier skuespiller Iselin Shumba.

It is thus a victory in which activism has played a key role in blocking entrances, halting conferences, and holding appeals. They do all the things that many people shake their heads at, but which actually work.

Tuesday may be a reminder of which sectors are required to take a stand on greenwashing. Extinction Rebellion demands that the cultural sector take a stand against greenwashing, and this will probably create ripple effects in business, politics and public debate.

Because when activists physically try to stop conferences and try to tear down the façade of the fossil fuel industry, they get politicians, business leaders and international guests to confront reality.



Here the activists are standing outside The Norwegian Theatre. Photo: Mirijam Stenevik.

A small victory with great significance

From a young perspective, and as someone who thinks that achieving the Paris Agreement's climate goals should be a minimum requirement, this week's event is an important milestone. It is a small, but important, victory.

Equinor and The Norwegian Theatre's break shows that activism can lead to concrete changes. This shows good reason to continue and push for a greener future.

The Norwegian Theatre has turned around. They have been pressured to exit a collaboration from which they have benefited financially for a long time.

It is easy to dismiss demonstrators as troublemakers. But if we look at what they actually achieve, it is difficult to come to any other conclusion than this:

Activism works.

16 Peace, justice and well-functioning institutions | 17 Working together to achieve the goals | 13 Stopping climate change



Cathrine Moe
Project manager and editor-in-chief

Cathrine Moe holds a Master's degree in Gender, Development and Globalisation from the London School of Economics and Political Science, and a Bachelor's degree in Global Communication and Management. She has work experience in marketing, and food programs, gender and development in the grassroots organization ORAP in Zimbabwe. Cathrine is dedicated to LGBTQIA+ rights, migration, the environment and global development from a feminist perspective.

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Cathrine Moe



Greenpeace Blocks Zeebrugge LNG Terminal For 29 Hours, Forces Tankers To Change Course

By MI News Network | October 4, 2025 | Shipping News



Image Credits: Greenpeace

A Greenpeace protest at the Zeebrugge liquefied natural gas (LNG) terminal disrupted vessel traffic for more than a day, forcing several LNG carriers to delay arrival or change course.

The blockade, which lasted nearly 29 hours, was ended by Belgian police and military forces, with more than 40 activists

arrested and Greenpeace's sailing vessel Witness removed from the terminal area.

The action began on Wednesday, October 1, when around 70 Greenpeace activists from 17 countries staged a blockade using small boats, kayaks, liferafts, and the sailing vessel Witness (74 feet/22.5 metres).

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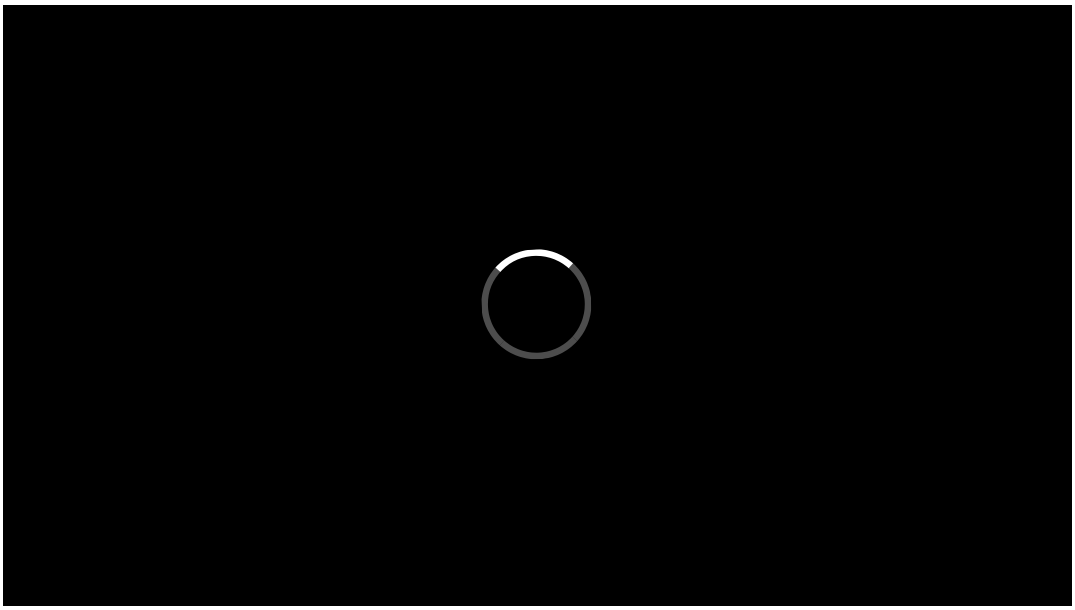

The group positioned themselves strategically to block the terminal entrance shortly after an LNG carrier departed the facility operated by Fluxys.

Protesters installed a large inflatable structure depicting Vladimir Putin and Donald Trump aboard a gas tanker, alongside

a banner reading: “They love gas, you pay the price.”

Greenpeace said the action aimed to highlight Europe’s dependence on fossil gas imports from Russia and the United States and to demand a full phase-out of fossil gas by 2035.

The blockade directly affected ship movements. The LNG carrier Arctic Voyager (75,485 dwt), operated by K Line and inbound from Norway, delayed its arrival until October 3.

Knutsen OAS Shipping’s Rias Baixas Knutsen (96,354 dwt) reported drifting off the coast of Spain. Reuters data showed that the Megara (95,452 dwt), arriving from the U.S. for Shell’s STASCO, and MOL’s LNG Phecada (91,712 dwt), arriving from Russia, postponed their calls. The LNG Phecada is now scheduled to arrive on October 5, while the Megara remained in the mid-Atlantic awaiting new instructions.

Fluxys confirmed that terminal operations continued despite the disruption but admitted that vessel traffic was affected. The company had expected the protest to last until at least Sunday, October 5, before police intervention.

Greenpeace described the removal of activists as a setback but said its campaign would continue. Lisa Göldner, a Fossil Fuel Campaigner for Greenpeace Germany, said the group will keep urging the EU and national governments to stop importing Russian LNG, halt new U.S. LNG supply contracts, and commit to a full phase-out of fossil gas.

The Zeebrugge terminal is one of Europe's main hubs, handling most of the Russian LNG entering the continent and an increasing volume of U.S. imports.

Police and military units took several hours to dismantle the blockade, arresting activists and towing Witness to a nearby dock. Greenpeace said that despite cold conditions, humidity, and a lack of sleep, protestors remained committed to the cause throughout the operation.

Reference: Greenpeace

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A day before the mass action, 100 people have already begun blocking truck traffic heading to Rotterdam World Gateway and APM Terminals.

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REDPERS

Geef Tegengas blokkeert terminals in haven Rotterdam: ‘Door met acties voor een vrij Palestina’

Beeld: Jasmijn Doorgeest

Politiek 24 oktober 2025, 15:00

Begin oktober blokkeerde actiegroep Geef Tegengas de Rotterdamse haven om te eisen dat deze een volledig handels- en wapenembargo invoert met Israël: 'Bedrijven zullen niet veranderen door een lief gesprek.'

Door: **Jasmijn Doorgeest**

Leestijd: **9 min**

De haven van Rotterdam telt op een gemiddelde dag de aankomst van duizenden containers. Een grote operatie, die afhankelijk is van een vlotte doorstroom van rijdend verkeer. Bij de terminals van Rotterdam World Gateway (RWG) en APM op de Tweede Maasvlakte kwam daar echter op 10 oktober tijdelijk een einde aan toen actiegroep Geef Tegengas een blokkade opwierp om arriverende en vertrekkende vrachtwagens tot stilstand te dwingen.

Ongeveer honderd deelnemers verbleven zes uur lang op de toegangswegen van de twee terminals om te eisen dat de haven een volledig handels- en wapenembargo invoert met Israël. Ook willen de actievoerders dat vervuilende handel en vracht gelinkt aan mensenrechtenschendingen uit de haven verdwijnen. “Vanuit hier worden allerlei spullen vervoerd die gemaakt zijn door uitbuiting of die geweld veroorzaken”, aldus Nora Kilembe, woordvoerder van Geef Tegengas. “Wij willen dat de haven stopt met daaraan geld verdienen.”

De financiële schade die zulke blokkades aanrichten, wil Geef Tegengas gebruiken om de haven tot actie te dwingen. Sinds de oprichting van de actiegroep in 2024, door mensen afkomstig van onder andere Fossielvrij NL en Extinction Rebellion, hebben de actievoerders al meerdere keren de havenspoorlijn versperd. Volgens een woordvoerder van ProRail kost zulk treinoponthoud zo’n 150.000 euro per uur. Het Havenbedrijf heeft geen schatting gedeeld

van de financiële schade door de terminalblokkades; zelf spreekt Geef Tegengas van honderdduizenden euro’s. De actievoerders zien het als een gerechtvaardigd middel om druk te zetten zolang de haven hun eisen niet wil inwilligen.



Geef Tegengas blokkeerde urenlang de toegangswegen van twee grote containerterminals. Beeld: Jasmijn Doorgeest

F-35-onderdelen in de Rotterdamse haven

De twee terminals waar Geef Tegengas zich op richtte, RWG en APM, zijn uitgekozen mede vanwege hun partnerschappen met verschillende grote containerrederijen. Hieronder valt het Deense conglomeraat Maersk, dat sinds ongeveer een jaar het doelwit is van een campagne onder de naam Mask Off Maersk, gelanceerd door de Palestinian Youth Movement (PYM). De organisatoren publiceerden in november 2024 een onderzoek waaruit bleek dat Maersk duizenden tonnen aan militaire vracht vanuit de VS naar Israël heeft verscheept. Daarnaast vonden ze bewijs voor Maersks essentiële rol binnen de productieketen van de F-35 gevechtsvliegtuigen waarmee het Israëlische leger Palestina bombardeert.

De internationale oproep van PYM om tegen de medeplichtigheid van Maersk in actie te komen ontketende protesten in onder andere Marokko, Spanje en Denemarken. Op 14 mei schaarde ook Geef Tegengas zich achter de campagne van PYM, met een blokkade van het Maersk hoofdkantoor in Rotterdam. Toen de week daarop bekend werd dat Maersk-schip Izmir een tussenstop zou maken in de Rotterdamse haven met een lading F-35-onderdelen, volgde een demonstratie bij het stadhuis. Het is een van meerdere gevallen waarin de haven betrokken was bij het transport van Israëlische vliegtuigonderdelen.

Sinds november 2024 maakt de haven van Rotterdam deel uit van een herhaaldelijke verschepingsroute tussen Israël en de Verenigde Staten. Op deze route brengt Maersk lege vleugelcontainers vanaf fabrikant Lockheed Martin in Houston naar Israel Aerospace Industries in Ashdod. Daar worden de containers gevuld met F-35-vleugels, alvorens teruggebracht te worden naar de VS voor reparatie of montering. De verschepingsroute ging eerst via Spanje; de wijziging naar Rotterdam volgde na een besluit van de Spaanse regering om de uit- en doorvoer van militaire vracht bestemd voor Israël niet meer te faciliteren.



Vrachtwagenchauffeurs nemen poolshoogte van het oponthoud. Beeld: Jasmijn Doorgeest

‘Symptomen van hetzelfde kapitalistische systeem’

Volgens Geef Tegengas passen de genocide in Gaza en de Rotterdamse medeplichtigheid daaraan binnen een web van (koloniale) uitbuiting, militarisering en klimaatverwoesting. Kilembe: “Dit zijn symptomen van hetzelfde kapitalistische systeem.” Binnen dat systeem,

voegt Kilembe toe, speelt de logistieke sector een belangrijke rol. “Er is iemand nodig die de fast fashion vanuit de sweatshops naar de winkel vervoert, iemand die de grondstoffen vanuit Congo haalt, iemand die de wapens naar Israël brengt… Het logistiek imperium maakt die uitbuiting mogelijk én winstgevend. Daarom richten wij ons daarop.”

Begin oktober vond er op uitnodiging van Geef Tegengas een gesprek plaats met enkele vertegenwoordigers van het Havenbedrijf. De actiegroep wilde over hun eisen praten. Het Havenbedrijf is daar volgens een woordvoerder echter niet het juiste adres voor: “Dit soort vraagstukken worden op nationaal en Europees niveau bepaald.” Dialoog tussen de haven en de politiek bestaat er overigens wel; echter zónder actievoerders, zegt het Havenbedrijf. “Wij hebben die demonstraties [in de haven] niet nodig om met het Rijk, de gemeente en andere stakeholders dit soort vraagstukken te bespreken. Wij doen dat achter de schermen.” Geef Tegengas vindt dat het Havenbedrijf wel degelijk de plicht en macht heeft om actie te ondernemen. Volgens de actiegroep kan de haven namelijk wel opkomen voor de belangen van multinationals.



Actievoerders van Geef Tegengas dragen een banner met een van hun eisen aan de haven. Beeld: Jasmijn Doorgeest

Uitbuiting in de logistieke keten

Onder werknemers zijn de reacties op het protest gemixt. Vanuit de files bij de RWG- en APM-terminals klonken af en toe haatdragende opmerkingen en luid getoeter. Ook gebruikte een chauffeur fysiek geweld tegen een actievoerder die een banner vasthield. Tegelijkertijd waren

veel chauffeurs het ook eens met het doel van de blokkade. Onder hen was de Macedonische Dejan: "De vertraging is niet fijn, maar ik begrijp de actie. Het is verschrikkelijk wat er in Gaza gebeurt."

Geef Tegengas zegt de frustratie onder sommige chauffeurs te begrijpen. Kilembe: "Zij willen gewoon hun werk doen en zijn niet verantwoordelijk voor de acties van het grootkapitaal. Daarnaast worden ook zij door dit systeem geraakt." Het beroep van vrachtwagenchauffeur kent relatief zware werkomstandigheden en is in het bijzonder voor degenen van buiten de Europese Unie financieel onzeker. Vakbond FNV spreekt van een schrijnende situatie voor chauffeurs uit bijvoorbeeld de Filippijnen en Oezbekistan: lage lonen, lange dagen en losse afspraken; transportbedrijven kunnen, mede door het (inter)nationale beleid en de ondermaatse inspectie, doen wat ze willen.

De FNV organiseert zich ook voor een verbetering van cao's in de Rotterdamse haven. Op 8 oktober begonnen zo'n 700 sjorders – werknemers die ladingen vastzetten en losmaken – een door de vakbond gesteunde staking, waardoor het werk uiteindelijk vijf dagen stil kwam te liggen. Dat leidde tot enorme achterstanden – "onterecht", volgens de werkgevers – én een toezegging op loonsverhoging en betere werkomstandigheden. Geef Tegengas steunt de sjorders, zegt Kilembe: "Wat hier gaande is, getuigt van een ongezonde situatie. De werknemers worden uitgebuit. Maar de staking laat ook zien dat we als mensen veel macht hebben als we ervoor kiezen om ons ergens voor in te zetten." De zichtbare invloed van protestacties biedt Geef Tegengas extra reden om met hun campagnes door te gaan.



Gewapende politieagenten omringen de actievoerders om de vrachtwagens weer door te laten rijden. Beeld: Jasmijn Doorgeest

Moeizame verandering

Ook de Mask Off Maersk campagne heeft inmiddels enkele successen behaald. Maersk kondigde op 23 juni aan dat het zou stoppen met transporteren van goederen afkomstig van bedrijven die door de United Nations Human Rights Office (OHCHR) zijn gesignaleerd als

verbonden aan illegale Israëlische nederzettingen in Palestina. De bekendmaking kwam na maandenlange druk door protestacties in verschillende landen, waaronder Nederland. Tegelijkertijd benadrukken actievoerders dat hun werk doorgaat, omdat Maersk nog steeds militaire vracht voor Israël vervoert, waaronder F-35-onderdelen.

Intussen gaat de gemeente Rotterdam onderzoek doen naar de betrokkenheid van de Rotterdamse haven bij genocidaal geweld in Gaza. Dit besluit volgde enkele weken na een spoeddebat op 22 mei, waarin het aanmeren van de Izmir uitvoerig werd besproken. Tijdens het debat riepen meerdere raadsleden het college op om Rotterdamse medeplichtigheid aan de genocide in Gaza tegen te gaan. Havenwethouder Robert Simons (Leefbaar Rotterdam) zei dat de gemeente Rotterdam geen verantwoordelijkheid draagt voor wat de schepen aan boord hebben. "Als het gaat over de inhoud van containers en controle daarop, is het bevoegd gezag de douane. En die handelt op instructie van het Rijk." Hier kan Geef Tegengas niet mee overeenkomen. De actievoerders vinden dat de gemeente zich juist moet inzetten om de doorvoer van Israëlische wapens te stoppen. Tevens is de gemeente Rotterdam naast de Nederlandse Staat de enige aandeelhouder van het Havenbedrijf en heeft circa 70 procent daarvan in handen.

'Staakt-het-vuren in Gaza is geen oplossing'

Hoewel de deur open staat voor een gesprek over hun eisen, is Geef Tegengas niet van plan om daar in alle rust op te wachten. Kilembe: "Wij geloven dat bedrijven die letterlijk over lijken gaan om hun winst te behalen niet zullen veranderen door een lief gesprek, dus wat ons betreft: hoe groter de schade, hoe beter."

Ook de meest recente – en meermaals door Israël geschonden – staakt-het-vuren in Gaza is voor de actiegroep geen reden om te stoppen met strijden voor een handels- en wapenembargo met Israël. "Natuurlijk zijn we heel blij dat het de mensen in Gaza een adempauze geeft," licht Kilembe toe. "Maar het is geen oplossing, want Palestijnen mogen zichzelf nog steeds niet besturen en leven nog altijd in apartheid. Er moet dus nog steeds een vrije Palestijnse staat komen. Tot die tijd gaan onze acties door."

Eindredactie door Hasse Drewes

Steun Red Pers

Je las dit artikel gratis, maar dat betekent niet dat het Red Pers niets heeft gekost. Wij bieden jonge, aspirerende journalisten een podium én begeleiding. Dat kunnen we nog beter met jouw steun. Die steun komt met twee voor de prijs van één, want onze sponsor matcht jouw donatie. Geef jij ons vijf euro? Dan ontvangen wij een tientje.

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Over de auteur:

Jasmijn Doorgeest (1996, die/hen) heeft internationale betrekkingen gestudeerd. Op een planeet die ecologische ineenstorting ondergaat, is hen geïnteresseerd in de verantwoordelijke (machts)structuren en de mensen die zich hiertegen verzetten. In het bijzonder wil hen onderzoeken hoe mensen zich nu al anders tot elkaar en de natuur proberen te verhouden.

Lees meer van Jasmijn Doorgeest

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vrijdag 29 mei, 2026
De stem van de nieuwe generatie

REDPERS

Give Tegengas blocks terminals in the port of Rotterdam: 'Continue with actions for a free Palestine'

Image: Jasmijn Doorgeest

Politics 24 October 2025, 15:00

At the beginning of October, action group Geef Tegengas blockaded the port of Rotterdam to demand that it introduce a full trade and arms embargo with Israel: 'Companies will not change because of a sweet conversation.'

By: **Jasmijn Doorgeest**

Reading time: **9 min**

The port of Rotterdam has the arrival of thousands of containers on an average day. A major operation, which depends on a smooth flow of moving traffic. However, this came to a temporary end at the terminals of Rotterdam World Gateway (RWG) and APM on the Second Maasvlakte on 10 October when action group Geef Tegengas set up a blockade to force arriving and departing trucks to a standstill.

About a hundred participants stayed for six hours on the access roads of the two terminals to demand that the port introduce a full trade and arms embargo with Israel. The activists also want polluting trade and cargo linked to human rights violations to disappear from the port. "All kinds of items are transported from here that are made by exploitation or that cause violence," said Nora Kilembe, spokesperson for Give Tegengas. "We want the port to stop making money from that."

Give Tegengas wants to use the financial damage caused by such blockades to force the port to take action. Since the action group was founded in 2024, by people from Fossielvrij NL and Extinction Rebellion, among others, the activists have blocked the port railway line several times. According to a ProRail spokesperson, such train delays cost about 150,000 euros per hour. The Port Authority has not shared an estimate of the financial damage caused by the terminal blockades; Geef Tegengas speaks of hundreds of thousands of euros. The activists

see it as a justified means of putting pressure as long as the port does not want to meet their demands.



Give Tegengas blocked the access roads of two large container terminals for hours. Image: Jasmijn Doorgeest

F-35 parts in the port of Rotterdam

The two terminals that Geef Tegengas focused on, RWG and APM, were chosen partly because of their partnerships with several large container shipping companies. This includes the Danish conglomerate Maersk, which has been the target of a campaign called Mask Off Maersk, launched by the Palestinian Youth Movement (PYM) for about a year. The organizers published an investigation in November 2024 that showed that Maersk shipped thousands of tons of military cargo from the US to Israel. In addition, they found evidence of Maersk's essential role within the production chain of the F-35 fighter planes with which the Israeli army bombs Palestine.

PYM's international call to take action against Maersk's complicity unleashed protests in Morocco, Spain and Denmark, among others. On May 14, Geef Tegengas also joined PYM's campaign, with a blockade of the Maersk headquarters in Rotterdam. When it was announced the following week that Maersk ship Izmir would make a stopover in the port of Rotterdam with a cargo of F-35 parts, a demonstration followed at the city hall. It is one of several cases in which the port was involved in the transport of Israeli aircraft parts.

Since November 2024, the port of Rotterdam has been part of a repeated shipping route between Israel and the United States. On this route, Maersk brings empty wing containers from manufacturer Lockheed Martin in Houston to Israel Aerospace Industries in Ashdod. There, the containers are filled with F-35 wings, before being returned to the US for repair or assembly. The shipping route first went through Spain; the change to Rotterdam followed a decision by the Spanish government to no longer facilitate the export and transit of military cargo destined for Israel.



Truck drivers are taking stock of the delay. Image: Jasmijn Doorgeest

'Symptoms of the same capitalist system'

According to Give Tegengas, the genocide in Gaza and Rotterdam's complicity in it fit within a web of (colonial) exploitation, militarization and climate destruction. Kilembe: "These are symptoms of the same capitalist system." Within that system, Kilembe adds, the logistics

sector plays an important role. "Someone is needed to transport fast fashion from the sweatshops to the store, someone to get the raw materials from Congo, someone to bring the weapons to Israel... The logistics empire makes this exploitation possible and profitable. That's why we focus on that."

At the beginning of October, at the invitation of Geef Tegengas, a meeting took place with a number of representatives of the Port Authority. The action group wanted to talk about their demands. However, according to a spokesperson, the Port Authority is not the right place for this: "These kinds of issues are determined at national and European level." Dialogue between the port and politics does exist; but without activists, says the Port Authority. "We don't need those demonstrations [in the port] to discuss these kinds of issues with the government, the municipality and other stakeholders. We do that behind the scenes." Give Tegengas believes that the Port Authority does have the duty and power to take action. According to the action group, the port can stand up for the interests of multinationals.



Activists from Give Counterweight carry a banner with one of their demands to the port. Image: Jasmijn Doorgeest

Exploitation in the logistics chain

Reactions to the protest have been mixed among employees. From the traffic jams at the RWG and APM terminals, hateful comments and loud honking could occasionally be heard. A driver also used physical violence against an activist who was holding a banner. At the same

time, many drivers also agreed with the purpose of the blockade. Among them was the Macedonian Dejan: "The delay is not nice, but I understand the action. It's terrible what's happening in Gaza."

Give Tegengas says it understands the frustration among some drivers. Kilembe: "They just want to do their job and are not responsible for the actions of big business. In addition, they are also affected by this system." The profession of lorry driver has relatively harsh working conditions and is financially precarious, especially for those from outside the European Union. Trade union FNV speaks of a harrowing situation for drivers from, for example, the Philippines and Uzbekistan: low wages, long days and loose appointments; Transport companies can do whatever they want, partly due to the (inter)national policy and the substandard inspection.

The FNV is also organizing for an improvement of collective labor agreements in the port of Rotterdam. On October 8, some 700 lashers – workers who secure and unload loads – started a union-backed strike, which eventually brought work to a standstill for five days. This led to huge backlogs – "unjustified", according to the employers – and a promise of a wage increase and better working conditions. Give Tegengas supports the lashers, says Kilembe: "What is going on here shows an unhealthy situation. The workers are exploited. But the strike also shows that we as people have a lot of power if we choose to commit ourselves to something." The visible influence of protest actions offers Geef Tegengas extra reason to continue with their campaigns.



Armed police officers surround the activists to allow the trucks to drive through again. Image: Jasmijn Doorgeest

Difficult change

The Mask Off Maersk campaign has also achieved some successes. Maersk announced on June 23 that it would stop transporting goods from companies flagged by the United Nations Human Rights Office (OHCHR) as linked to illegal Israeli settlements in Palestine. The

announcement came after months of pressure due to protests in several countries, including the Netherlands. At the same time, activists emphasize that their work continues, because Maersk is still transporting military cargo for Israel, including F-35 parts.

In the meantime, the municipality of Rotterdam is going to investigate the involvement of the port of Rotterdam in genocidal violence in Gaza. This decision followed a few weeks after an emergency debate on May 22, in which the docking of the Izmir was discussed in detail. During the debate, several council members called on the municipal executive to counter Rotterdam's complicity in the genocide in Gaza. Port alderman Robert Simons (Leefbaar Rotterdam) said that the municipality of Rotterdam bears no responsibility for what the ships have on board. "When it comes to the contents of containers and their control, the competent authority is customs. And it acts on the instructions of the government." Give Tegengas cannot correspond to this. The activists believe that the municipality should work to stop the transit of Israeli weapons. The municipality of Rotterdam is also the sole shareholder of the Port Authority besides the Dutch State and owns approximately 70 percent of it.

'Ceasefire in Gaza is not a solution'

Although the door is open for a conversation about their demands, Give Countergas does not intend to wait for it in peace. Kilembe: "We believe that companies that literally go over corpses to make their profits will not change because of a sweet conversation, so as far as we are concerned: the greater the damage, the better."

The most recent ceasefire in Gaza – and repeatedly violated by Israel – is also no reason for the action group to stop fighting for a trade and arms embargo with Israel. "Of course we are very happy that it gives the people in Gaza a breather," Kilembe explains. "But it is not a solution, because Palestinians are still not allowed to govern themselves and still live in apartheid. So there must still be a free Palestinian state. Until then, our actions will continue."

Final editing by Hasse Drewes

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About the author:

Jasmijn Doorgeest (1996, they/them) studied international relations. On a planet that is undergoing ecological collapse, they are interested in the responsible (power) structures and

the people who resist them. In particular, they want to investigate how people already try to relate to each other and nature differently.

Read more by Jasmijn Doorgeest

Also read:



Image: Jasmijn Doorgeest

Red-colored procession: the third Red Line protest in pictures

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DEMONSTRATIE

Protest haven ten einde na stevig ingrijpen, actiegroep vond het 'groot succes'



Nikki Veerbeek 11 oktober 2025, 13:10 • Aangepast 11 oktober 2025, 16:01 •

4 minuten leestijd



De politie grijpt hardhandig in
© MediaTV

De actiegroep Geef Tegengas demonstreerde zaterdag wederom in de Rotterdamse haven. Vrijdag gebeurde dat ook al. Honderden actievoerders blokkeerden de kilometerslange havenspoorlijn op meerdere plekken. De actiegroep verwijt de haven een rol te spelen bij oorlogen, onderdrukking en klimaatverandering. Na hardhandig ingrijpen van de politie is het spoor inmiddels weer vrij.

De spoorlijn loopt tussen de Maasvlakte en Barendrecht. De actievervoerders bevonden zich onder meer ter hoogte van de Vondelingenplaat, de Eemhaven en knooppunt Vaanplein in Barendrecht.

Geef Tegengas spreekt zelf van 800 actievoerders. Een 112-fotograaf schat dat het om 400 man ging, verspreid over meerdere groepen.

"Het was een groot succes. Er waren meer mensen dan ooit en we hebben het treinverkeer urenlang stilgelegd. Hiermee is de druk op de haven opgevoerd", zegt een woordvoerder van Geef Tegengas.

Rake klappen

De politie en de Mobiele Eenheid (ME) keken aanvankelijk alleen toe, maar ondernamen al snel actie. Zij konden "niet zorgen dat er veilig gedemonstreerd kan worden". De politie zei de demonstranten eerst te verzoeken om vrijwillig te

vertrekken. Wie niet wilde luisteren, werd "een handje geholpen". Op de plek van de demonstratie waarschuwde een politie-agent door een megafoon dat dat er geweld kon worden gebruikt.

De actievoerders werden geduwd of van het spoor gesleept. De politie gebruikte wapenstokken en pepperspray om de actievoerders in bedwang te houden. Volgens een 112-fotograaf ging het er soms hardhandig aan toe. Er zouden rake klappen zijn uitgedeeld.

"Er is meerdere keren overmatig geweld gebruikt", stelt de woordvoerder van Geef Tegengas. Enkele actievoerders zouden daardoor verwoningen aan hun hoofd hebben opgelopen.



De politie grijpt in bij de demonstratie op de havenspoorlijn
© MediaTV

Veel aanhoudingen

De politie heeft meerdere activisten opgepakt. Het gaat om actievoerders die op het spoor bleven zitten en geen gehoor gaven aan de oproep te vertrekken. Sommigen verzetten zich en werden over de grond gesleept. De opgepakte activisten zijn volgens de politie met busjes naar een speciale locatie gebracht en voorgeleid.

De woordvoerder kan nog geen aantallen geven. Een 112-fotograaf zegt dat minstens 300 man is aangehouden. Bij de Blindweg zijn minstens honderd mensen met geweld

van het spoor gehaald, opgepakt en afgevoerd. In Pernis zijn er nog eens 200 demonstranten opgepakt.

Meerdere activisten hadden zichzelf vastgeketend aan het spoor. Zij zijn door de technische eenheid van de politie losgehaald en aangehouden.



Activisten aan het spoor vastgeketend
© JB Media

De actievoerders hadden banners bij zich met leuzen als '*no bombs, barrels or bullshit*', 'deze haven spoort niet' en '*cargo here means horror* daar'. Door de megafoon scanderen zij teksten als '*free free Palestine*' en '*shame on you*'. Naast het spoor stond een podium opgesteld waar dj's muziek draaien en speeches worden gegeven.



Actievoerders in de haven
© -

VVD vraagt debat met burgemeester aan

De Rotterdamse VVD heeft naar aanleiding van deze demonstratie een debat aangevraagd om opheldering te krijgen van de burgemeester over de gang van zaken en het optreden van de gemeente en politie.

"Onacceptabel dit soort acties in onze haven", vindt raadslid Marike Abrahamse. "Dit schaadt onze economie én de veiligheid van de Rotterdammers."

“Deze actie heeft meer weg van een gecoördineerde sabotagepoging van de Rotterdamse haven dan van een demonstratie. De haven is van cruciaal belang voor onze economie en veiligheid. Dat moeten we beschermen en voorkomen dat activisten die bewust grenzen overschrijden onze stad ontwrichten."

'Motor van dood en destructie'

De haven was zaterdag het decor van verschillende acties. Geef Tegengas strijdt tegen "het wereldwijde, kapitalistische systeem dat bombardeert, vervuilt, ongelijkheid creëert, koloniseert, gemeenschappen opbreekt en ecosystemen vernietigt". Volgens de actiegroep is de haven de "Nederlandse motor van dood en destructie".

De activisten eisen dat de haven per direct een volledig wapen- en handelsembargo met Israël instelt. Ook willen ze dat de haven stopt met handel met gebieden waar mensenrechten worden geschonden, en een plan maakt om alle 'vervuilende troep' zo snel mogelijk uit te faseren.



De actievoerder liggen op het spoor
© JB Media

Ook vrijdag protesteerde Geef Tegengas in de haven. Actievoerders blokkeerden urenlang het vrachtverkeer op de Tweede Maasvlakte, op twee locaties: bij de containerterminals van APM en Rotterdam World Gateway (RWG). Ongeveer honderd activisten waren daarbij betrokken. De sfeer was grimmig voordat de politie arriveerde. Enkele vrachtwagenchauffeurs reageerden agressief op de blokkade.



LEES OOK

Protest op Maasvlakte ten einde: 'Doel was platleggen van vrachtverkeer, dat is gelukt'

Protest op Maasvlakte na uren voorbij | Rijnmond
Rijnmond

Watch on

Staking sjorders

De actie komt bovenop de staking van de sjorders. Zij zorgen voor het veilig laden en lossen in de haven. De havenmedewerkers eisen betere arbeidsomstandigheden en hogere lonen. De staking begon woensdag en werd vrijdag voor onbepaalde tijd verlengd. Zaterdagmiddag om 15:30 uur dient een kort geding. havenbedrijven stappen naar de rechter om de staking van de sjorders te beëindigen.

Geef Tegengas zegt solidair te zijn met de stakende sjorders. "Met twee dagen staken hebben ze de hele haven plat weten te leggen, dat bewonderen wij en we voelen ons daardoor gesterkt. Het laat zien hoeveel macht werkers hebben als zij in actie komen. Voor de winst van de logistieke reuzen en hun aandeelhouders worden zowel hier in de haven als in het buitenland mensen uitgebuit en uitgemoord. Hun strijd voor een goed loon en betere arbeidsvoorwaarden is er een die wij van harte steunen."



LEES OOK

Schepen kunnen geen kant op door staking sjorders in haven, FNV eist hogere lonen



Demonstratie van Geef Tegengas in de Rotterdamse haven
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Read aloud

DEMONSTRATIE

Protest port ends after firm intervention, action group thought it was 'great success'



Nikki Veerbeek 11 October 2025, 13:10 • Customized 11 October 2025, 16:01 •

4 minutes reading time



The police intervene harshly
© MediaTV

The action group Give Counterweight demonstrated again in the port of Rotterdam on Saturday. That also happened on Friday. Hundreds of activists blocked the kilometre-long port railway line in several places. The action group accuses the port of playing a role in wars, oppression and climate change. After heavy-handed intervention by the police, the trail is now clear again.

The railway line runs between the Maasvlakte and Barendrecht. The action transporters were located near the Vondelingenplaat, the Eemhaven and the Vaanplein junction in Barendrecht, among other places.

Give Tegengas itself speaks of 800 activists. A 112 photographer estimates that there were 400 men, spread over several groups.

"It was a great success. There were more people than ever and we stopped train traffic for hours. This has increased the pressure on the port," says a spokesperson for Give Tegengas.

Striking blows

The police and the Mobile Unit (ME) initially only watched, but soon took action. They could "not ensure that there can be a safe demonstration". The police said they would first ask the protesters to leave voluntarily. Those who did not want to listen were

"given a helping hand". At the site of the demonstration, a police officer warned through a megaphone that violence could be used.

The activists were pushed or dragged off the tracks. The police used batons and pepper spray to restrain the activists. According to a 112 photographer, it was sometimes heavy-handed. There would have been striking blows.

"Excessive force has been used several times," says the spokesperson for Give Countergas. Some activists would have suffered injuries to their heads as a result.



The police intervene in the demonstration on the harbor railway line
© MediaTV

Many arrests

The police have arrested several activists. These are activists who remained on the tracks and did not respond to the call to leave. Some resisted and were dragged along the ground. According to the police, the arrested activists were taken to a special location by vans and brought before the court.

The spokesperson cannot yet give numbers. A 112 photographer says that at least 300 people have been arrested. At least a hundred people were forcibly removed from the tracks at the Blindweg, arrested and taken away. In Pernis, another 200 protesters have been arrested.

Several activists had chained themselves to the railway. They were detached and arrested by the technical unit of the police.



Activists chained to the tracks
© JB Media

The activists carried banners with slogans such as '*no bombs, barrels or bullshit*', 'this port does not track' and '*cargo here means horror* there'. Through the megaphone they chant texts such as '*free free Palestine*' and '*shame on you*'. Next to the track was a stage where DJs play music and speeches are given.



Activists in the port
© -

VVD requests debate with mayor

As a result of this demonstration, the Rotterdam VVD has requested a debate to get clarification from the mayor about the course of events and the actions of the municipality and police.

"This kind of action in our port is unacceptable," says council member Marike Abrahamse. "This harms our economy and the safety of the people of Rotterdam."

"This action looks more like a coordinated sabotage attempt by the port of Rotterdam than a demonstration. The port is crucial for our economy and security. We must protect that and prevent activists who deliberately cross borders from disrupting our city."

'Engine of death and destruction'

The port was the setting for various actions on Saturday. Give Countergas fights against "the global, capitalist system that bombs, pollutes, creates inequality, colonizes, breaks up communities and destroys ecosystems". According to the action group, the port is the "Dutch engine of death and destruction".

The activists demand that the port immediately impose a full arms and trade embargo with Israel. They also want the port to stop trading with areas where human rights are violated, and make a plan to phase out all 'polluting junk' as soon as possible.



The activists are on the tracks
© JB Media

Also on Friday, Give Countergas protested in the port. Activists blocked freight traffic on the Second Maasvlakte for hours, at two locations: at the container terminals of APM and Rotterdam World Gateway (RWG). About a hundred activists were involved. The atmosphere was grim before the police arrived. Some truck drivers reacted aggressively to the blockade.



ALSO READ

Protest on Maasvlakte ends: 'The aim was to shut down freight traffic, and we succeeded'

Protest op Maasvlakte na dreigen voorbij | Rijnmond
Rijnmond

Watch on

Strike lashers

The action comes on top of the strike of the lashers. They ensure safe loading and unloading in the port. The port employees demand better working conditions and higher wages. The strike started on Wednesday and was extended indefinitely on Friday. Saturday afternoon at 3:30 p.m. summary proceedings will be filed. Port companies are going to court to end the strike of the lashers.

Give Tegengas says it stands in solidarity with the striking lashers. "With two days of strike, they managed to shut down the entire port, we admire that and we feel strengthened by it. It shows how much power workers have when they take action. For the profits of the logistics giants and their shareholders, people are exploited and murdered both here in the port and abroad. Their fight for good wages and better working conditions is one that we wholeheartedly support."



ALSO READ

Ships have nowhere to go due to strike lashers in port, FNV demands higher wages



Demonstration of Give Counterweight in the port of Rotterdam
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EXTINCTION REBELLION BLOKKERER TFO KONFERANSE I SANDEFJORD

I dag blokkerte vi, sammen med titalls av klimaaktivister og flere organisasjoner, Tildeling i Forhåndsdefinerte områder (TFO) konferanse, i Scandic Sandefjord, hvor energiminister Terje Aasland skal dele ut nye oljelisenser.

Vårt krav er at det ikke deles ut noen nye oljelisenser.
Klimakrisen tar allerede titusener av menneskeliv hvert eneste år.
Hver nye utvinningstillatelse som deles ut, vil være en lisens til å drepe enda flere.
>



Jan 13, 2026, 10:54 AM · · Tusky



Extinction Rebellion Norway
@XR_Norway@social.rebellion.global

EXTINCTION REBELLION BLOCKS TFO CONFERENCE IN SANDEFJORD

Today we blocked, with tens of activists and several other organisations, the Assignment of Predefined Areas (TFO) concerence, at Scandic Hotel Sandefjord, where the energy minister Terje Aasland shall hand out new oil licenses.

Our demand is that no new oil licemses are handed out.
The climate crisis already takes tens of tohousands of human lives every single year.
Every new extraction license handed out is a license to kill people.
>



Jan 13, 2026, 10:51 AM · · Tusky



Persberichten

XR KOMT OP VOOR OMWONENDEN GASVELDEN EN BEZET 3 GASBORINGSLOCATIES IN GRONINGEN, FRIESLAND, EN WEST-FRIESLAND

21 maart 2026

De eis aan het nieuwe kabinet: Gaskraan dicht!!

Op zaterdag 21 maart hebben rebellen van Extinction Rebellion 3 gasboringslocaties bezet. De rebellen zijn over de hekken geklommen en hebben op een veilige manier het gaswinningsterrein betreden. Extinction Rebellion eist dat het kabinet zorgt voor een snelle en ruimhartige schadeafhandeling, alle gasvelden direct permanent sluit, geen nieuwe meer opent en verdere klimaatschade een halt toeroept.

De acties zijn live te volgen op XRTV.nl

oud, maar nog steeds gaat de versterking en schadeafhandeling bijzonder traag en ook het kabinet Jetten laat de gaswinning onverminderd doorgaan. XR staat vierkant achter de Groningers, Drenten, Friezen en andere Nederlanders die rond gasvelden wonen. De landelijke politiek en de NAM moeten de ereschuld aan onder andere Groningen echt inlossen en alle gasvelden per direct sluiten. Noord Nederland is geen wingewest!”

Gaswinning gaat onverminderd door

De meeste mensen denken dat er geen gas meer gewonnen wordt in Groningen, maar niets is minder waar: van de 84 actieve gasvelden liggen er maar liefst 17 in Groningen en in de rest van het land dus ook nog 67.

Gasboringen veroorzaken niet alleen scheuren in huizen, cultureel erfgoed en bodemverzakkingen, ze veroorzaken ook scheuren in de hoofden, harten en lichamen van vele Groningers. In Groningen overlijden op basis van onderzoek van Gronings Perspectief jaarlijks naar schatting 16 mensen voortijdig als gevolg van ernstige gezondheidsklachten door de gaswinning [1]. Op andere plekken dreigt hetzelfde te gebeuren, getuige ook de meest recente aardbeving in Drenthe [2].

Schadeafhandeling Groningen

Een humane en ruimhartige schadeafhandeling van aardbevingsschade is ver te zoeken. Veel huishoudens leven in onzekerheid en onveiligheid, in afwachting van een nog steeds uiterst trage versterkingsoperatie. Mensen worden jarenlang van het kastje naar de muur gestuurd omdat de overheid en de NAM niet willen betalen, met moegestreden burgers tot gevolg [3]. Mensen zijn terecht woedend, gefrustreerd en vol wantrouwen. En dan is de NAM uit naam van Shell en Exxon afgelopen week nog een rechtszaak begonnen ook om onder de kosten van de hersteloperatie uit te komen, terwijl deze bedrijven miljardenwinsten maken [4]. De wereld op zijn kop.

Coalitieakkoord faalt

De plannen in het coalitieakkoord voor een veilig klimaat zijn ver onder de maat. Op dit moment passeren we de grens van 1,5 graad opwarming, [5] maar het sluiten van de 84 gasboringslocaties in Nederland wordt nergens genoemd. Voor meerdere gasvelden met een aflopende vergunning wordt zelfs verlenging aangevraagd (ook in Groningen) en er is nog steeds geen afbouwplan.

Woordvoerder Koelikamp: “De gaswinning stoppen is nodig voor de huidige én toekomstige gezondheid en veiligheid! Schoon fossiel gas bestaat niet. Het kabinet Jetten verscheurt hiermee het klimaatakkoord van Parijs, terwijl het de contracten met Shell en Exxon moet verscheuren! De tweede energiecrisis in korte tijd laat de fossiele ineenstorting zien. We moeten zo snel mogelijk volledig weg van dit giftige systeem naar veel meer besparing en duurzame energie in plaats van ergens anders meer gas winnen ten koste van

de burgers van Noord-Nederland.”

Belangrijke informatie over veiligheid actie

Extinction Rebellion voert geweldloze directe actie, ook op deze locatie. We hebben hiervoor een risicoinventarisatie opgesteld en informatie ingewonnen bij oud medewerkers. Alle aanwezige rebellen kennen de veiligheidsvoorschriften en weten dat gas op deze locatie geurloos is. Zodra rebellen over het hek gaan, wordt de eigenaar gebeld. Er wordt eerst met een professionele gekalibreerde gasdetectiemeter gecontroleerd of er eventueel sprake is van een gaslek, voordat rebellen zich verspreiden over het terrein. Alle rebellen dragen beschermende kleding, stevige schoenen en helmen. Bij een detecteerbaar gaslek wordt het terrein onmiddelijk verlaten en wordt dit gemeld. Zonder gaslek is er geen risico voor het gebruik van gewone mobiele telefoons en synthetische kleding. XR gebruikt nooit vuur op de locatie van haar acties, dat is onderdeel van de actieconsensus.

Bronnen

[1] Meer sterfgevallen door Groningse aardbevingsstress: https://nos.nl/l/2432133
[2] Aardbeving van 3,0 bij Eleveld in Drenthe: ‘deze was goed te voelen’: https://nos.nl/l/2606245
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[5] 20 februari 2026 – https://www.sciencedirect.com/science/article/pii/S2590332225003914









MEER PERSBERICHTEN





Press releases

XR STANDS UP FOR LOCAL GAS FIELDS AND OCCUPIES 3 GAS DRILLING SITES IN GRONINGEN, FRIESLAND, AND WEST FRIESLAND

March 21, 2026

The demand to the new cabinet: Close the gas tap!!

On Saturday 21 March, Extinction Rebellion rebels occupied 3 gas drillingsites. The rebels have climbed over the fences and have entered the gas extraction site in a safe manner. Extinction Rebellion demands that the government ensure a quick and generous settlement of claims, immediately close all gas fields permanently, do not open any new ones and stop further climate damage.

The actions can be followed live on XRTV.nl

years old, but the reinforcement and damage settlement is still very slow and the Jetten cabinet is also allowing gas extraction to continue unabated. XR stands squarely behind the Groningers, Drenten, Frisians and other Dutch people who live around gas fields. National politics and the NAM must really redeem the debt of honor to Groningen, among others, and close all gas fields immediately. The North of the Netherlands is not a winning region!"

Gas extraction continues unabated

Most people think that gas is no longer being extracted in Groningen, but nothing could be further from the truth: of the 84 active gas fields, no fewer than 17 are in Groningen and 67 in the rest of the country.

Gas drilling not only causes cracks in houses, cultural heritage and subsidence, they also cause cracks in the heads, hearts and bodies of many Groningen residents. Based on research by Gronings Perspectief, an estimated 16 people die prematurely in Groningen every year as a result of serious health problems caused by gas extraction [1]. The same threatens to happen in other places, as evidenced by the most recent earthquake in Drenthe [2].

Claims handling Groningen

A humane and generous settlement of earthquake damage is hard to find. Many households live in uncertainty and insecurity, awaiting a still extremely slow reinforcement operation. People are sent from pillar to post for years because the government and the NAM do not want to pay, resulting in tired citizens [3]. People are rightly furious, frustrated and full of distrust. And then the NAM started a lawsuit last week on behalf of Shell and Exxon also to get out of the costs of the recovery operation, while these companies make billions in profits [4]. The world upside down.

Coalition agreement fails

The plans in the coalition agreement for a safe climate are far below standard. At the moment we are passing the 1.5 degree warming mark, [5] but the closure of the 84 gas drilling sites in the Netherlands is not mentioned anywhere. For several gas fields with an expiring permit, an extension is even requested (also in Groningen) and there is still no phase-out plan.

Spokesperson Koelikamp: "Stopping gas extraction is necessary for current and future health and safety! Clean fossil gas does not exist. The Jetten cabinet is tearing up the Paris climate agreement, while it should be tearing up the contracts with Shell and Exxon! The second energy crisis in a short period of time shows the fossil fuel collapse. We need to get away from this toxic system completely as soon as possible to much more savings and sustainable energy instead of extracting more gas elsewhere at the expense of populations there. Protect the earth, protect the cultural heritage and protect the citizens of the Northern Netherlands."

Extinction Rebellion conducts non-violent direct action, also at this location. We have drawn up a risk inventory for this and gathered information from former employees. All rebels present know the safety regulations and know that gas is odorless at this location. As soon as rebels cross the fence, the owner is called. A professional calibrated gas detection meter is first used to check whether there is a gas leak before rebels spread across the site. All rebels wear protective clothing, sturdy shoes and helmets. In the event of a detectable gas leak, the site is immediately left and reported. Without a gas leak, there is no risk for the use of ordinary mobile phones and synthetic clothing. XR never uses fire at the location of its actions, that is part of the action consensus.

Sources

[1] More deaths due to Groningen earthquake stress: https://nos.nl/l/2432133
[2] Earthquake of 3.0 near Eleveld in Drenthe: 'this one was good to feel': https://nos.nl/l/2606245
[3] https://pointer.kro-ncrv.nl/onderzoeken/schade-door-gaswinning
[4] https://www.rtvnoord.nl/politiek/1388743/wie-draait-op-voor-800-miljoen-euro-aan-aardbevingsschade
[5] 20 February 2026 – https://www.sciencedirect.com/science/article/pii/S2590332225003914











Persberichten

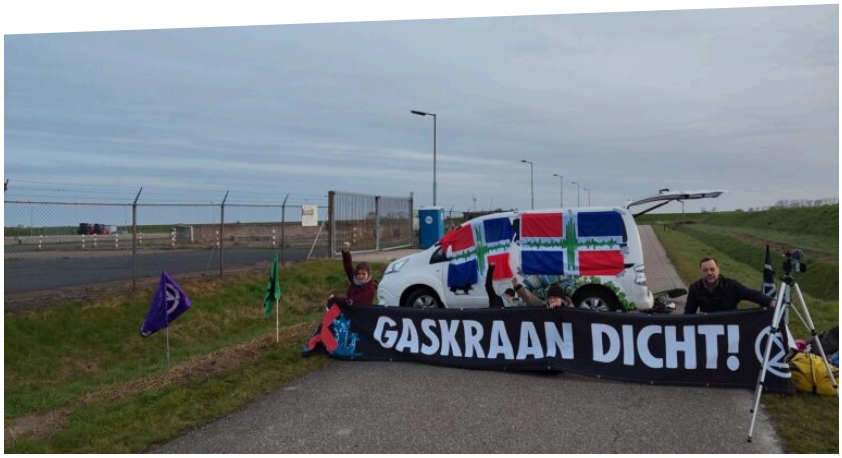
EXTINCTION REBELLION KOMT OP VOOR OMWONENDEN GASVELD WARFFUM EN BLOKKEERT WERKZAAMHEDEN NAM

13 april 2026

De eis aan de NAM en het kabinet: De gaskraan blijft dicht!!

Op maandag 13 april hebben rebellen van Extinction Rebellion de doodlopende weg geblokkeerd naar de gasput in Warffum. Daarmee willen ze voorkomen dat de NAM werkzaamheden kan starten om dit gasveld weer te openen. Extinction Rebellion eist dat het kabinet zorgt voor een snelle en ruimhartige schadeafhandeling, alle gasvelden direct permanent sluit, geen nieuwe meer opent en verdere klimaatschade een halt toeroept.

De actie is live te volgen op XRTV.nl



Woordvoerder Daniël Koelikamp: “Het gasveld bij Warffum bevindt zich letterlijk en figuurlijk op een doodlopende weg. De NAM en het kabinet vertellen sprookjes over leveringszekerheid, terwijl deze locatie in werkelijkheid al een half jaar niet gebruikt wordt en dus helemaal niet nodig is. Er is geen enkele zekerheid dat de winning in Warffum veilig kan en versterking en schadeafhandeling gaan nog steeds bijzonder traag. XR steunt de lokale actiegroepen en inwoners van Warffum in hun strijd. Daarom blokkeren we zolang mogelijk de werkzaamheden.”

Gaswinning gaat onverminderd door

De meeste mensen denken dat er geen gas meer gewonnen wordt in Groningen, maar niets is minder waar: van de 84 actieve gasvelden liggen er maar liefst 17 in Groningen (waaronder Warffum) en in de rest van het land dus ook nog 67.

Gasboringen veroorzaken niet alleen scheuren in huizen, cultureel erfgoed en bodemverzakkingen, ze veroorzaken ook scheuren in de hoofden, harten en lichamen van vele Groningers. In Groningen overlijden op basis van onderzoek van Gronings Perspectief jaarlijks naar schatting 16 mensen voortijdig als gevolg van ernstige gezondheidsklachten door de gaswinning [1]. Op andere plekken dreigt hetzelfde te gebeuren, getuige ook de meest recente aardbeving in Drenthe [2].

Schadeafhandeling Groningen

Drie jaar na de parlementaire enquête is een humane en ruimhartige schadeafhandeling van aardbevingsschade nog steeds ver te zoeken. Veel huishoudens leven in onzekerheid en onveiligheid, in afwachting van een nog steeds uiterst trage versterkingsoperatie.
Mensen worden jarenlang van het kastje naar de muur gestuurd omdat de overheid en de NAM niet willen betalen, met moegestreden burgers tot gevolg [3]. Ze zijn terecht woedend, gefrustreerd en vol wantrouwen. Ondertussen is de NAM uit naam van Shell en Exxon nog een rechtszaak begonnen ook om onder de kosten van de herstelloperatie uit te komen, terwijl deze bedrijven miljardenwinsten maken [4]. Dit is de wereld op zijn kop.

Coalitieakkoord faalt

De plannen in het coalitieakkoord voor een veilig klimaat zijn ver onder de maat. Op dit moment passeren we de grens van 1,5 graad opwarming, [5] maar het sluiten van de 84 gasboringslocaties in Nederland wordt nergens genoemd. Voor meerdere gasvelden met een

steeds geen afbouwplan. Terwijl we prima met mínder in plaats van meer gas uit de voeten kunnen [6 en 7].

Woordvoerder Koelikamp: “Alle gaswinning stoppen is nodig voor de huidige én toekomstige gezondheid en veiligheid! Schoon fossiel gas bestaat niet. Het kabinet Jetten moet de contracten met Shell en Exxon verscheuren, maar verscheurt liever het Klimaatakkoord van Parijs! De tweede fossiele crisis in korte tijd laat de ineenstorting van dit giftige systeem zien. We moeten zo snel mogelijk naar veel meer besparing en duurzame energie in plaats van meer gas winnen ten koste van lokale bevolkingsgroepen in Groningen en wereldwijd. Bescherm de aarde, bescherm de akkers en het cultureel erfgoed en bescherm de burgers van Noord-Nederland.”

Bronnen

[1] Meer sterfgevallen door Groningse aardbevingsstress – https://nos.nl/l/2432133
[2] https://nos.nl/l/2606245
[3] https://pointer.kro-ncrv.nl/onderzoeken/schade-door-gaswinning
[4] https://www.rtvnoord.nl/politiek/1388743/wie-draait-op-voor-800-miljoen-euro-aan-aardbevingsschade?at_medium=sharing&at_campaign=sharedArticle
[5] https://www.sciencedirect.com/science/article/pii/S2590332225003914
[6] https://www.independer.nl/energie/info/onderzoek/gasverbruik-2025
[7] https://nos.nl/collectie/14015/artikel/2605996-in-vijf-jaar-flink-minder-gasverbruik-is-mogelijk-zegt-duurzaamheidsbranche

MEER PERSBERICHTEN



Press

EXTINCTION REBELLION STANDS UP FOR LOCAL RESIDENTS OF THE WARFFUM GAS FIELD AND BLOCKS WORK BY NAM

13 April 2026

The demand to the NAM and the cabinet: The gas tap remains closed!!

On Monday, April 13, Extinction Rebellion rebels **blocked the dead end road to the gas well in Warffum. In doing so, they** want **to prevent the NAM from starting work to reopen this gas field. Extinction Rebellion demands that the government ensure a quick and generous settlement of claims, immediately close all gas fields permanently, do not open any new ones and stop further climate damage.**

The action can be followed live on XRTV.nl



Spokesman Daniël Koelikamp: "The gas field at Warffum is literally and figuratively located on a dead end. The NAM and the cabinet tell fairy tales about security of supply, while in reality this location has not been used for six months and is therefore not needed at all. There is no certainty that extraction in Warffum can be done safely and reinforcement and damage settlement are still very slow. XR supports the local action groups and residents of Warffum in their struggle. That is why we are blocking the work for as long as possible."

Gas extraction continues
unabated Most people think that gas is no longer extracted in Groningen, but nothing could be further from the truth: of the 84 active gas fields, no fewer than 17 are in Groningen (including Warffum) and 67 in the rest of the country.

Gas drilling not only causes cracks in houses, cultural heritage and subsidence, they also cause cracks in the heads, hearts and bodies of many Groningen residents. Based on research by Gronings Perspectief, an estimated 16 people die prematurely in Groningen every year as a result of serious health problems caused by gas extraction [1]. The same threatens to happen in other places, as evidenced by the most recent earthquake in Drenthe [2].

Claims handling Groningen
Three years after the parliamentary inquiry, a humane and generous settlement of earthquake damage is still a long way off. Many households live in uncertainty and insecurity, awaiting a still extremely slow reinforcement operation. People are sent from pillar to post for years because the government and the NAM do not want to pay, resulting in tired citizens [3]. They are rightly furious, frustrated and full of distrust. In the meantime, the NAM has started a lawsuit on behalf of Shell and Exxon, also to get out of the costs of the recovery operation, while these companies are making billions in profits [4]. This is the world upside down.

Coalition agreement fails
The plans in the coalition agreement for a safe climate are far below standard. At the moment we are passing the 1.5 degree warming mark, [5] but the closure of the 84 gas drilling sites in the Netherlands is not mentioned anywhere. For several gas fields with an

[illegible] requested (also in Groningen) and there is still no phase-out plan. While we can get by just fine with less instead of more gas [6 and 7].

Spokesperson Koelikamp: "Stopping all gas extraction is necessary for current and future health and safety! Clean fossil gas does not exist. The Jetten cabinet has to tear up the contracts with Shell and Exxon, but would rather tear up the Paris Climate Agreement! The second fossil crisis in a short time shows the collapse of this toxic system. We must move as quickly as possible to much more savings and sustainable energy instead of extracting more gas at the expense of local populations in Groningen and worldwide. Protect the earth, protect the fields and cultural heritage and protect the citizens of the Northern Netherlands."

Sources

[1] More deaths due to Groningen earthquake stress – https://nos.nl/l/2432133
[2] https://nos.nl/l/2606245
[3] https://pointer.kro-ncrv.nl/onderzoeken/schade-door-gaswinning
[4] https://www.rtvnoord.nl/politiek/1388743/wie-draait-op-voor-800-miljoen-euro-aan-aardbevingsschade?at_medium=sharing&at_campaign=sharedArticle
[5] https://www.sciencedirect.com/science/article/pii/S2590332225003914
[6] https://www.independer.nl/energie/info/onderzoek/gasverbruik-2025
[7] https://nos.nl/collectie/14015/artikel/2605996-in-vijf-jaar-flink-minder-gasverbruik-is-mogelijk-zegt-duurzaamheidsbranche

MORE PRESS





extinctionrebellionnl and **2 others** ...

extinctionrebellionnl 9w
Afgelopen maandag kwamen we in actie in Warffum. Samen lieten we zien dat het anders moet én kan. Samen brachten we één duidelijke eis: gaskraan dicht.

Deze aftermovie laat zien wat er gebeurt als mensen opstaan voor klimaatrechtvaardigheid. Meerdere omwonenden kwamen steun betuigen. Dit is waarom we blijven komen. Dit is waarom we niet stoppen.

Kijk, deel en sluit je aan.

zwemmmmmmy 7w
Goede actie ❤️ 🔥 🙌

1 like Reply

281 12

April 15

HS8/203 in to like or comment.



extinctionrebellionnl and **2 others** ...

extinctionrebellionnl 10w
Last Monday we came into action in Warffum. Together we showed that things must and can be done differently. Together we brought one clear demand: turn off the gas tap.

This aftermovie shows what happens when people stand up for climate justice. Several local residents came to show support. This is why we keep coming. This is why we don't stop.

Watch, share and connect.

zwemmmmmmy 9w
Good action ❤️ 🔥 🙌

1 like Reply

281 12

April 15

HS8/204 g in to like or comment.



Flag of the Extinction Rebellion movement - Credit: InkDropCreative / DepositPhotos (https://depositphotos.com/273527672/stock-photo-london-uk-june-4th-2019.html) - License: DepositPhotos (https://depositphotos.com/license.html)

1-1-2 (/CATEGORIES/1-1-2) RIJKSWATERSTAAT (/TAGS/RIJKSWATERSTAAT) DE MEERN (/TAGS/DE-MEERN) EXTINCTION REBELLION (/TAGS/EXTINCTION-REBELLION) A12 (/TAGS/A12) EX

(https://www.facebook.com/sharer/sharer.php?u=https://nltimes.nl/2026/04/25/dutch-police-arrest-200-xr-blocks-a12-near-de-meern&title=Dutch%20police%20arrest%20over%20200%20after%20XR%20blocks%20A12%20near%20De%20Meern) (https://twitter.com/inter text=Dutch%20police%2(police-arrest-200-xr-blocl

SATURDAY, 25 APRIL 2026 - 16:25

Dutch police arrest over 200 after XR blocks A12 near De Meern

Make NL Times your top Google source (https://www.google.com/preferences/source?q=nltimes.nl)

Police arrested more than 200 demonstrators after climate activists from Extinction Rebellion (XR) blocked the A12 near De Meern, close to Utrecht, while a separate group of six drivers was also detained for obstructing traffic. Their vehicles were seized as authorities cleared the highway.

The A12 was fully reopened after XR activists occupied the roadway on Saturday in a protest against fossil fuel subsidies. Police began removing demonstrators at about 1:45 p.m., physically pulling people from the road and loading them into buses that had arrived under police escort shortly beforehand.

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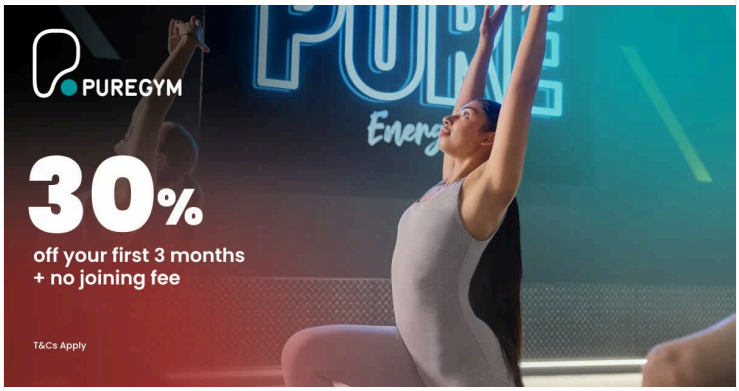

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By 3:35 p.m., the operation was reported complete, and traffic was again moving on the A12 toward Arnhem. The route in the opposite direction toward The Hague had been reopened earlier.

The action caused significant traffic congestion, prompting Rijkswaterstaat to urge drivers at one point to avoid the A12 entirely and instead reroute via the A15 or A1.

According to police, more than 200 protesters were detained during the operation. Six drivers were also arrested for blocking traffic, and their vehicles were confiscated.

The demonstration escalated before noon when several hundred activists reached the roadway after three activists used cars to block a stretch of the A12 near Utrecht. Those three were arrested. Police later confirmed they were continuing to process arrest totals and would provide a full count later on Saturday.

During the removal operation, police used physical force to clear the roadway. Officers had warned demonstrators shortly before the intervention to leave the area, stating that force could be used if they did not comply.

Reports indicate that some activists chained themselves to roadside barriers. Police attempted to free them by unscrewing parts of the guardrail. Other protesters left the roadway voluntarily and walked toward waiting buses.

Minister Vincent Karremans, who oversees Infrastructure and Water Management for the VVD, criticized the blockade on X. “Blocking highways by activists, such as today on the A12, is extremely dangerous for road users, Rijkswaterstaat staff, and emergency responders,” he said. “Demonstrating is allowed, but not on a highway. I truly have 0.0 understanding of these kinds of actions.”#

Reporting by ANP and NL Times

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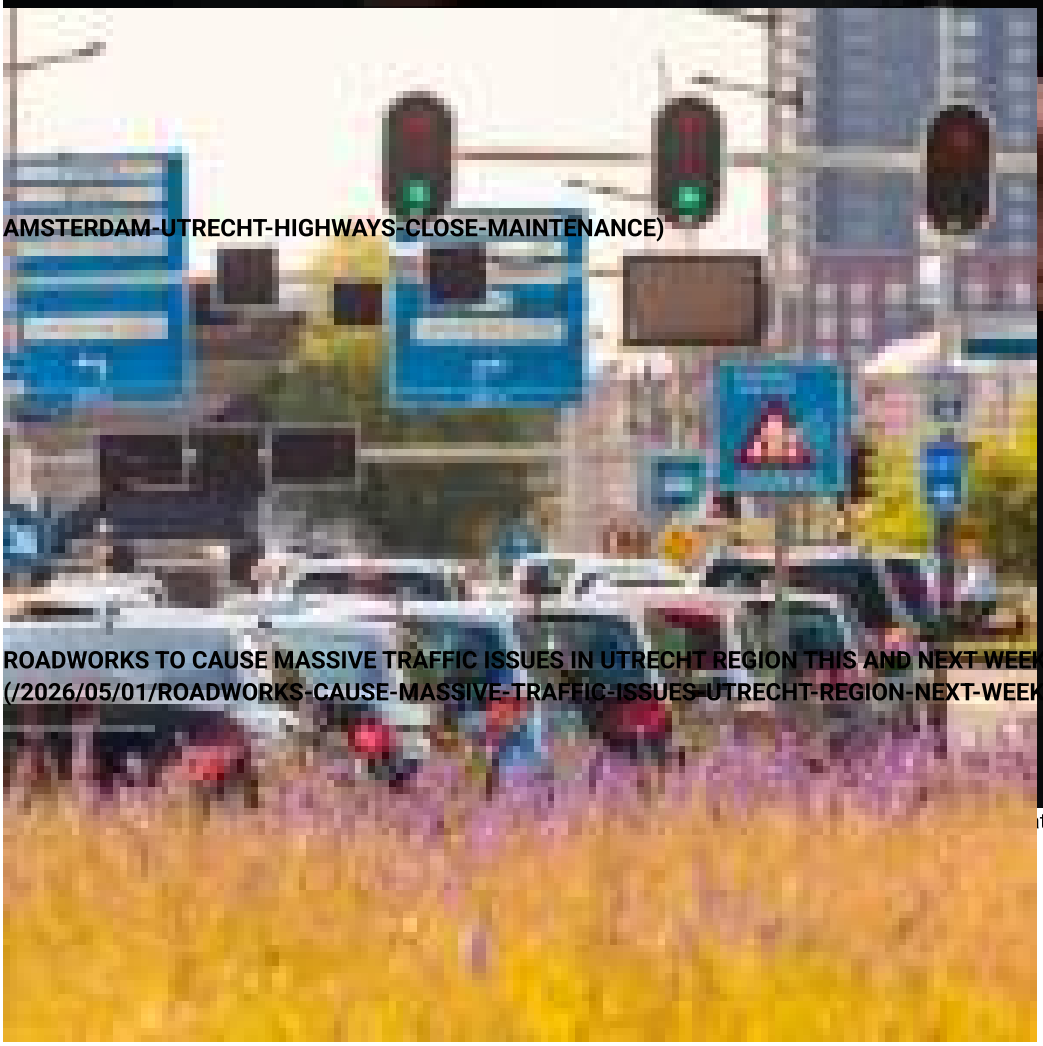
ARRESTS TOP 400 AT EXTINCTION REBELLION'S A12 BLOCKADE, DOUBLE INITIAL POLICE ESTIMATE (/2026/04/26/ARRESTS-TOP-400-EXTINCTION-REBELLIONS-A12-BLOCKADE-DOUBLE-INITIAL-POLICE-ESTIMATE)



WEEKS OF TRAFFIC CHAOS AROUND AMSTERDAM, UTRECHT AS HIGHWAYS CLOSE FOR MAINTENANCE (/2025/05/09/WEEKS-TRAFFIC-CHAOS-AROUND-AMSTERDAM-UTRECHT-HIGHWAYS-CLOSE-MAINTENANCE)

ROADWORKS TO CAUSE MASSIVE TRAFFIC ISSUES IN UTRECHT REGION THIS AND NEXT WEEKEND (/2026/05/01/ROADWORKS-CAUSE-MASSIVE-TRAFFIC-ISSUES-UTRECHT-REGION-NEXT-WEEKEND)

(https://nltimes.nl/2025/05/09/weeks-traffic-chaos-around-amsterdam-utrecht-highways-close-maintenance)

JUST STOP OIL



Just Stop Oil is hanging up the hi vis

Press / March 27, 2025

Three years after bursting on the scene in a blaze of orange, at the end of April we will be hanging up the hi vis.

Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful.

So it is the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison. We have exposed the corruption at the heart of our legal system, which protects those causing death and destruction while prosecuting those seeking to minimize harm. Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK's oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen.

This is not the end of civil resistance. Governments everywhere are retreating from doing what is needed to protect us from the consequences of unchecked fossil fuel burning. As we head towards 2°C of global heating by the 2030s, the science is clear: billions of people will have to move or die and the global

economy is going to collapse. This is unavoidable. We have been betrayed by a morally bankrupt political class.

As corporations and billionaires corrupt political systems across the world, we need a different approach. We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Nothing short of a revolution is going to protect us from the coming storms.

We are calling on everyone who wants to be a part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. Sign up here. See you on the streets.

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: https://juststopoil.org/press-media

Website: https://juststopoil.org/

Facebook: https://www.facebook.com/JustStopOil/

Instagram: https://www.instagram.com/just.stopoil/

Twitter: https://twitter.com/JustStop_Oil

Youtube: https://juststopoil.org/youtube

TikTok: https://www.tiktok.com/@juststopoil

Notes to Editors

[1] Just Stop Oil is committed to nonviolent direct action to resist the destruction of our communities as a result of climate breakdown. We do not consent to plans that will result in 3C of warming and mass death.

We demand an emergency plan to Just Stop Oil by 2030. Our government must work with other governments to end the extraction and burning of all oil, gas and coal by 2030.

Just Stop Oil is a member of the A22 Network of civil resistance projects.

Just Stop Oil 'Blue Lights' policy: our policy is, and has always been, to move out of the way for emergency vehicles with siren sounding and 'blue lights' on.

We take all possible steps to ensure that no-one's safety is compromised by our actions.

[2] During our 3 year history Just Stop Oil supporters have been arrested 3,300 times and imprisoned 180 times, for having broken laws that were drafted by the fossil fuel industry. 7 people are now in prison serving sentences of up to 4 years and 8 are on remand. 16 Just Stop Oil supporters are due to be sentenced in the next few months.

← Previous Post

Next Post →

Support
Just Stop Oil

Donate

This action is not currently available.

Action Network

Follow us on social media.

About us

Just Stop Oil was a nonviolent civil resistance group in the UK. In 2022 we started taking action to demand the UK Government stop licensing all new oil, gas and coal projects. We have won on this. **Civil resistance works.**

Just Stop Oil ended its street campaign in 2025, whilst we continue to support our action takers through the courts and in prison.

Not in the UK? Visit the Global Website.

Change Font



WE QUIT

December 31, 2022 by Extinction Rebellion

When XR burst onto the scene four years ago, few could have imagined the seismic shift it would bring about in the climate movement, the climate conversation, and the world at large.

But despite the blaring alarm on the climate and ecological emergency ringing loud and clear, very little has changed. Emissions continue to rise and our planet is dying at an accelerated rate.

The root causes? A financial system prioritising profits over life, a media failing to inform the public and hold power to account, and a reckless government entrenched in corruption and suppressing the right to protest injustice.

As we ring in the new year, we make a controversial resolution to temporarily shift away from public disruption as a primary tactic. We recognise and celebrate the power of

disruption to raise the alarm and believe that constantly evolving tactics is a necessary approach. What's needed now most is to disrupt the abuse of power and imbalance, to bring about a transition to a fair society that works together to end the fossil fuel era. Our politicians, addicted to greed and bloated on profits won't do it without pressure.

We must be radical in our response to this crisis and determined in our efforts to address the climate and ecological emergency, even if it means taking a different approach than before. In a time when speaking out and taking action are criminalised, building collective power, strengthening in number and thriving through bridge-building is a radical act.

XR is committed to including everyone in this work and leaving no one behind, because everyone has a role to play. This year, we prioritise attendance over arrest and relationships over roadblocks, as we stand together and become impossible to ignore.

The conditions for change in the UK have never been more favourable – it's time to seize the moment. The confluence of multiple crises presents us with a unique opportunity to mobilise and move beyond traditional divides. No one can do this alone, and it's the responsibility of all of us, not just one group. It may be uncomfortable or difficult, but the strength of all social, environmental, and justice movements lies in working together. As our rights are stripped away and those speaking out and most at risk are silenced, we must find common ground and unite to survive.

It's no secret that those in power are hoarding wealth and power at the expense of ordinary people, while ignoring the consequences of their greed. Emissions continue to rise, but they couldn't care less. But people do care, and changes to democracy that free and empower the voices of the people through Citizens Assemblies could balance the tables and bring about the positive societal tipping point we all need.

Choose Your Future – 21st April and beyond – The Big One – Houses of Parliament – 100,000 people.

Read more here.

SHARE

RECENT ARTICLES

27/05/26
The Architecture of Truth: from local conversation to national security

From [redacted]@met.police.uk [redacted]@met.police.uk>
Sent: Wednesday, May 21, 2025 10:23:06 AM
To: [redacted]@met.police.uk> [redacted]@londoncityairport.com>; [redacted]
[redacted]@londoncityairport.com>
Cc: [redacted]@met.police.uk [redacted]@met.police.uk> [redacted]@met.police.uk
<[redacted]@met.police.uk>
Subject: RE: UKAIF: NPOCC SIB: Current Aviation Protest picture

[redacted]

Hope the below is useful. I know it is mentioned but the injunction at HAL had a real impact on the Shell protest yesterday and builds on your experiences. To remove an injunction now would open up to further protest and whilst JSO have stepped down there tends to be a cycle of new groups emerging and this can not be ruled out so maintaining it would be very much recommended.

Hope this helps.

Regards,
[redacted]

From: [redacted]@met.police.uk>
Sent: 21 May 2025 07:56
To: [redacted]@londoncityairport.com>;[redacted]@londoncityairport.com>
Cc:[redacted]@met.police.uk [redacted]
[redacted]@met.police.uk>[redacted]@met.police.uk>
Subject: FW: UKAIF: NPOCC SIB: Current Aviation Protest picture

Moring [redacted]

Please see the below update from our partners at NPOCC (National Police Coordination Centre) regarding the current aviation protest picture. This is shareable with yourselves and may be of assistance with further extension of injunctions.

Kind regards

[redacted]

From: [redacted]@sussex.police.uk>
Sent: 21 May 2025 07:36
To: [redacted]@scotland.police.uk; [redacted]@scotland.police.uk;

[redacted]@humberside.police.uk; [redacted]@leics.police.uk; [redacted]@scotland.police.uk; [redacted]@scotland.police.uk; [redacted]@avonandsomerset.police.uk>; [redacted]@merseyside.police.uk>; [redacted]@northwales.police.uk; [redacted]@scotland.police.uk [redacted]@scotland.police.uk; [redacted]@met.police.uk> [redacted]@westyorkshire.police.uk>; [redacted]@sussex.police.uk>; [redacted]@gmp.police.uk>; [redacted]@met.police.uk> [redacted]@scotland.police.uk; [redacted]@lancashire.police.uk; [redacted]@essex.police.uk; [redacted]@scotland.police.uk; [redacted]@scotland.police.uk; [redacted]@scotland.police.uk; [redacted]@northumbria.police.uk>; [redacted]@dorset.pnn.police.uk; [redacted]@met.police.uk>; [redacted]@psni.police.uk; [redacted]@dorset.pnn.police.uk; [redacted]scotland.police.uk; [redacted]@south-wales.police.uk; [redacted]@scotland.police.uk>; [redacted]@norfolk.police.uk>; [redacted]@essex.police.uk; [redacted]@cambs.police.uk; [redacted]@devonandcornwall.pnn.police.uk; [redacted]@beds.police.uk; [redacted]@westmidlands.police.uk>; [redacted]@durham.police.uk; [redacted]@scotland.police.uk; [redacted]@hampshire.police.uk>; [redacted]@met.police.uk>; [redacted]@thamesvalley.police.uk

Subject: UKAIF: NPOCC SIB: Current Aviation Protest picture

Good Morning colleagues,

I am grateful to John Foreman at NPOCC SIB for the below sitrep in relation to JSO and the wider protest piece in relation to UK Aviation. This may be useful if approached by your operator in consideration of their decision whether or not to apply for a further extension on High Court Injunctions obtained last year.
It is fair to say that we are not in the same place we were then, and whilst I have my own view on the necessity of a further injuncted period, it would be inappropriate for me to express this opinion and for that to be a local, operator led decision.

The following would be the current assessment of NPoCC SIB regarding the Anti-Aviation environmental sub-thematic:

[START TEXT]

The overall situation with environmental protest regarding anti-aviation / airport expansion is that within the UK the position has returned to dormant.

With the outcome of the main Operation ZIZEL prosecutions resulting in convictions and custodial sentences, this appears to be having a deterrent effect on the resolve of UK environmental protesters to engage in further targeting of aviation industry interests. Whilst European environmental protest groups – such as those associated with the *A22 Network* – remain active within the anti-aviation protest space abroad, they have openly noted the significant impact of the UK criminal justice system on UK environmentalism and will thus be similarly deterred from engaging in any direct action within the UK, for fear of attracting such penalties themselves.

Additionally, with the demise of *Just Stop Oil* (JSO), this also leaves the UK without a leading environmental direct action protest group at this time. Those UK environmental protest groups that remain active, are predominantly engaging only in lawful protest activity. By way of relevant example, those environmental protest groups who desired to oppose the Shell AGM on 20/05/2025, conscious of the Heathrow Airport Limited (HAL) High Court Injunction still in effect, were forced to hold their protest at the Shell head office in central London rather than the AGM location at a hotel within the Heathrow Airport injuncted area, in order to avoid the risk of associated penalties for breaching of the injunction.

Youth Demand (YD) are filling some of the void left by JSO, particularly in terms of recent targeting of cultural / sporting events, but are almost entirely focused on pro-Palestinian issues. Hence if YD were to target aviation interests, it would have to significantly serve their primary purpose of opposing Israel's conflict with the Palestinians.

Whilst YD protesters are experienced, capable and motivated to carry out high-profile direct action utilising very small numbers of protesters, there appears to only be a small cohort of YD willing to risk prosecutions arising from such activity. Overall, despite their online rhetoric, YD does not appear to be effective in growing their protest group numbers beyond a fluctuating core membership of circa 50 persons.

With UK Government approval for proposed expansion of Gatwick, Heathrow and Luton airports, there has been vocal opposition from environmentalist, but mainly those existing local / regional campaign groups, who will not engage in protest criminality. Believed interest in opposing airport expansion by the regenerated environmental direct action protest group *Reclaim The Power* (RTP), needs to be tempered against the fact that the group in its newest incarnation of primarily higher-education aged persons based in the North East area of England, have yet to engage in any protest of significance. 15 RTP protesters remain on bail pending trial in September 2025 for POA 2023 offences in connection with their attempt to stage a protest camp in opposition to Drax power station during 2024. Further to this, the RTP group continue to display general naivety around engaging in protest associated criminality, with circa 13 RTP protesters currently sought or identified and arrested in connection with the investigation into a recent burglary of an office building linked to the biofuel industry, further impacting the group's capability and credibility to function as an effective direct action protest group. Overall, significant physical protest opposition to any expansion of the three airports will be assuaged until such time that any legal challenges have been exhausted and there is on-going work available to be physically obstructed.

Sporadic protest in opposition to private jet hubs continues at a couple of sites in the South East region, but fails to reach a level of activity that requires any significant police intervention at this time.

[END TEXT]

I hope this assists, as all of the above is shareable with non-police stakeholders. But please do come back to me if you need anything further.

[redacted]

[redacted]

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JUST STOP OIL

Donate to help build the revolution



Youth Demand
5 May 2025 ·

🌱 Seeds of Revolution: Training Programme
📅 Saturday 14th + Sunday 15th June, 11am - 6pm 📍 Waterloo Action Centre, London SE1 7AA
🔗 Register in bio !

This summer Youth Demand and Just Stop Oil are running a joint 6-week training course to build the generation of revolutionary organisers we need. It is being launched in London on the 14th + 15th of June!

📚There will be inspiring and practical sessions covering all the theory and practice for pulling off the nonviolent democratic revolution that is coming. We will be covering how to mass mobilise, how to run local groups and build momentum, the basics of planning actions and how to build an effective strategy. Guest speakers and trainers will be joining us!

🏡There will be free food & accommodation provided. And if travel expenses would stop you from coming to the weekend, email youthdemand@proton.me and we can help!

This is the training programme that will inspire people across the UK to build the revolution we need. You do not want to miss this!!



Shell anti-protest injunctions upheld after challenge by Just Stop Oil supporters

Court & Prison, Press / October 20, 2025

A Judge has ruled that Shell's anti-protest injunctions against Just Stop Oil supporters will be allowed to continue for another year, following an annual review hearing at the Royal Courts of Justice last week.[1]

Two Just Stop Oil supporters, Charles Phillip Laurie and Emma Ireland had challenged the continuation of Shell 's anti-protest injunctions, which were originally granted for a period of 5 years, with annual reviews.

They are among 13 Just Stop Oil supporters who have refused to sign undertakings not to take action at oil terminals, petrol stations and Shell's HQ in future.[2]

The hearing before Mr Justice Eyre related to three Shell injunctions – private laws – which were initially secured in May 2022 following Just Stop Oil's historic resistance at oil terminals and petrol stations. That campaign led to over 1000 arrests and had a significant impact on fuel availability at petrol pumps across the South East and the Midlands. [3][4]

In their submissions, lawyers acting for the £154bn oil giant Shell argued that the continuation of the injunctions for another year was necessary despite Just Stop Oil having suspended its campaign in March 2025 after winning its original demand of 'no new oil and gas'. They argued that there had been 'no material change' in circumstances since the injunctions were granted and that the orders remained 'necessary' and a 'proportionate' restriction on the right to protest, intended to prevent trespass, obstruction, and damage to Shell's sites. In particular Shell argued that the Just Stop Oil website remains live and is "s*oliciting recurring donations for a new campaign"* and that materials demonstrate that the campaign is being *"retooled—not retired."* [5]

One of the people challenging the injunction was Emma Ireland. In her opening remarks, Emma addressed the court saying:

"I begin this by reminding the court and Shell Oil, via their legal representatives, that we are in a climate and nature crisis. These crises are fueled by the burning of fossil fuels. The business of Shell Oil is the discovery, development and distribution of fossil fuels, ready for burning. Climate scientists around the world agree that all new oil and gas needs to stay in the ground if we are to have any chance of a livable future. Protest acts as a way to raise the alarm. "

Speaking after the ruling, Charles Phillip Laurie, a father of three, Quaker and retired Civil Engineer said:

"In 1988 Shell released a report detailing the predicted climate impact of continued fossil fuel usage. It summed up the position by stating that by the time the impact was detectable it might be too late to avert disaster. Well we are well beyond that now. By granting injunctions in favour of Shell, the court is absolving Shell of responsibility for their actions. They are insulating them from criticism and from protest. However, they can never be wholly immune from the consequences of the climate crisis and there will always be those that want to hold them to account."

A Just Stop Oil spokesperson said:

"Shell's lawyers are right. For as long as the UK government continues to allow the extraction of fossil fuels and the export of weapons to genocidal states like Israel and treats its own citizens of conscience like criminals and terrorists, there will be resistance. For as long as climate criminals like Shell are allowed to hide behind private laws instead of facing justice in the International Criminal Court, there will be resistance. Just Stop Oil may have ended but our supporters will continue to tell the truth in court and challenge the UK's oppressive anti-protest laws."

Shell's own internal research shows that the company understood the link between fossil fuels and climate change as far back as the 1980s. A confidential 1988 report warned that burning oil and gas was a major

cause of rising carbon dioxide levels and predicted severe environmental and social impacts if emissions were not reduced. Despite this knowledge, Shell went on to publicly cast doubt on climate science and continued expanding fossil fuel production. Documents later published by the Union of Concerned Scientists revealed that Shell and other oil companies took part in coordinated efforts to mislead the public about the dangers of fossil fuels and to block government action on climate change.[6] [7] [8]

More recently, a report by the United States Senate Budget Committee found that Shell's actions continue to contradict its public climate pledges. The investigation noted that although Shell promotes "net-zero" goals, its internal communications and investment plans show an ongoing commitment to oil and gas expansion. The report cited Shell executives acknowledging that the company intends to extract fossil fuels "for as long as possible" and highlighted Shell's plan to keep production levels stable until at least 2030 while investing tens of billions of dollars in new oil and gas projects. The Committee concluded that such strategies are incompatible with the targets of the Paris Agreement. [9]

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: https://juststopoil.org/press-media

Website: https://juststopoil.org/

Facebook: https://www.facebook.com/JustStopOil/

Instagram: https://www.instagram.com/just.stopoil/

Twitter: https://twitter.com/JustStop_Oil

Youtube: https://juststopoil.org/youtube

TikTok: https://www.tiktok.com/@juststopoil

Notes to Editors

[1] Just Stop Oil is a member of the A22 Network of civil resistance projects.

April 26th 2025 was the last Just Stop Oil action, but our supporters will continue to tell the truth in the courts, speak out for our political prisoners, and call out the UK's oppressive anti-protest laws.

Just Stop Oil continues to rely on small donations from the public to make this happen.

[2] **10 April 2022: Fuel shortage grips Britain: One in three petrol stations in the South are CLOSED after eco mob cause ten days of chaos at oil terminals** https://www.dailymail.co.uk/news/article-

10704779/Petrol-stations-fuel-shortage-Just-Stop-Oil-Extinction-Rebellion-protest-block-oil-depots.html

[3] **5th May 2022: Shell obtains injunctions against UK climate protests** https://www.reuters.com/business/energy/shell-obtains-injunctions-against-uk-climate-protests-2022-05-06/

[4] **Petrol station actions 26 August 2022** https://www.theguardian.com/environment/2022/aug/26/just-stop-oil-protesters-blockade-central-london-petrol-stations

[5] All legal documents here: https://www.noticespublic.com/

[6] https://www.scientificamerican.com/article/shell-grappled-with-climate-change-20-years-ago-documents-show/

[7] https://www.climatefiles.com/shell/1988-shell-report-greenhouse/

[8] https://www.ucs.org/resources/climate-deception-dossiers/

[9] https://www.budget.senate.gov/imo/media/doc/fossil_fuel_report1.pdf

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Next Post →

Support
Just Stop Oil

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This action is not currently available.

Action Network

Follow us on social media.

About us

Just Stop Oil was a nonviolent civil resistance group in the UK. In 2022 we started taking action to demand the UK Government stop licensing all new oil, gas and coal projects. We have won on this. **Civil resistance works.**

Just Stop Oil ended its street campaign in 2025, whilst we continue to support our action takers through the courts and in prison.

FAQs | **Research**

Contact us

Press enquiries: juststopoilpress@protonmail.com
General enquiries: info@juststopoil.org
Donation enquiries: juststopoilgiving@protonmail.com
Volunteer enquiries: gettinginvolvedjso@protonmail.com
Book a speaker: contact@juststopoil.org

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ADD YOUR NAME

JUST STOP OIL

HELP SUPPORT OUR ACTION TAKERS THROUGH THE COURTS

Low Wage Supporter

Show solidarity with those taking action with Just Stop Oil's with a low wage monthly donation.

£4 per month

Subscribe

Most popular

Standard Supporter

Give an hour's wage each month to make our resistance movement possible and join as a supporter.

£15 per month

Subscribe





Can’t commit to a monthly donation?
You can make a one-off donation with no fees here.

How do my donations help?
The street campaign may be over, but hundreds of good people are still being dragged through the courts with fines, prison time, electronic tags and isolating curfews. We rely on small monthly donations from the public to fund the support team that they need.

Need to change your donation?
We rely on small donations from members of the public to keep up our support of those in the courts and prisons. If you want to cancel or amend your donation, please head here.

Support Just Stop Oil

£500.00

Change amount

Make a one-off gift

Supported payment methods:



SINCE WE STARTED (FEB 2022)

NAME RECOGNITION FOR JUST STOP OIL

92%

52%

OF BRITONS HAVE AN UNFAVOURABLE OPINION OF THE OIL AND GAS INDUSTRY

100%

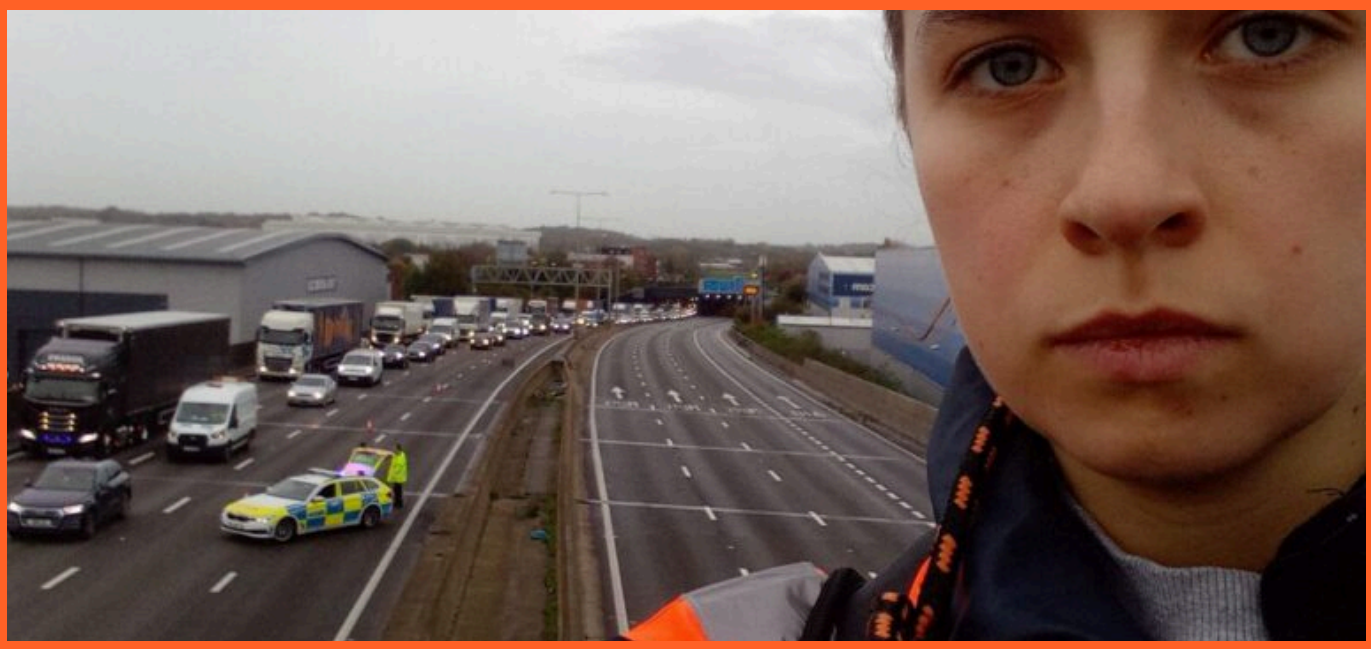
OF MAJOR POLITICAL PARTIES (EXCEPT THE TORIES) HAVE ADOPTED OUR KEY DEMAND, NO NEW OIL, GAS OR COAL

58%

OF THE PUBLIC SUPPORT OUR DEMAND

GLOBAL COVERAGE FOR OUR ACTIONS







54K

PRESS MENTIONS IN 2024

227B

POTENTIAL PRESS REACH

£2.1B

EQUIVALENT ADVERTISING VALUE

AS FEATURED IN

Daily Mail

DAZED

The New York Times



22ND APRIL 2023



26 MAY 2023

BANG FOR YOUR BUCK

Nonviolent civil resistance is the most cost-effective way of creating transformative change.

378

Tonnes of CO2E unburnt per pound (£) donated to Just Stop Oil

THE EXPERTS WHO STUDY SOCIAL MOVEMENTS NOT ONLY BELIEVE THAT STRATEGIC DISRUPTION CAN BE AN EFFECTIVE TACTIC, BUT THAT IT IS THE MOST IMPORTANT TACTICAL FACTOR FOR A SOCIAL MOVEMENT'S SUCCESS.

James Özden, Director of Social Change Lab





Margaret Klein Salamon – Clinical psychologist turned climate warrior

"IF WE DON'T ACT WE ARE DOOMED."



Chris Packham – Naturalist, nature photographer, television presenter and author

"DO PEOPLE NOT CARE ABOUT THEIR KIDS' FUTURES?"



Matthew Todd – Writer, editor and occasional stand-up comedian

"CIVIL DISOBEDIENCE IS OUR LAST AND ONLY HOPE."



Valerie Brown – Burning Pink candidate for London Mayor

"DISRUPTION IS PART AND PARCEL OF PROTEST, IT IS HOW YOU GET ATTENTION."


Dale Vince – Green industrialist and founder of Ecotricity
"THE NEXT WAVE OF REBELLION IS COMING"
Naomi Klein – Author, professor and social activist

2000+ PEOPLE DONATE MONTHLY IN SUPPORT OF RESISTANCE. CAN YOU?

DONATE NOW



From: Just Stop Oil <info@juststopoil.org>
Sent: 28 April 2026 16:45
To: LON ExxonMobil Service
Subject: Join the Festival of Revolutions- an International Gathering

External email
First time sender

JUST STOP OIL

Dear NRF,

Just Stop Oil has hung up the hi-vis, but there's still plenty going on in the wider movement!

In a time of fragmentation and rising authoritarianism, The Festival of Revolutions will be gathering thousands of people and dozens of movements into one shared online international space, to connect, learn, imagine, and act.

On 9th May, join the Festival of Revolutions held by Revolution in the 21st century.

Join the Festival of Revolutions!



Featuring talks from Kazu Haga, A'ida Al Shibli, A'ida Al-Shibli, Jeremy Lent, Sabine Lichtenfels, Roger Hallam, Pete the Temp and many more. The Festival of Revolutions is creating spaces in which relationships can form, connections can strengthen, and new collaborations can emerge.

The Festival will be an information-rich space, with radical, honest and revolutionary conversations that will help us build our collective power.

Register for Tickets Here!

Just Stop Oil



aberdeenspsc and **4 others**

aberdeenspsc 6w

Today we occupied the headquarters of Dana Petroleum in Aberdeen, demanding answers to crucial questions that the company has so far failed to answer.

Why did Dana Petroleum go into business with a genocidal state, to explore gas in waters internationally recognised as Palestinian?

Will Dana Petroleum now walk away from its contract with Israel, now that its partner ENI has said it will no longer be exploring gas in the region?

Why have Dana Petroleum repeatedly failed to respond to concerned citizens, civil society organisations, journalists and politicians, who have all raised their concerns?

263 4

March 12

Log in to like or comment.

GREENPEACE



Oil and gas | Press Release

Greenpeace shines light on Shell's war profiteering



Graham Thompson
May 7, 2026

Greenpeace projects on Shell HQ as oil giant posts $53,241-per-minute profits

Photographs and video of the various projections are available here.

In response to Shell announcing their first-quarter profits this morning, Maja Darlington, climate campaigner for Greenpeace UK, said:

“As bombs fall and bills go up, more billions roll in for Shell, one of the UK’s top war profiteers. Shell is making $53,241 per minute while millions of people across Britain are dreading their next energy bill. Our fossil fuelled economy is rigged in favour of oil giants like Shell – whether it’s war or wildfires, they profit, we pay.

“In the twenty-first century we have cheaper, cleaner alternatives that we can use to power Britain without anybody being bombed. We don’t need to let the fossil fuel industry hold us to ransom and pass on the costs of endless wars and limitless pollution. The cost of living crisis, the climate crisis, the middle-east crisis, these are all oil industry operating costs. We need to stop subsidising them, introduce new taxes to make them pay and start taxing their obscene profits properly.”

At the weekend a team of Greenpeace activists projected the truth about the source of Shell’s huge profits, announced at 7am this morning, onto their global headquarters by the Thames in London.

The team projected onto the huge office building from a number of different angles, including from the other side of the Thames, and also onto a nearby Shell garage, all in central London.

The projection includes footage from the conflict in Iran as well as footage of the extreme weather that has been increasing around the world in recent years, and footage of Shell’s CEO Wael Sawan.

Photographs and video of the various projections are available here.

ENDS

Contact

Greenpeace UK Press Office – press.uk@greenpeace.org or 020 7865 8255

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Activism



Activism



Activism



30 April, 2026 GP0SU8UTN
Projection Action in London Exposes Source of Shell's Profits - News Access (Portrait)
Restrictions Apply
★★★★ (E)



30 April, 2026 GP0SU8UWG
Projection Action in London Exposes Source of Shell's Profits - News Access (Wide)
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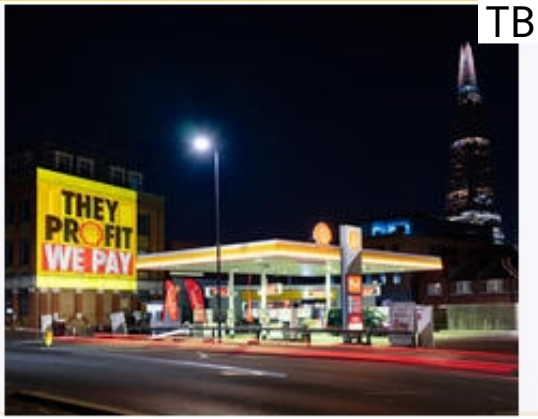
TB/590



30 April, 2026 GP0SU8TVH
Projection Action in London Exposes Source of Shell's Profits
Restrictions Apply
★★★★★★ (B)



30 April, 2026 GP0SU8TV4
Projection Action in London Exposes Source of Shell's Profits
Restrictions Apply
★★★★★★ (B)



30 April, 2026 GP0SU8TUW
Projection Action in London Exposes Source of Shell's Profits
Restrictions Apply
★★★★★★★ (A)



30 April, 2026 GP0SU8TVP
Projection Action in London Exposes Source of Shell's Profits
Restrictions Apply
★★★★★★ (B)





HS8/240





April, 2026 GP0SU8TV6
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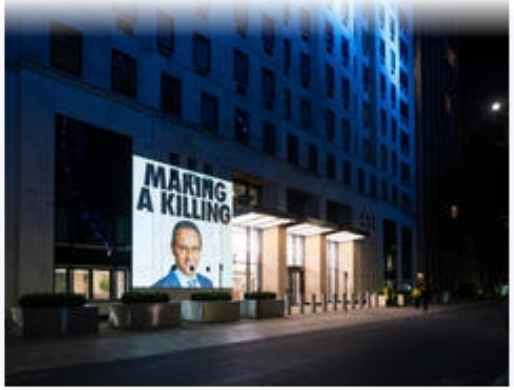
★★★★★ (C)



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Projection Action in London Exposes Source of
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Projection Action in London Exposes Source of
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Shell's Profits
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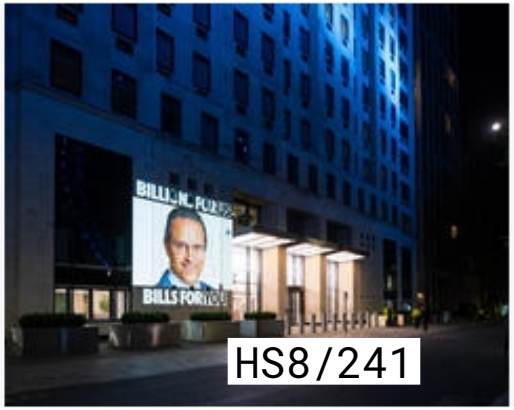


Stories Greenpeace

Greenpeace Pictures of the Week

Greenpeace International

15 May 2026 • 3 min read

Oil company war profiteering, a deep arctic expedition, and a planned megafarm in Spain. Here are some images from Greenpeace work around the world over the past week.



© Greenpeace

GB U.K. – Greenpeace UK activists project the truth about the source of Shell's huge profits onto their global headquarters by the Thames in



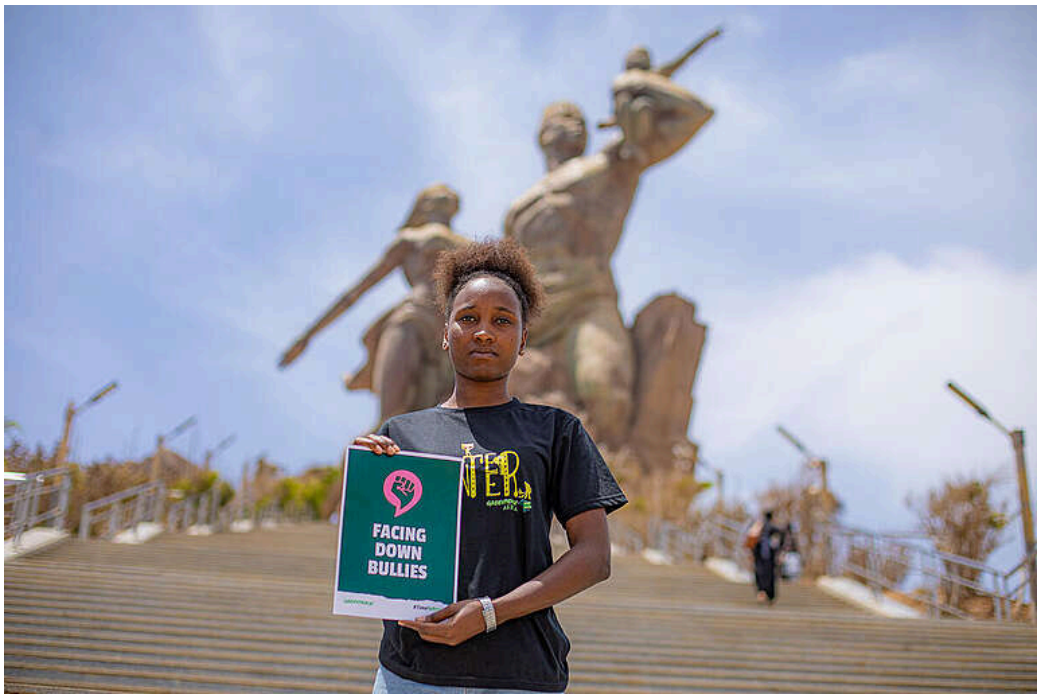
© Max Cavallari / Greenpeace

GR Greece – Damaged component on board the ship Mystere, part of the Global Sumud Flotilla, found adrift by Greenpeace after the flotilla was illegally intercepted in international waters by Israeli forces as they attempted to break the long standing illegal blockade of Gaza.



© Christian Åslund / Greenpeace

depth of 3000m to gather scientific evidence of the diversity, distribution and connectivity of fauna in Arctic deep-sea ecosystems in the mining area – with particular focus on vulnerable, rare, endemic and undescribed species – in order to trigger international, regional and national conservation protocols. The expedition will be live-streamed via this page.



© Momath KANE / Greenpeace

SN Senegal – Facing Down Bullies, a Greenpeace campaign push against the Energy Transfer SLAPP case against Greenpeace International and USA. Greenpeace Africa volunteers in Congo unite in solidarity, raising their voices against corruption, corporate greed, and authoritarianism. Together, we speak out and take action to defend our rights, freedoms, and environment – because power belongs to the people.



© Greenpeace / Lara Aparicio

ES Spain- Greenpeace Spain opposes the construction of a large-scale poultry farm in San Clemente (Cuenca) that would house nearly a million hens.



© Greenpeace / Matthew Kemp

NO Norway – Ahead of the 2026 Equinor AGM, Greenpeace Norway activists project messages on the head office in Stavanger, Norway to protest the obscene profits made since the start of the Iran war pushed up global oil prices.



© Marten van Dijl / Greenpeace

NL Netherlands – Greenpeace Netherlands activists have disrupted the first-ever shareholder meeting of meat giant JBS in the Netherlands. At the Sheraton Hotel at Schiphol Airport, where the meeting took place, activists hung a banner dripping with fake blood that read: 'JBS: Keep your bloody business out of Africa'. Activists entered the meeting hall, where Greenpeace Director Marieke Vellekoop personally served an information request to the JBS CEOs. This document formally signals that Greenpeace Netherlands is taking legal action against the company. The goal of the legal battle is to block JBS's destructive expansion plans in Nigeria.

Greenpeace has been a pioneer of photo activism for more than 50 years, and remains committed to bearing witness and exposing environmental injustice through the images we capture.

To see more Greenpeace photos and videos, visit our Media Library .

#Photography

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Just Stop Oil
@JustStop_Oil

🦺 Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that make protests impossible at oil refineries, oil depots and even petrol stations.

💀 Our government issued 100 new oil and gas licences, confirming their disregard of human life. This is a last ditch attempt to stop our corrupt government taking more lives.

➡️ They know new oil and gas is genocide – take action now at juststopoil.org

11:18 AM · Sep 13, 2023 · **253.9K** Views

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United Kingdom

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Injunction

View the hearing and supporting documents

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- Re-re-amended Particulars of Claim – 23rd July 2025
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- Sealed Ellenbogen Order - 9th July Annual Review Hearing
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- Claimants' Skeleton Argument for Annual Review Hearing – 9 July 2025
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- Operating Sites Injunction - Amended Order dated 21 January 2025
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- Operating Sites Injunction – Notice and Consent Order
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- ESSO v PU - Trial Bundle 1 - 10.07.23
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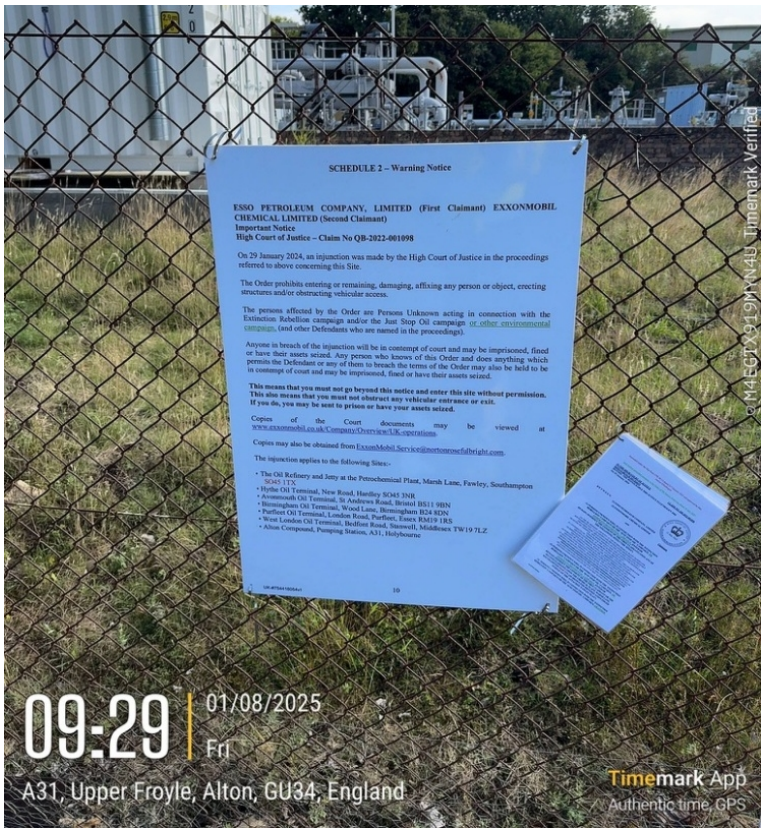
European region

Latest news and information about the European region

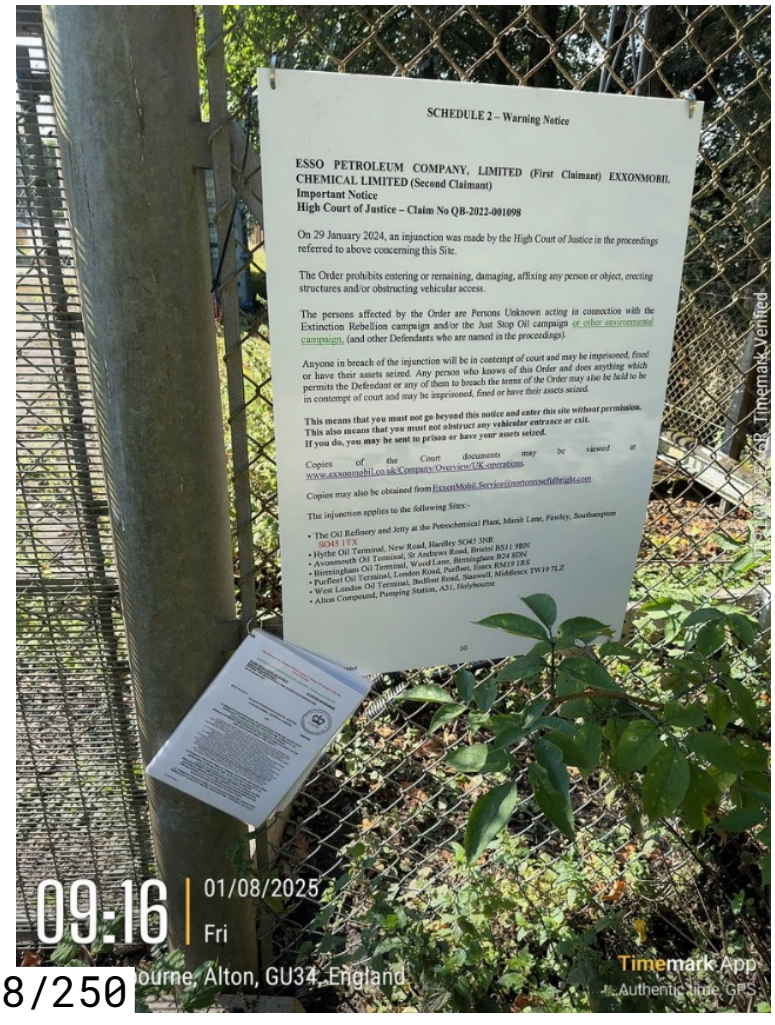
Evidence of Service – Amended Ellenbogen Order and amended Warning Notice

Alton Compound, Pumping Station – 01.08.25

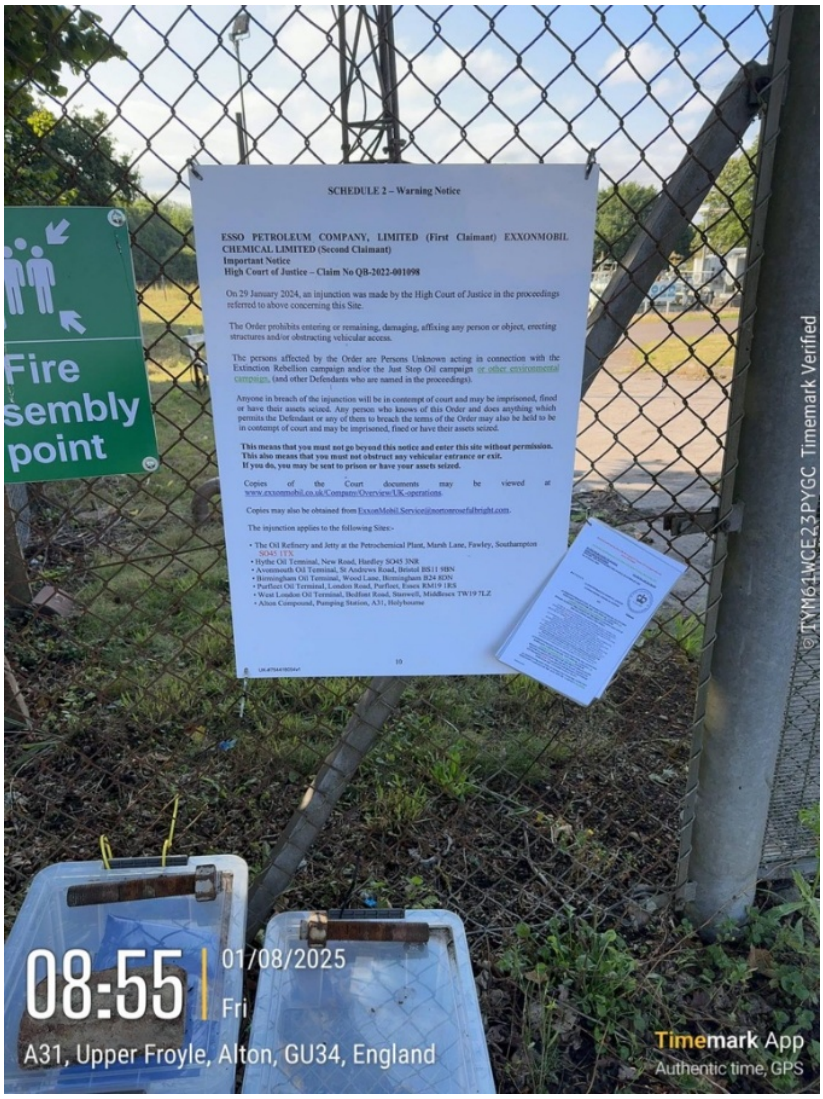
Alton Location 1 – West fence line



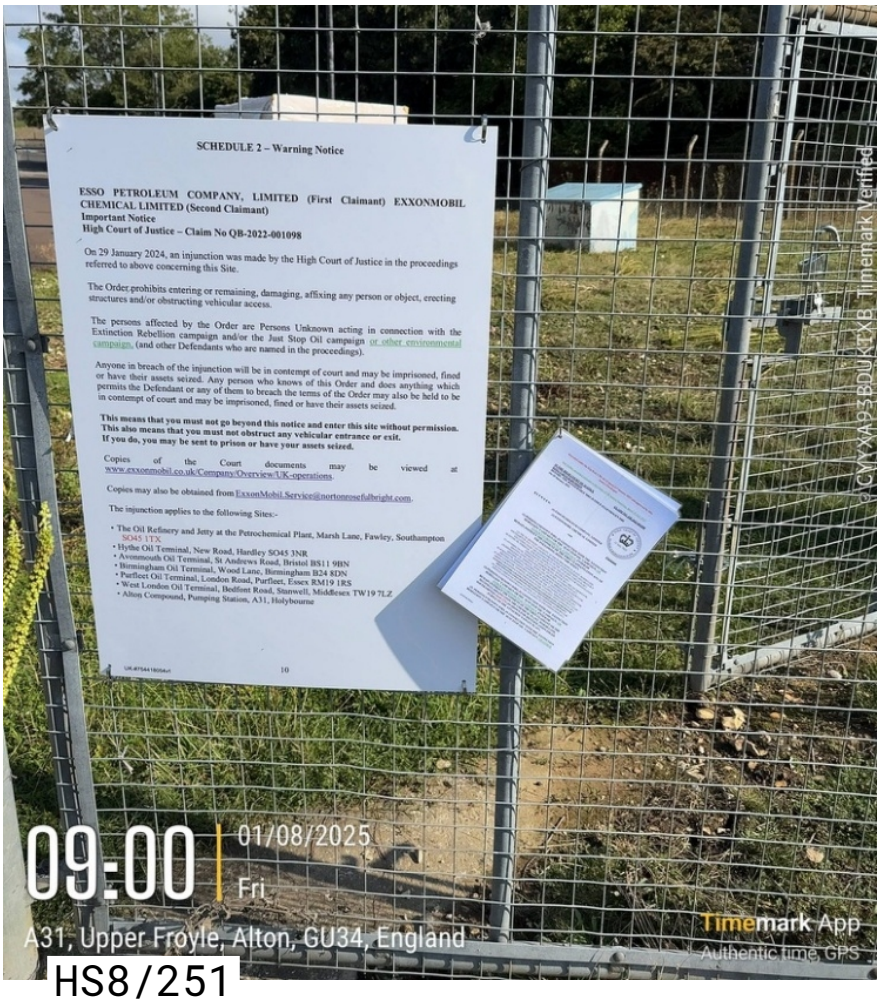
Alton Location 2 – Secondary main gate



Alton Location 3 – Main gate



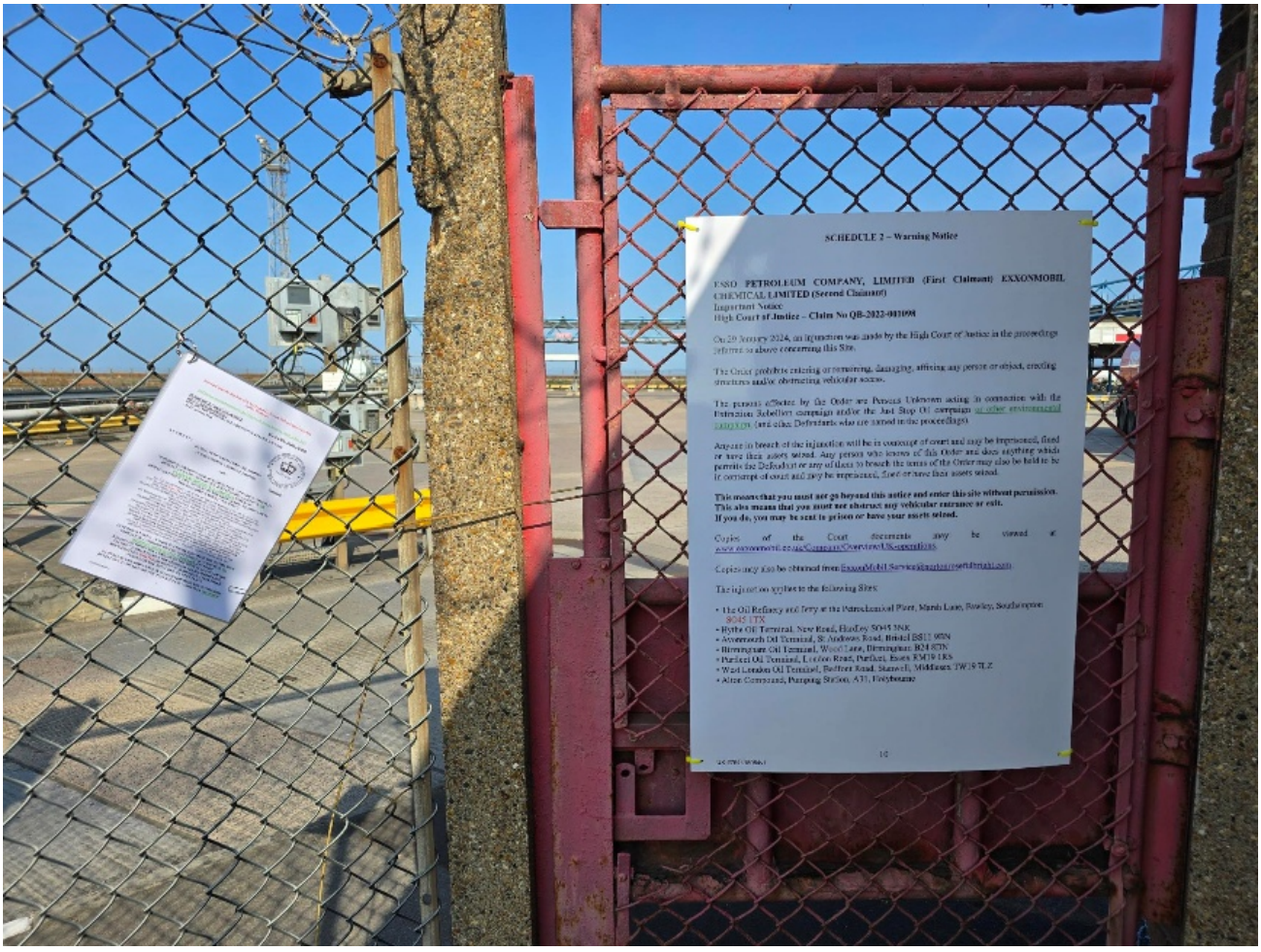
Alton Location 4 – Bottom gate



Avonmouth Oil Terminal – 06.08.25

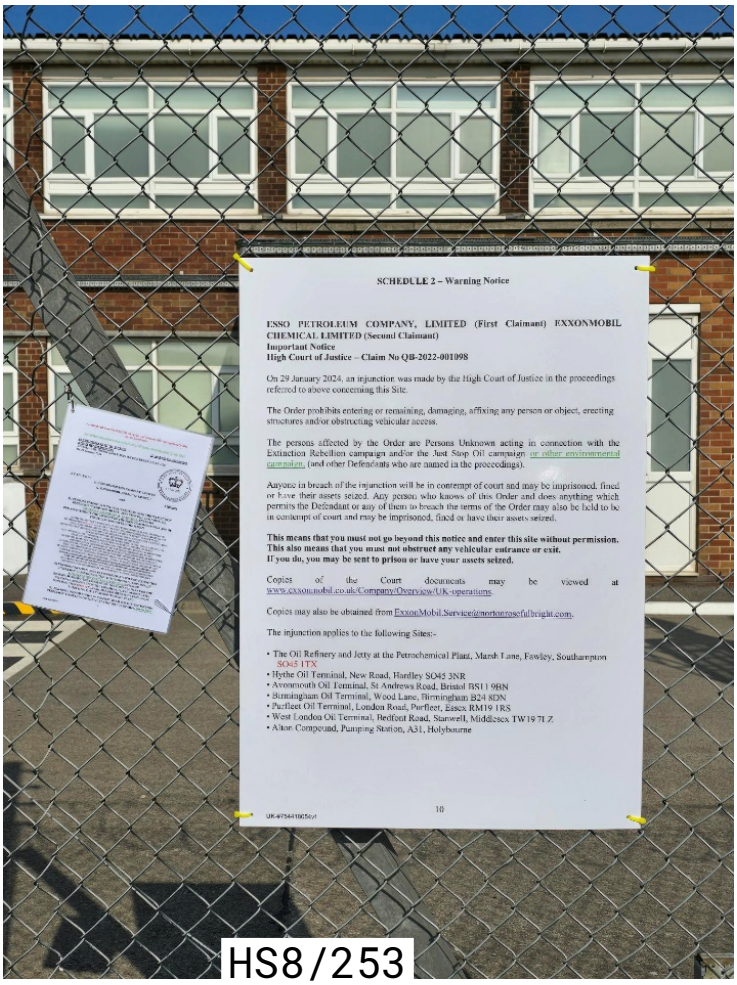
Avonmouth Location 1 – Main vehicle gates, next to gatehouse





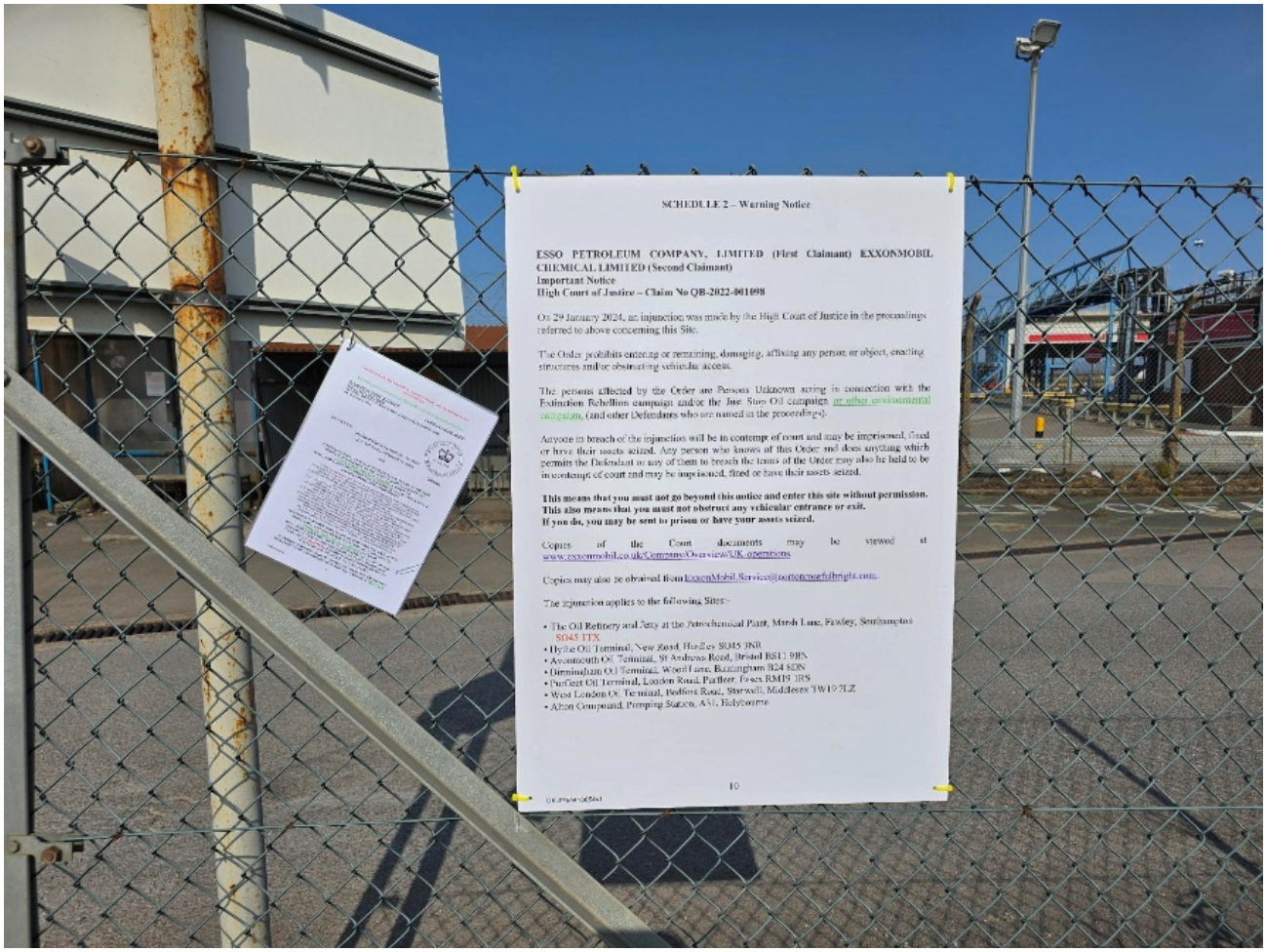
Avonmouth Location 2 – Main pedestrian gate to office buildings





Avonmouth Location 3 – Entrance to main car park and Bristol Port land behind





SCHEDULE 2 – Warning Notice

ESSO PETROLEUM COMPANY, LIMITED (First Claimant) EXXONMOBIL CHEMICAL LIMITED (Second Claimant)
Important Notice
High Court of Justice – Claim No QB-2022-001098

On 29 January 2024, an injunction was made by the High Court of Justice in the proceedings referred to above concerning this Site.

The Order prohibits entering or remaining, damaging, affixing any person or object, erecting structures and/or obstructing vehicular access.

The persons affected by the Order are Persons Unknown acting in connection with the Extinction Rebellion campaign and/or the Just Stop Oil campaign or other environmental campaign, (and other Defendants who are named in the proceedings).

Anyone in breach of the injunction will be in contempt of court and may be imprisoned, fined or have their assets seized. Any person who knows of this Order and does anything which permits the Defendant or any of them to breach the terms of the Order may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

This means that you must not go beyond this notice and enter this site without permission. This also means that you must not obstruct any vehicular entrance or exit. If you do, you may be sent to prison or have your assets seized.

Copies of the Court documents may be viewed at www.exxonmobil.co.uk/CompanyOverview/UK-operations

Copies may also be obtained from ExxonMobil.Service@nortonrosefulbright.com.

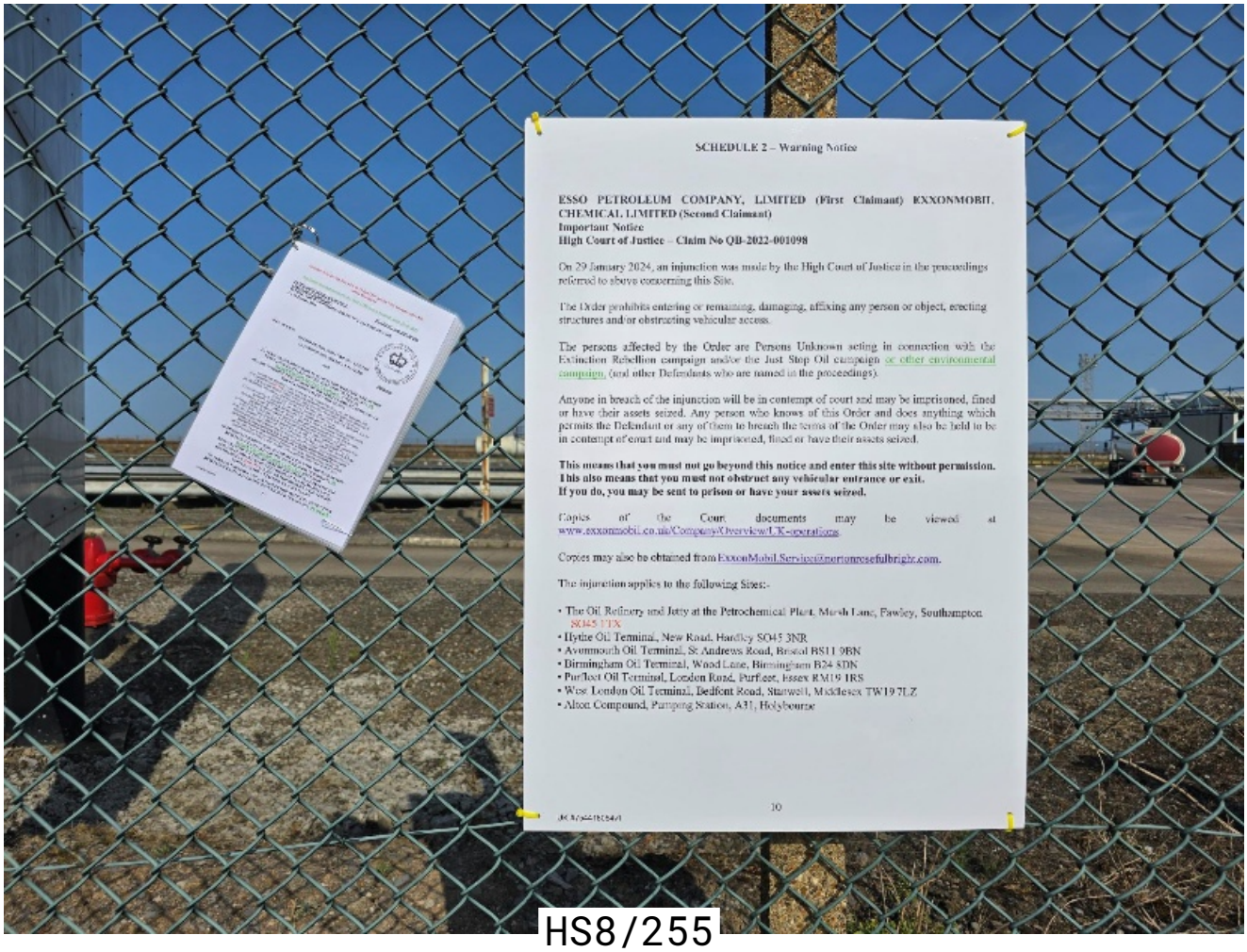
The injunction applies to the following Sites:-

- The Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Fawley, Southampton SO45 1TX
- Hythe Oil Terminal, New Road, Hardley SO45 3NR
- Avonmouth Oil Terminal, St Andrews Road, Bristol BS11 9BN
- Birmingham Oil Terminal, Wood Lane, Birmingham B24 8DN
- Purfleet Oil Terminal, London Road, Purfleet, Essex RM15 4RS
- West London Oil Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ
- Alton Compound, Pumping Station, A31, Holybourne

10

Avonmouth Location 4 – Other side of vehicle gates at the bottom of the site access ramp





SCHEDULE 2 – Warning Notice

ESSO PETROLEUM COMPANY, LIMITED (First Claimant) EXXONMOBIL CHEMICAL LIMITED (Second Claimant)
Important Notice
High Court of Justice – Claim No QB-2022-001098

On 29 January 2024, an injunction was made by the High Court of Justice in the proceedings referred to above concerning this Site.

The Order prohibits entering or remaining, damaging, affixing any person or object, erecting structures and/or obstructing vehicular access.

The persons affected by the Order are Persons Unknown acting in connection with the Extinction Rebellion campaign and/or the Just Stop Oil campaign or other environmental campaign (and other Defendants who are named in the proceedings).

Anyone in breach of the injunction will be in contempt of court and may be imprisoned, fined or have their assets seized. Any person who knows of this Order and does anything which permits the Defendant or any of them to breach the terms of the Order may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

This means that you must not go beyond this notice and enter this site without permission. This also means that you must not obstruct any vehicular entrance or exit. If you do, you may be sent to prison or have your assets seized.

Copies of the Court documents may be viewed at www.exxonmobil.co.uk/Company/Overview/UK-operations.

Copies may also be obtained from ExxonMobil.Service@mortonfitzfulbright.com.

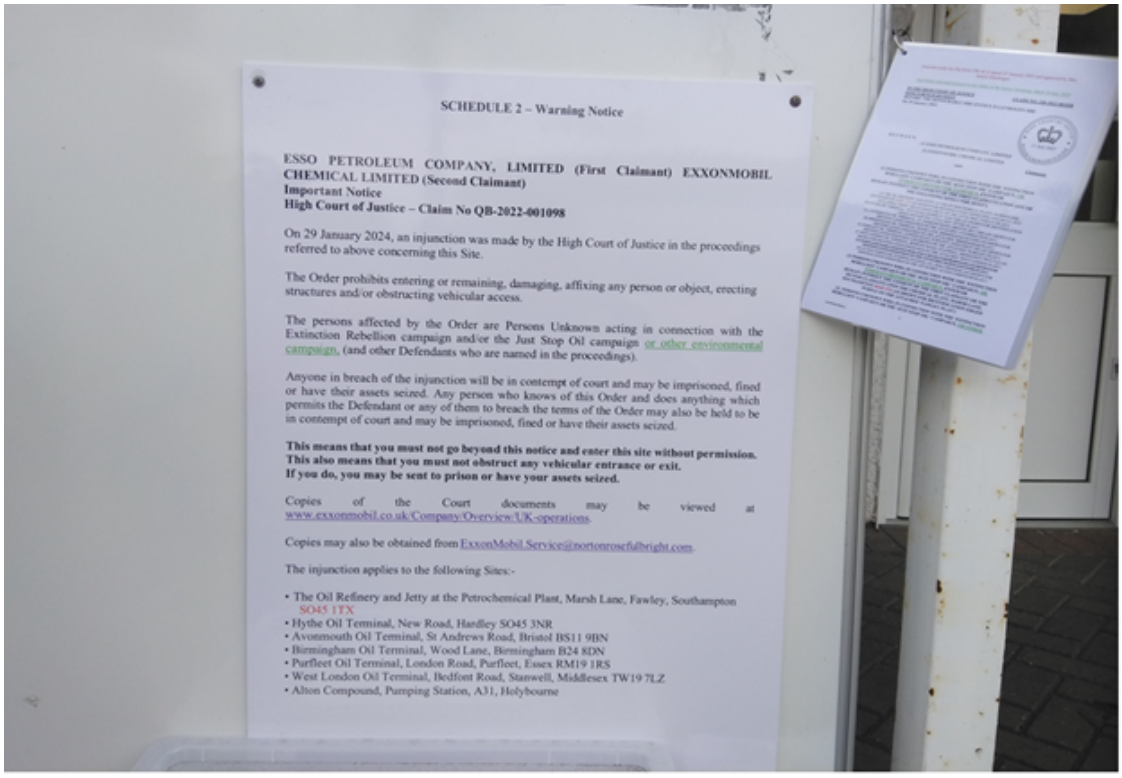
The injunction applies to the following Sites:-

- The Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Fawley, Southampton SO45 1TX
- Hythe Oil Terminal, New Road, Hardley SO45 3NR
- Avonmouth Oil Terminal, St Andrews Road, Bristol BS11 9BN
- Birmingham Oil Terminal, Wood Lane, Birmingham B24 8DN
- Purfleet Oil Terminal, Loeden Road, Purfleet, Essex RM19 1RS
- West London Oil Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ
- Alton Compound, Pumping Station, A31, Holybourne

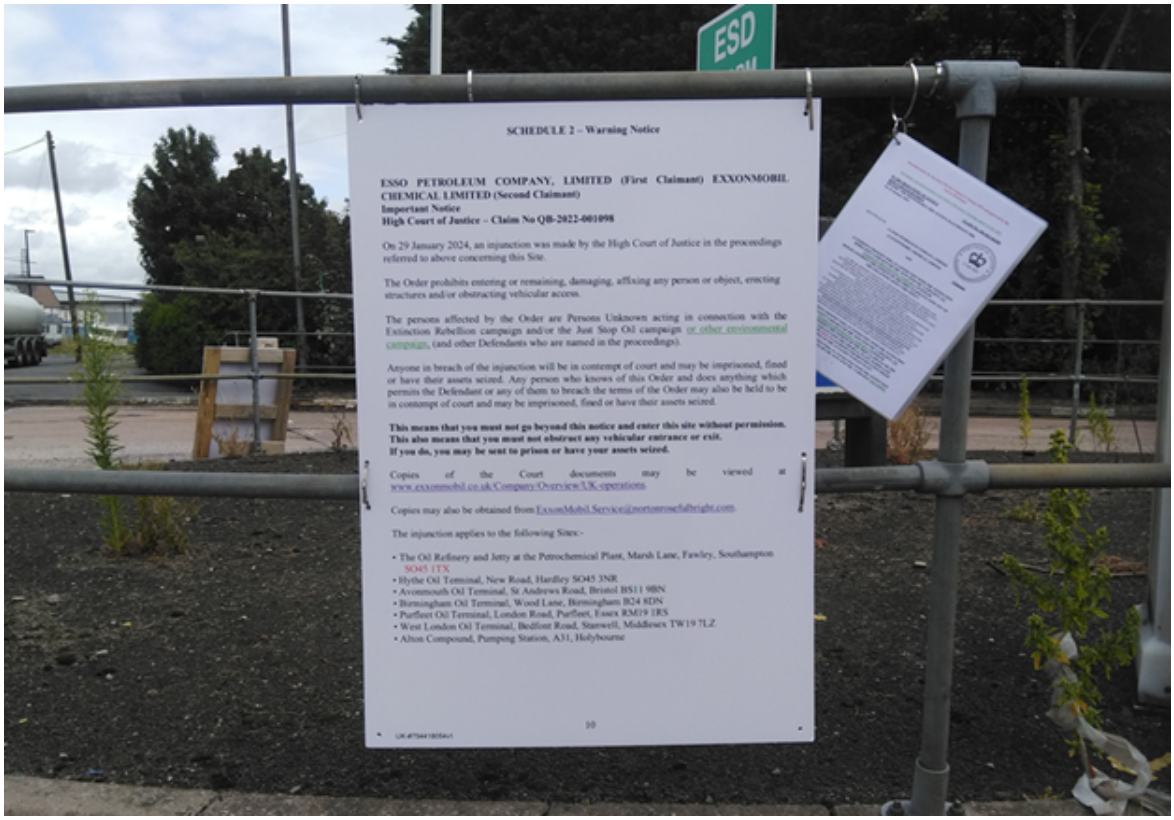
10

Birmingham Oil Location – 01.08.25

Birmingham Location 1 – Main entrance on Wood Lane



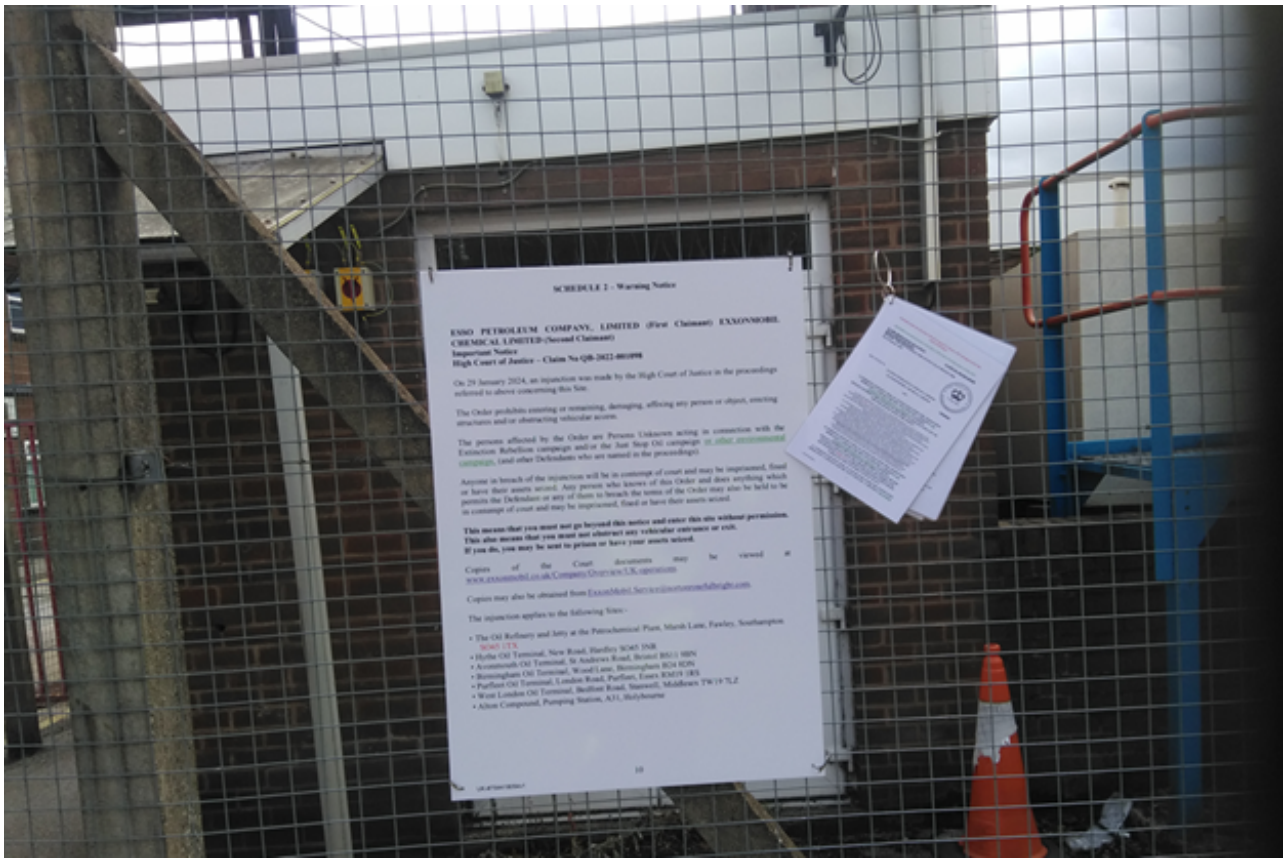
Birmingham Location 2 – Main vehicle entrance to Birmingham Terminal



Birmingham Location 3 – Pedestrian path directly outside Birmingham Terminal

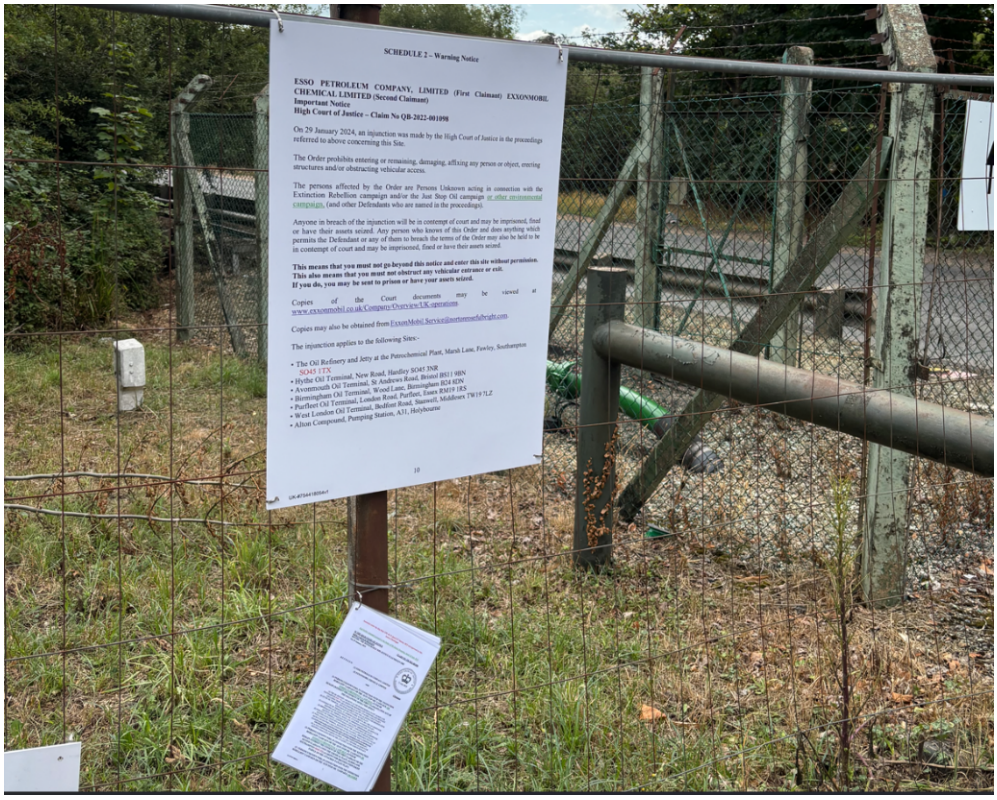


Birmingham Location 4 – Righthand side of pedestrian turnstile

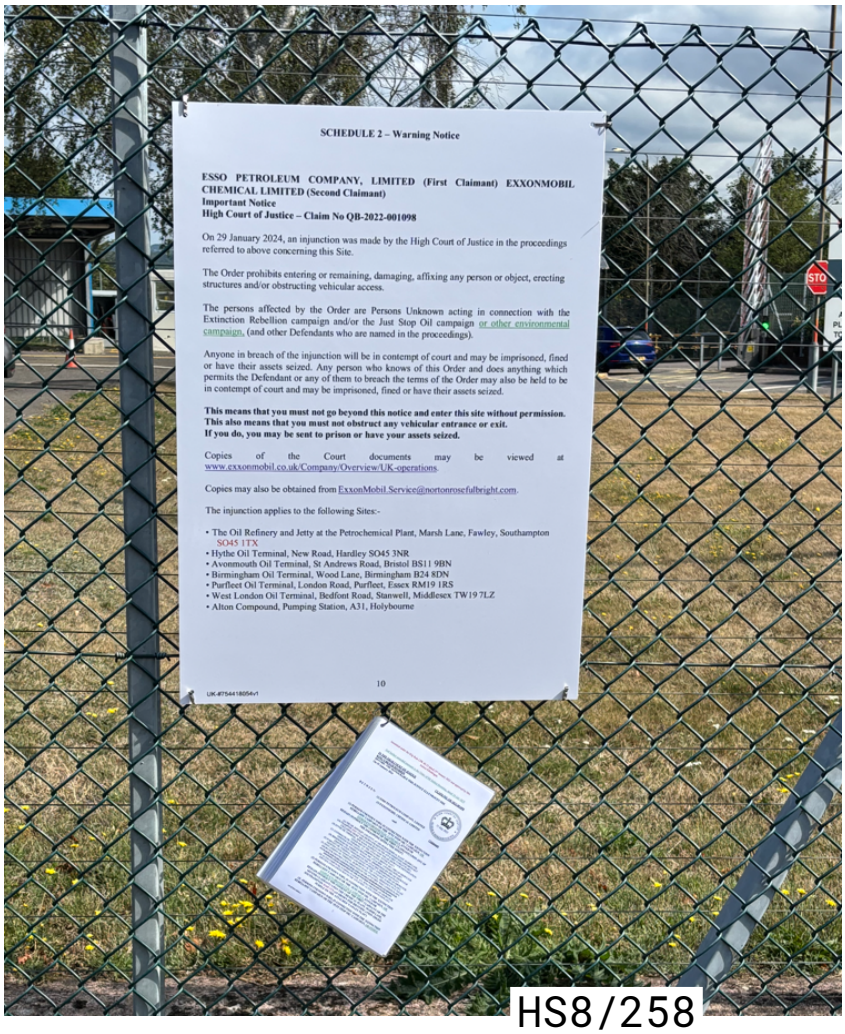


The Oil Refinery and Jetty at the Petrochemical Plant, Fawley – 05.08.25

Fawley Location 1 – Hythe Terminal & Gate 1 Access Route



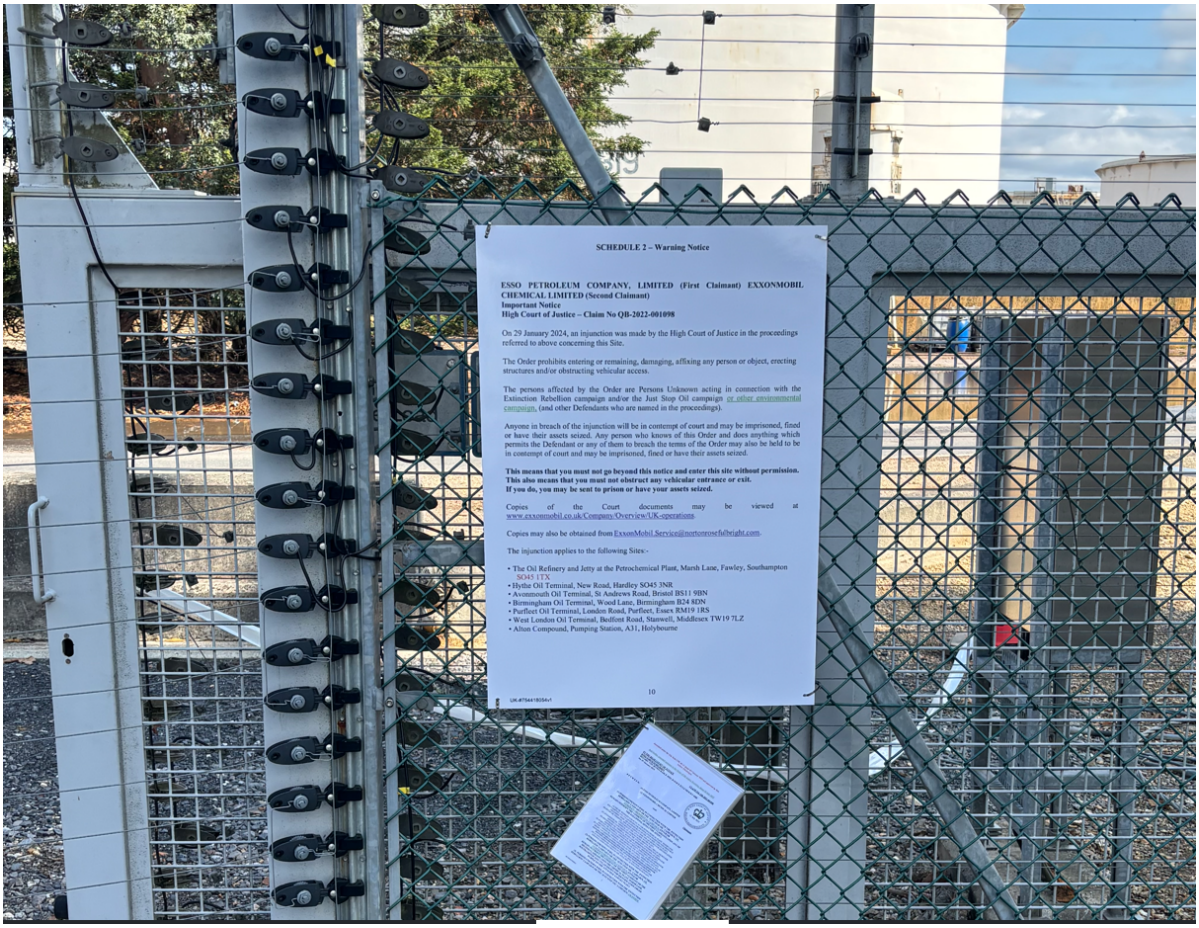
Fawley Location 2 – Gate 2 & Admin Drive Access Route



Fawley Location 3 – Gate 3 Access Route

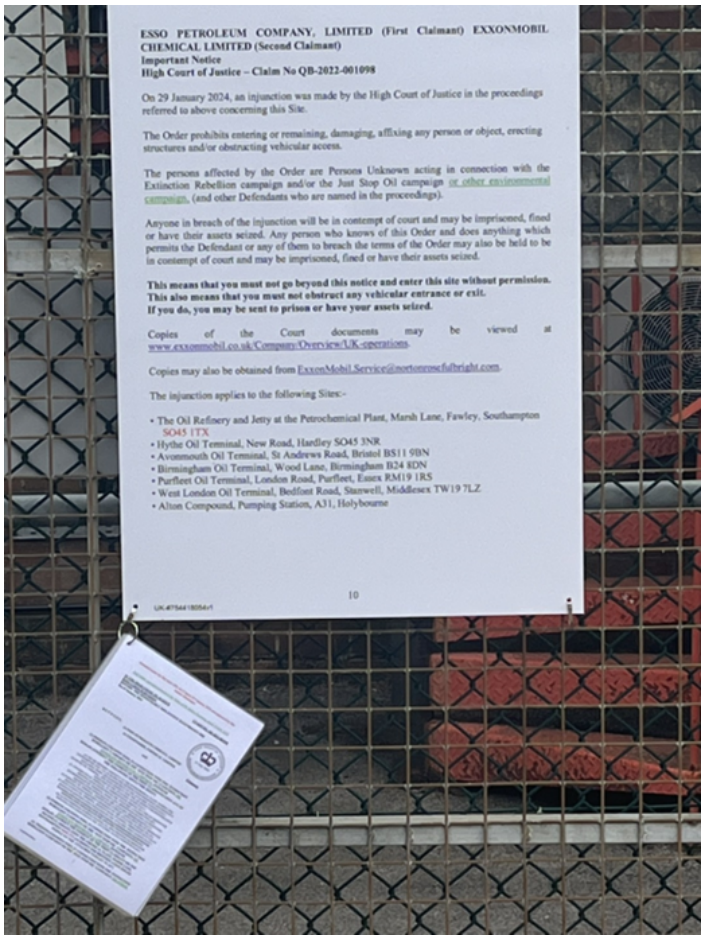


Fawley Location 4 – Wideload aka Greenbelt Side

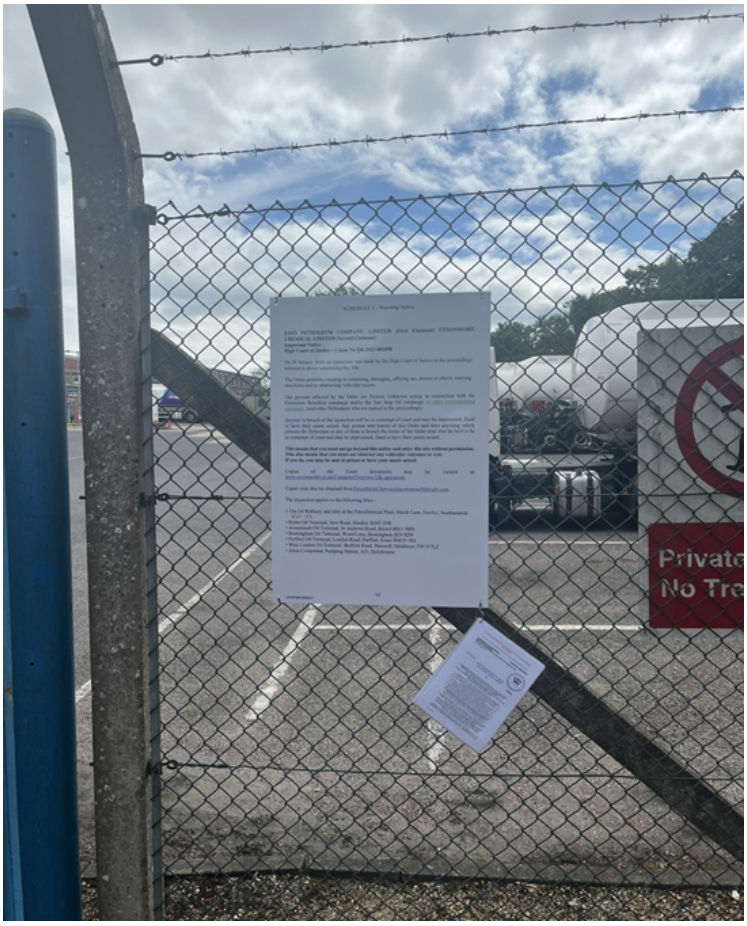


Hythe Oil Terminal – 31.07.25

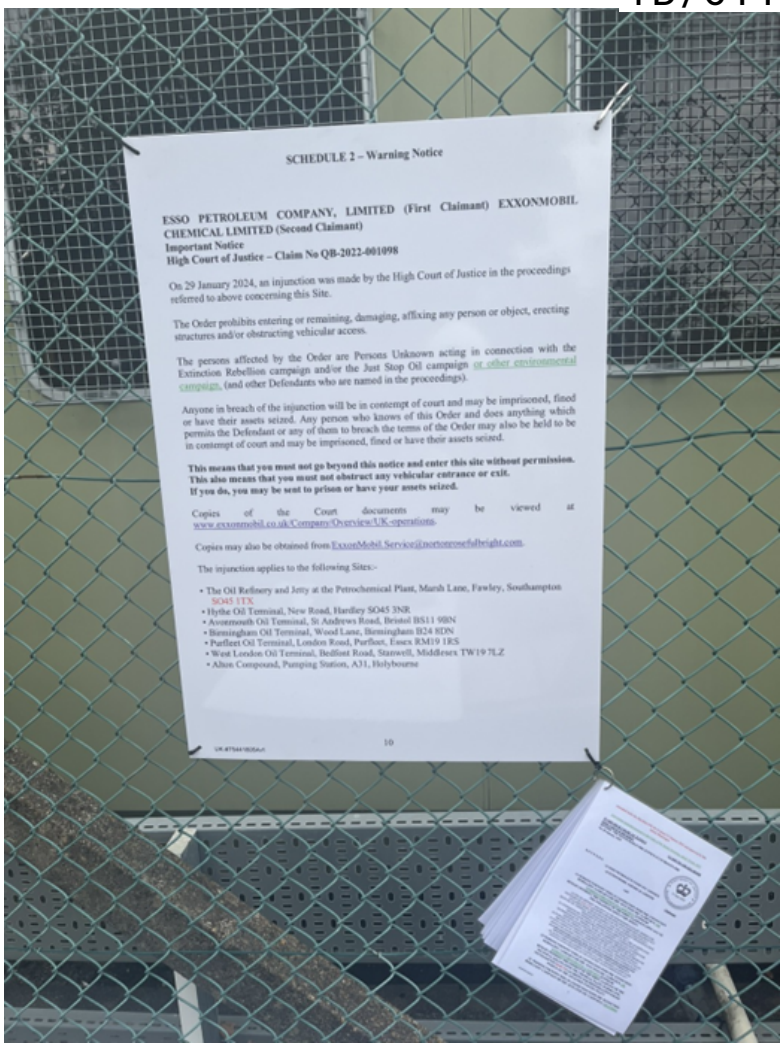
Hythe Location 1 - Main truck entrance gate



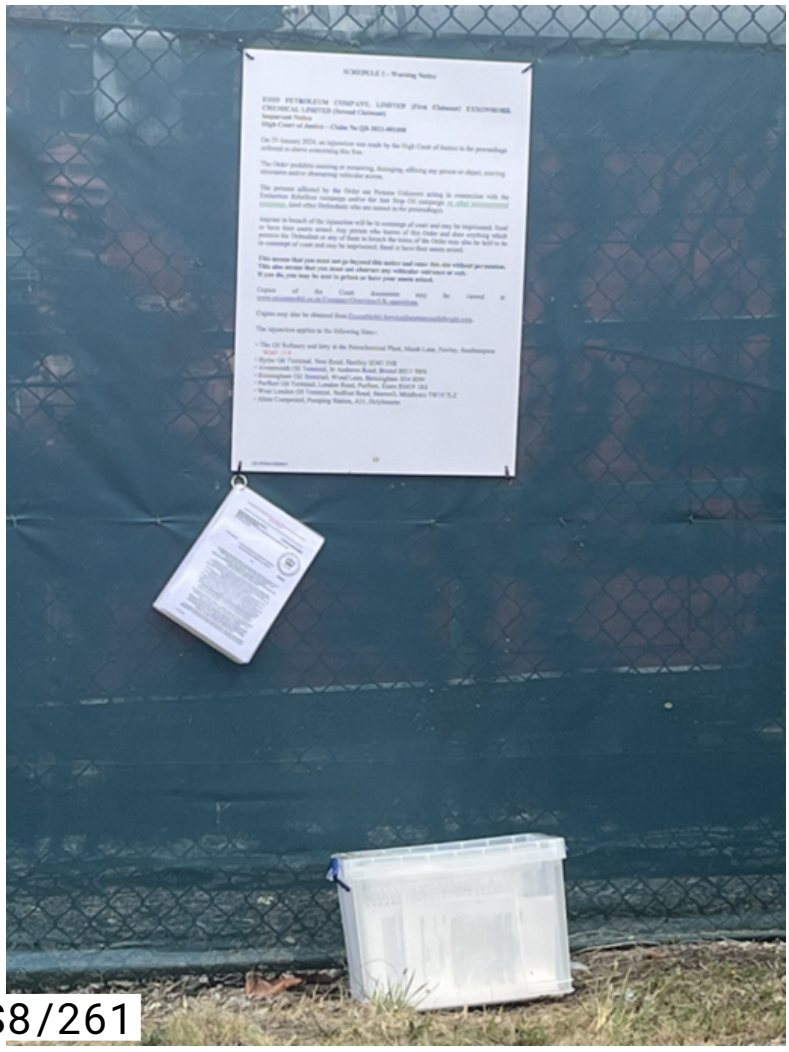
Hythe Location 2 – North emergency access gate



Hythe Location 3 – South emergency access gate

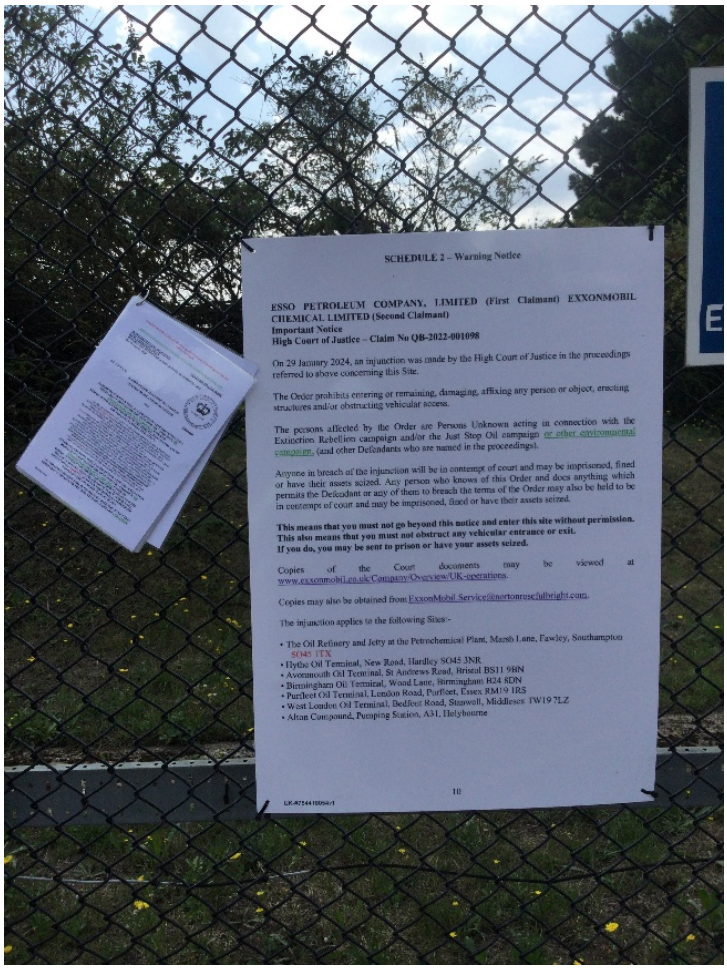


Hythe Location 4 – Right of the pedestrian walkway from visitor car park up to terminal

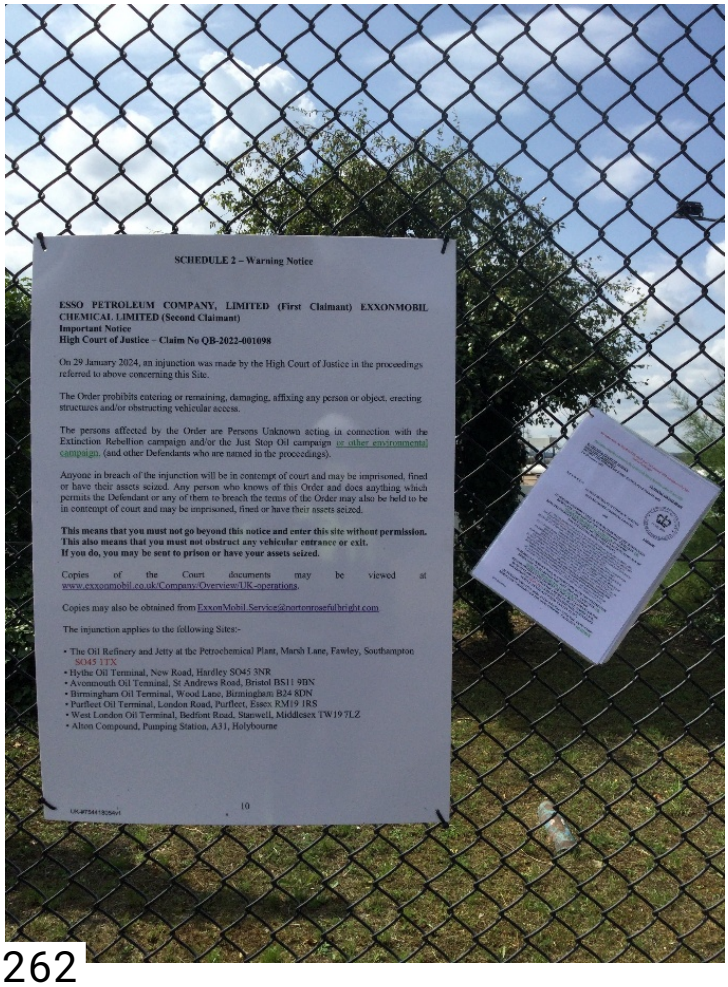


Purfleet Oil Terminal – 04.08.25

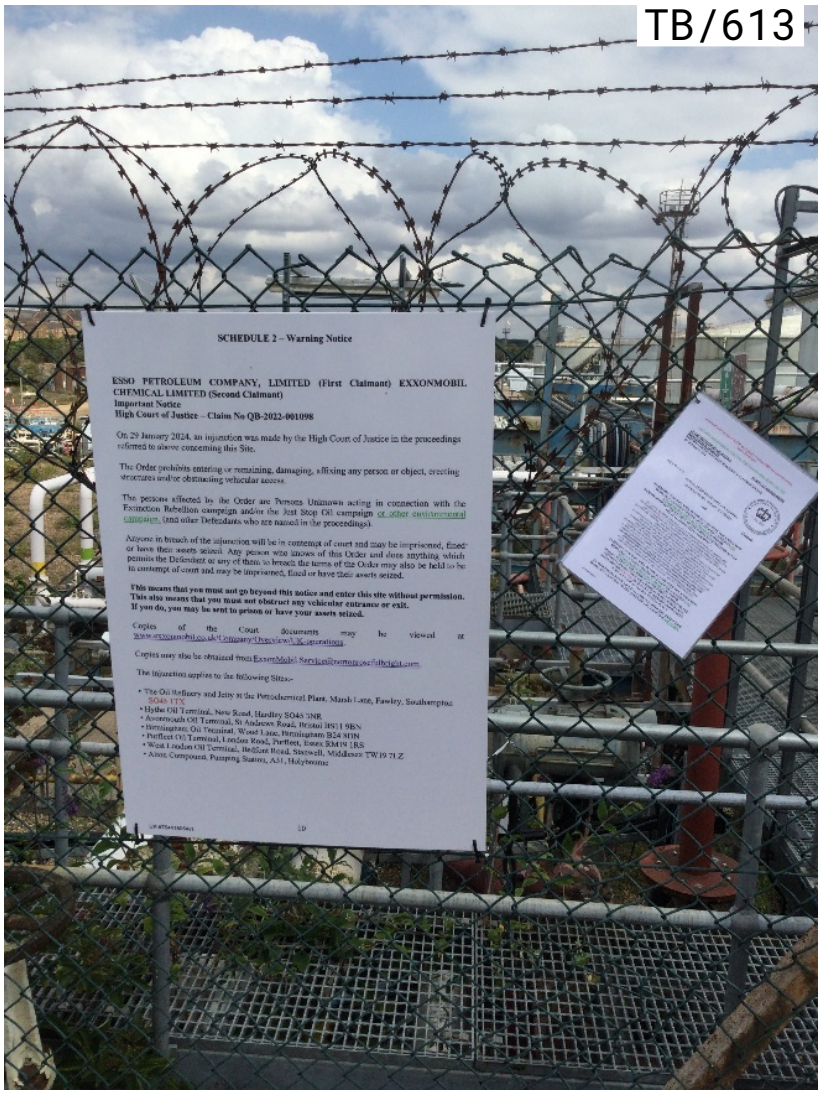
Purfleet Location 1 – Terminal vehicle entry



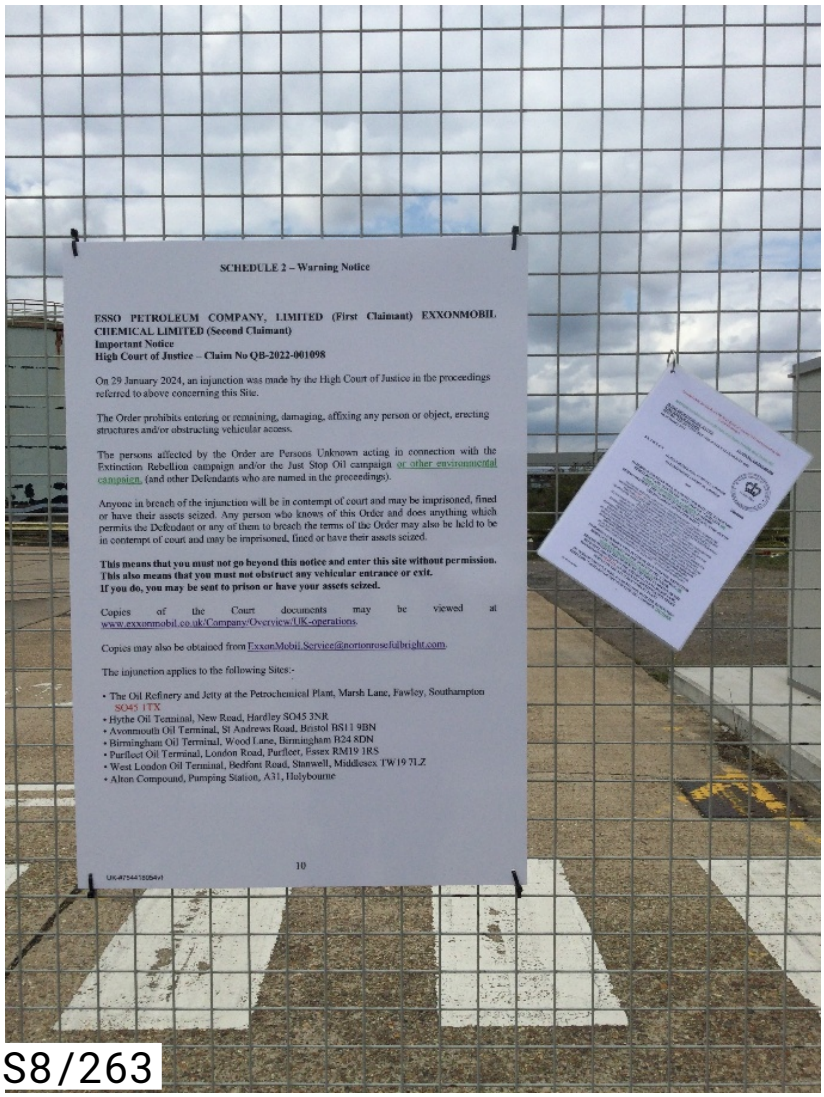
Purfleet Location 2 – Terminal vehicle exit



Purfleet Location 3 – Sea wall jetty gate



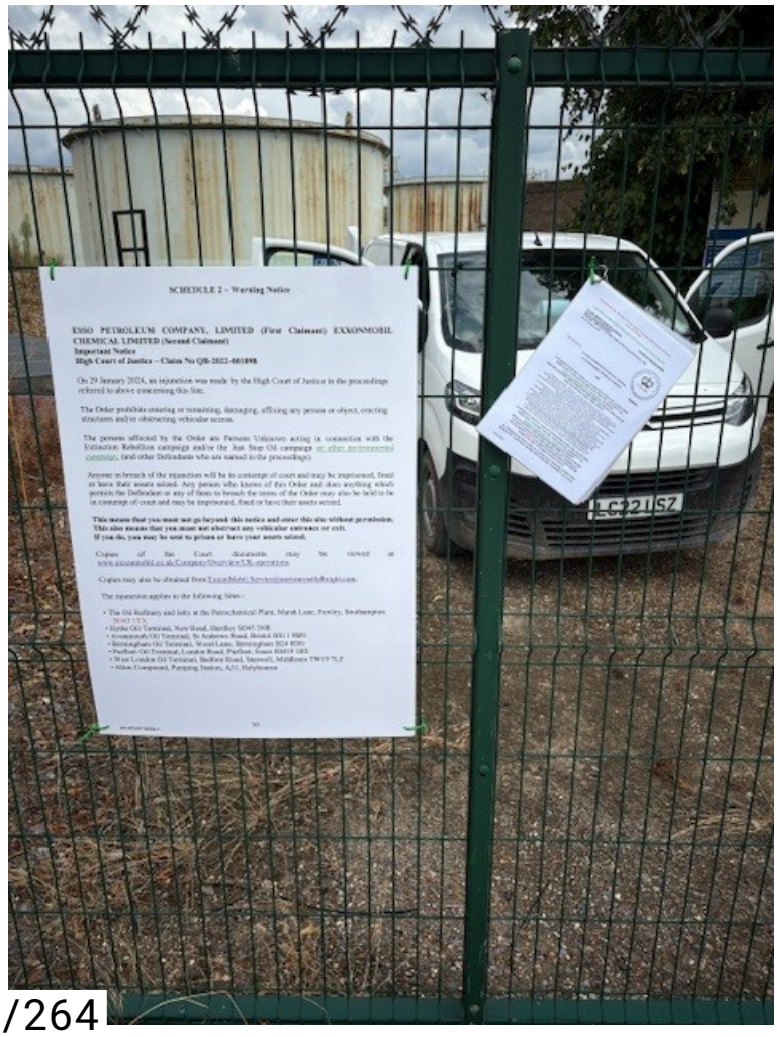
Purfleet Location 4 – Canteen entrance aka exit gate



West London Oil Terminal – 04.08.25

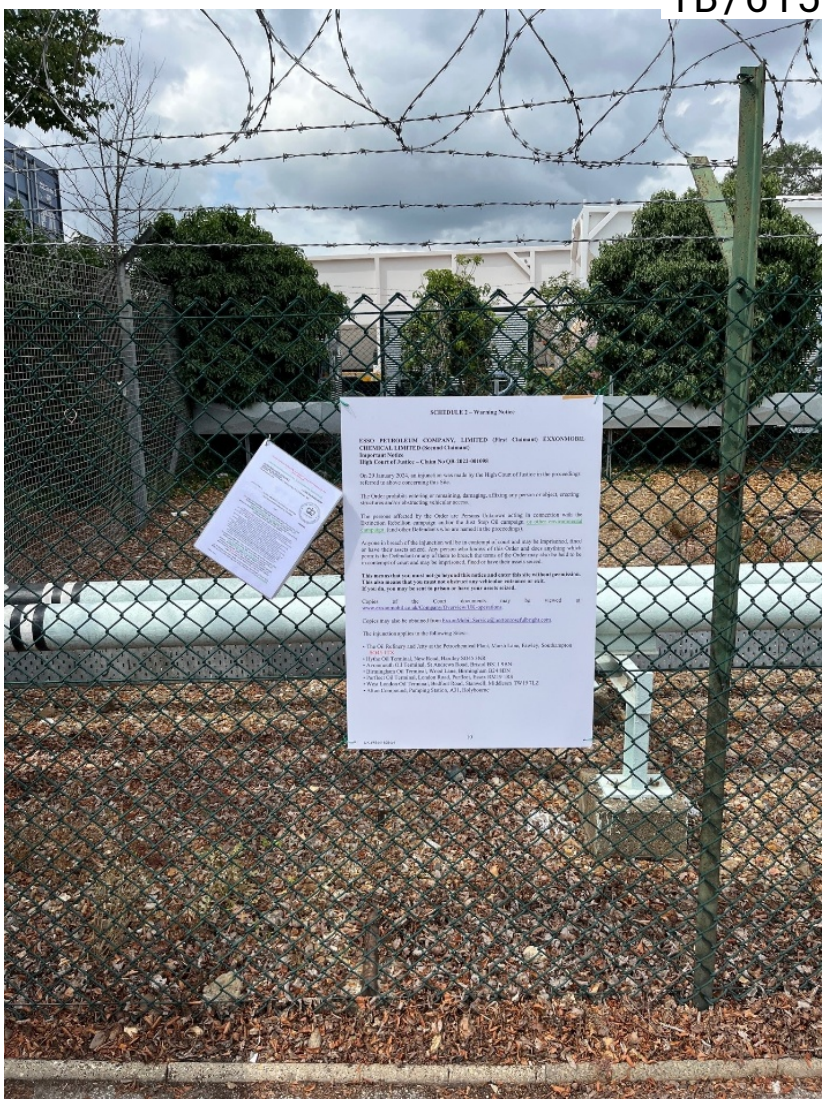


West London Location 1 – West side by the football pitch

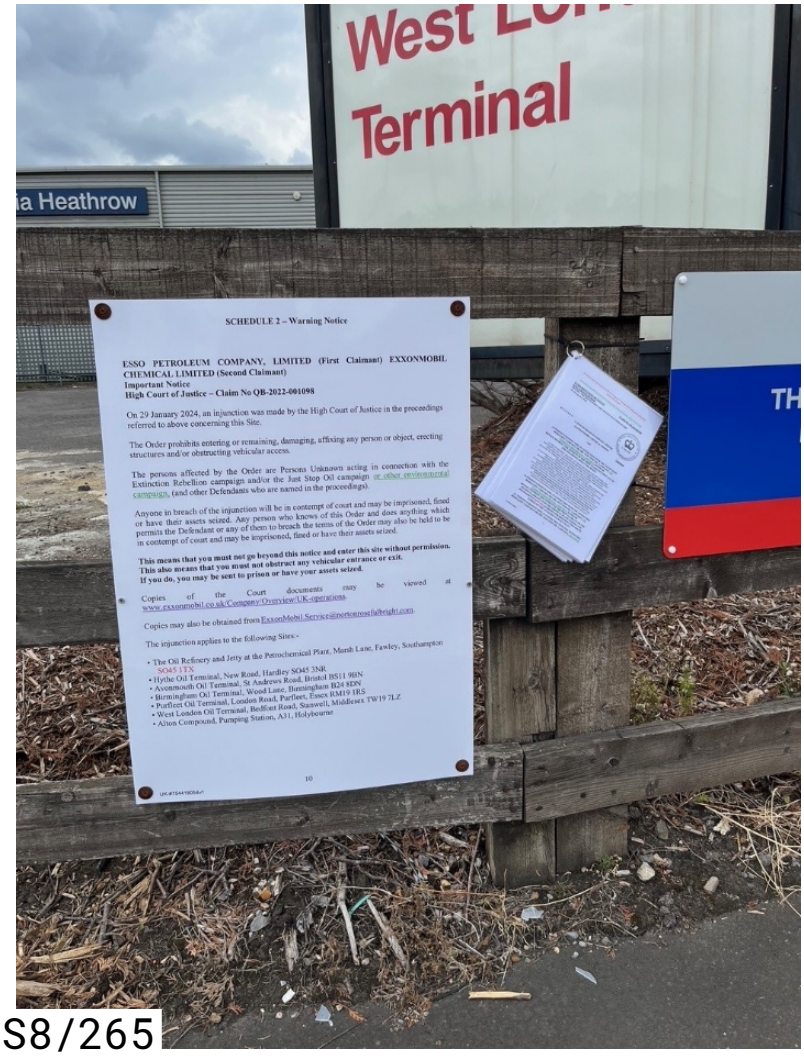


West London Location 2 – Southwest corner by short lane fire gate

West London Location 3 – Outside the main front of the gatehouse



West London Location 4 – Main entrance to the site



From:	Scott Speirs
Sent:	01 August 2025 13:05
To:	juststopoilpress@protonmail.com
Cc:	Holly Stebbing
Subject:	QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]
Attachments:	2025.07.11 - King's Bench Associate's - Sealed Sweeting Order.pdf; 2025.07.11 - Sealed Ellenbogen Order (amended description of D1-D3, 2025 review hearing).pdf

To whom it may concern

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors

Service of Amended Justice Ellenbogen Order and Justice Sweeting Order (sealed 11 July 2025)

We refer to our letter dated 4 April 2025 in connection with the above mentioned proceedings, in which we provided notice that the date had been fixed for this year's injunction review hearing for Wednesday, 9 July 2025 (the **Review Hearing**).

We confirm that the Review Hearing has taken place. By way of service, we attach the Order of Justice Sweeting, sealed on 11 July 2025, which maintains the injunctions granted in the Order of Justice Ellenbogen, dated 29 January 2024, (the **Sweeting Order**).

The Sweeting Order also amended the description of the defendants in the Ellenbogen Order so that it now includes "or other environmental campaign" when describing persons unknown and dispensed with the need to serve documents in plastic containers at the sites. We also attach by way of service the Amended Ellenbogen Order, sealed on 11 July 2025 (**Amended Ellenbogen Order**).

Further copies of the Sweeting Order and Amended Ellenbogen Order may be obtained from Norton Rose Fulbright LLP, at the address stated below, or by emailing ExxonMobil.Service@nortonrosefulbright.com. A copy of the Sweeting Order and Amended Ellenbogen Order may also be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

Yours faithfully
Norton Rose Fulbright LLP

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
Tel +44 20 7444 2441 | Mob +44 75111 76603
scott.speirs@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

From:	Scott Speirs
Sent:	01 August 2025 13:05
To:	xr-legal@riseup.net; Extinction Rebellion
Cc:	Holly Stebbing
Subject:	QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]
Attachments:	2025.07.11 - King's Bench Associate's - Sealed Sweeting Order.pdf; 2025.07.11 - Sealed Ellenbogen Order (amended description of D1-D3, 2025 review hearing).pdf

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Yours faithfully
Norton Rose Fulbright LLP

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
Tel +44 20 7444 2441 | Mob +44 75111 76603
scott.speirs@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: juststopoilpress@protonmail.com
Sent: 01 August 2025 13:05
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

juststopoilpress@protonmail.com (juststopoilpress@protonmail.com)

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: xr-legal@riseup.net; Extinction Rebellion
Sent: 01 August 2025 13:05
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

xr-legal@riseup.net (xr-legal@riseup.net)

Extinction Rebellion (enquiries@extinctionrebellion.uk)

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

From: xr-legal@riseup.net
Sent: 01 August 2025 13:06
To: Scott Speirs
Subject: Autoreply for XR Legal Support

External Email - Use Caution

Hi there,

Thanks for getting in touch with the XR Legal Support Team.

We have received your email and are working on getting a response to you ASAP! We are currently quite low in capacity and so our response to your email(s) might be delayed.

If you don't hear from us within two weeks, please email back and we will do our best to get to you sooner.

In the meantime, please have a look at our website (https://www.informeddissent.info), as this may have information to answer your questions.

If your email is related to an upcoming court appearance, we will prioritise your email and get a response to you ASAP. Please also email the XR Arrest Welfare Team (XR-ArrestWelfare@protonmail.com) with the details of your court date.

If your email is related to trainings run by our team, see our Trainings Calendar for details about upcoming Trainings. This can be accessed at this link: https://teamup.com/ksqttxh86ftomucpgu

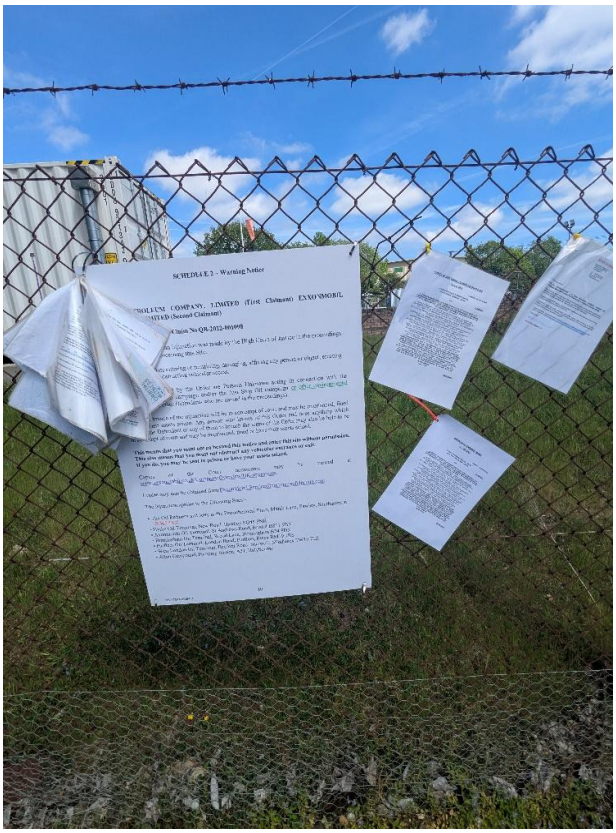
During Rebellions, where you need an urgent response or if someone has been arrested at an action you are at, please call the XR Legal Back Office on 07749 335574 and we will deal with your query that way.

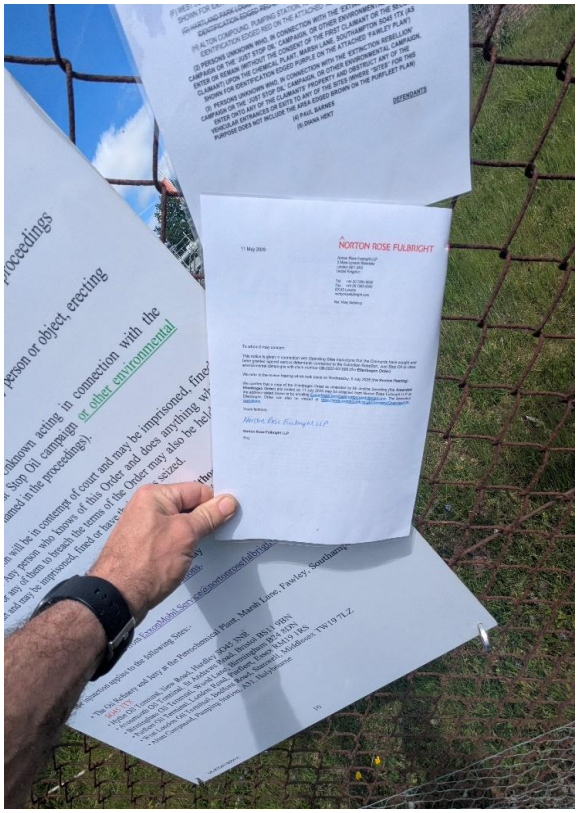
In Solidarity,
XR Legal Support Team

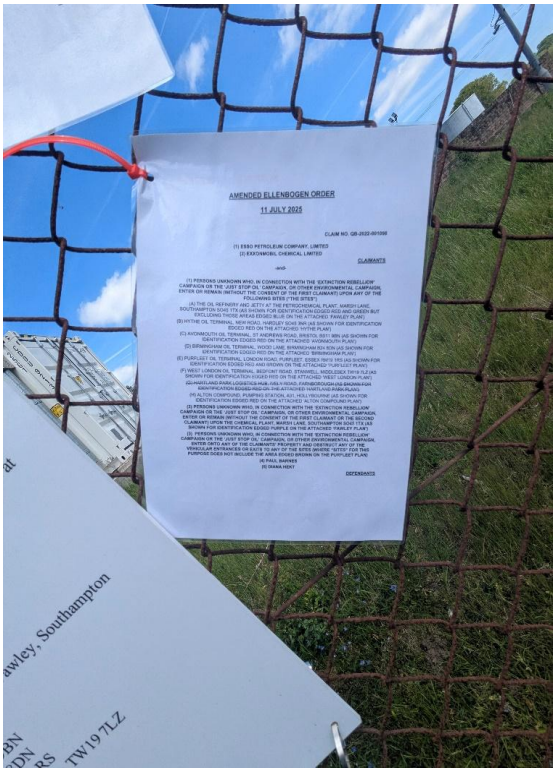
Evidence of Service – Notice accompanying the Amended Ellenbogen Order

Alton Compound, Pumping Station – 21.05.26

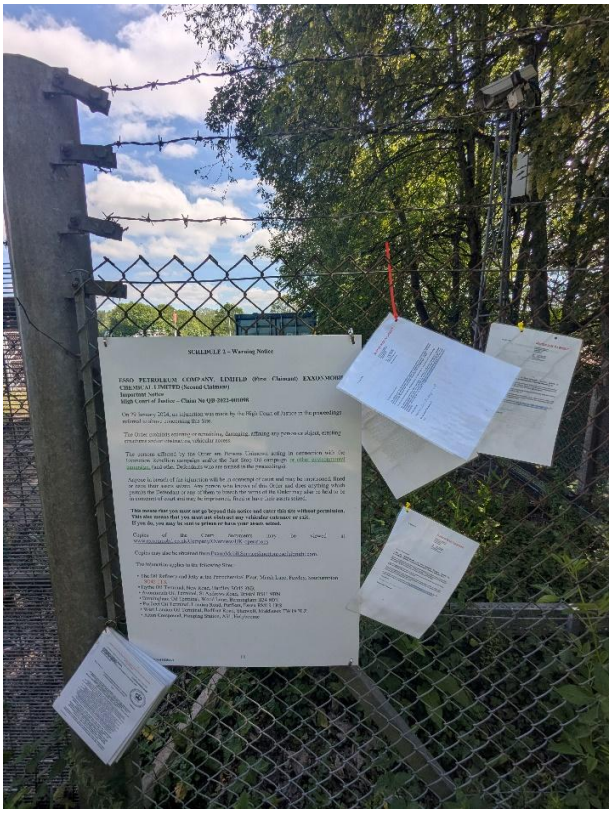
Alton Location 1 – West fence line / Container Side Fence

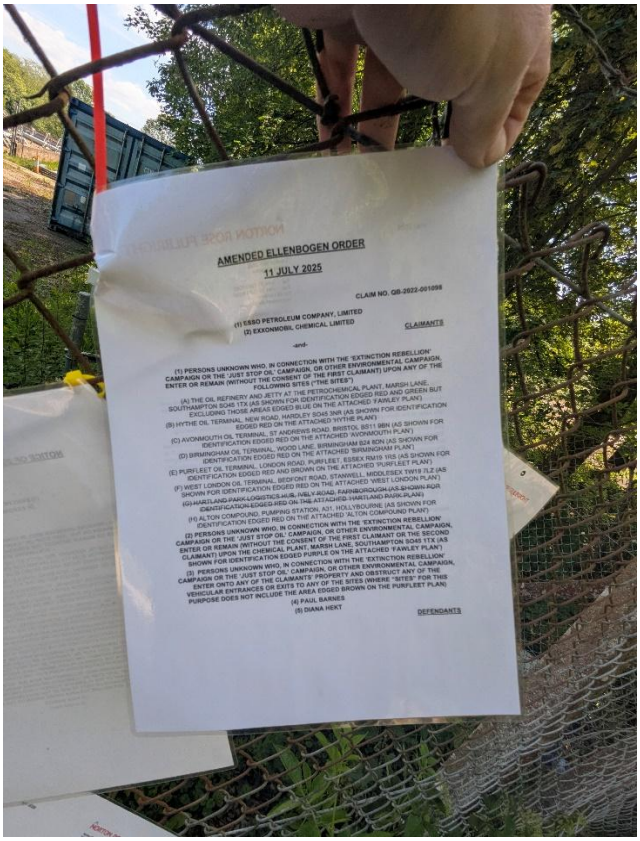


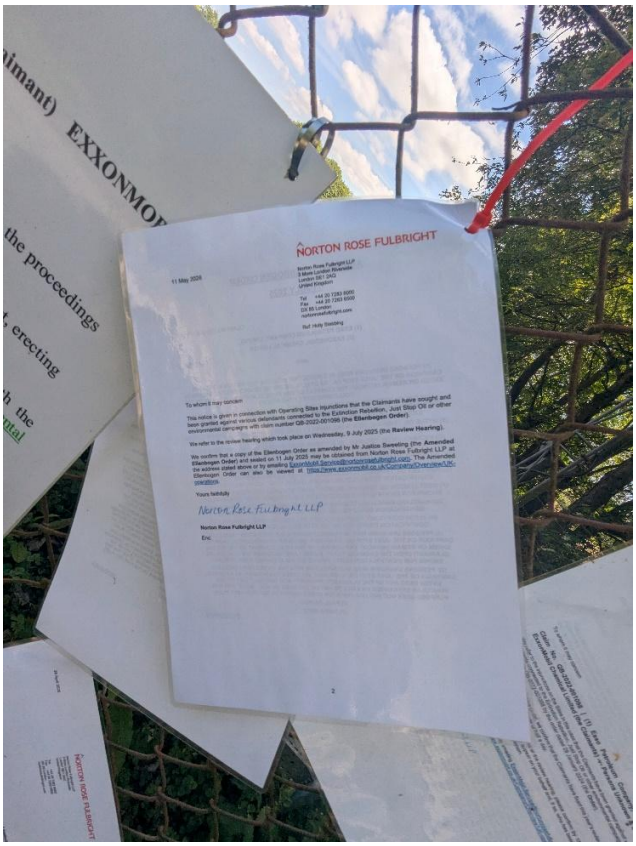




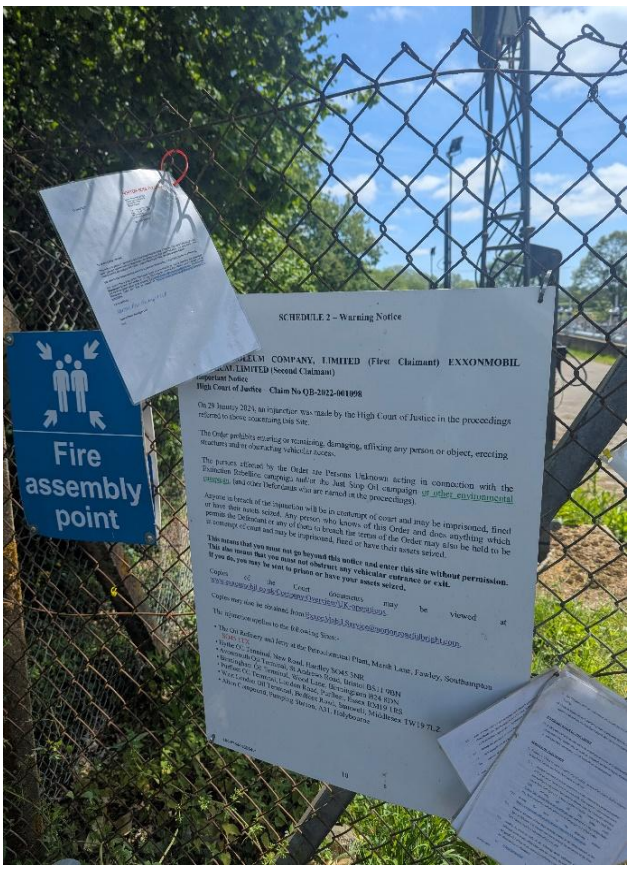
Alton Location 2 – Secondary main gate / Top Second Gate

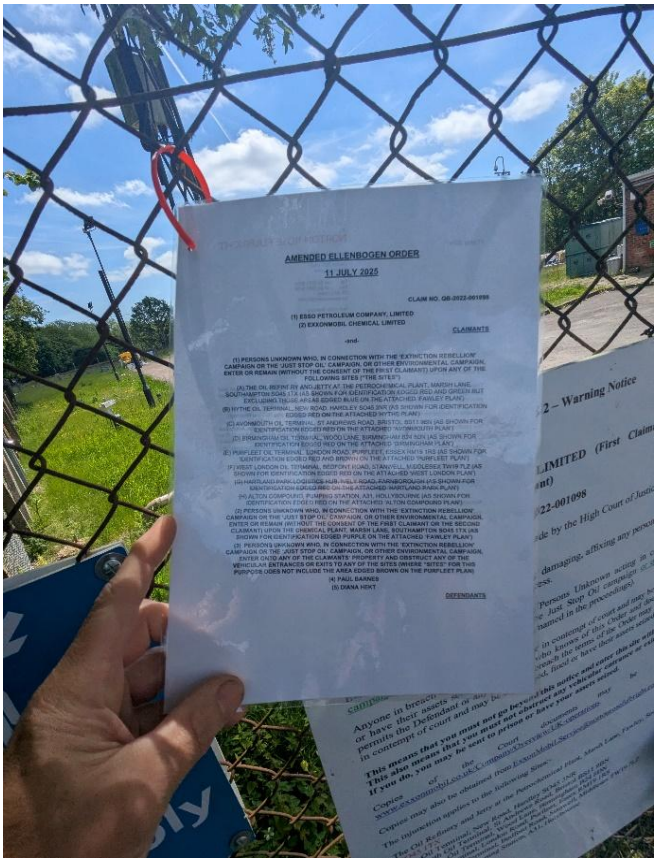


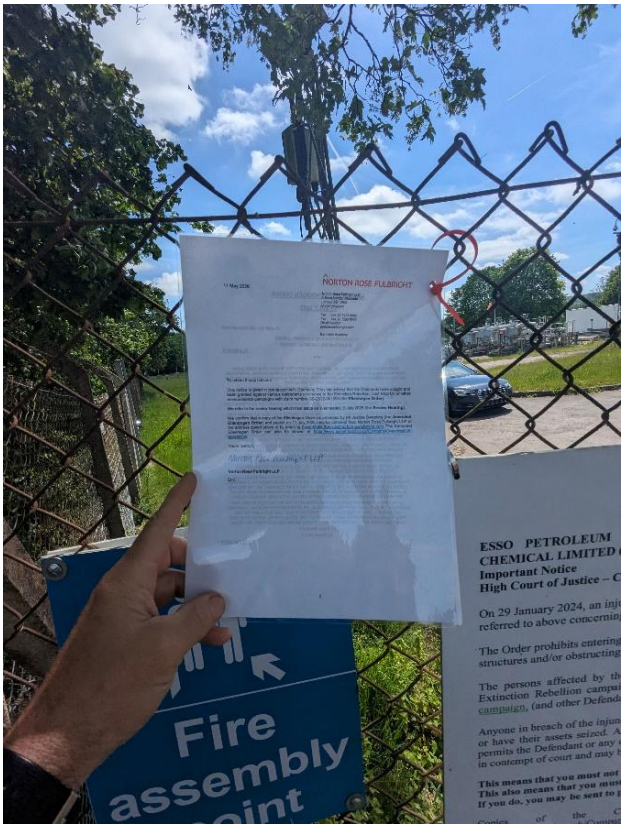




Alton Location 3 – Main gate

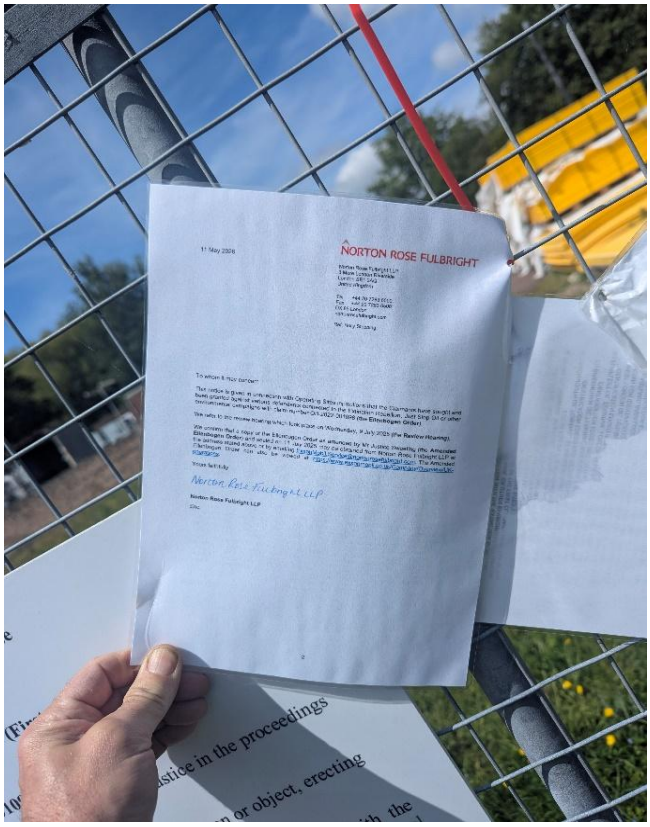


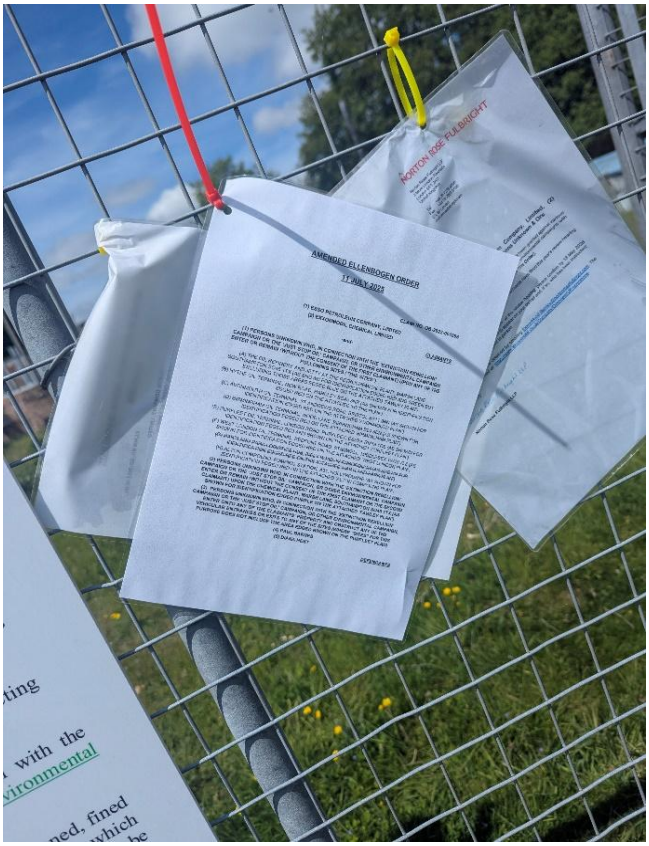




Alton Location 4 – Bottom gate

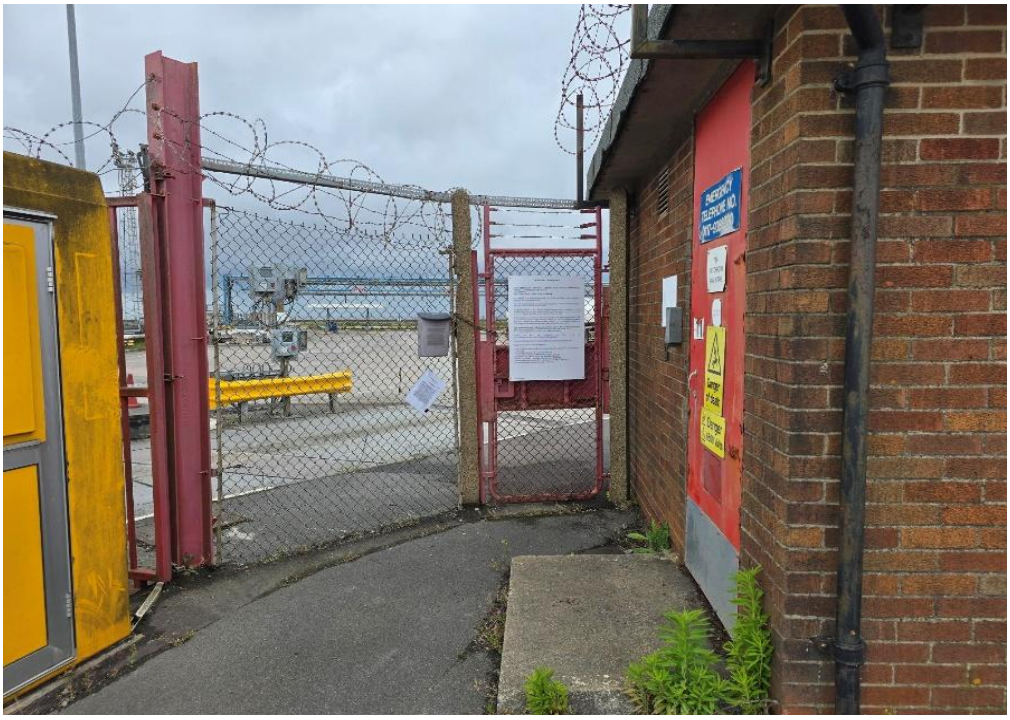


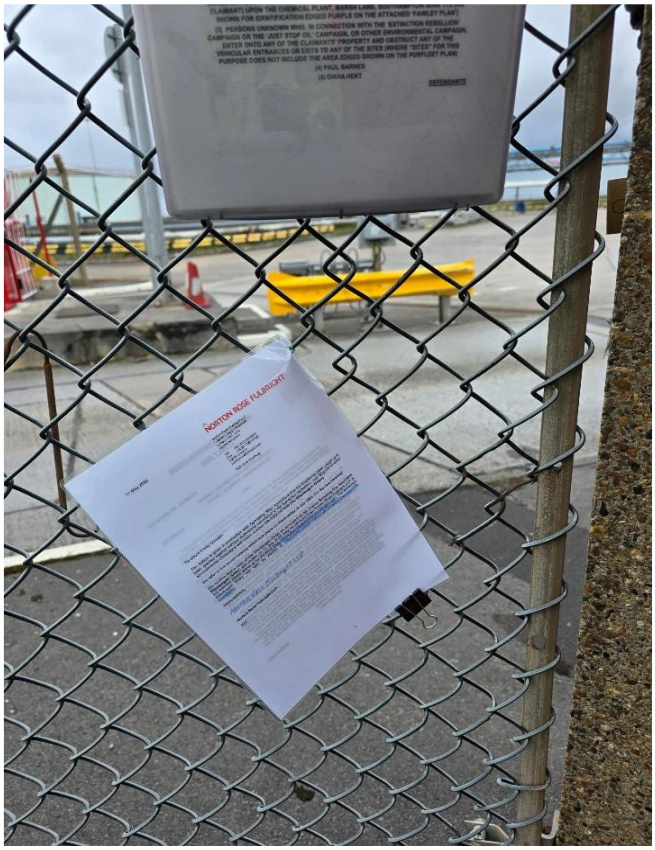


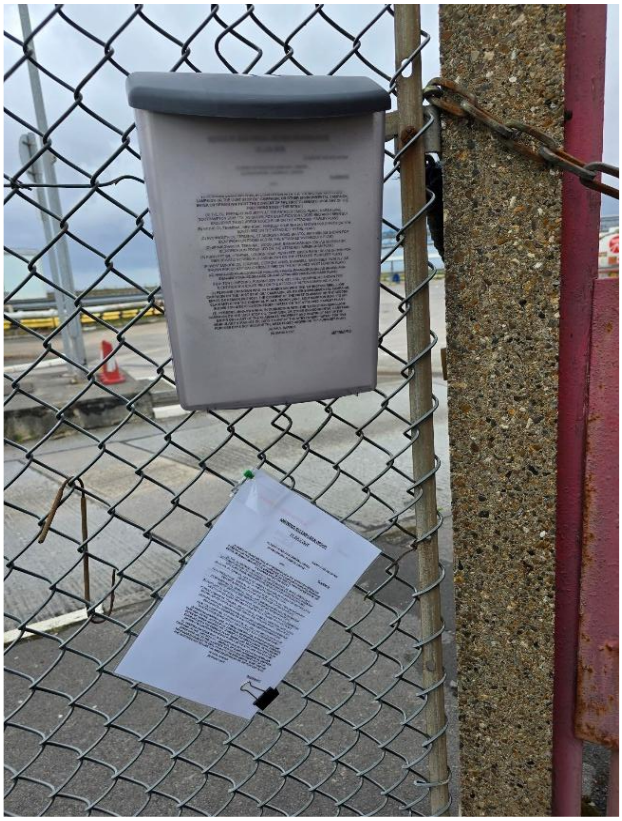


Avonmouth Oil Terminal – 26.05.26

Avonmouth Location 1 – Main vehicle gates



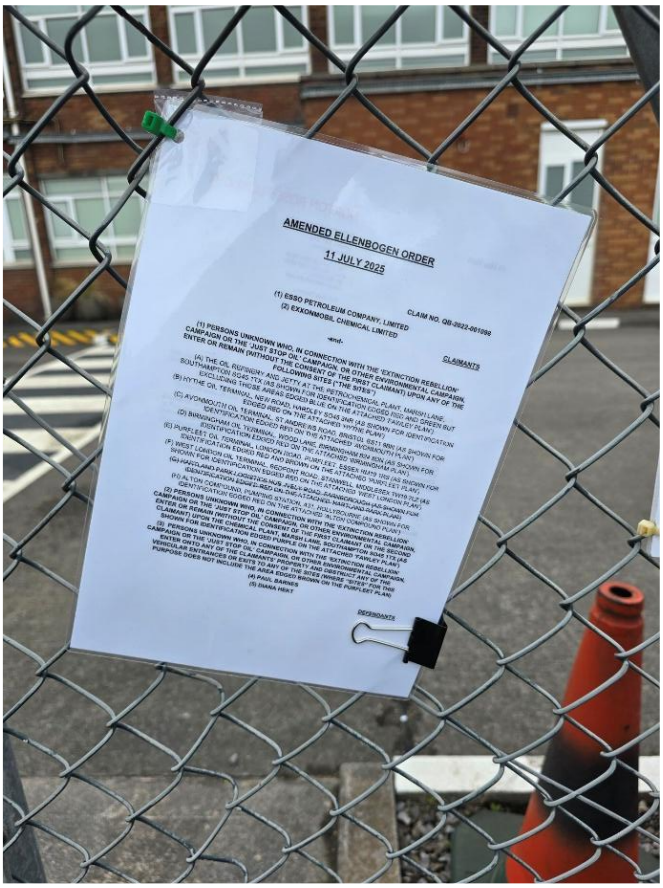




Avonmouth Location 2 – Main pedestrian gate to office buildings

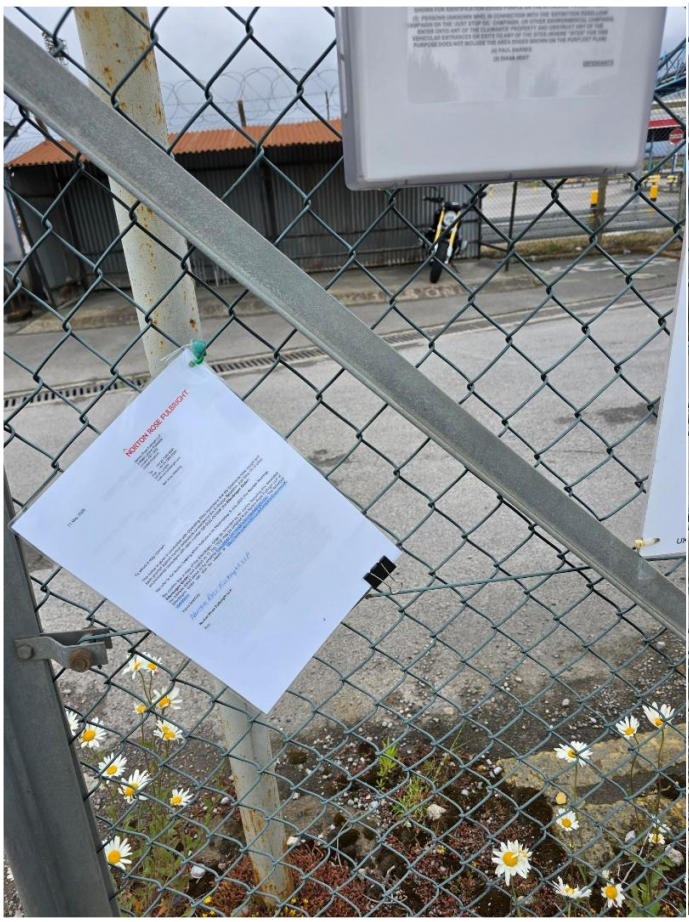


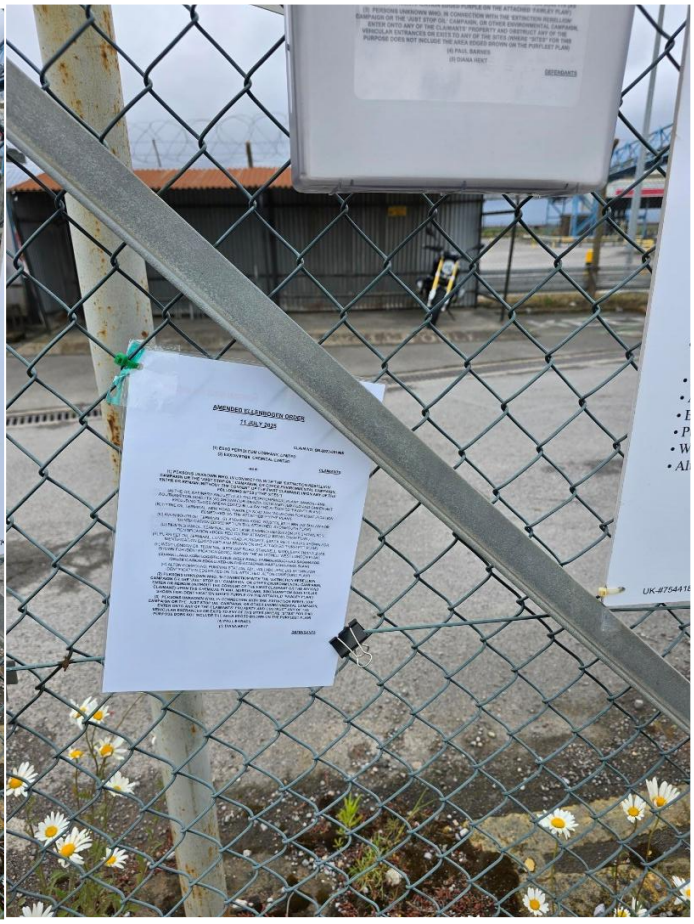




Avonmouth Location 3 – Entrance to main car park and Bristol port land behind

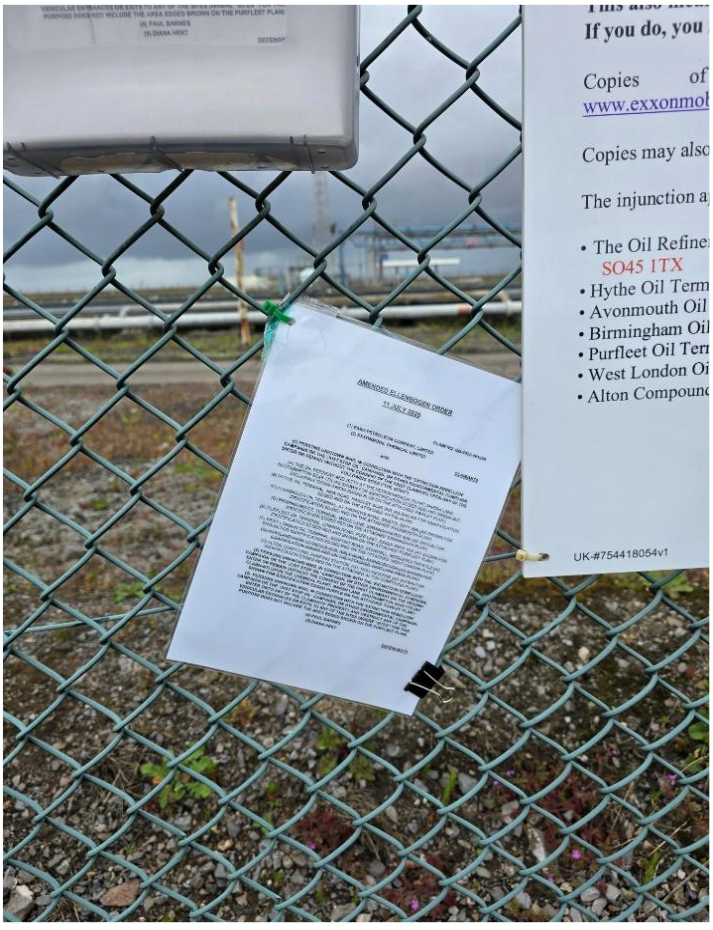


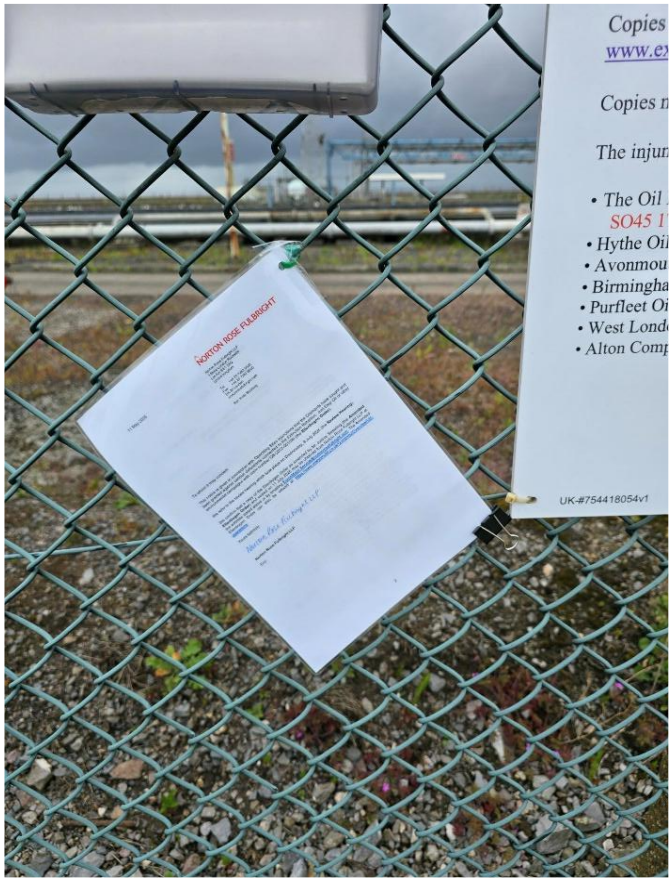




Avonmouth Location 4 – Other side of vehicle gates

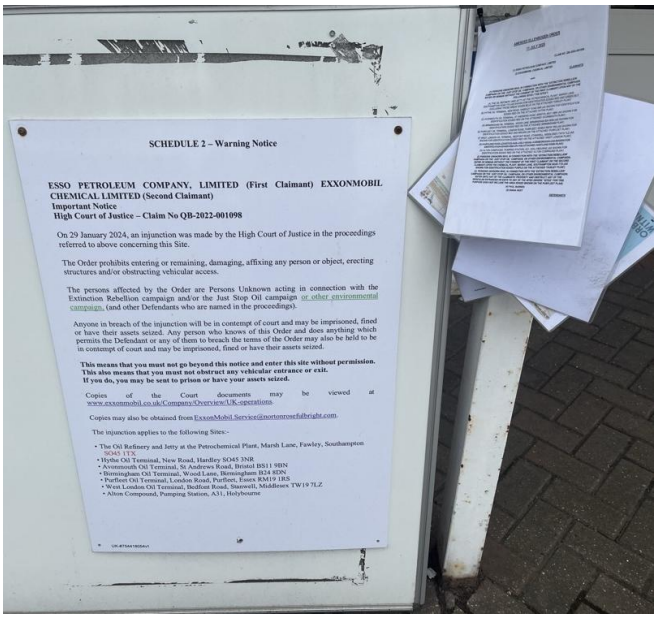






Birmingham Oil Location – 20.05.26

Birmingham Location 1 – Main entrance on Wood Lane / Reception



SCHEDULE 2 – Warning Notice

ESSO PETROLEUM COMPANY, LIMITED (First Claimant) EXXONMOBIL CHEMICAL LIMITED (Second Claimant)
Important Notice
High Court of Justice – Claim No QB-2022-001098

On 29 January 2024, an injunction was made by the High Court of Justice in the proceedings referred to above concerning this Site.

The Order prohibits entering or remaining, damaging, affixing any person or object, erecting structures and/or obstructing vehicular access.

The persons affected by the Order are Persons Unknown acting in connection with the Extinction Rebellion campaign and/or the Just Stop Oil campaign or other environmental campaign, (and other Defendants who are named in the proceedings).

Anyone in breach of the injunction will be in contempt of court and may be imprisoned, fined or have their assets seized. Any person who knows of this Order and does anything which permits the Defendant or any of them to breach the terms of the Order may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

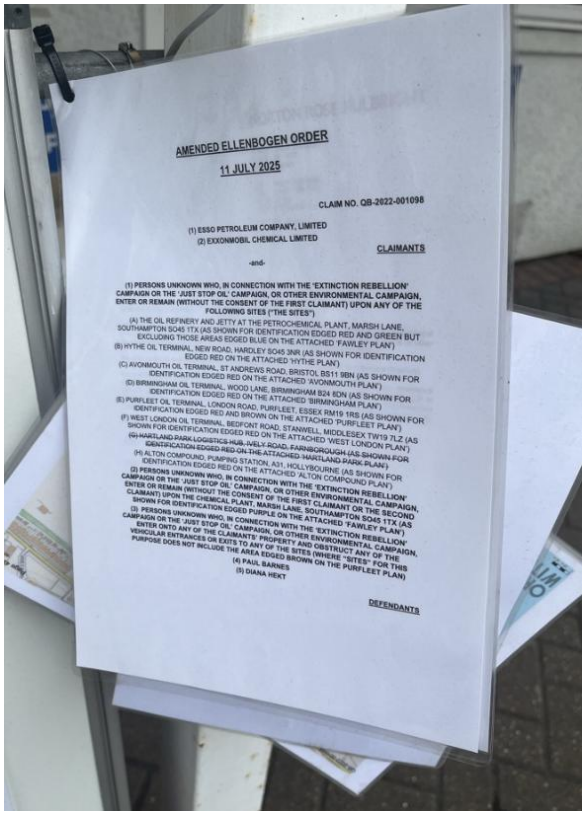
This means that you must not go beyond this notice and enter this site without permission.
This also means that you must not obstruct any vehicular entrance or exit.
If you do, you may be sent to prison or have your assets seized.

Copies of the Court documents may be viewed at www.exxonmobil.co.uk/Company/Overview/UK-operations.

Copies may also be obtained from ExxonMobil.Service@nortonrosefulbright.com.

The injunction applies to the following Sites:-

- The Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Fawley, Southampton SO45 1TX
- Hythe Oil Terminal, New Road, Hardley SO45 3NR
- Avonmouth Oil Terminal, St Andrews Road, Bristol BS11 9BN
- Birmingham Oil Terminal, Wood Lane, Birmingham B24 8DN ;
- Purfleet Oil Terminal, London Road, Purfleet, Essex RM19 1RS
- West London Oil Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ
- Alton Compound, Pumping Station, A31, Holybourne



AMENDED ELLENBOGEN ORDER

11 JULY 2025

CLAIM NO. QB-2022-001098

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

CLAIMANTS

-and-

(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")

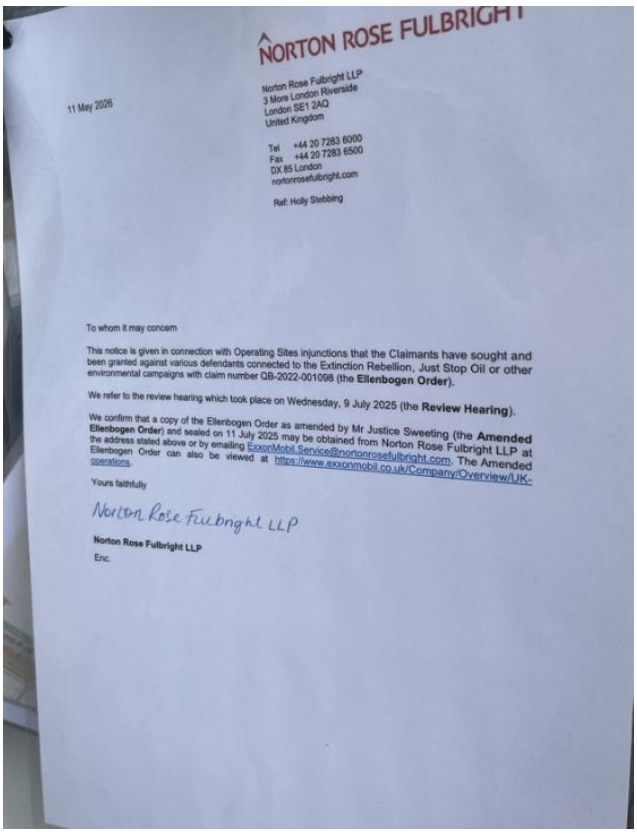
(A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) 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 THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN 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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

DEFENDANTS



NORTON ROSE FULBRIGHT

11 May 2026

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London SE1 2AQ
United Kingdom

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Fax +44 20 7283 6500
DX 85 London
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Ref: Holly Stebbing

To whom it may concern

This notice is given in connection with Operating Sites injunctions that the Claimants have sought and been granted against various defendants connected to the Extinction Rebellion, Just Stop Oil or other environmental campaigns with claim number QB-2022-001098 (the **Ellenbogen Order**).

We refer to the review hearing which took place on Wednesday, 9 July 2025 (the **Review Hearing**).

We confirm that a copy of the Ellenbogen Order as amended by Mr Justice Sweeting (the **Amended Ellenbogen Order**) and sealed on 11 July 2025 may be obtained from Norton Rose Fulbright LLP at the address stated above or by emailing ExxonMobil.Service@nortonrosefulbright.com. The Amended Ellenbogen Order can also be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

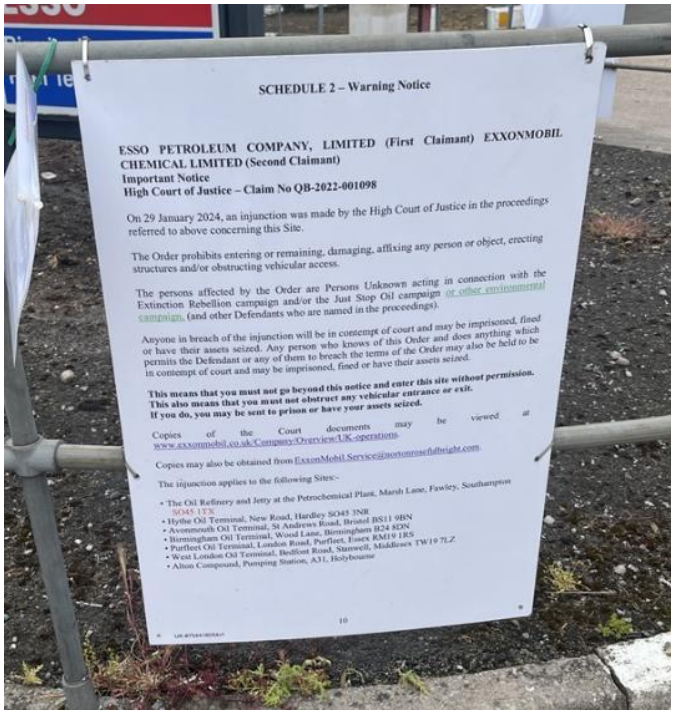
Yours faithfully

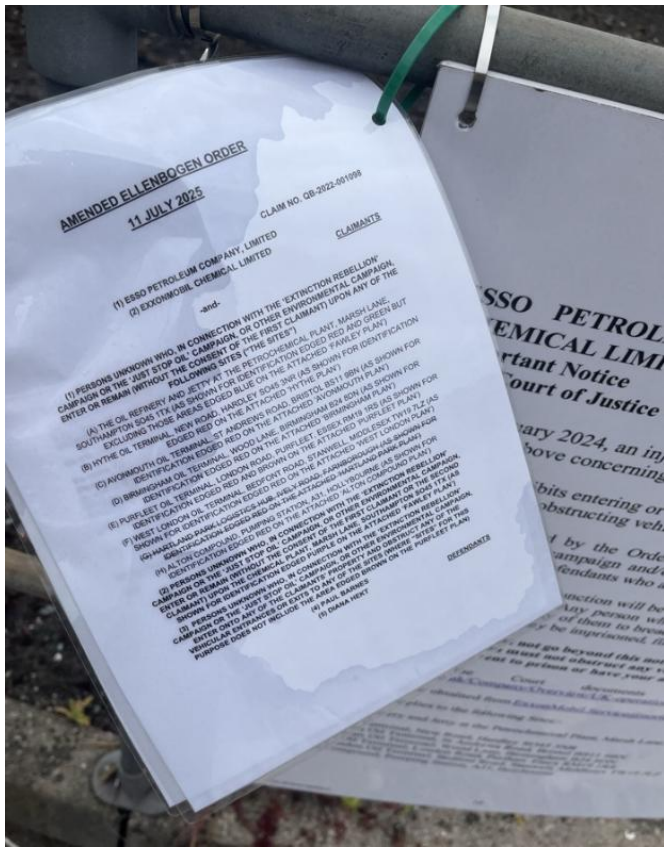
Norton Rose Fulbright LLP

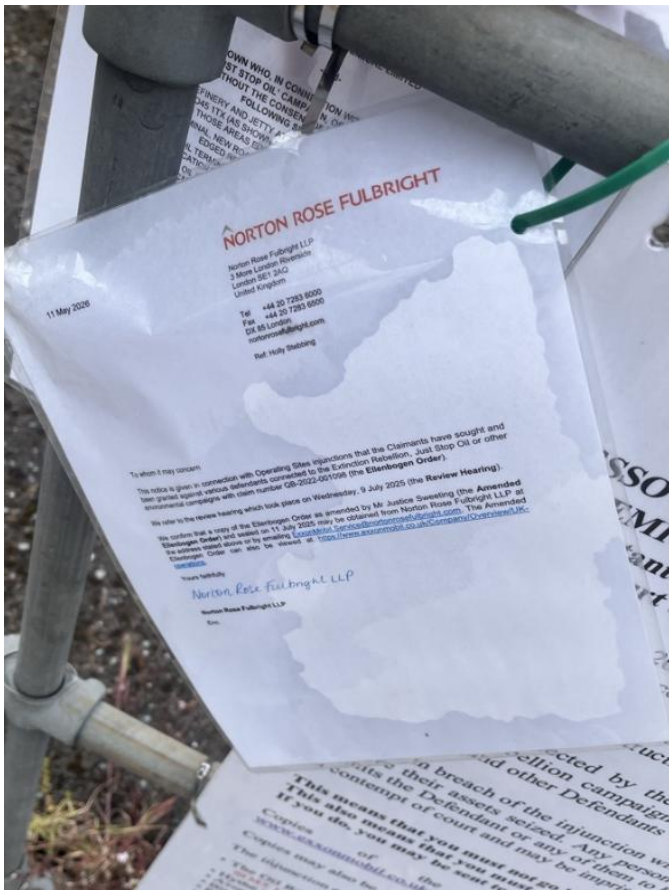
Norton Rose Fulbright LLP

Enc.

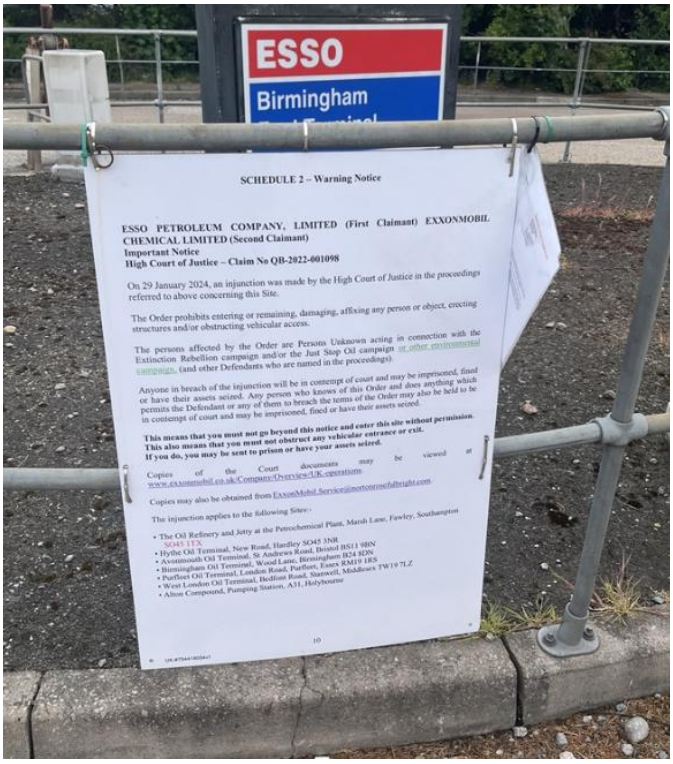
Birmingham Location 2 – Main vehicle entrance to Birmingham terminal

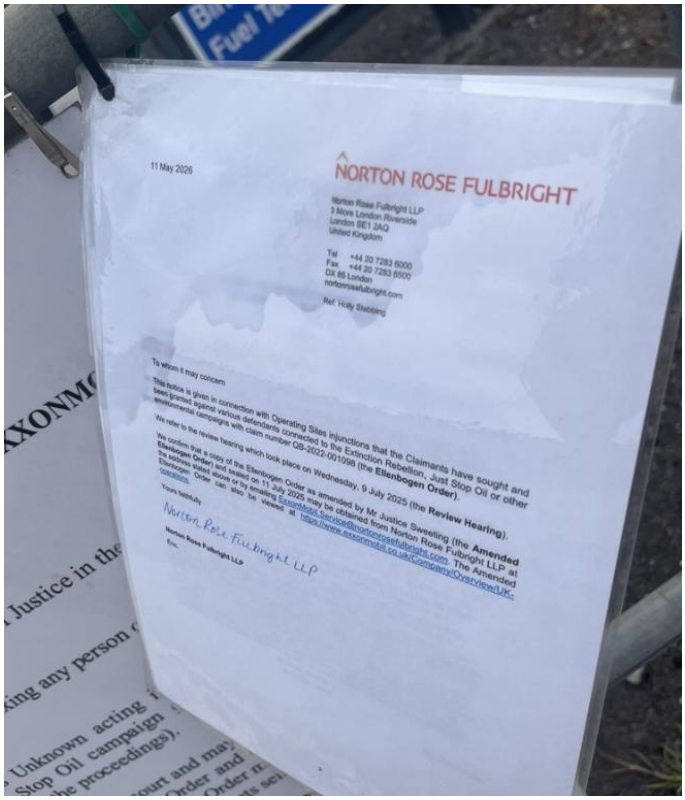


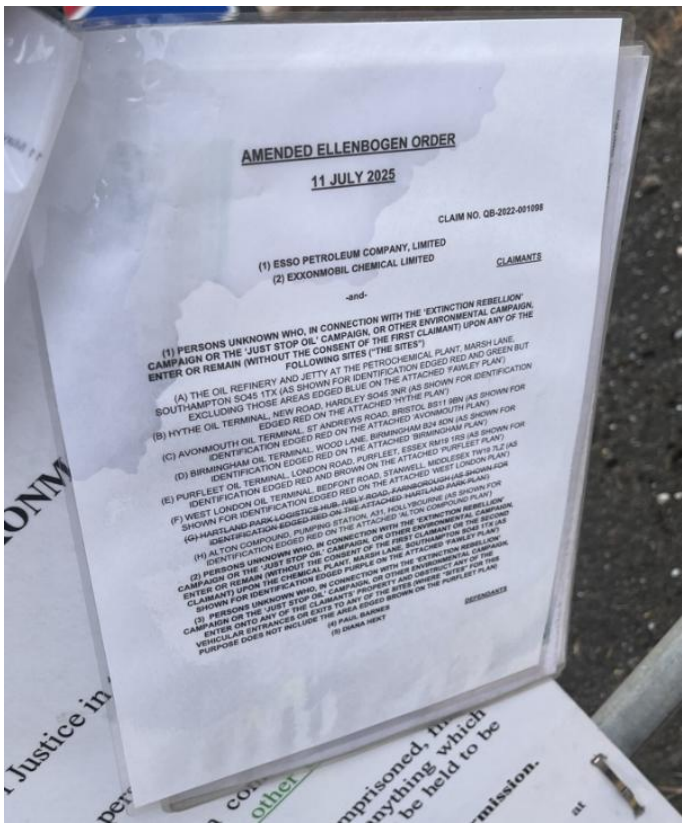




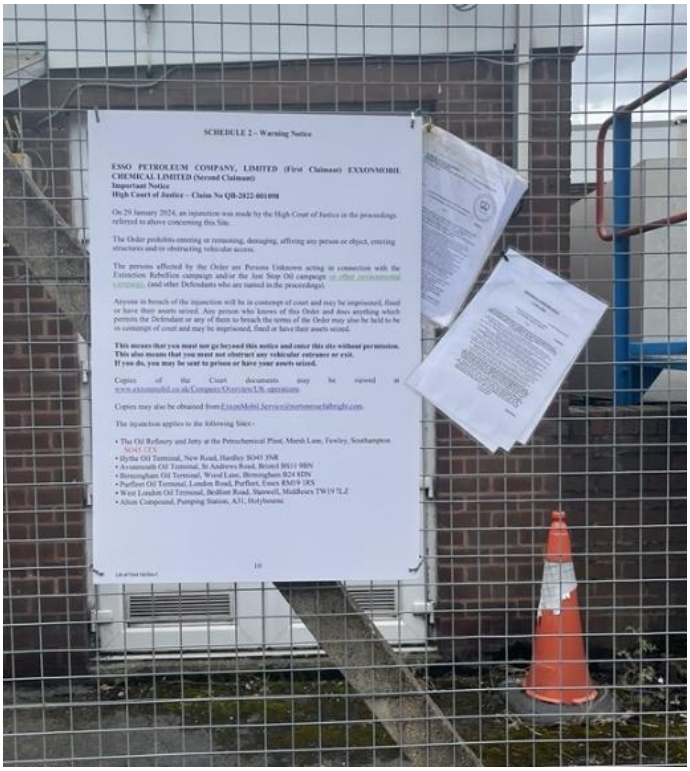
Birmingham Location 3 – Pedestrian path directly outside Birmingham Terminal

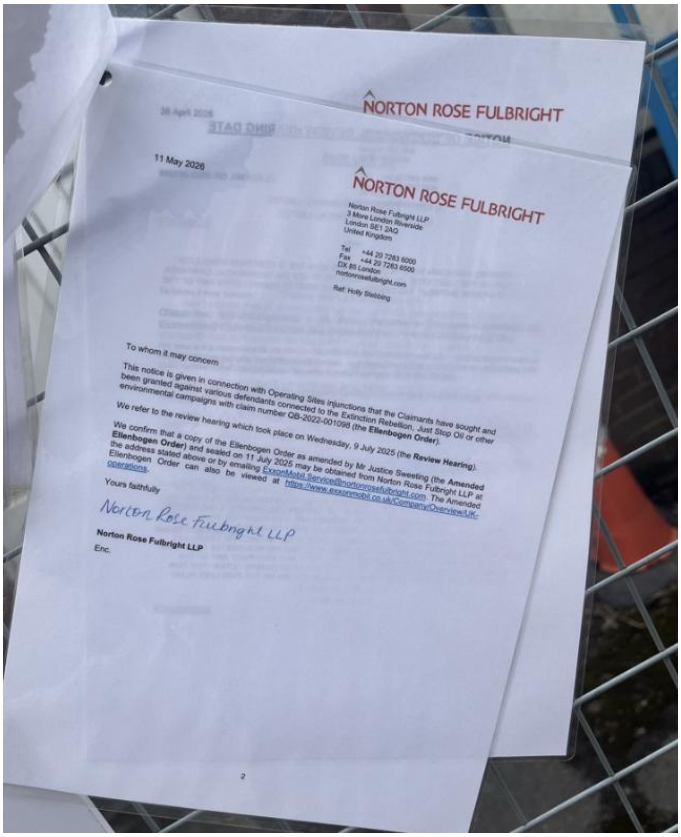


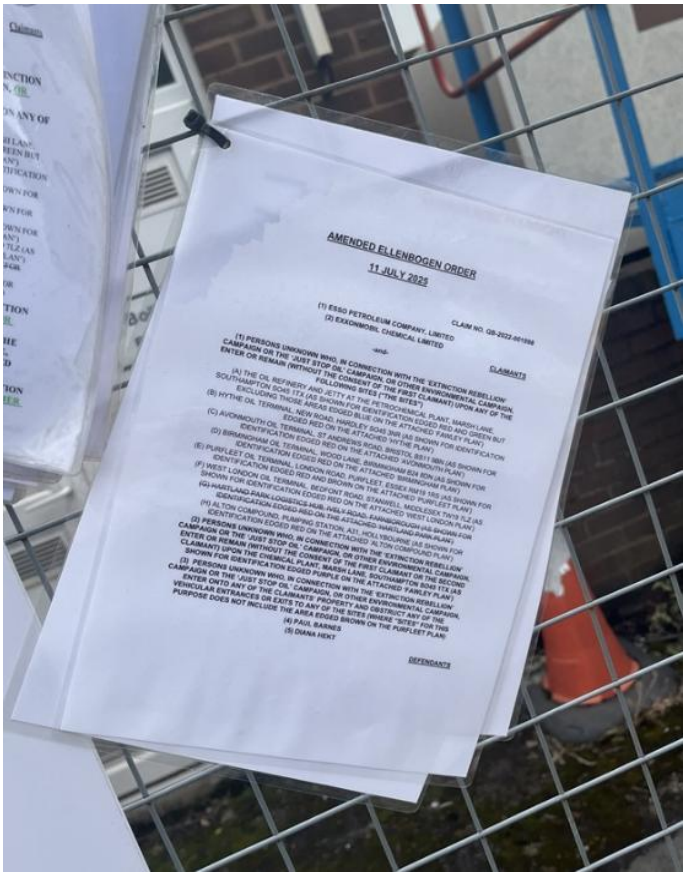




Birmingham Location 4 – Righthand side of pedestrian turnstile



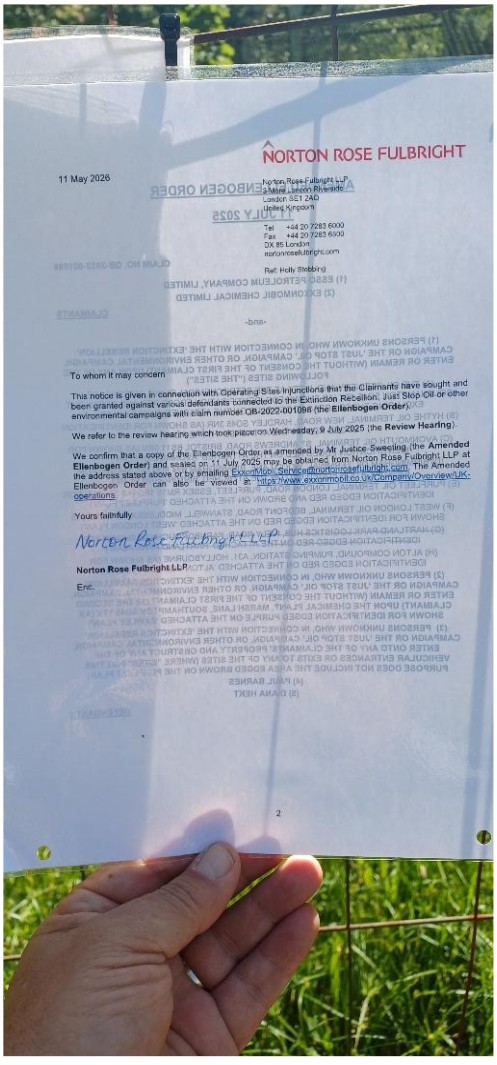


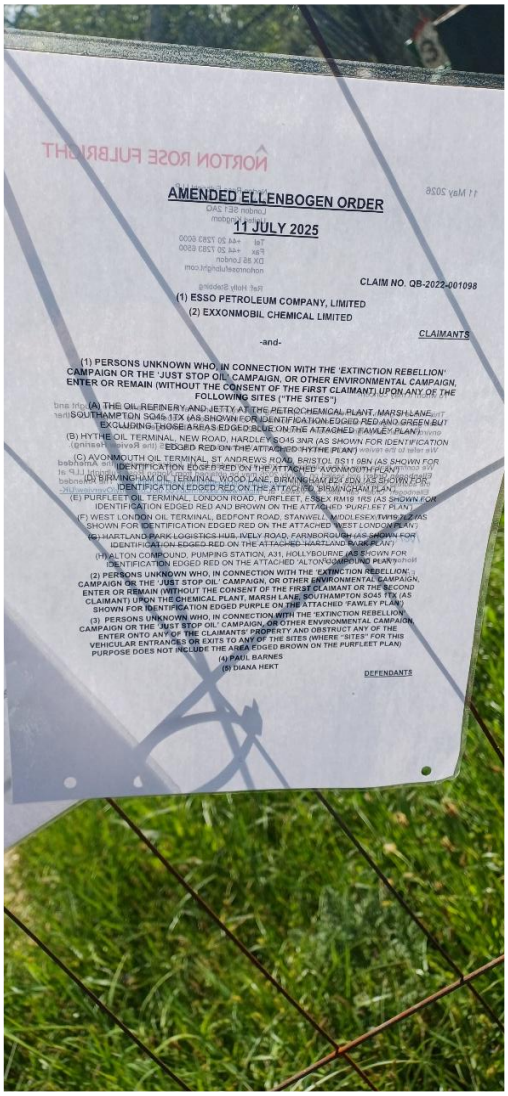


The Oil Refinery and Jetty at the Petrochemical Plan, Fawley – 12.05.26

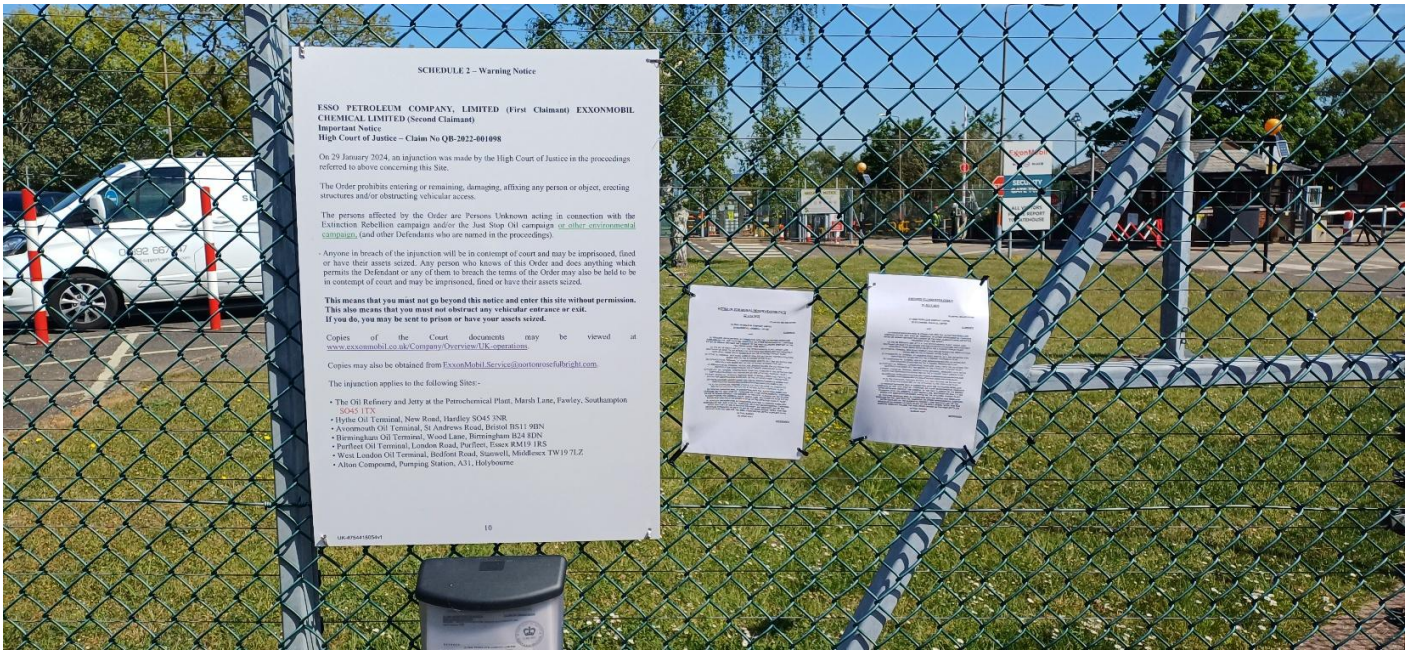
Fawley Location 1 – Hythe Terminal & Gate 1 Access Route

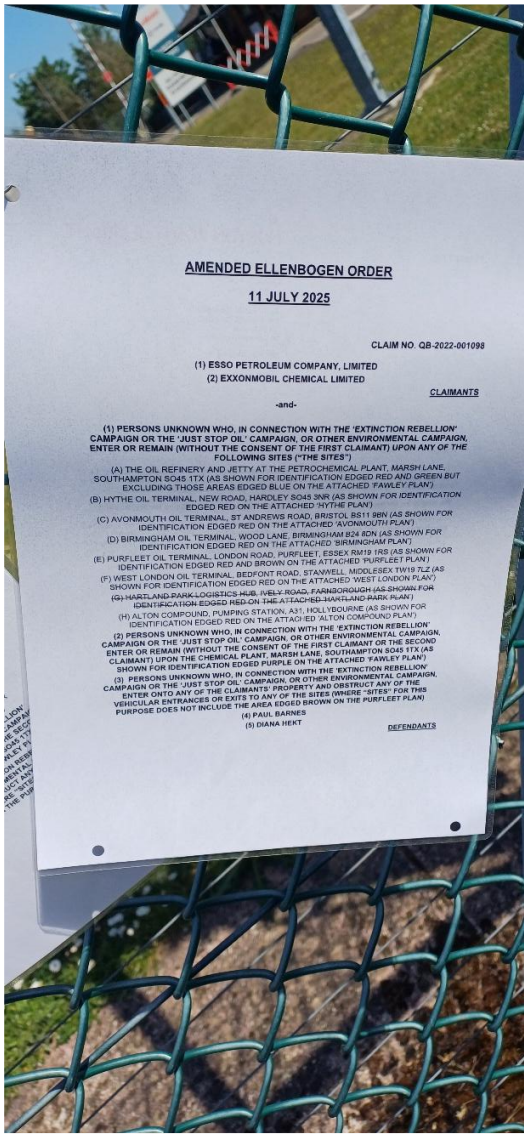


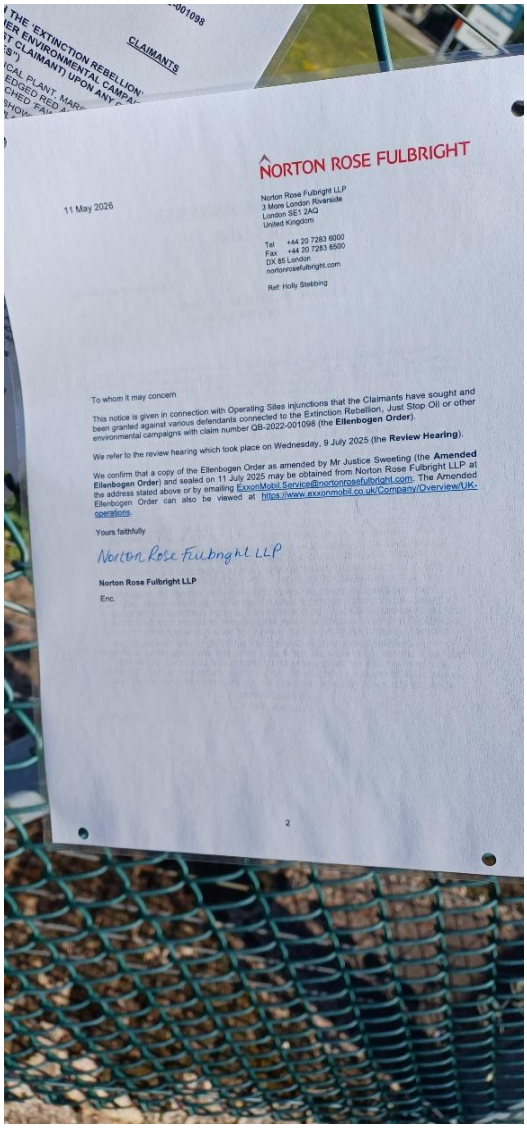




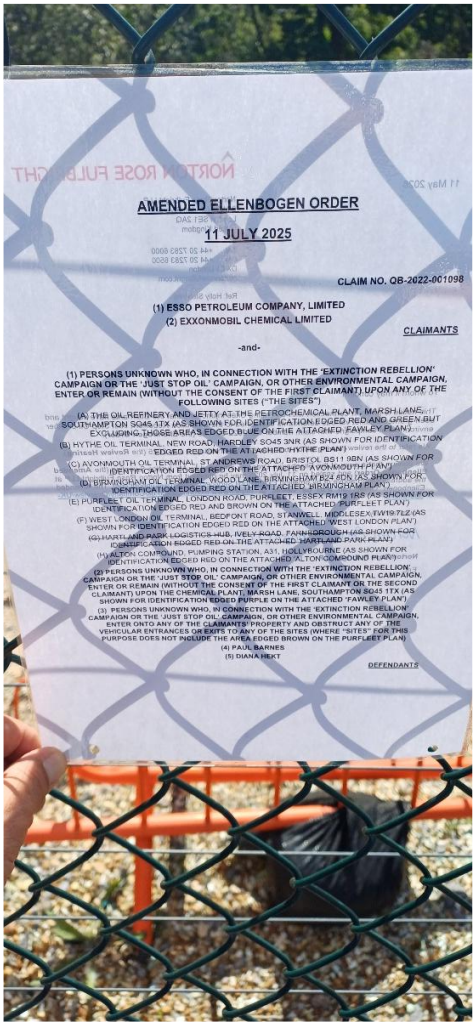
Fawley Location 2 – Gate 2 & Admin Drive Access Route







Fawley Location 3 – Gate 3 Access Route



AMENDED ELLENBOGEN ORDER

11 JULY 2025

CLAIM NO. QB-2022-001098

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

CLAIMANTS

-and-

(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")

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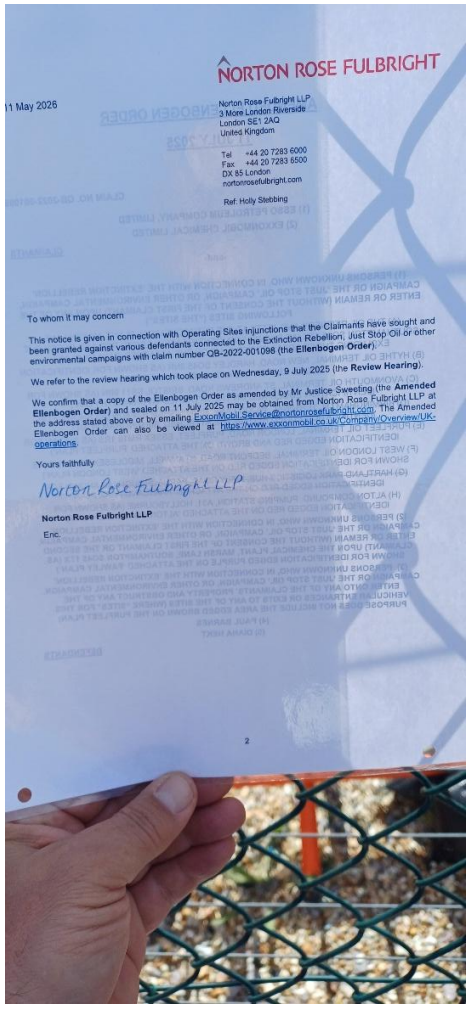
(5) DIANA HEAT

DEFENDANTS



NORTON ROSE FULBRIGHT

11 May 2026

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3 More London Riverside
London SE1 2AQ
United Kingdom

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DX 85 London
nortonrosefulbright.com

Ref: Holly Stebbing

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Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Enc.

2



SCHEDULE 2 – Warning Notice

ESSO PETROLEUM COMPANY, LIMITED (First Claimant) EXXONMOBIL CHEMICAL LIMITED (Second Claimant)
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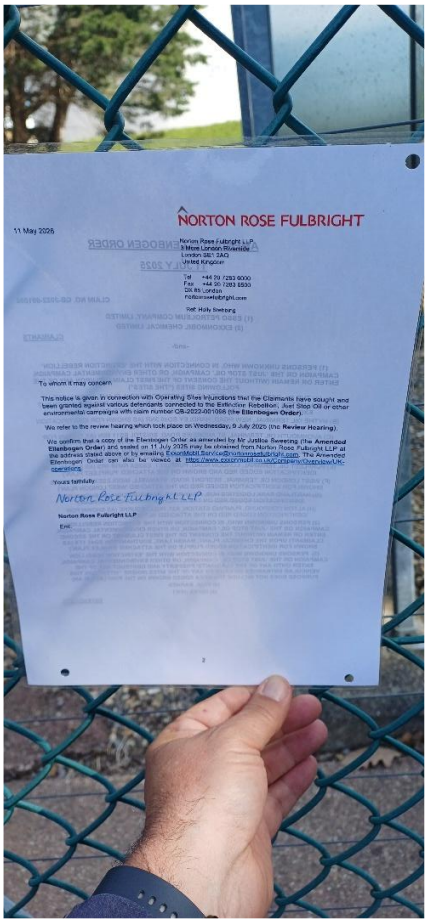
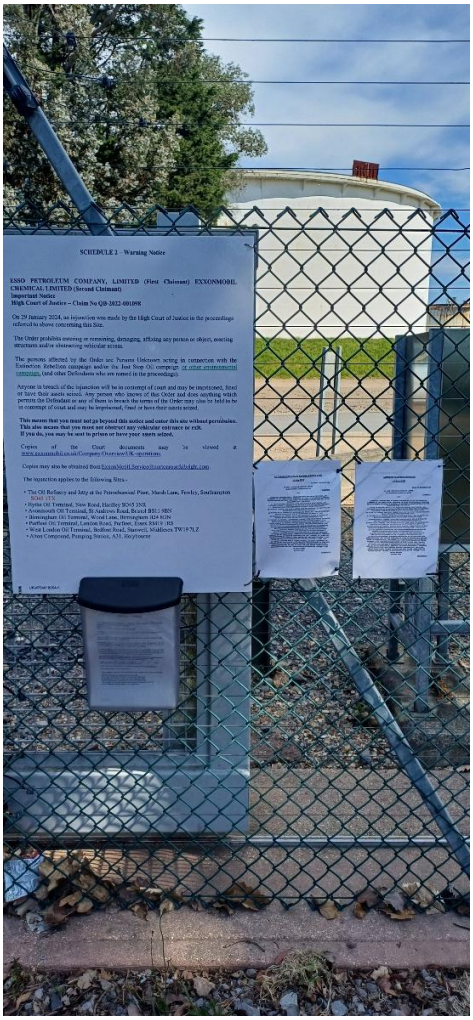
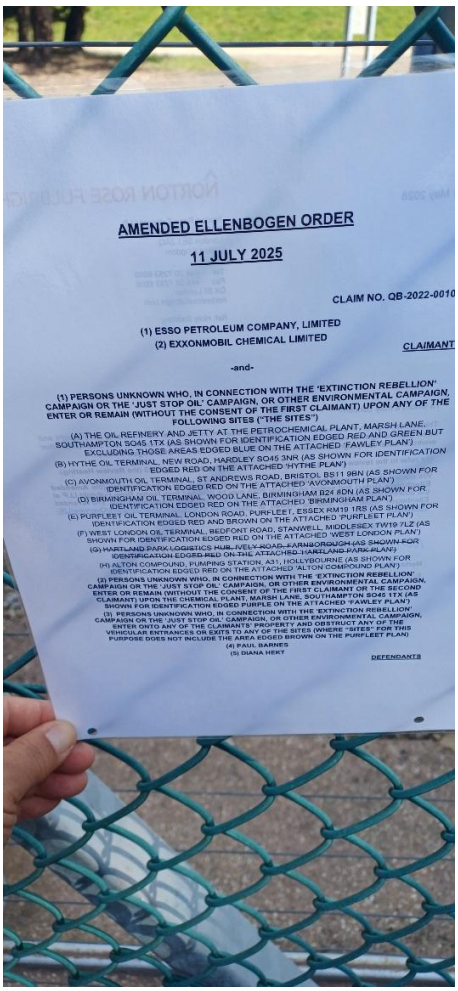
- West London Oil Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ
- Alton Compound, Pumping Station, A31, Holybourne

10

Fawley Location 4 – Wideload aka Greenbelt Side

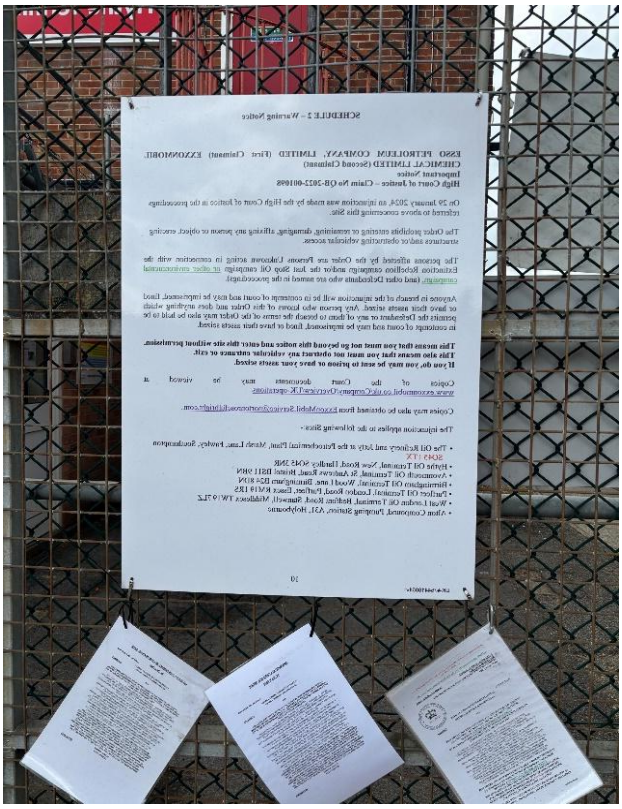


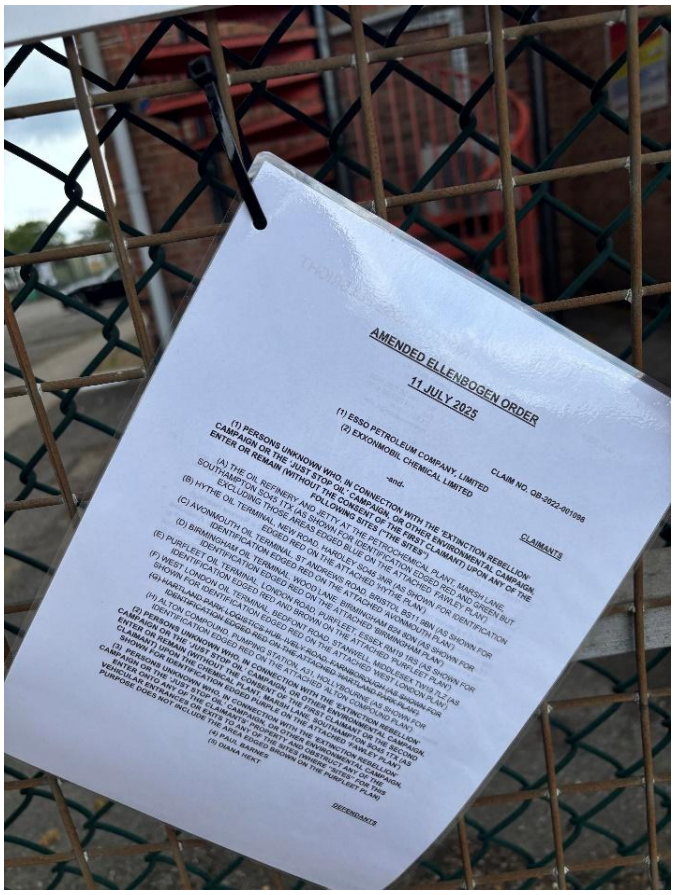


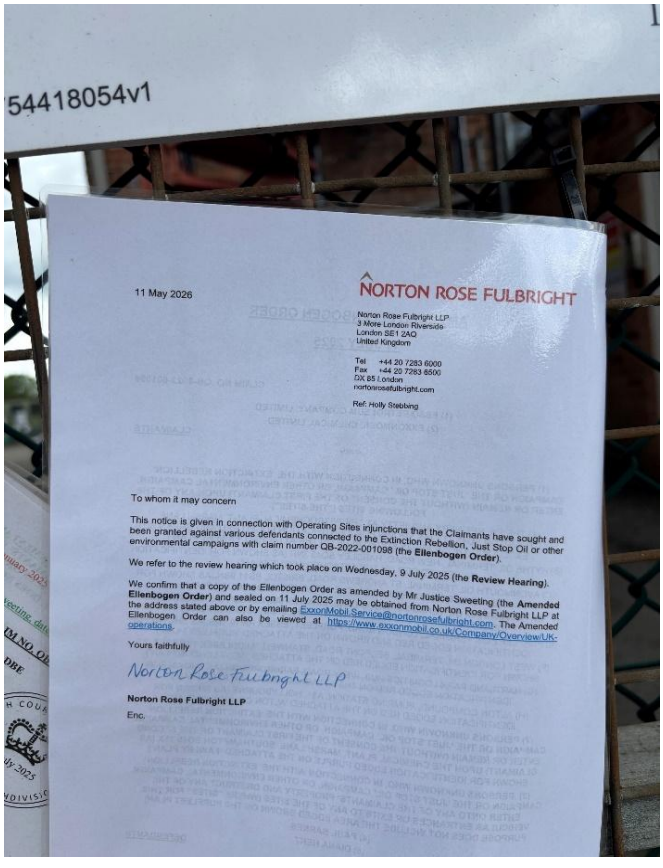


Hythe Oil Terminal – 19.05.26

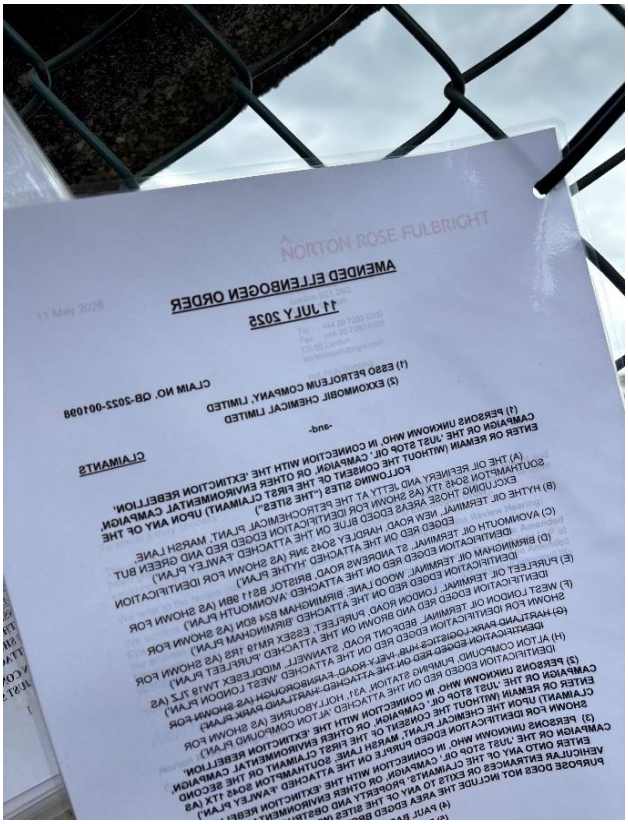
Hythe Location 1 – Main truck entrance gate

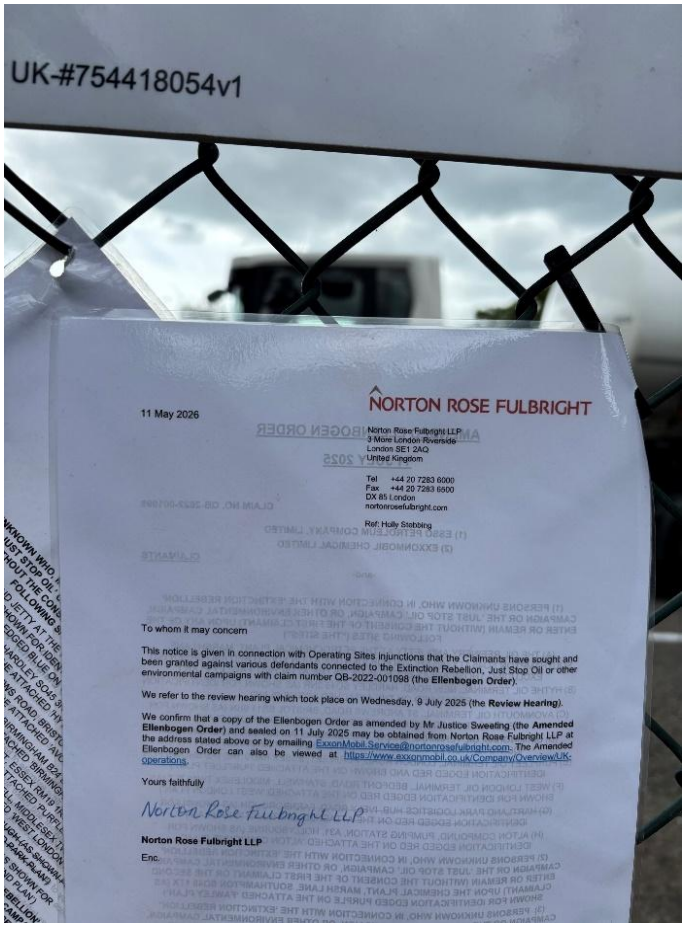


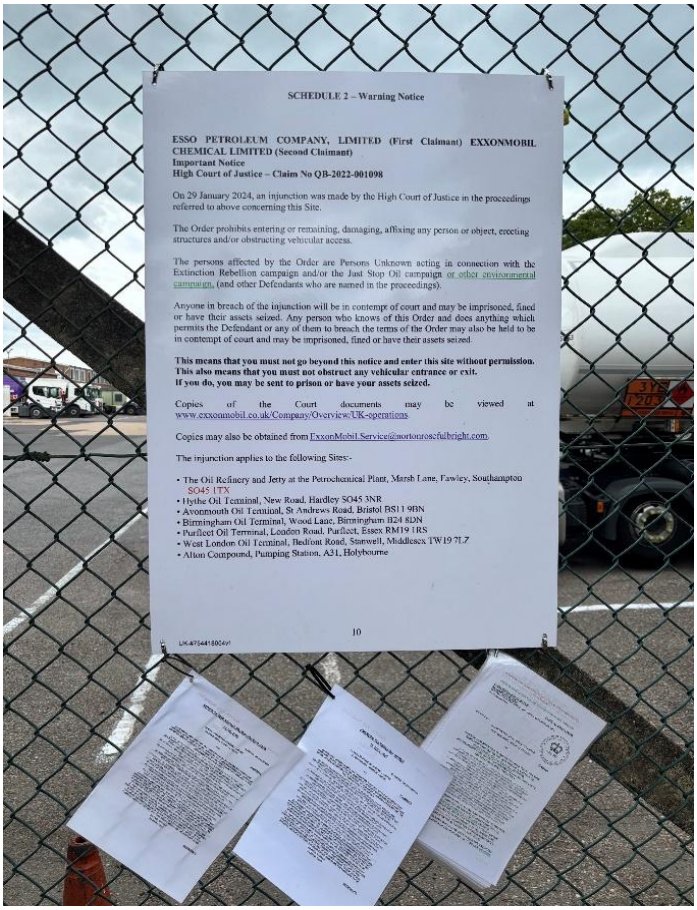




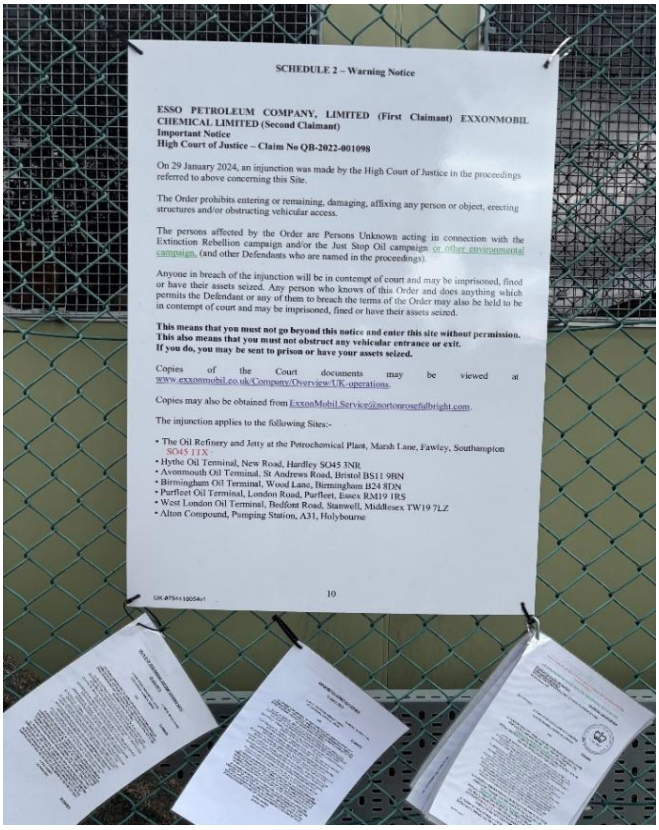
Hythe Location 2 – North emergency access gate

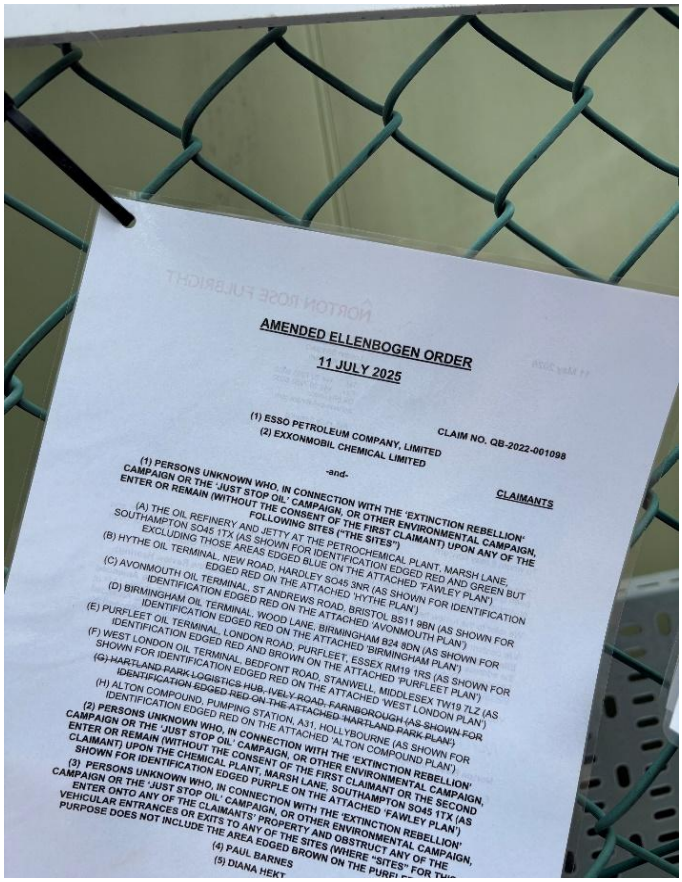


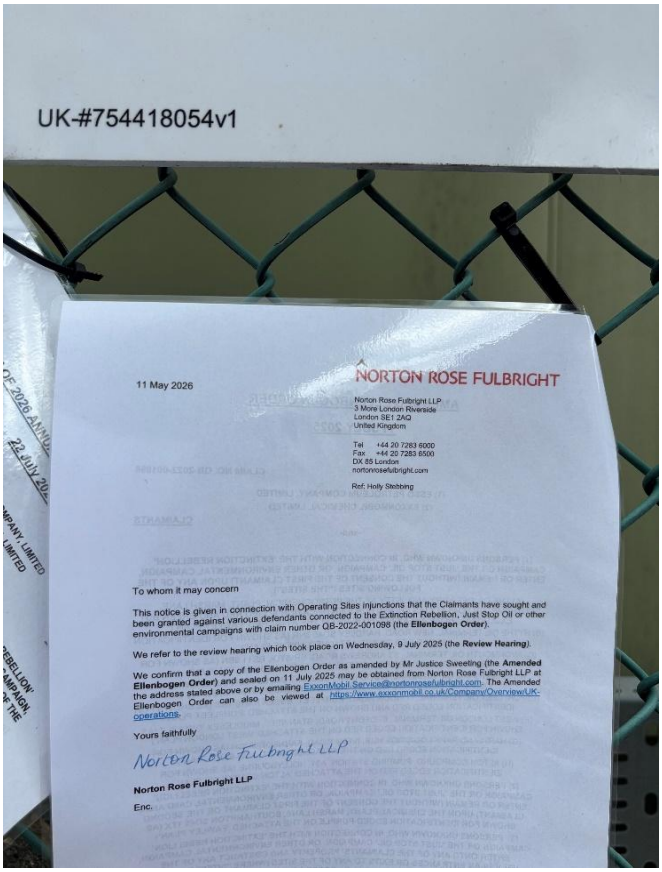




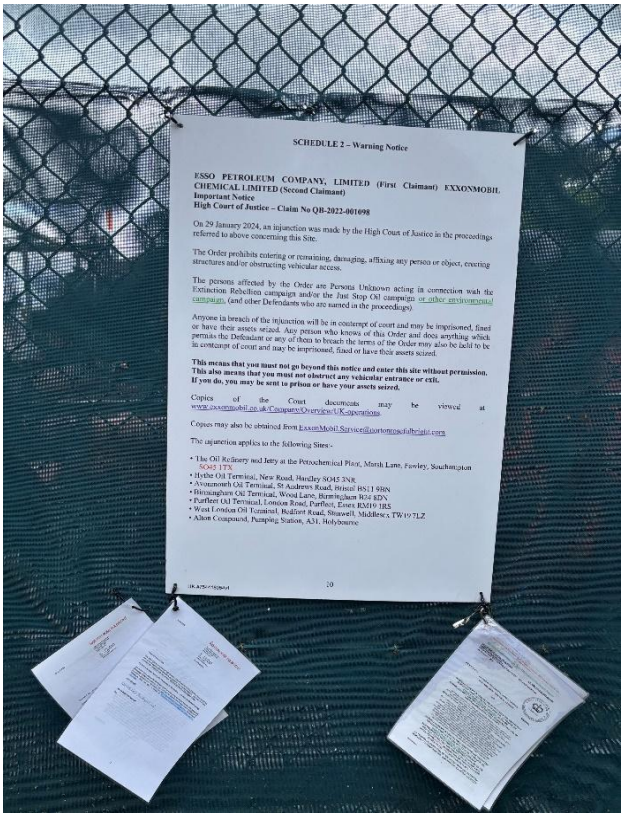
Hythe Location 3 – South emergency access gate

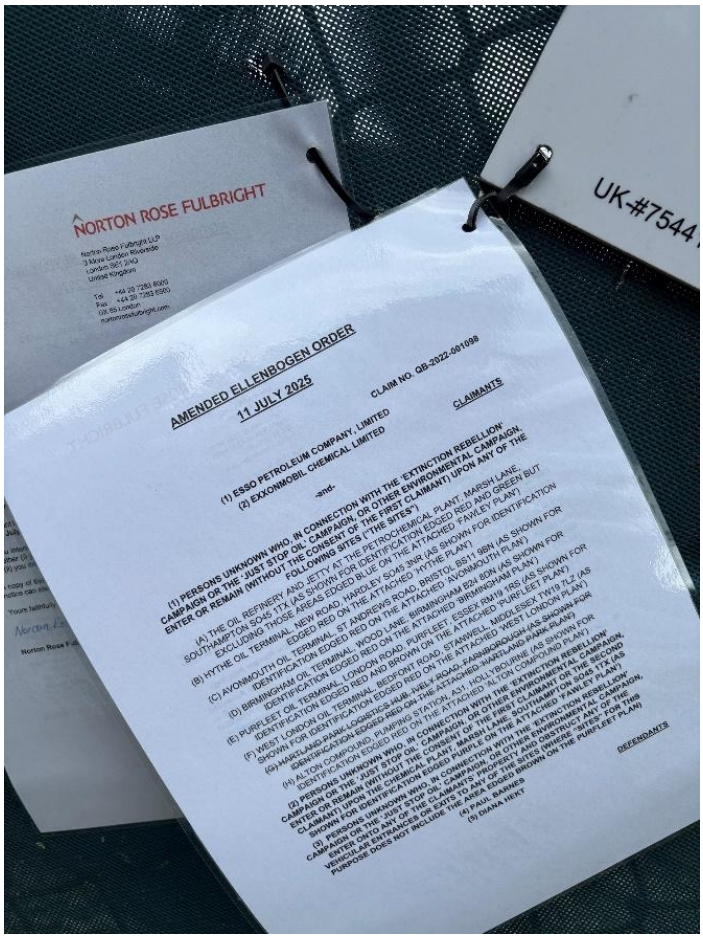


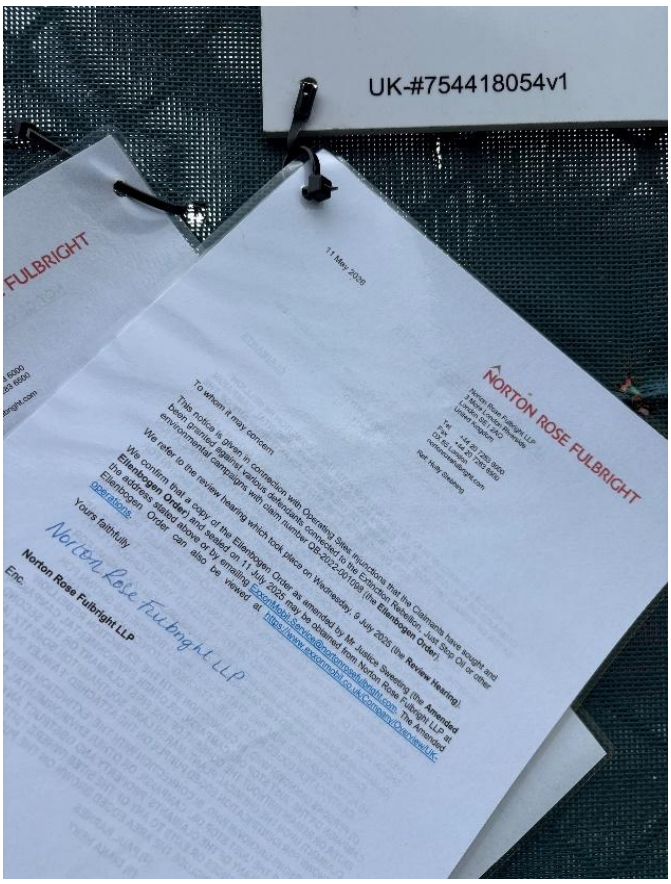




Hythe Location 4 – Right of pedestrian walkway from visitor car park up to terminal



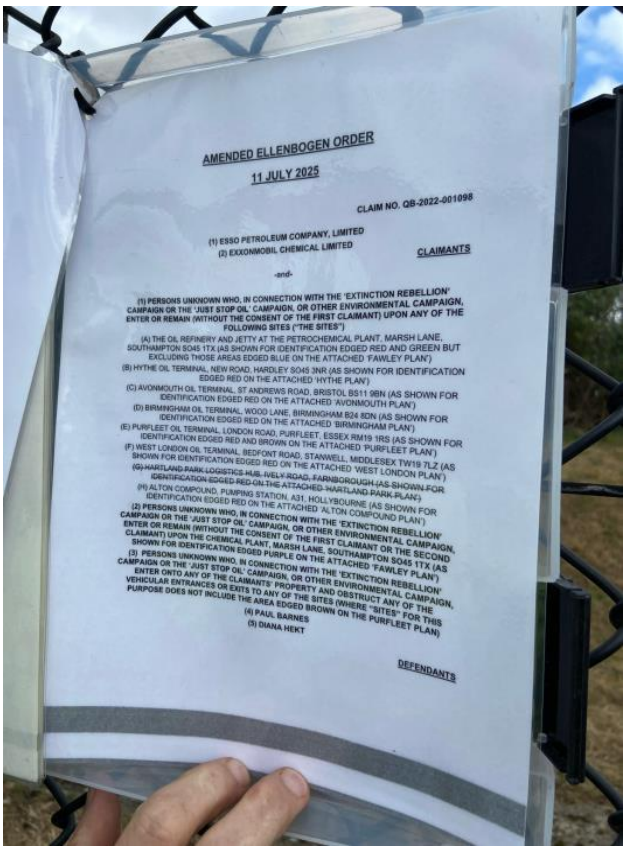




Purfleet Oil Terminal – 03.06.26 / 04.06.26

Purfleet Location 1 – Terminal vehicle entry / Entrance side of Main Gate – 03.06.2026




AMENDED ELLENBOGEN ORDER

11 JULY 2025

CLAIM NO. QB-2022-001098

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

CLAIMANTS

-and-

(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')

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

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

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

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

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

(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')

(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

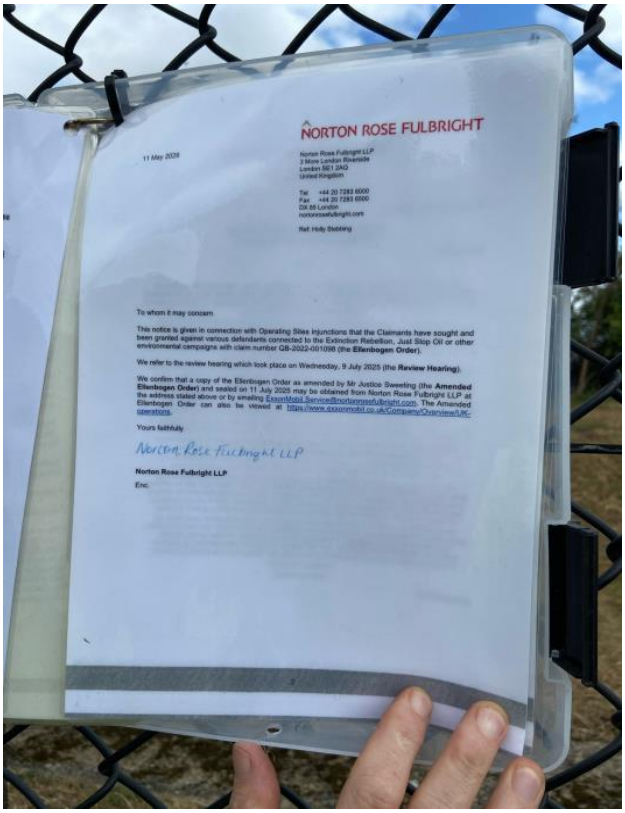
(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (AS SHOWN FOR 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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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

(5) DIANA HEKT

DEFENDANTS


NORTON ROSE FULBRIGHT

11 May 2026

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Ref: Holly Stebbing

To whom it may concern

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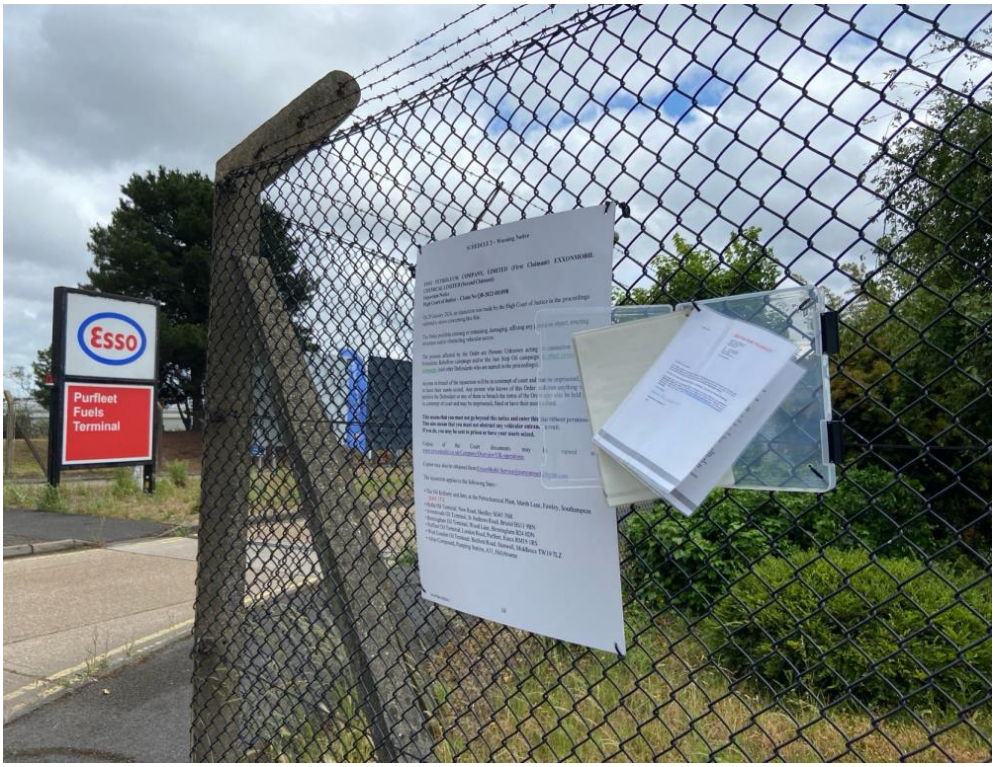
Yours faithfully

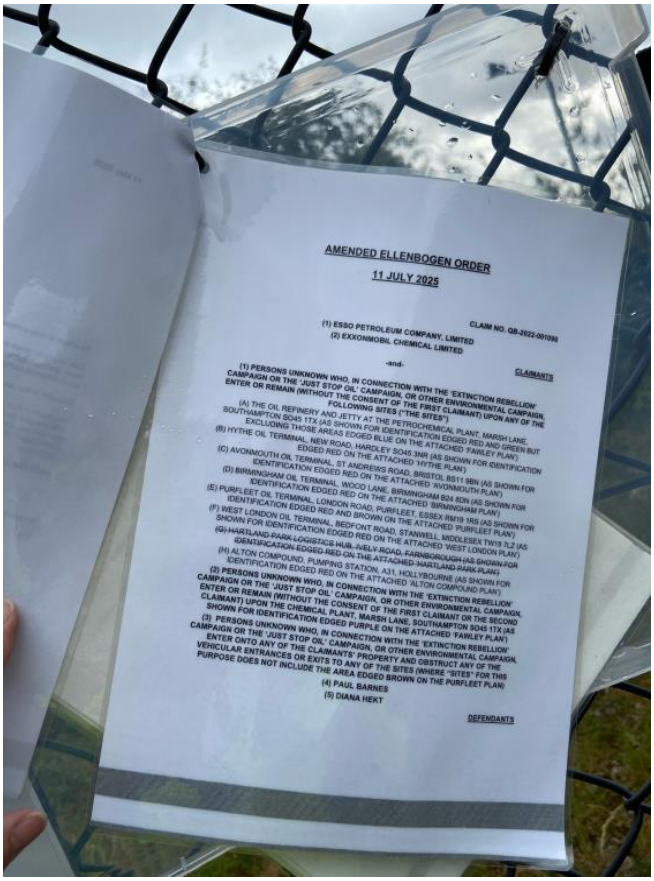
Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Enc.

Purfleet Location 2 – Terminal vehicle exit / Exit side of main entry – 03.06.2026




AMENDED ELLENBOGEN ORDER

11 JULY 2025

CLAIM NO. QB-2022-001098

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

-and-

CLAIMANTS

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(A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
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(G) HARTLAND PARK LOGISTICS HUB, JUELLY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')
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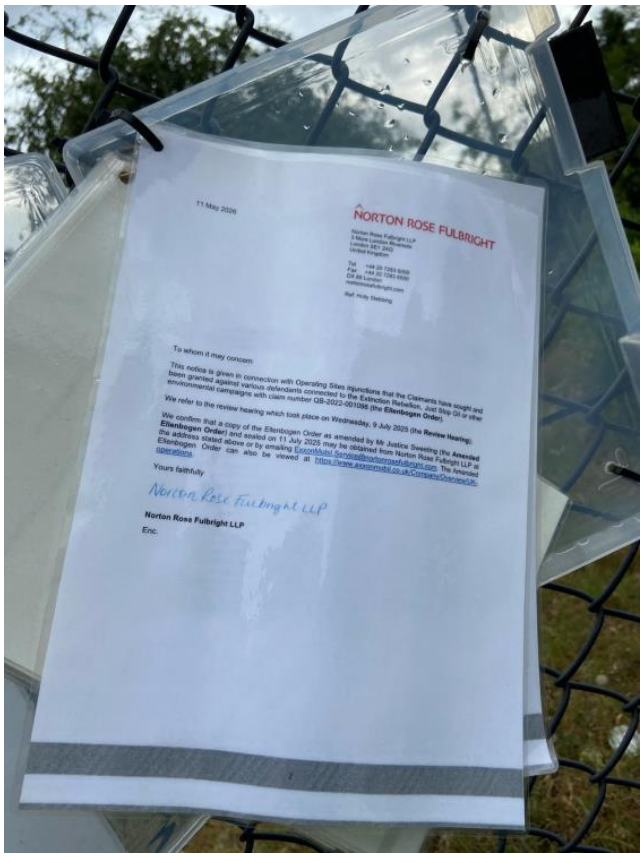
(4) PAUL BARNES
(5) DIANA HEKT

DEFENDANTS


11 May 2026

NORTON ROSE FULBRIGHT

To whom it may concern

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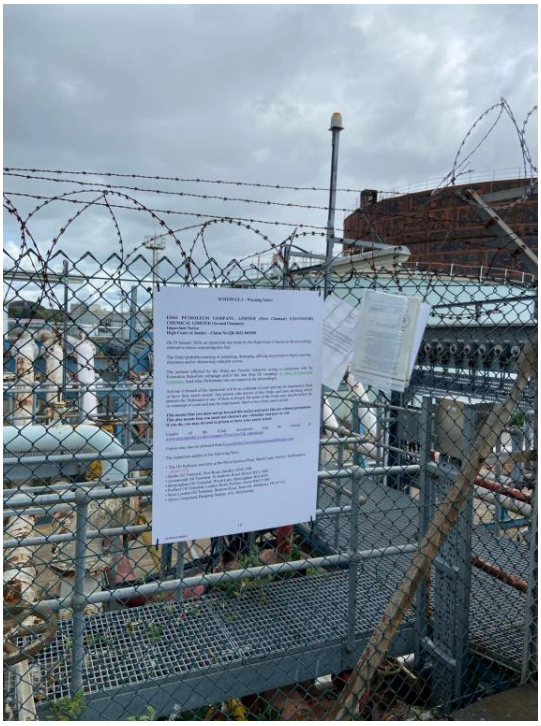
Yours faithfully

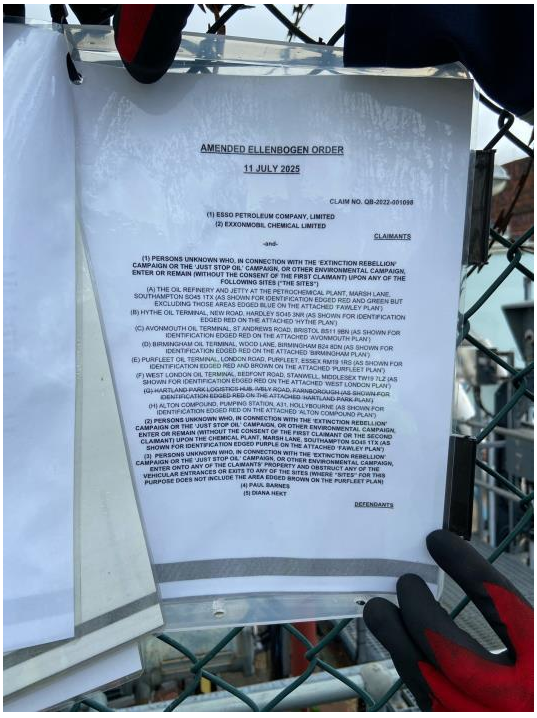
Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Enc.

Purfleet Location 3 – Sea wall jetty gate / Public Footpath – 04.06.2026





AMENDED ELLENBOGEN ORDER

11 JULY 2025

CLAIM NO. QB-2022-001098

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

CLAIMANTS

-and-

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(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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)

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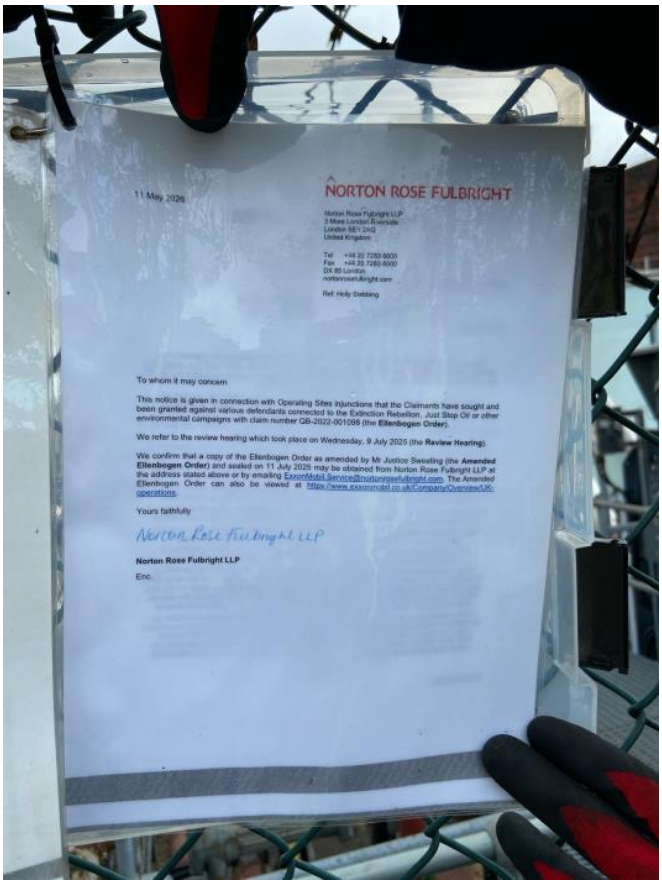

11 May 2026

NORTON ROSE FULBRIGHT

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
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Ref: Holly Stebbing

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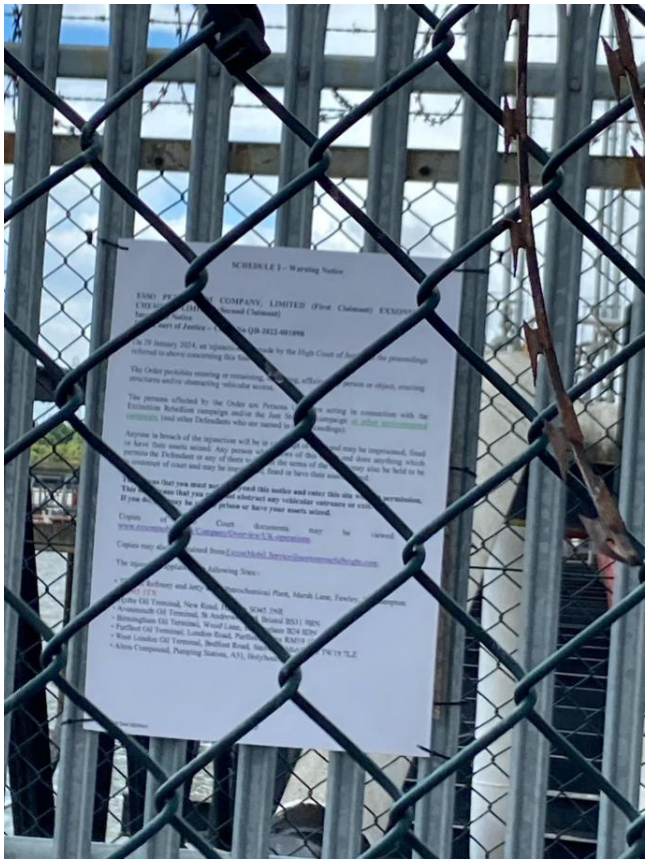
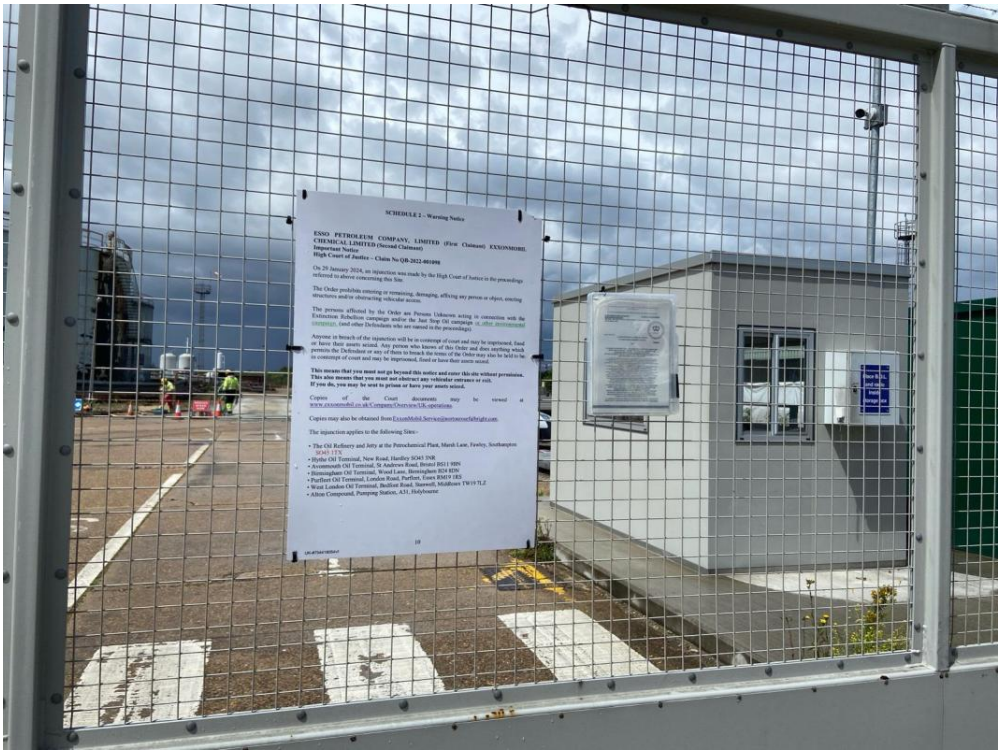
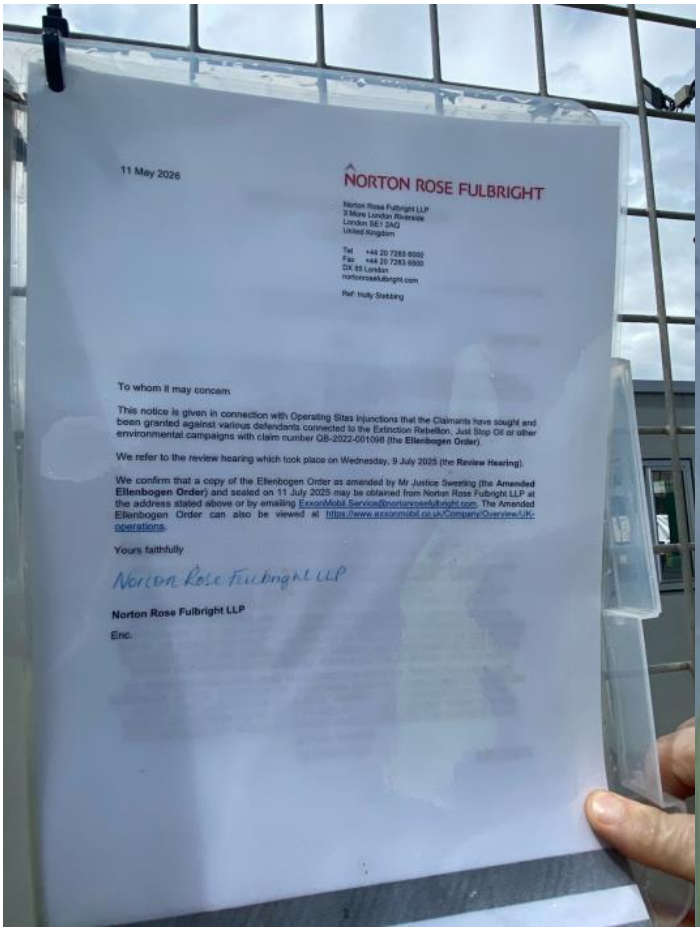
Enc.

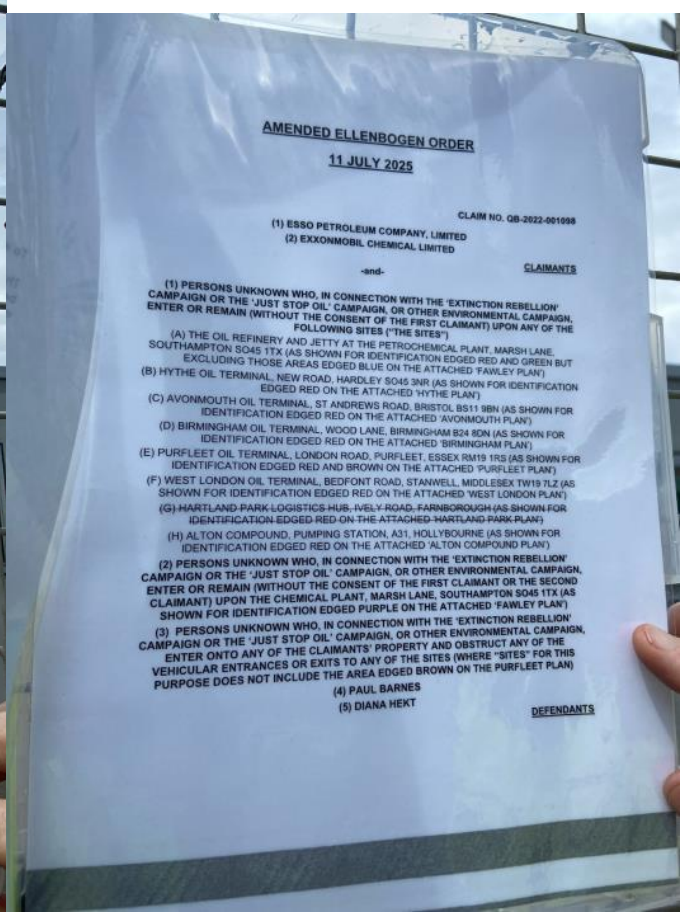


SCHEDULE 1 – Warning Notice

Purfleet Location 4 – Canteen entrance aka exit gate – 04.06.2026



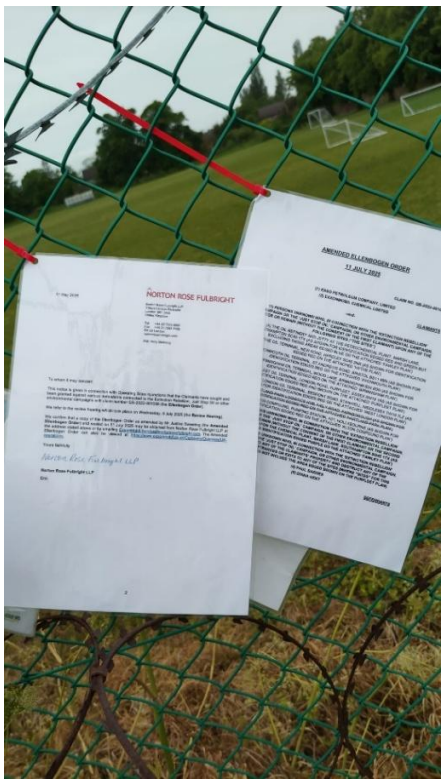




West London Oil Terminal

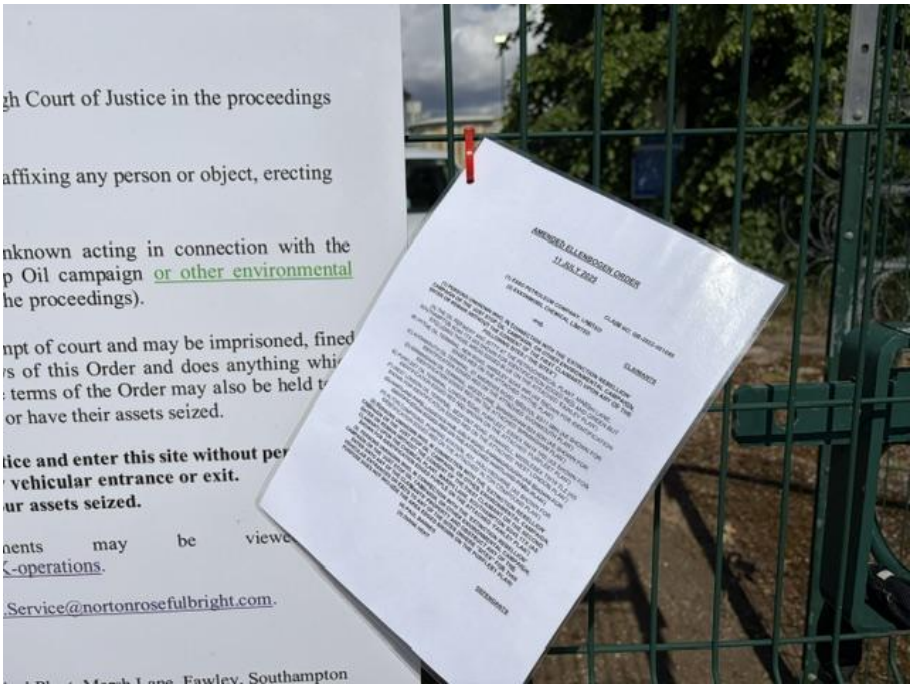
West London Location 1 – West side by the football pitch – 15.05.26

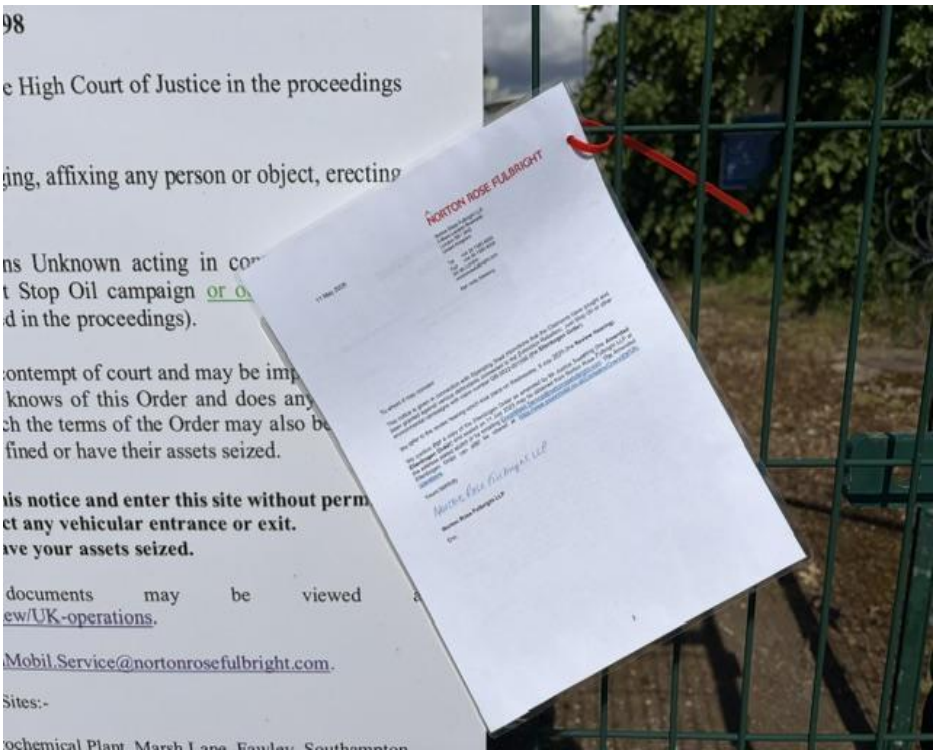




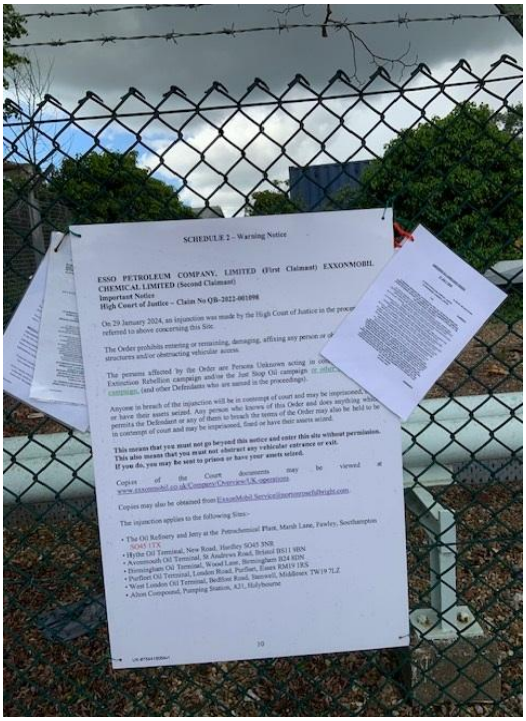
West London Location 2 – South west corner by short lane fire gate – 15.05.26

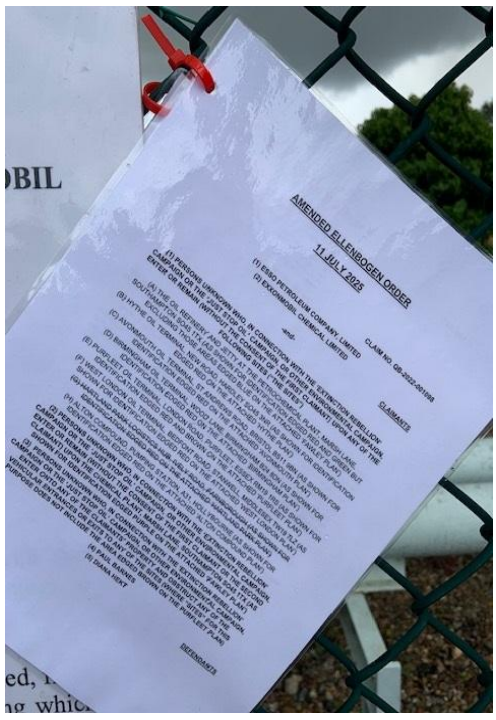


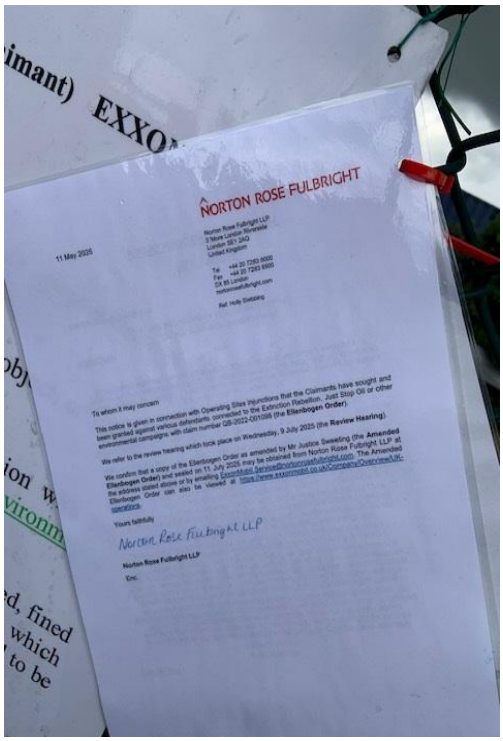




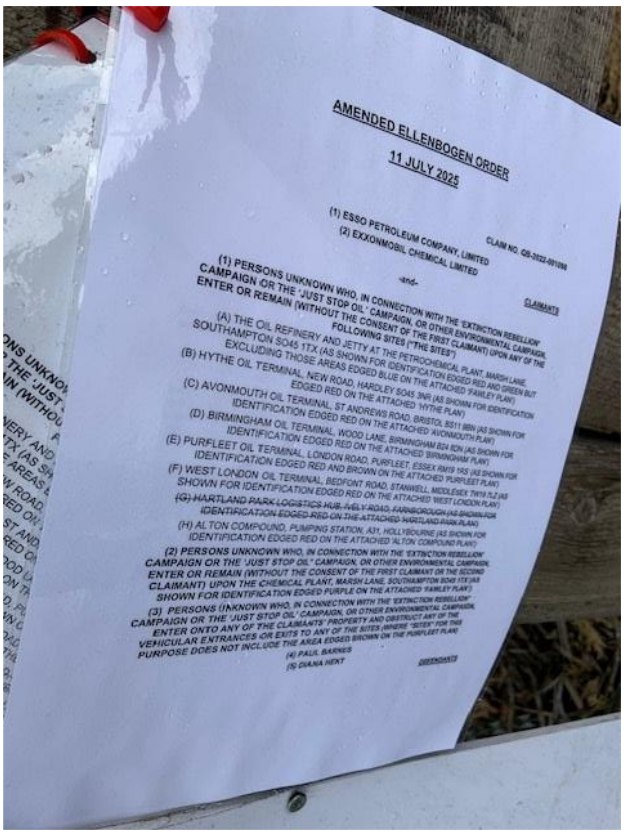
West London Location 3 – Outside the main front of the gatehouse – 13.05.26







West London Location 4 – Main entrance to the site – 13.05.2026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11 JULY 2025

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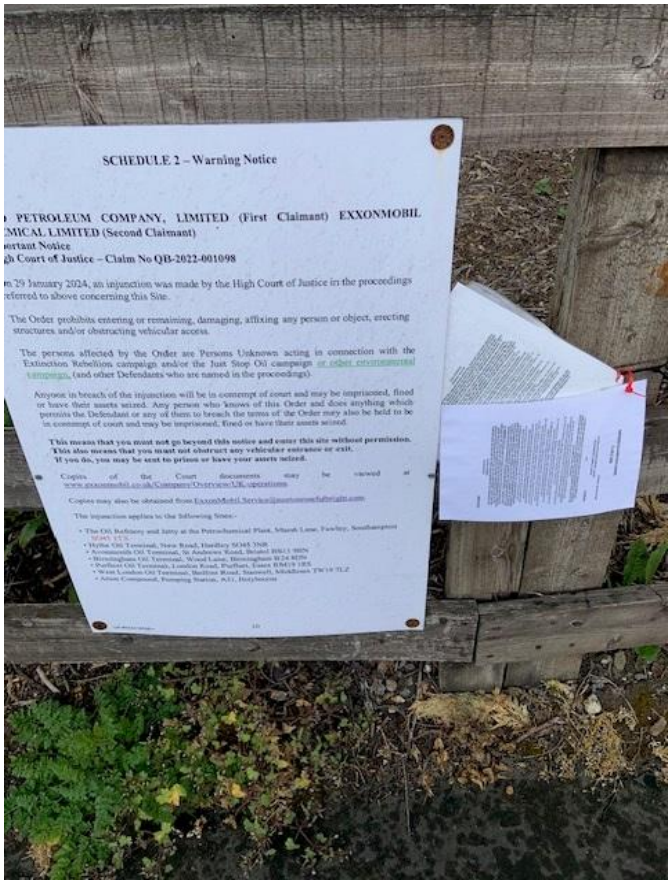
(5) DIANA HENT

DEFENDANTS


SCHEDULE 2 – Warning Notice

PETROLEUM COMPANY, LIMITED (First Claimant) EXXONMOBIL MICAL LIMITED (Second Claimant)
ortant Notice
gh Court of Justice – Claim No QB-2022-001098

n 29 January 2024, an injunction was made by the High Court of Justice in the proceedings referred to above concerning this Site.

The Order prohibits entering or remaining, damaging, affixing any person or object, erecting structures and/or obstructing vehicular access.

The persons affected by the Order are Persons Unknown acting in connection with the Extinction Rebellion campaign and/or the Just Stop Oil campaign or other environmental campaigns, (and other Defendants who are named in the proceedings).

Anyone in breach of the injunction will be in contempt of court and may be imprisoned, fined or have their assets seized. Any person who knows of this Order and does anything which permits the Defendant or any of them to breach the terms of the Order may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

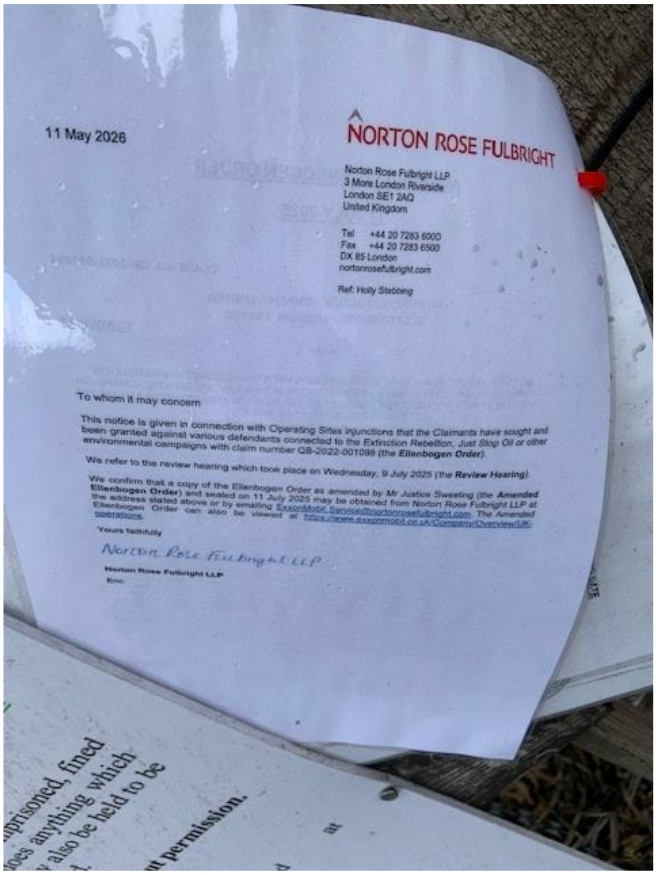
This means that you must not go beyond this notice and enter this site without permission. This also means that you must not obstruct any vehicular entrance or exit. If you do, you may be sent to prison or have your assets seized.

Copies of the Court documents may be viewed at www.exxonmobil.co.uk/Company/Overview/UK-operations

Copies may also be obtained from ExxonMobil.Service@nortonrosefulbright.com

The injunction applies to the following Sites:-

- The Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Fawley, Southampton SO45 1TX
- Hythe Oil Terminal, New Road, Hardley SO45 3NR
- Avonmouth Oil Terminal, St Andrews Road, Bristol BS11 9BN
- Birmingham Oil Terminal, Wood Lane, Birmingham B24 8DN
- Purfleet Oil Terminals, London Road, Purfleet, Essex RM19 1RS
- West London Oil Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ
- Alton Compound, Pumping Station, A31, Hollybourne


11 May 2026

NORTON ROSE FULBRIGHT

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Ref: Holly Stebbing

To whom it may concern

This notice is given in connection with Operating Sites injunctions that the Claimants have sought and been granted against various defendants connected to the Extinction Rebellion, Just Stop Oil or other environmental campaigns with claim number QB-2022-001098 (the **Ellenbogen Order**).

We refer to the review hearing which took place on Wednesday, 9 July 2025 (the **Review Hearing**).

We confirm that a copy of the Ellenbogen Order as amended by Mr Justice Sweeting (the **Amended Ellenbogen Order**) and sealed on 11 July 2025 may be obtained from Norton Rose Fulbright LLP at the address stated above or by emailing ExxonMobil.Service@nortonrosefulbright.com. The Amended Ellenbogen Order can also be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Enc.

From:	Scott Speirs
Sent:	01 August 2025 13:53
To:	PBHPXR@protonmail.com
Cc:	Holly Stebbing
Subject:	QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]
Attachments:	2025.07.11 - King's Bench Associate's - Sealed Sweeting Order.pdf; 2025.07.11 - Sealed Ellenbogen Order (amended description of D1-D3, 2025 review hearing).pdf

Dear Paul

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors

Service of Amended Justice Ellenbogen Order and Justice Sweeting Order (sealed 11 July 2025)

We refer to our letter dated 10 April 2025 in connection with the above mentioned proceedings, in which we provided notice that the date had been fixed for this year's injunction review hearing for Wednesday, 9 July 2025 (the **Review Hearing**).

We confirm that the Review Hearing has taken place. By way of service, we attach the Order of Justice Sweeting, sealed on 11 July 2025, which maintains the injunctions granted in the Order of Justice Ellenbogen, dated 29 January 2024, (the **Sweeting Order**).

The Sweeting Order also amended the description of the defendants in the Ellenbogen Order so that it now includes "or other environmental campaign" when describing persons unknown and dispensed with the need to serve documents in plastic containers at the sites. We also attach by way of service the Amended Ellenbogen Order, sealed on 11 July 2025 (**Amended Ellenbogen Order**).

We draw your particular attention to the final recital (beginning "AND UPON the Claimants having received assurances from Diana Hekt..."), paragraph 3 and paragraph 9 of the Sweeting Order.

Further copies of the Sweeting Order and Amended Ellenbogen Order may be obtained from Norton Rose Fulbright LLP, at the address stated below, or by emailing ExxonMobil.Service@nortonrosefulbright.com. A copy of the Sweeting Order and Amended Ellenbogen Order may also be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

Yours faithfully
Norton Rose Fulbright LLP

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
Tel +44 20 7444 2441 | Mob +44 75111 76603
scott.speirs@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

From: Scott Speirs
Sent: 01 August 2025 13:50
To: Diana Hekt
Cc: Holly Stebbing
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]
Attachments: 2025.07.11 - King's Bench Associate's - Sealed Sweeting Order.pdf; 2025.07.11 - Sealed Ellenbogen Order (amended description of D1-D3, 2025 review hearing).pdf

Tracking:

Recipient	Delivery
Diana Hekt	
Holly Stebbing	Delivered: 01/08/2025 13:50

Dear Diana

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors

Service of Amended Justice Ellenbogen Order and Justice Sweeting Order (sealed 11 July 2025)

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Further copies of the Sweeting Order and Amended Ellenbogen Order may be obtained from Norton Rose Fulbright LLP, at the address stated below, or by emailing ExxonMobil.Service@nortonrosefulbright.com. A copy of the Sweeting Order and Amended Ellenbogen Order may also be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

Yours faithfully
Norton Rose Fulbright LLP

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
Tel +44 20 7444 2441 | Mob +44 75111 76603
scott.speirs@nortonrosefulbright.com

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Law around the world
nortonrosefulbright.com

From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: PBHPXR@protonmail.com
Sent: 01 August 2025 13:53
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

PBHPXR@protonmail.com (PBHPXR@protonmail.com)

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: Diana Hekt
Sent: 01 August 2025 13:50
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

Diana Hekt (hekt@outlook.com)

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

From: Postmaster
Sent: 01 August 2025 13:53
To: Scott Speirs
Subject: [Postmaster] Email Delivery Failure
Attachments: ATT00001

This is a delivery failure notification message indicating that an email you addressed to email address :
-- pbhpxr@protonmail.com

could not be delivered. The problem appears to be :
-- Recipient mailbox is full

Additional information follows :
-- 5.2.2 <pbhpxr@protonmail.com>: Recipient address rejected: Mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

NORTON ROSE FULBRIGHT

4 August 2025

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Paul Barnes

[redacted]

Dear Mr Barnes

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors

Service of Amended Justice Ellenbogen Order and Justice Sweeting Order (sealed 11 July 2025)

We refer to our letter dated 10 April 2025 in connection with the above-mentioned proceedings, in which we provided notice that the date had been fixed for this year's injunction review hearing for Wednesday, 9 July 2025 (the **Review Hearing**).

We confirm that the Review Hearing has taken place and the Order of Justice Sweeting, sealed on 11 July 2025, maintains the injunctions granted in the Order of Justice Ellenbogen, dated 29 January 2024, (the **Sweeting Order**). The Sweeting Order also amended the description of the defendants in the Ellenbogen Order (sealed on 11 July 2025, **Amended Ellenbogen Order**) so that it now includes "or other environmental campaign" when describing persons unknown and dispensed with the need to serve documents in plastic containers at the sites.

Pursuant to paragraph 2 of the Linden J consent order sealed 19 July 2023, the Claimants are entitled to effect service by email, which they have, at the email address pbhpxr@protonmail.com. However, a notification message was received stating the mailbox was full. Therefore, we are also providing the link to a copy of the Sweeting Order and Amended Ellenbogen Order by first class post (noting service has already been effected). These orders can be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations. We draw your particular attention to the final recital (beginning "AND UPON the Claimants having received assurances from Diana Hekt..."), paragraph 3 and paragraph 9 of the Sweeting Order.

Further copies of the Sweeting Order and Amended Ellenbogen Order may be obtained from Norton Rose Fulbright LLP, at the address stated above, or by emailing ExxonMobil.Service@nortonrosefulbright.com.

Yours sincerely

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Encs.

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from

Norton Rose

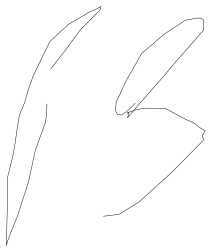
TB/655

Track your Item

Proof of delivery

Tracking number: ZI255256261GB





Your item was delivered on **07-08-2025**.

Signed for by: BARNES
Service used: Royal Mail Special Delivery Guaranteed 1pm™
Delivered at: 13:05, Thursday 07 August 2025

From:	Beatrice Shah Scott
Sent:	23 March 2026 11:19
To:	'juststopoilpress@protonmail.com'
Cc:	Holly Stebbing
Subject:	Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]
Attachments:	2025.07.11 - Sealed Ellenbogen Order (amended description of D1-D3, 2025 review hearing).pdf; 2026.03.23 - Letter from NRF to Just Stop Oil re Annual Review Hearing.pdf

To whom it may concern

Re: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing

Please see the attached correspondence.

Yours faithfully

Norton Rose Fulbright LLP

Beatrice Shah Scott | Associate

Norton Rose Fulbright LLP
3 More London Riverside, London, SE1 2AQ, United Kingdom
Tel +44 20 7444 5081 | Mob +44 7708 298091 | Fax +44 20 7283 6500
beatrice.shahscott@nortonrosefulbright.com

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Law around the world
nortonrosefulbright.com

NORTON ROSE FULBRIGHT

23 March 2026

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Just Stop Oil

By email only: juststopoilpress@protonmail.com

Your reference	**Our reference**
	HMOR/1001267389

To whom it may concern

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown

We write on behalf of Esso Petroleum Company, Limited and ExxonMobil Chemical Limited (the **Claimants**) in connection with the enclosed Operating Sites injunctions that the Claimants have sought and been granted against various defendants connected to the Extinction Rebellion, Just Stop Oil or other environmental campaigns with claim number QB-2022-001098 (the **Order**).

Pursuant to paragraph 8 of the Order, the injunctions are to be reviewed on or around 18 July each year. Should you intend to appear and make submissions at the 2026 review hearing, please confirm (i) whether you will be instructing Counsel to appear on your behalf, and if so who; or (ii) if you intend to appear as a litigant in person, whether there are any dates to avoid in July 2026.

Please provide your response to the above questions by **4pm on Monday, 6 April 2026** by emailing ExxonMobil.Service@nortonrosefulbright.com, so that the Claimants can take steps to fix this year's annual review hearing. If you do not intend to appear and make submissions, there is no need to respond to this letter.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Enc.

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From:	Beatrice Shah Scott
Sent:	23 March 2026 11:12
To:	'xr-legal@riseup.net'; 'enquiries@extinctionrebellion.uk'
Cc:	Holly Stebbing
Subject:	Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]
Attachments:	2025.07.11 - Sealed Ellenbogen Order (amended description of D1-D3, 2025 review hearing).pdf; 2026.03.23 - Letter from NRF to Extinction Rebellion re Annual Review Hearing.pdf

To whom it may concern

Re: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing

Please see the attached correspondence.

Yours faithfully

Norton Rose Fulbright LLP

Beatrice Shah Scott | Associate

Norton Rose Fulbright LLP
3 More London Riverside, London, SE1 2AQ, United Kingdom
Tel +44 20 7444 5081 | Mob +44 7708 298091 | Fax +44 20 7283 6500
beatrice.shahscott@nortonrosefulbright.com

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Law around the world
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NORTON ROSE FULBRIGHT

23 March 2026

Norton Rose Fulbright LLP
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United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Extinction Rebellion

By email only: enquiries@extinctionrebellion.uk; xr-legal@riseup.net

Your reference **Our reference**
HMOR/1001267389

To whom it may concern

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown

We write on behalf of Esso Petroleum Company, Limited and ExxonMobil Chemical Limited (the **Claimants**) in connection with the enclosed Operating Sites injunctions that the Claimants have sought and been granted against various defendants connected to the Extinction Rebellion, Just Stop Oil or other environmental campaigns with claim number QB-2022-001098 (the **Order**).

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Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

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Norton Rose Fulbright LLP, Norton Rose Fulbright Australia, Norton Rose Fulbright Canada LLP, Norton Rose Fulbright South Africa Inc and Norton Rose Fulbright US LLP are separate legal entities and all of them are members of Norton Rose Fulbright Verein, a Swiss verein. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself provide legal services to clients. Details of each entity, with certain regulatory information, are available at nortonrosefulbright.com.

From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: 'juststopoilpress@protonmail.com'
Sent: 23 March 2026 11:19
Subject: Relayed: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

'juststopoilpress@protonmail.com' (juststopoilpress@protonmail.com)

Subject: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]

From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: 'xr-legal@riseup.net'; 'enquiries@extinctionrebellion.uk'
Sent: 23 March 2026 11:12
Subject: Relayed: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

'xr-legal@riseup.net' (xr-legal@riseup.net)

'enquiries@extinctionrebellion.uk' (enquiries@extinctionrebellion.uk)

Subject: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]

From: Extinction Rebellion <enquiries@extinctionrebellion.uk>
Sent: 23 March 2026 11:14
To: Beatrice Shah Scott
Subject: Message Received - Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]

External email

Hello Beatrice Shah Scott,

This is an automated reply to let you know we received your message.

It'll be read - usually within 24 hours - and we'll send you a personal reply, or forward it to an appropriate person within Extinction Rebellion.

To view the status of the ticket or to add comments, you can visit
https://risingup.freshdesk.com/helpdesk/tickets/48914

Thank you for contacting us,
With Love & Kindness from

The XR Public Engagement Working Group

Extinction Rebellion UK - General Enquiries powered by Freshworks 48914:1123824

From: xr-legal@riseup.net
Sent: 23 March 2026 11:13
To: Beatrice Shah Scott
Subject: Autoreply for XR Legal Support

External email

Hi there,

Thanks for getting in touch with the XR Legal Support Team.

We have received your email and are working on getting a response to you ASAP! We are currently quite low in capacity and so our response to your email(s) might be delayed.

If you don't hear from us within two weeks, please email back and we will do our best to get to you sooner.

In the meantime, please have a look at our website (https://www.informeddissent.info), as this may have information to answer your questions.

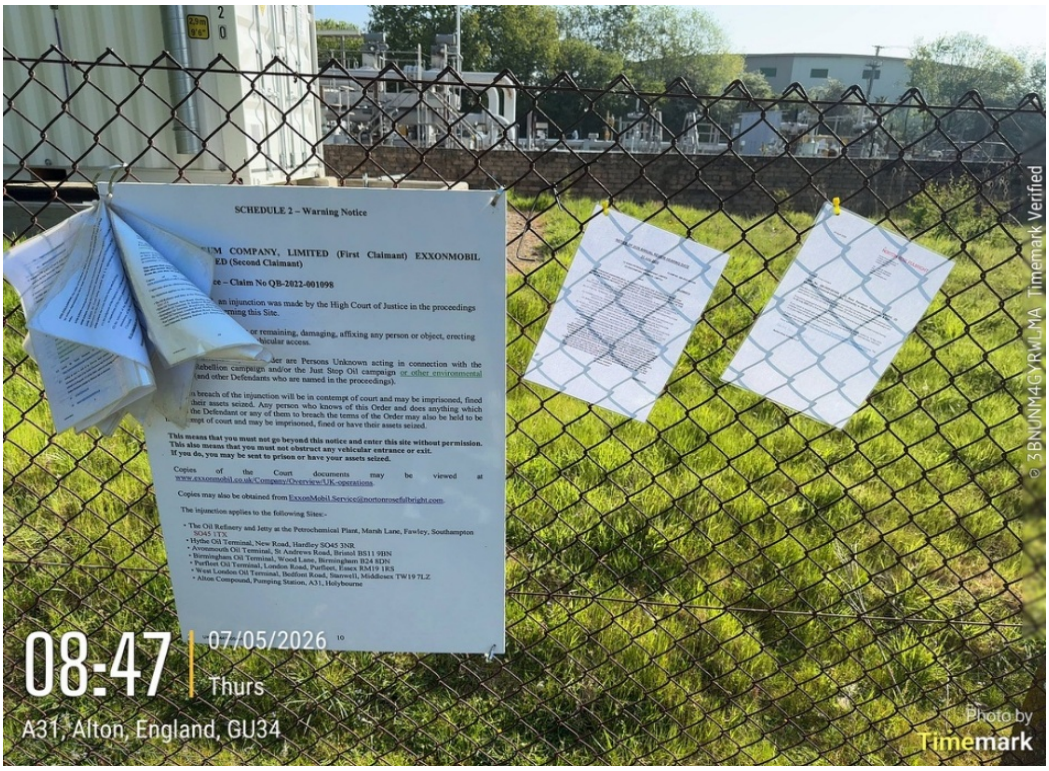
If your email is related to an upcoming court appearance, we will prioritise your email and get a response to you ASAP. Please also email the XR Legal Fund team to ensure you have the relevant support (legalfinancialsupport@riseup.net) with the details of your court date.

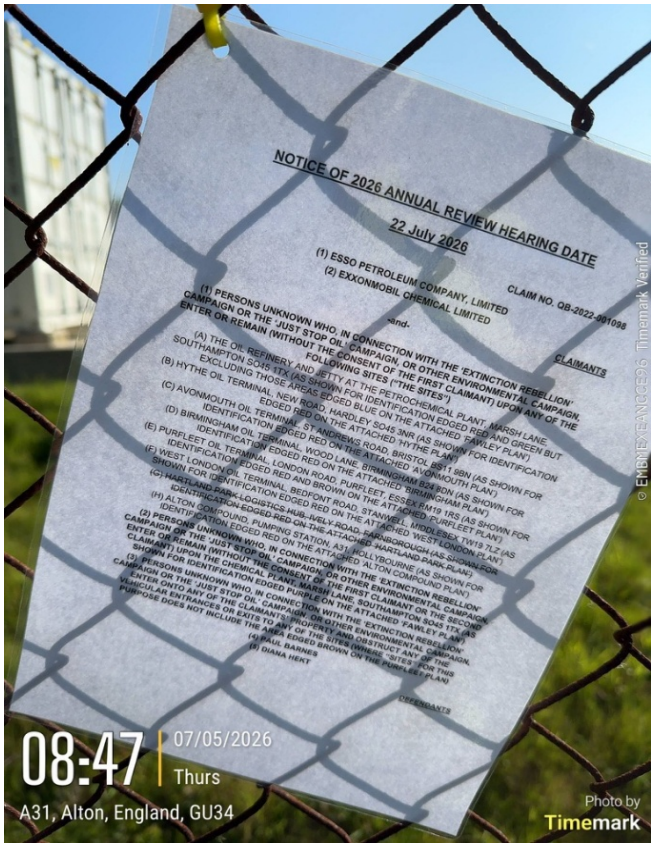
In Solidarity,
XR Legal Support Team

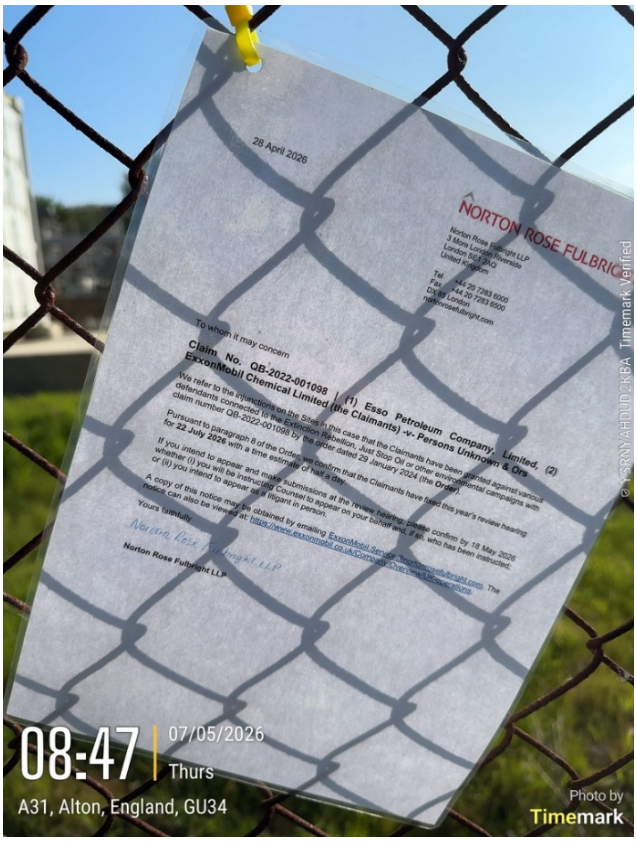
Evidence of Service – Review Hearing Notice

Alton Compound, Pumping Station – 07.05.26

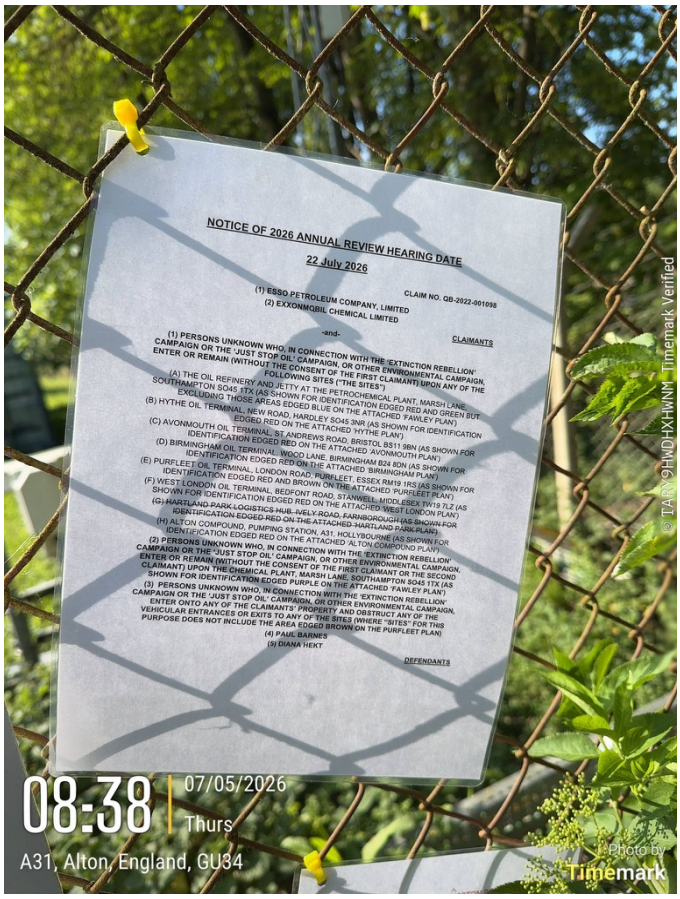
Alton Location 1 – West fence line

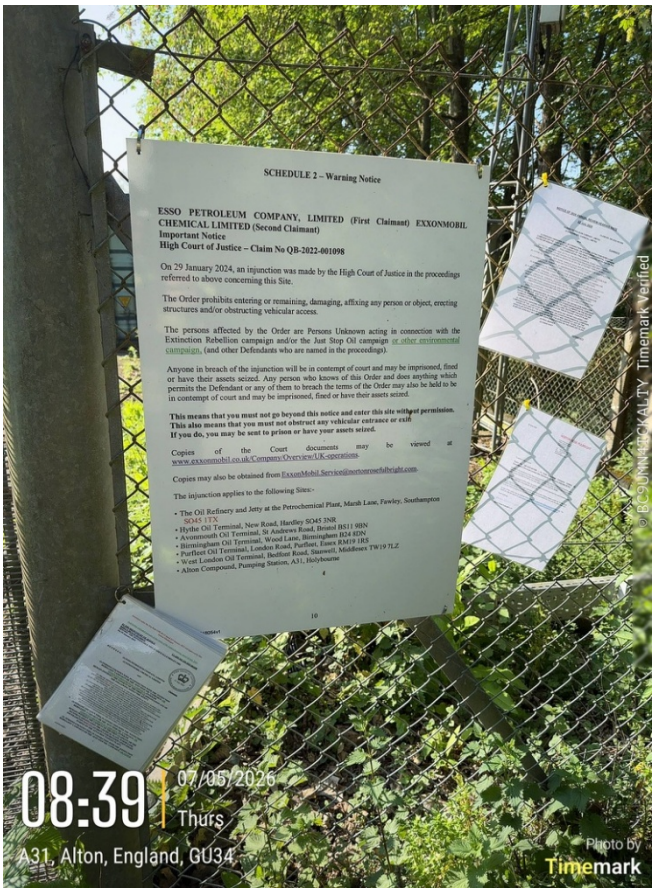


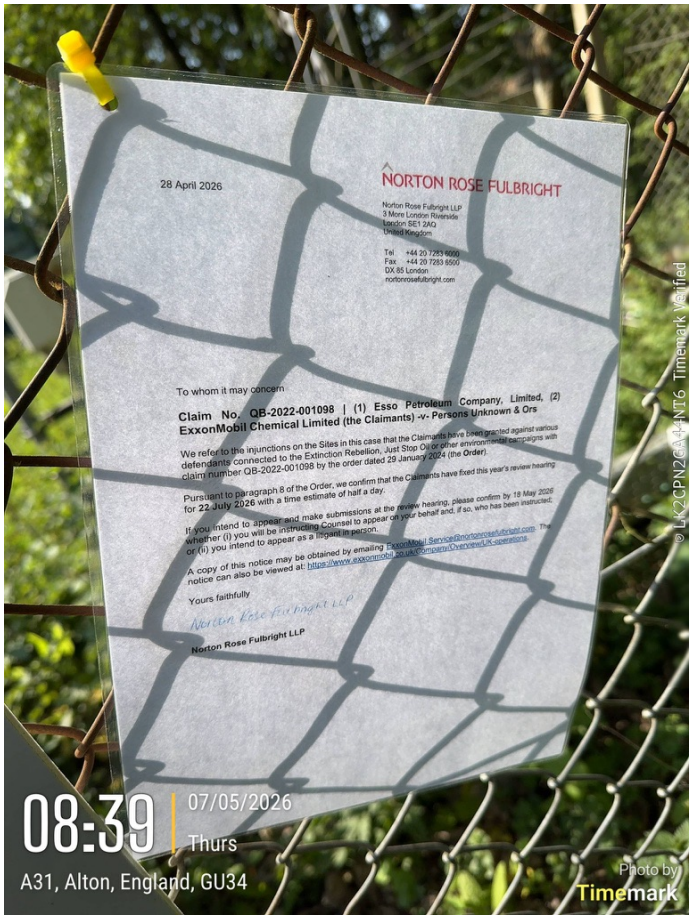




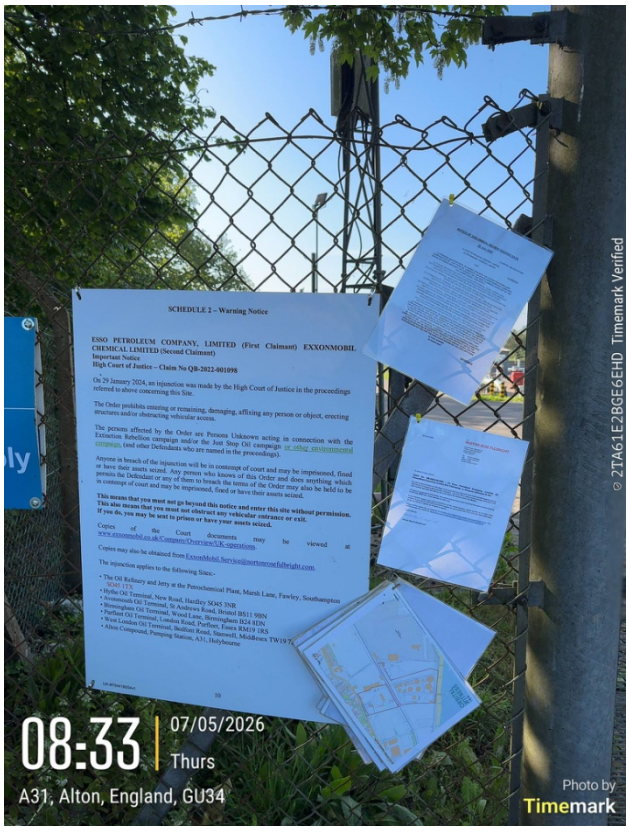
Alton Location 2 – Secondary main gate

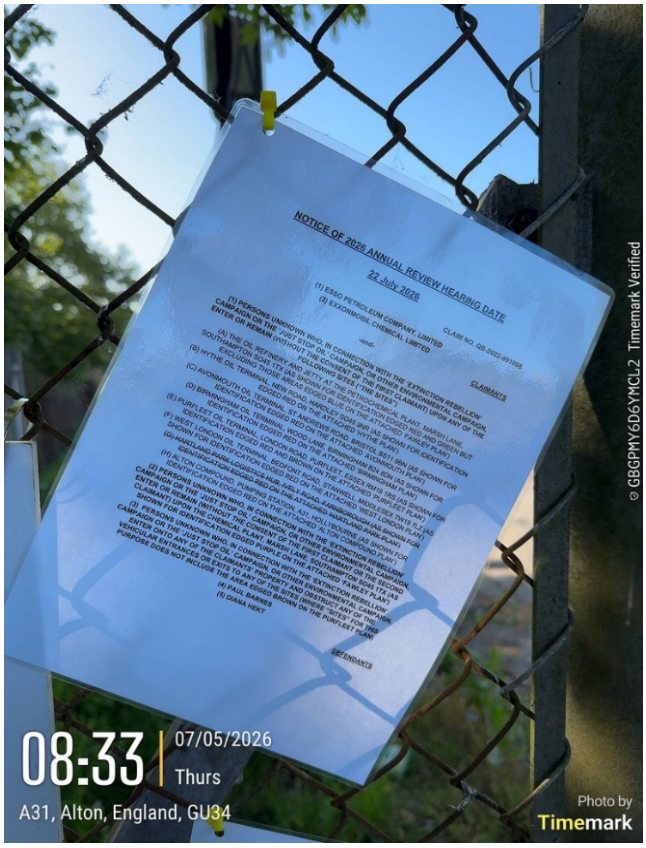


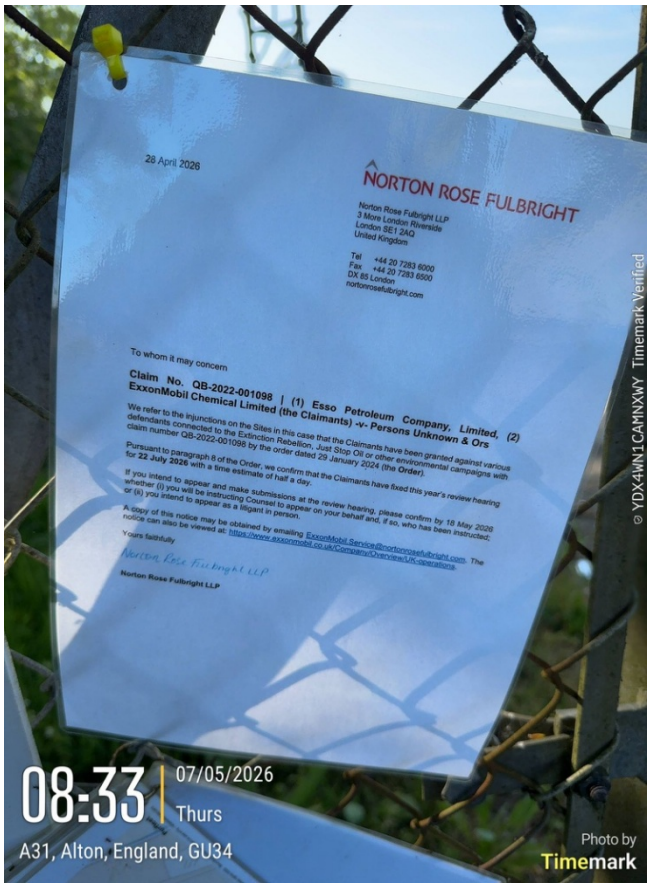




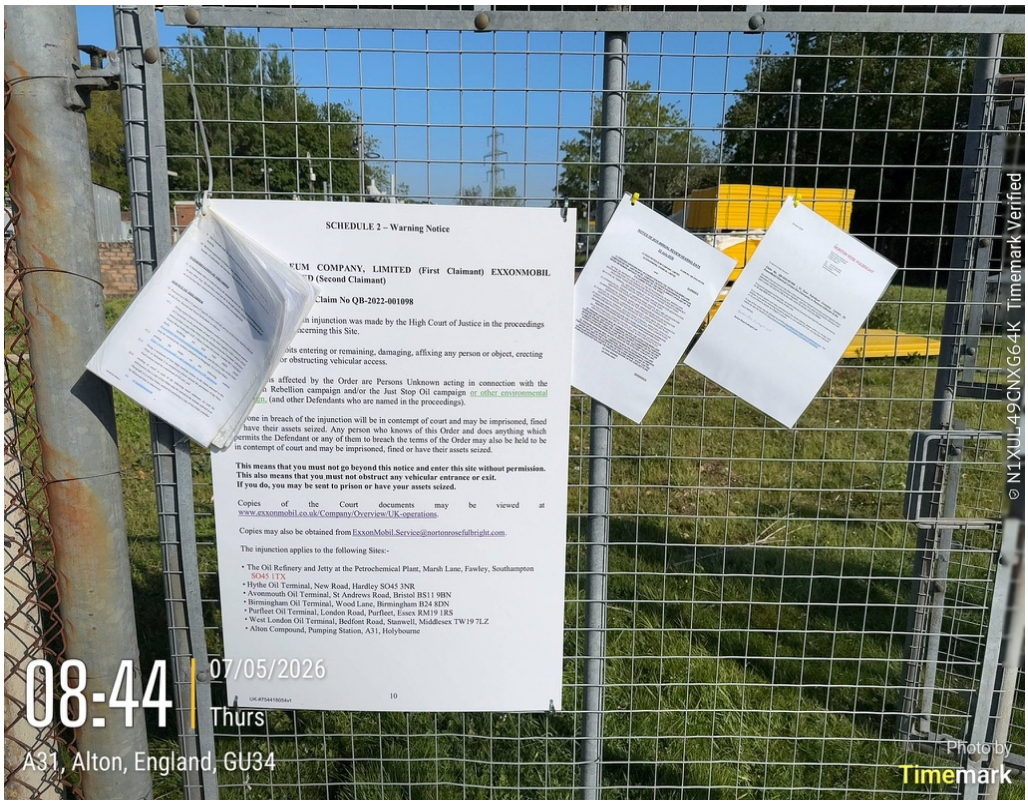
Alton Location 3 – Main gate

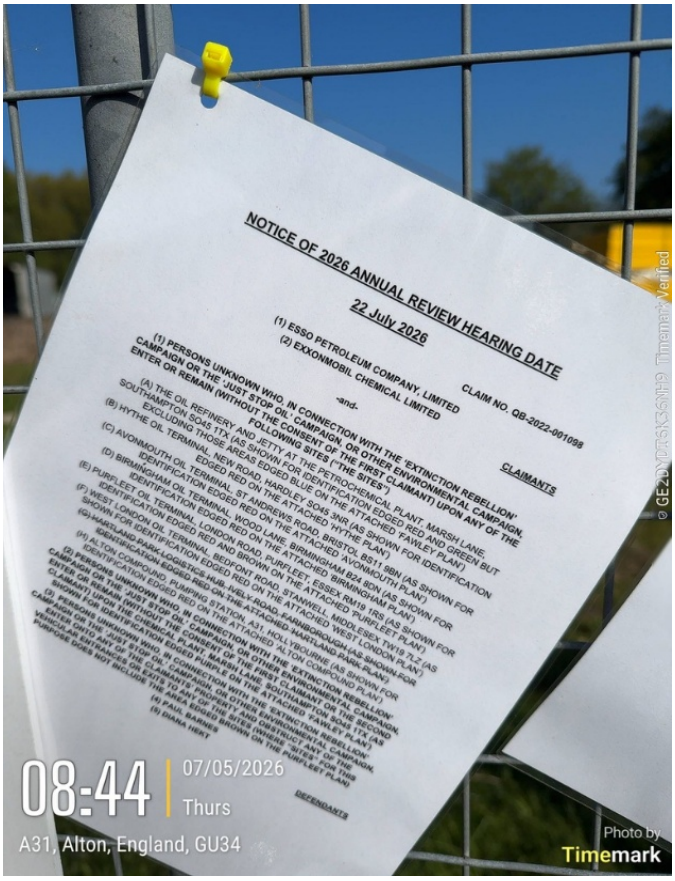


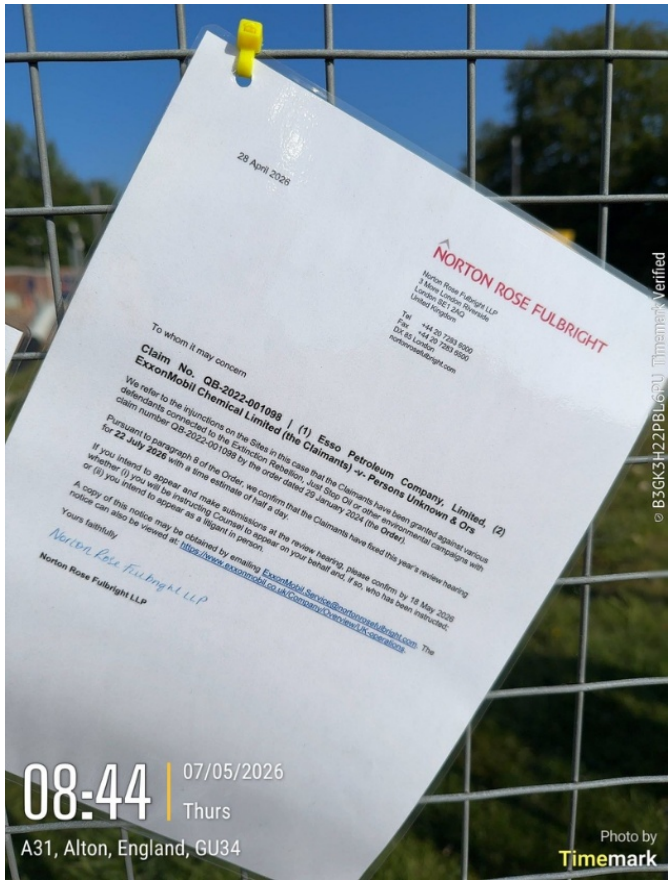




Alton Location 4 – Bottom gate



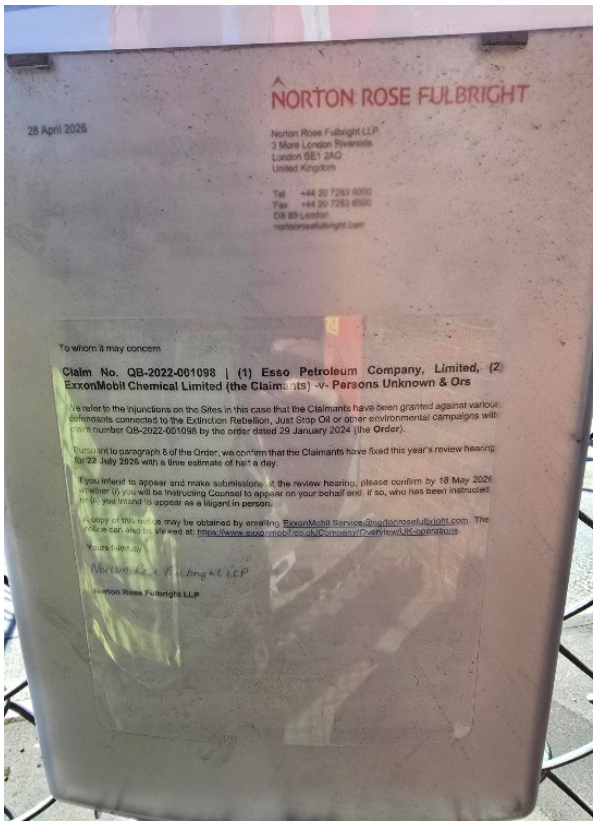


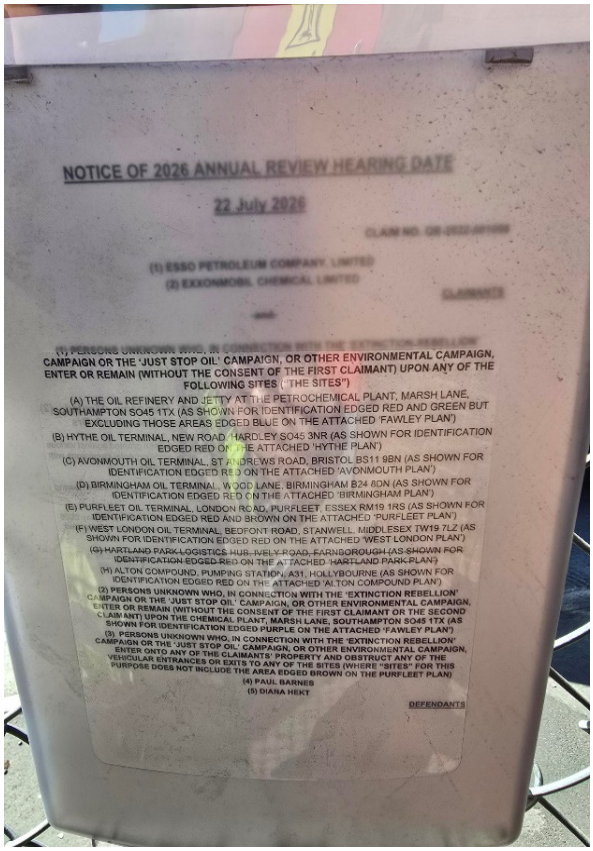


Avonmouth Oil Terminal – 30.04.26

Avonmouth Location 1 – Main vehicle gates, next to gatehouse

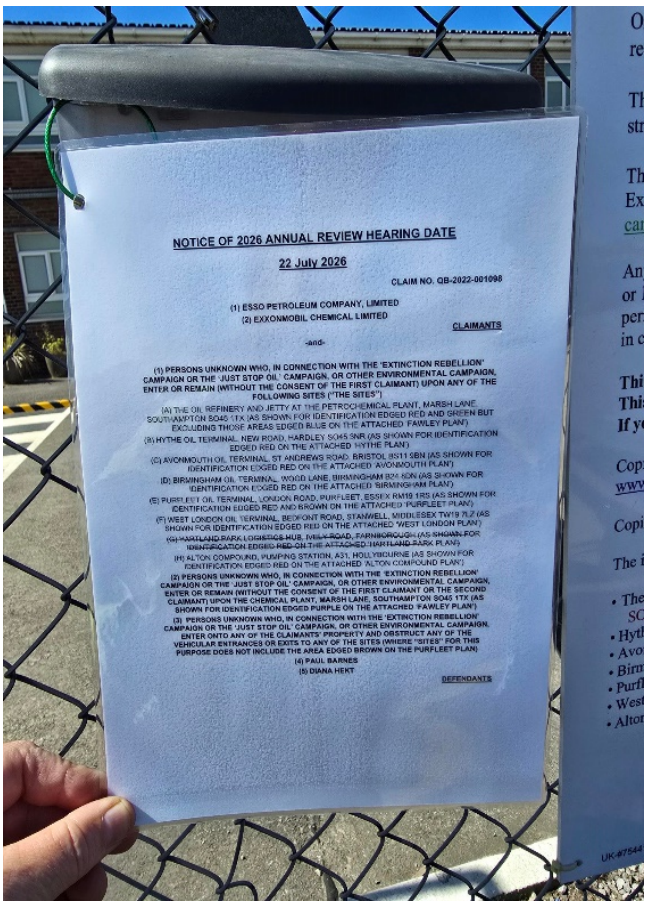


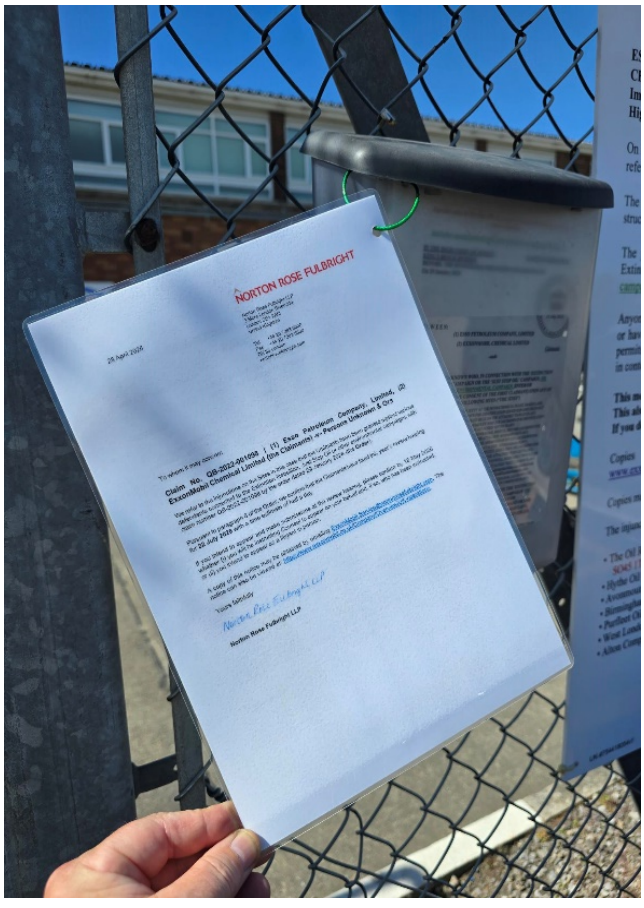




Avonmouth Location 2 – Main pedestrian gate to office buildings

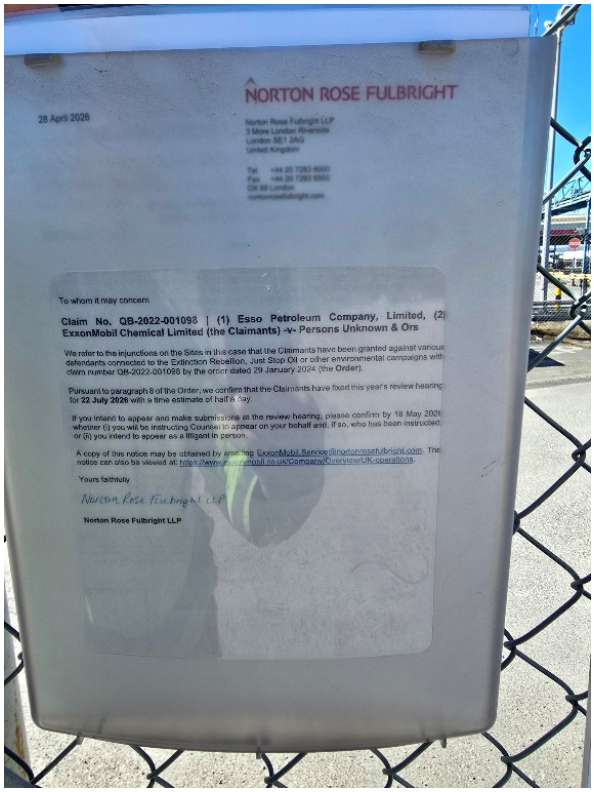






Avonmouth Location 3 – Entrance to main car park and Bristol Port land behind





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28 April 2026

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To whom it may concern

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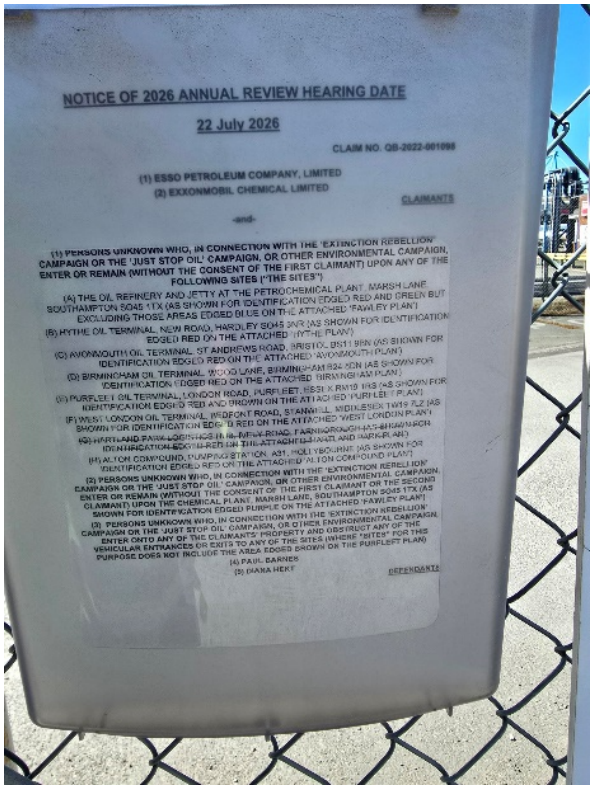

NOTICE OF 2026 ANNUAL REVIEW HEARING DATE

22 July 2026

CLAIM NO. QB-2022-001098

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

CLAIMANTS

-and-

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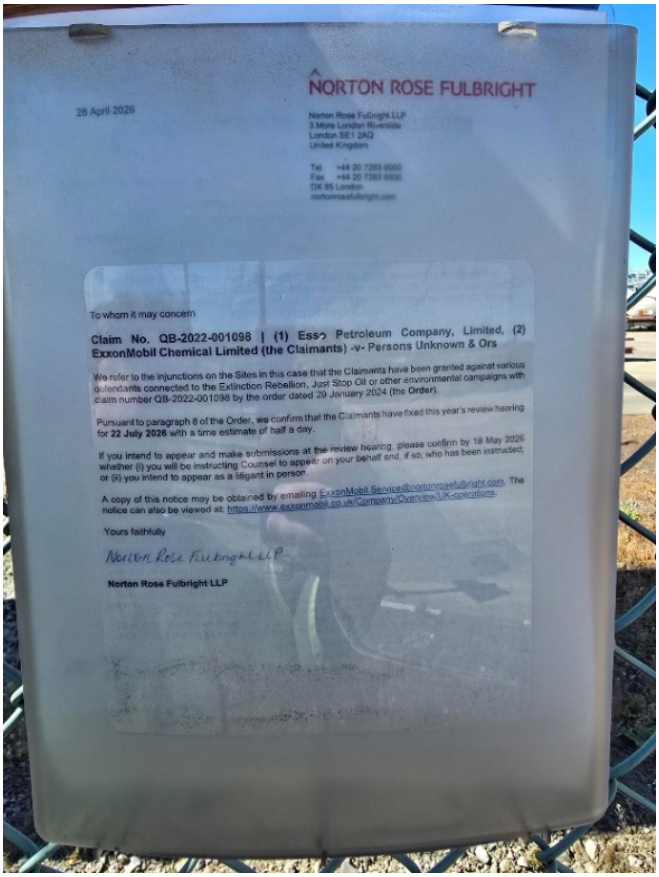
(4) PAUL BARNES
(5) DIANA HEKT

DEFENDANTS

Avonmouth Location 4 – Other side of vehicle gates





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28 April 2026

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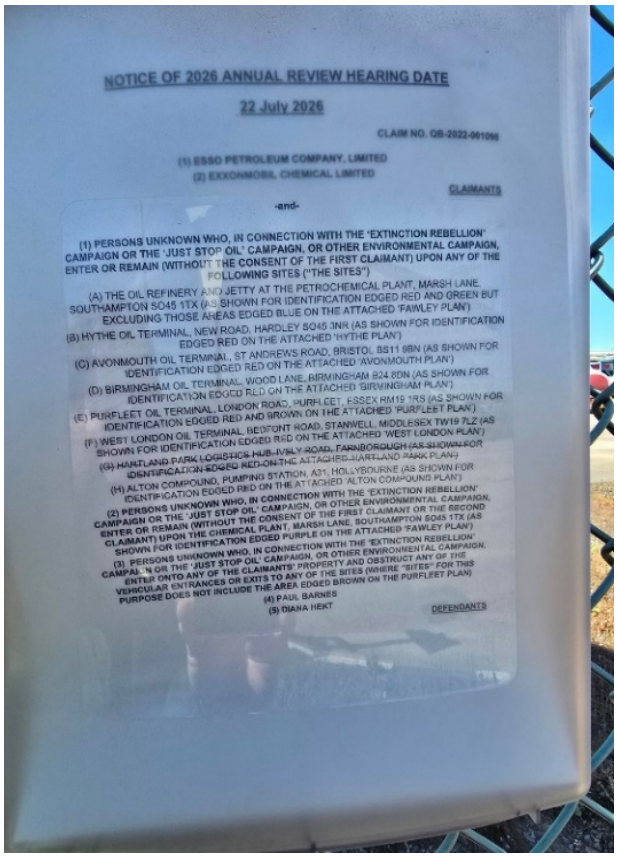

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22 July 2026

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(2) EXXONMOBIL CHEMICAL LIMITED

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-and-

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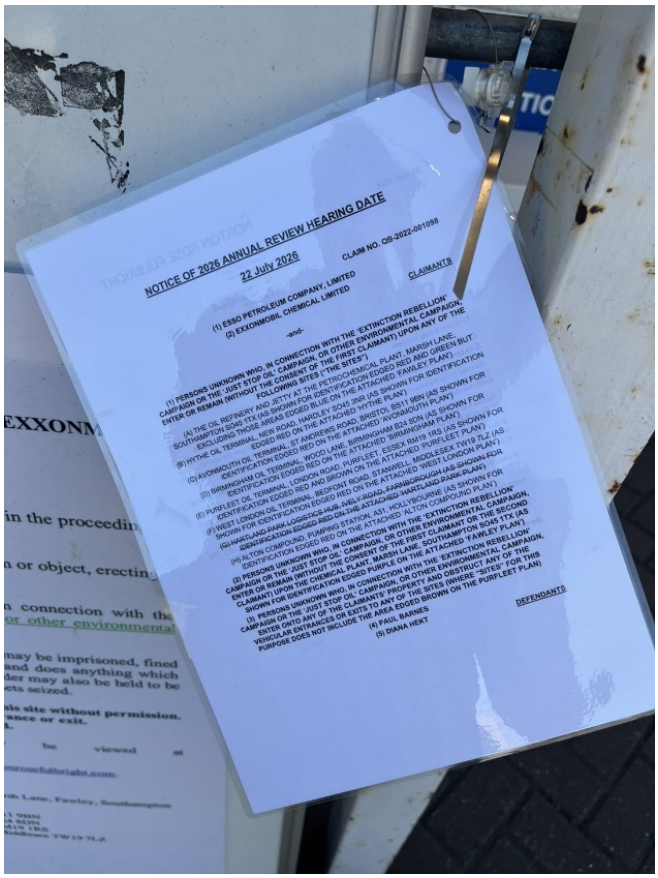
(4) PAUL BARNES
(5) DIANA HEKT

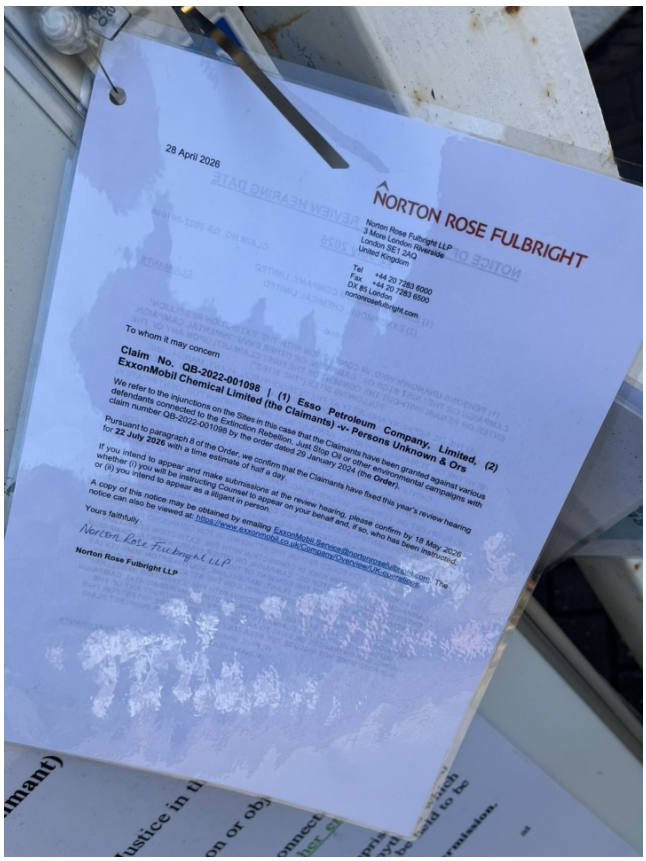
DEFENDANTS

Birmingham Oil Location – 30.04.26

Birmingham Location 1 – Main entrance on Wood Lane / Reception

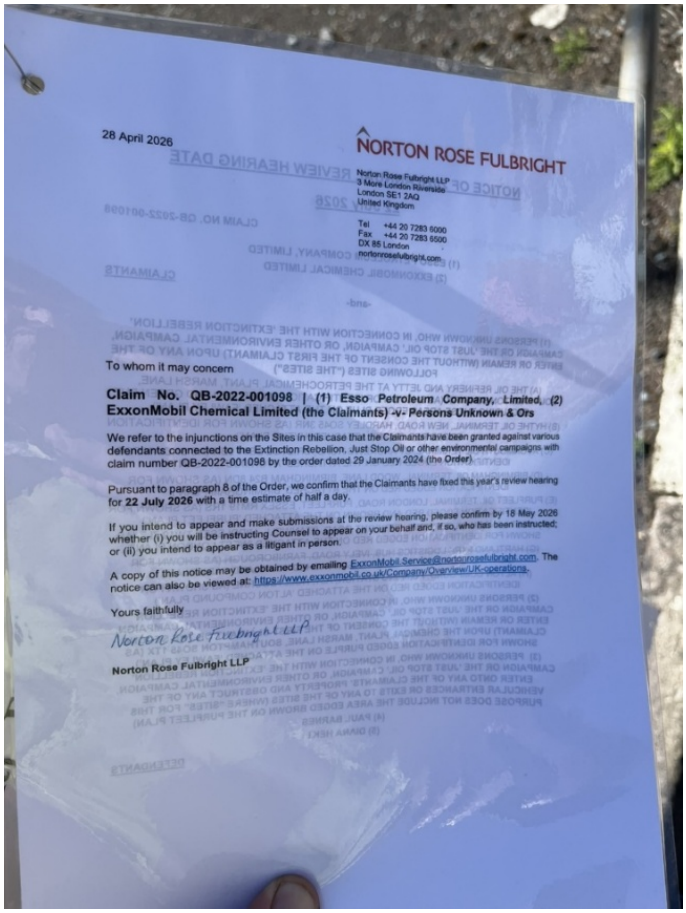






Birmingham Location 2 – Main vehicle entrance to Birmingham Terminal





28 April 2026

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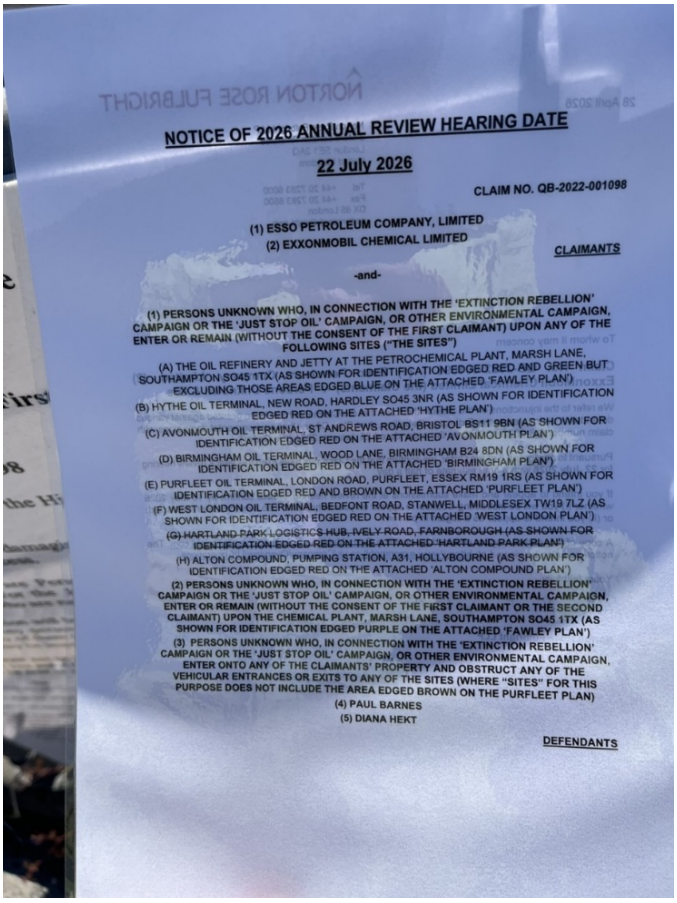

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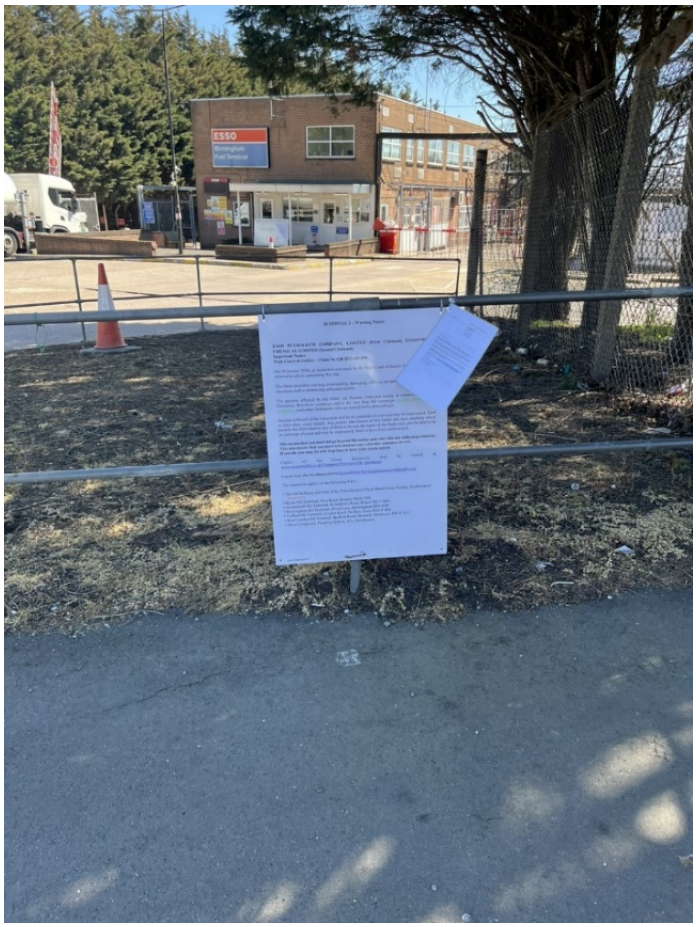
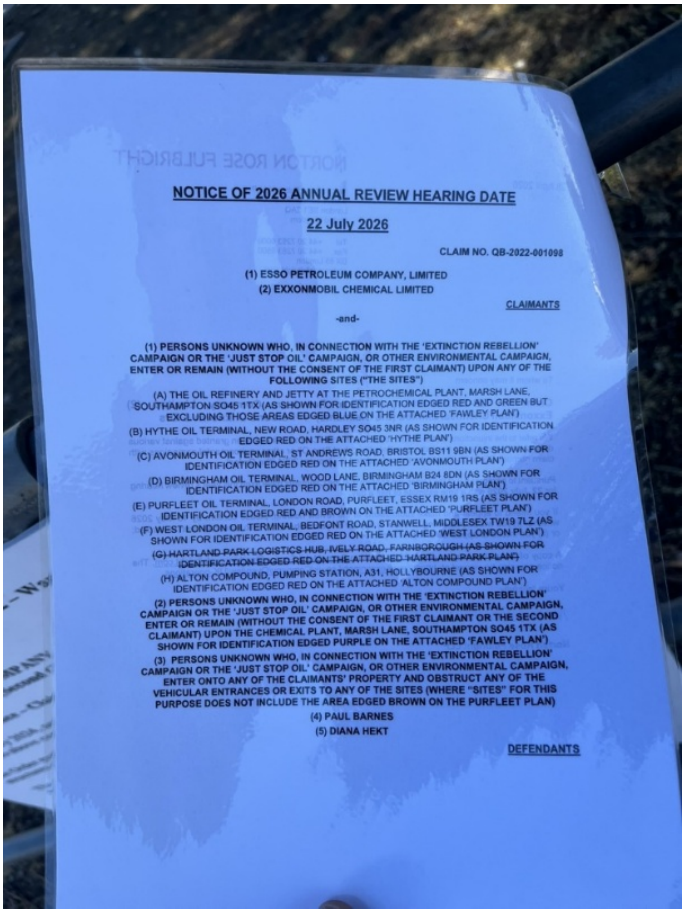
(4) PAUL BARNES
(5) DIANA HEKT

DEFENDANTS

Birmingham Location 3 – Pedestrian path directly outside Birmingham Terminal





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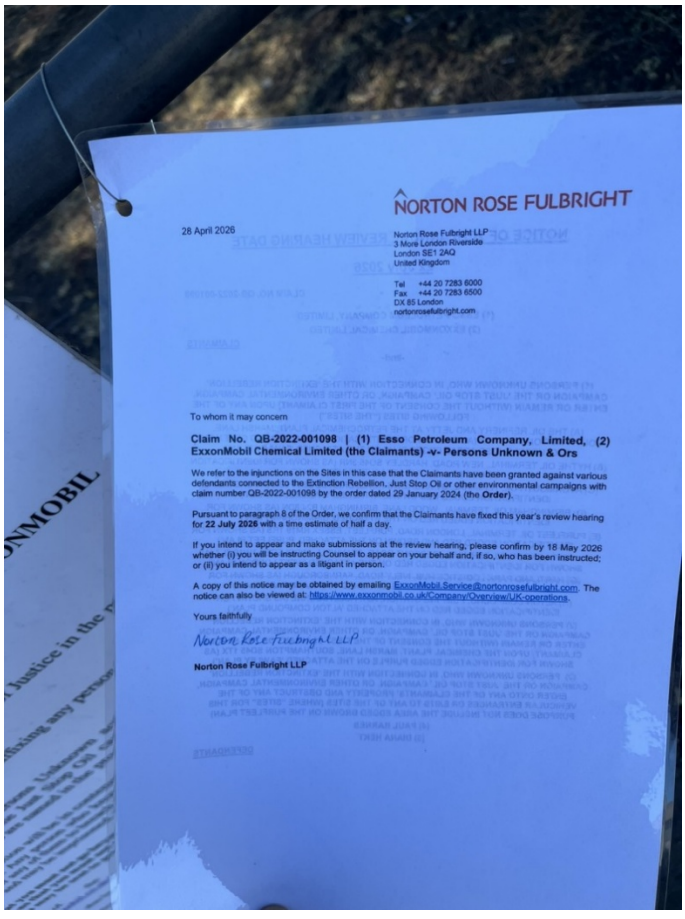

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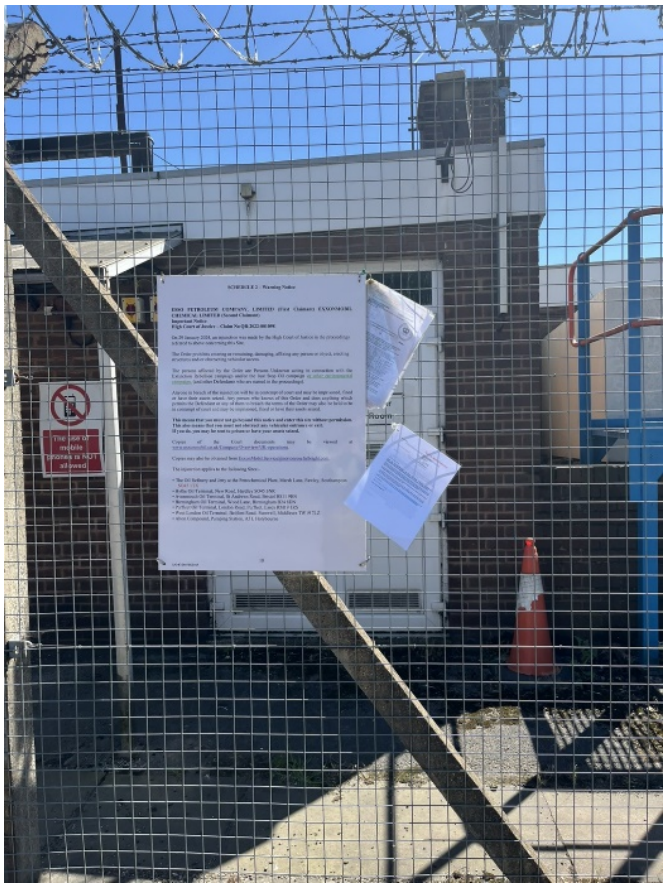
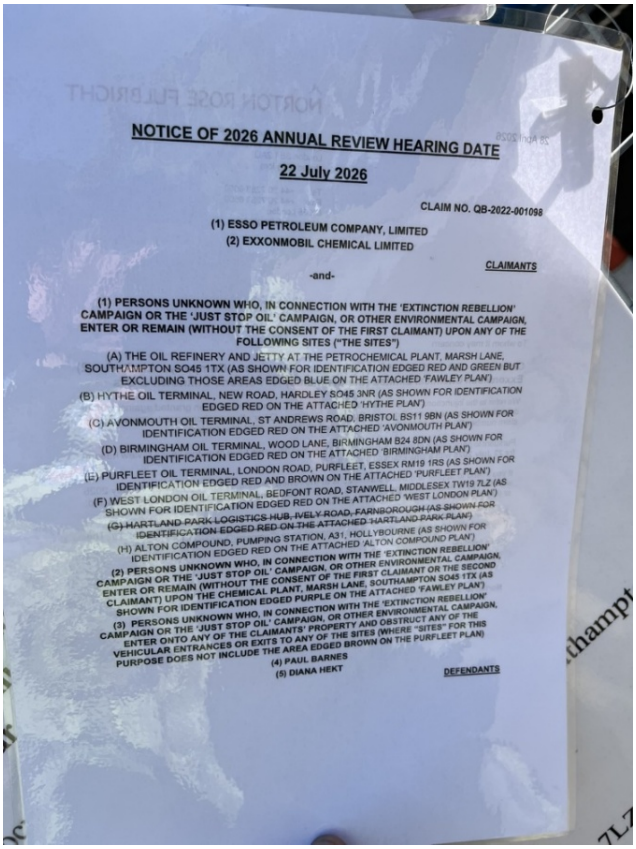
Birmingham Location 4 – Righthand side of pedestrian turnstile





NOTICE OF 2026 ANNUAL REVIEW HEARING DATE

22 July 2026

CLAIM NO. QB-2022-001098

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

CLAIMANTS

-and-

(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')

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

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

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

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

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

(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')

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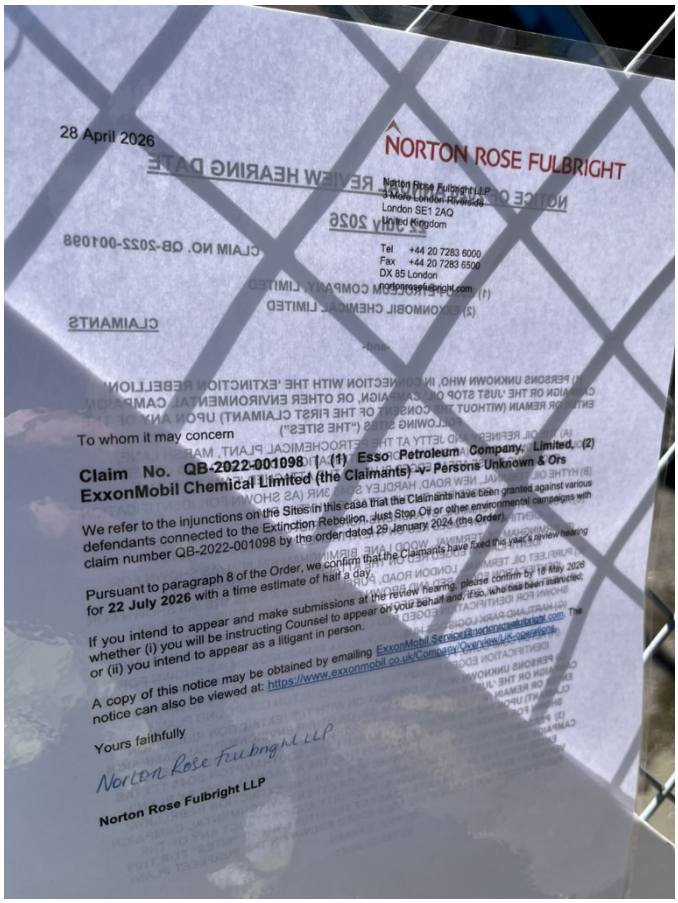
(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES (WHERE "SITES" FOR THIS PURPOSE DOES NOT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

(4) PAUL BARNES
(5) DIANA HEKT

DEFENDANTS



28 April 2026

NORTON ROSE FULBRIGHT

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United Kingdom

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Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

To whom it may concern

Claim No. QB-2022-001098 (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited (the Claimants) -v- Persons Unknown & Ors

We refer to the injunctions on the Sites in this case that the Claimants have been granted against various defendants connected to the Extinction Rebellion, Just Stop Oil or other environmental campaigns with claim number QB-2022-001098 by the order dated 29 January 2024 (the Order).

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Yours faithfully

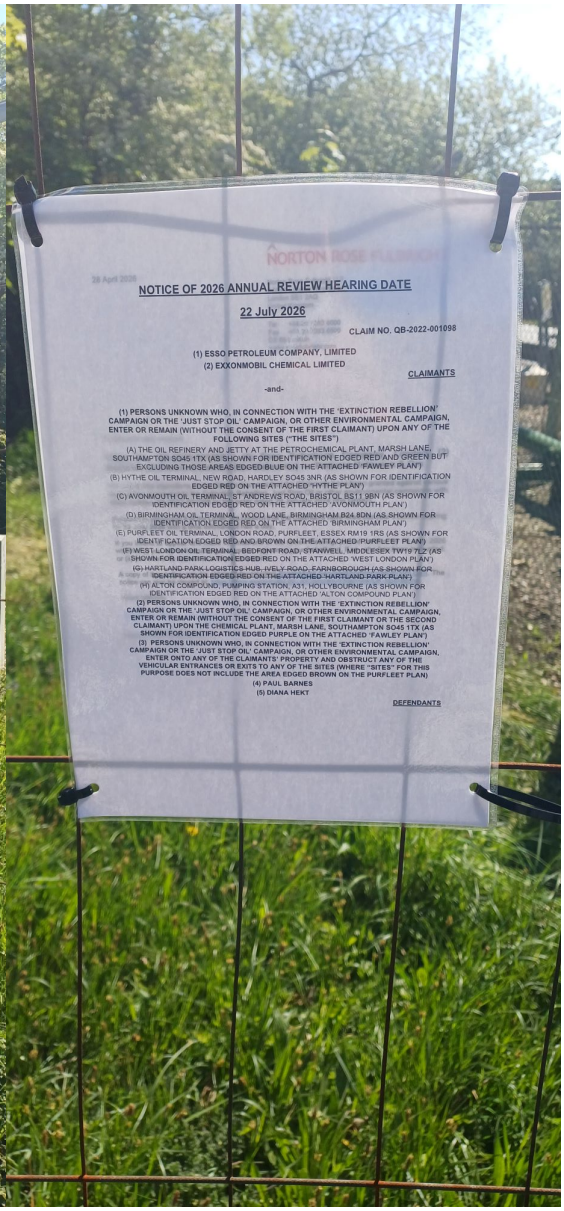
Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

The Oil Refinery and Jetty at the Petrochemical Plant, Fawley – 29.04.26

Fawley Location 1 – Hythe Terminal & Gate 1 Access Route





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22 July 2026

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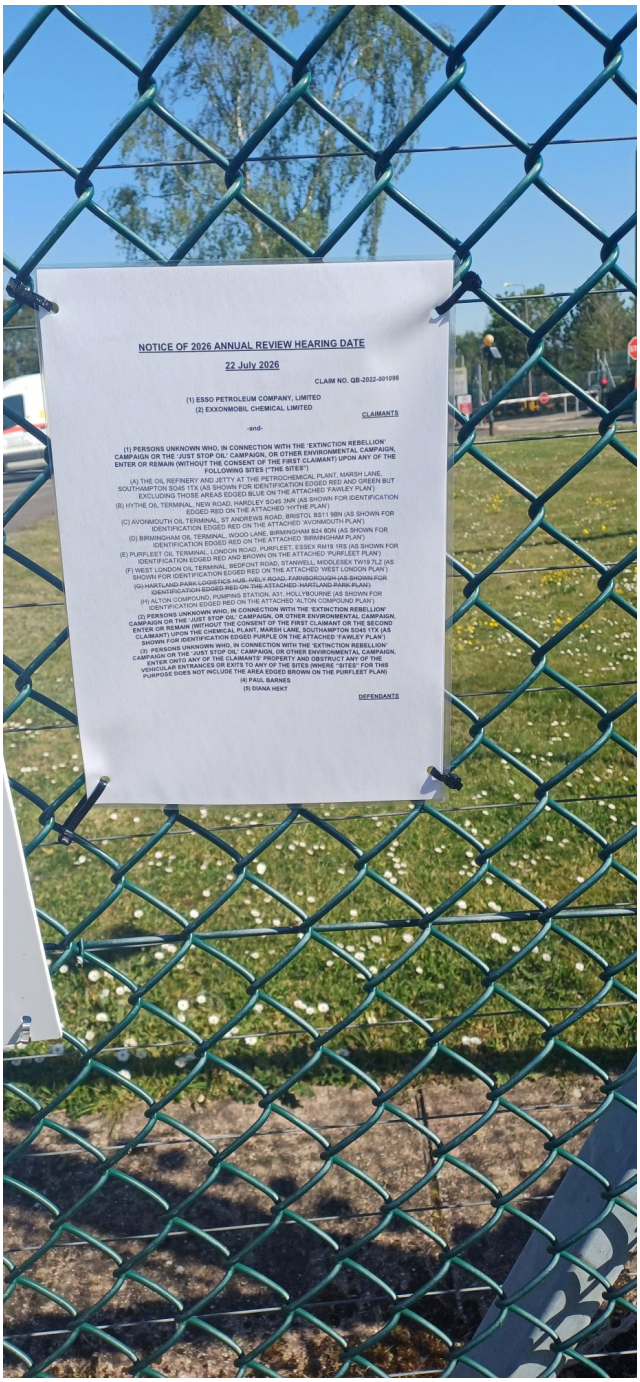
(4) PAUL BARNES
(5) DIANA HEKT

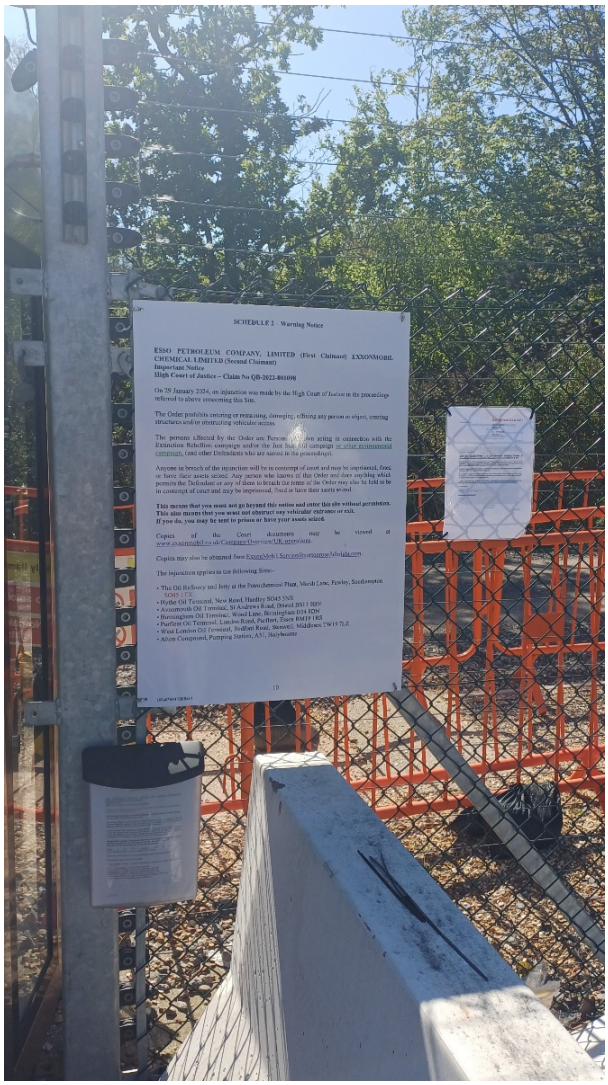
DEFENDANTS

Fawley Location 2 – Gate 2 & Admin Drive Access Route





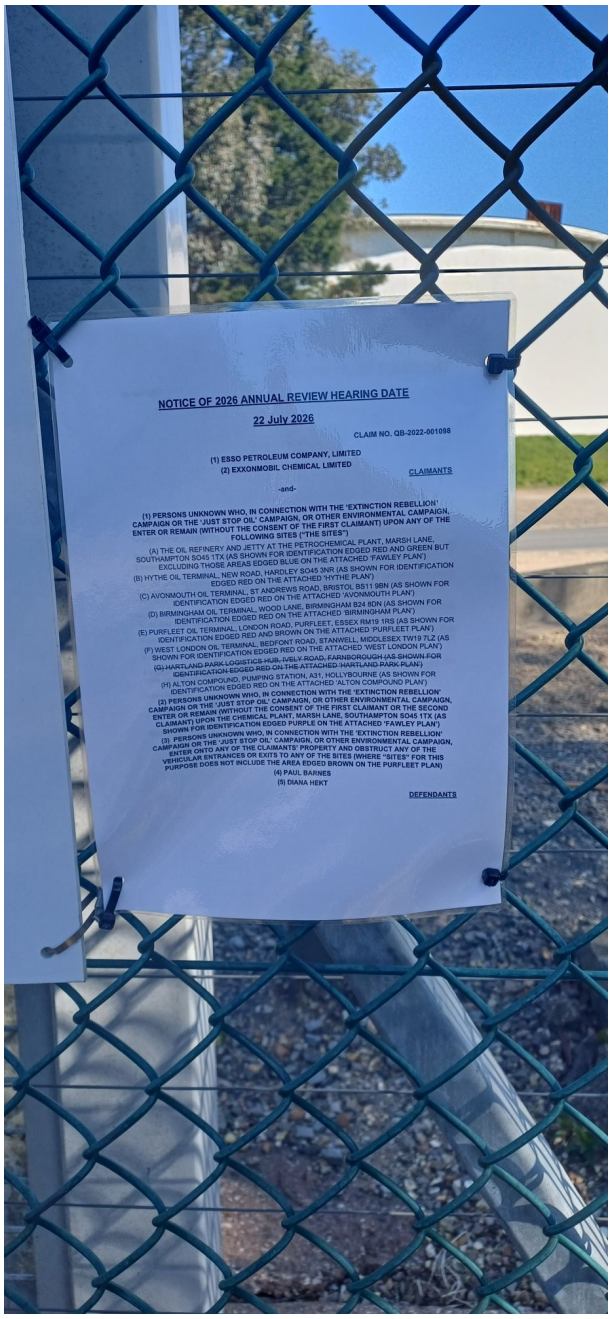
Fawley Location 3 – Gate 3 Access Route





Fawley Location 4 – Wideload aka Greenbelt Side





NOTICE OF 2026 ANNUAL REVIEW HEARING DATE

22 July 2026

CLAIM NO. QB-2022-001098

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

CLAIMANTS

-and-

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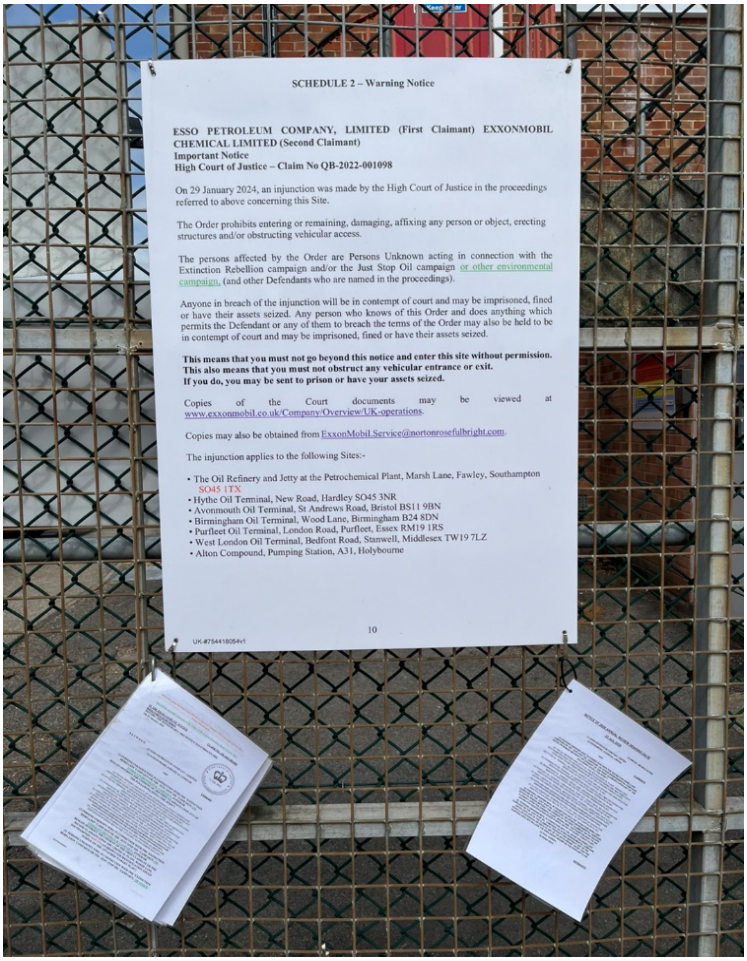
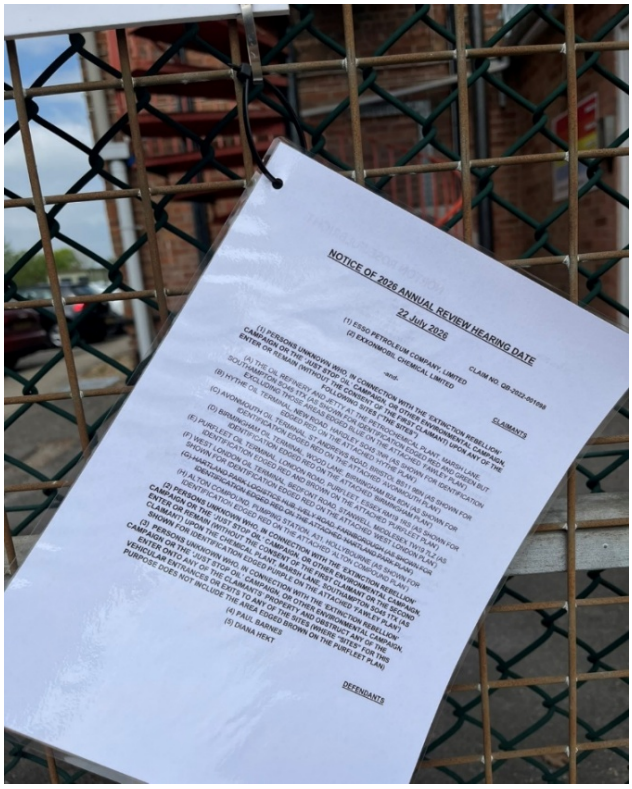
(4) PAUL BARNES
(5) DIANA HEKT

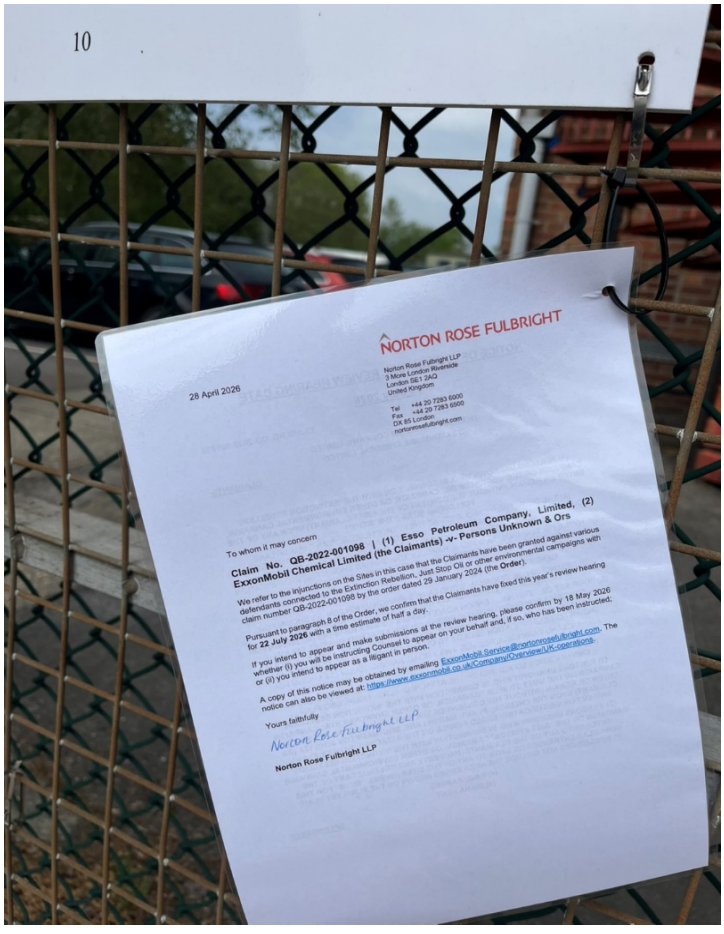
DEFENDANTS

Hythe Oil Terminal – 01.05.26

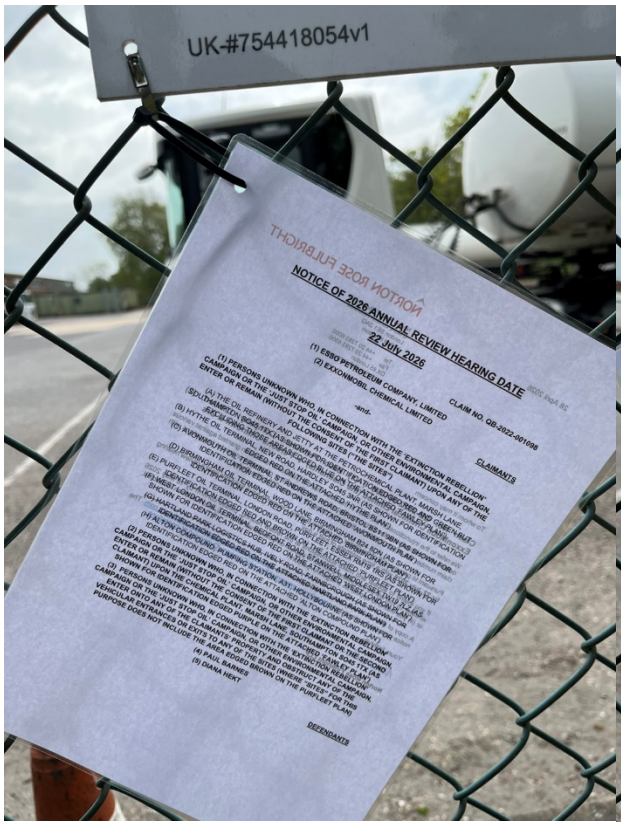
Hythe Location 1 - Main truck entrance gate

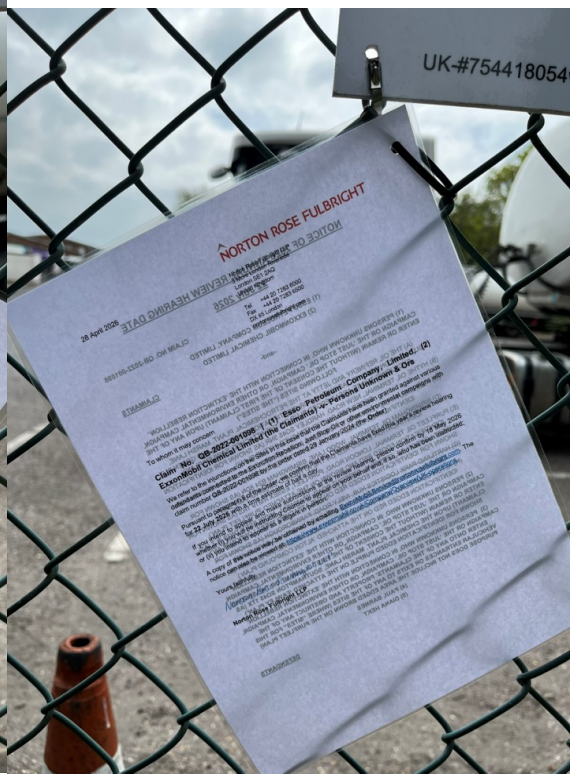


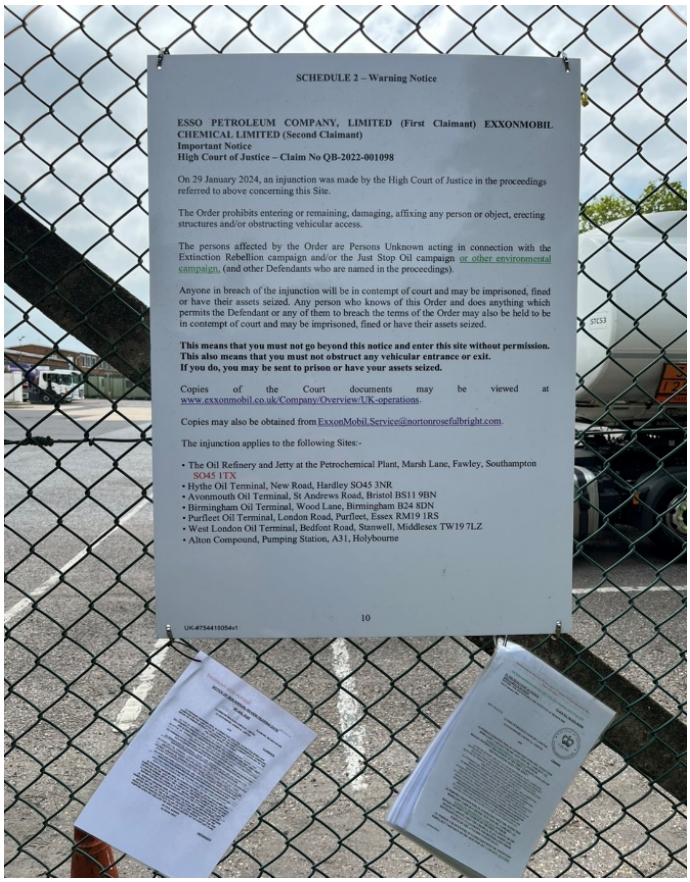




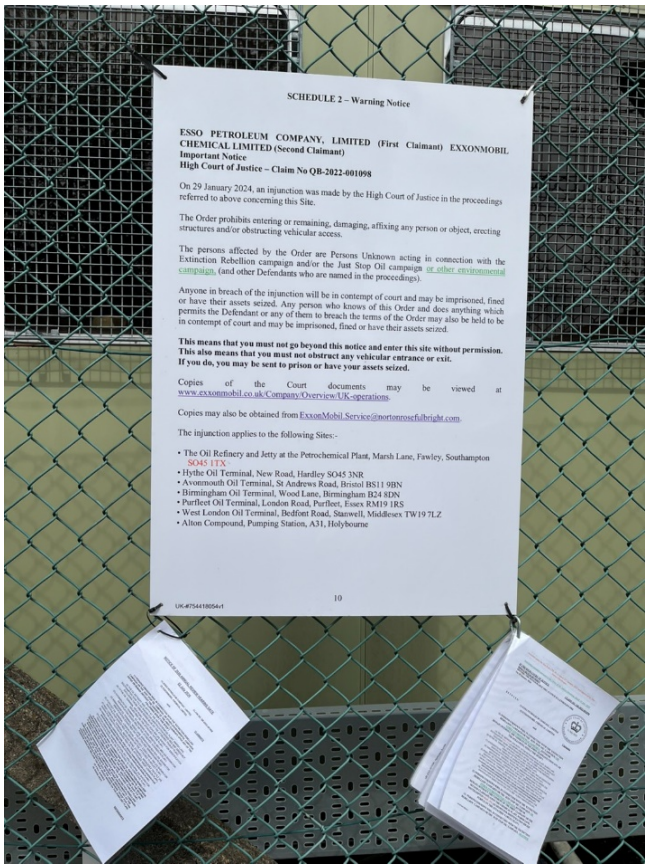
Hythe Location 2 – North emergency exit gate







Hythe Location 3 – South emergency access gate



SCHEDULE 2 – Warning Notice

ESSO PETROLEUM COMPANY, LIMITED (First Claimant) EXXONMOBIL CHEMICAL LIMITED (Second Claimant)
Important Notice
High Court of Justice – Claim No QB-2022-001098

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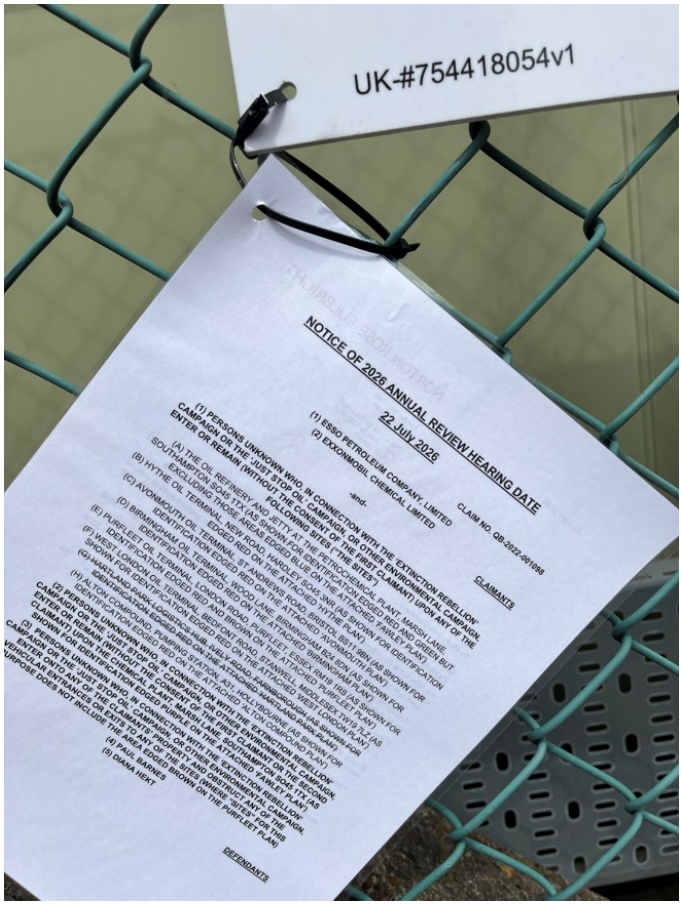
UK-#754418054v1



UK-#754418054v1

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22 July 2026

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-and-

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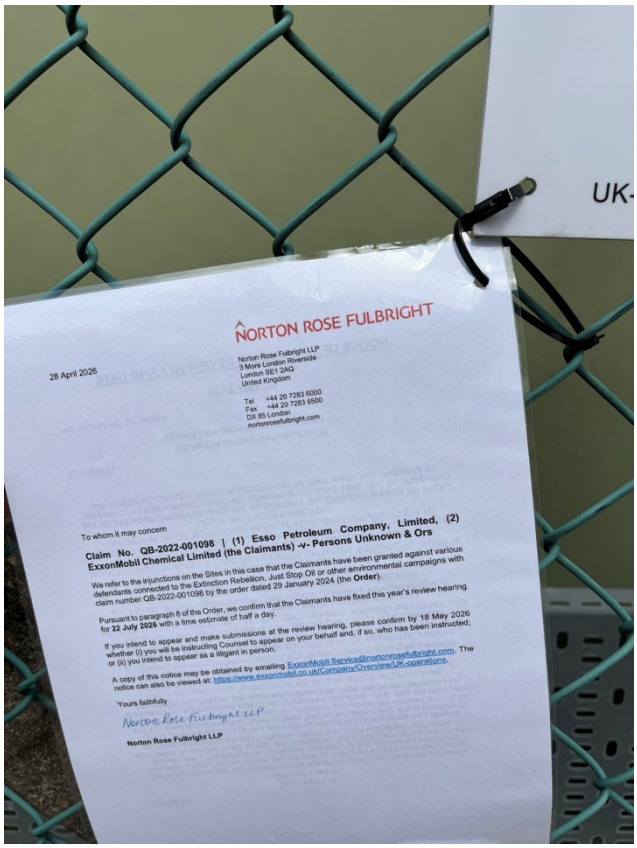

UK-

NORTON ROSE FULBRIGHT

28 April 2026

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

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Fax +44 20 7283 6500
DX 85 London
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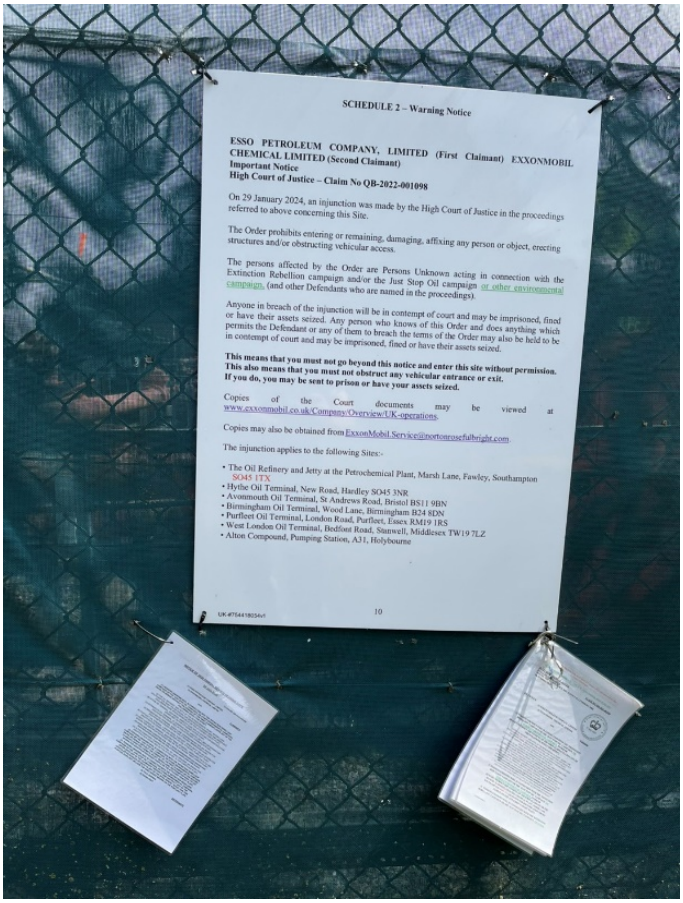
Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Hythe Location 4 – Right of the pedestrian walkway from visitor car park up to terminal



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UK-#754418054v1

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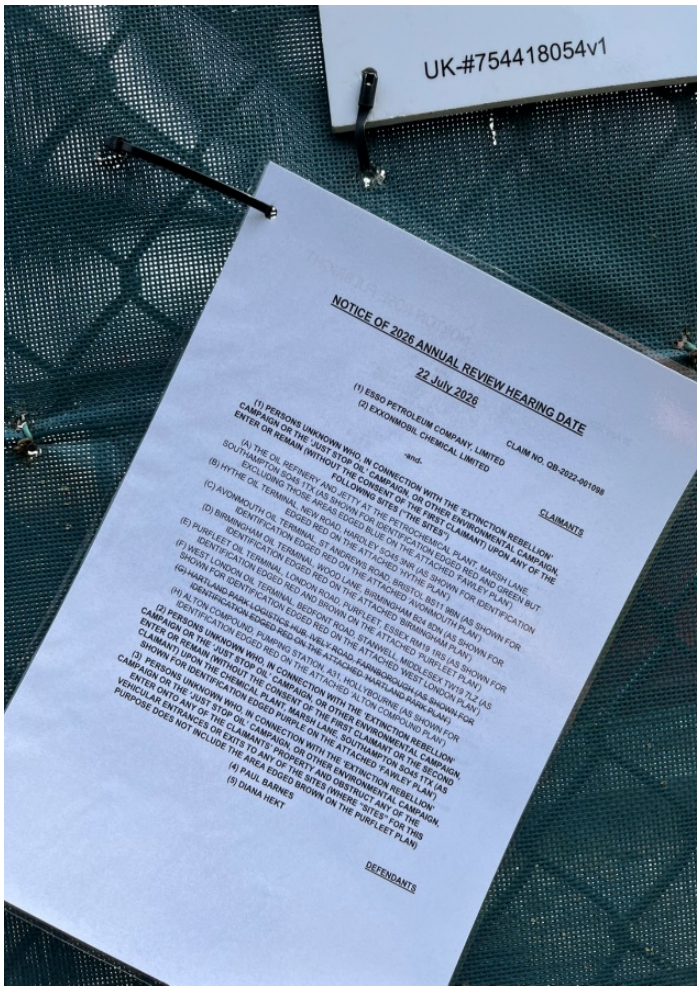


UK-#754418054v1

NOTICE OF 2026 ANNUAL REVIEW HEARING DATE

22 July 2026

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

CLAIM NO. QB-2022-001098

-and-

CLAIMANTS

(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"):

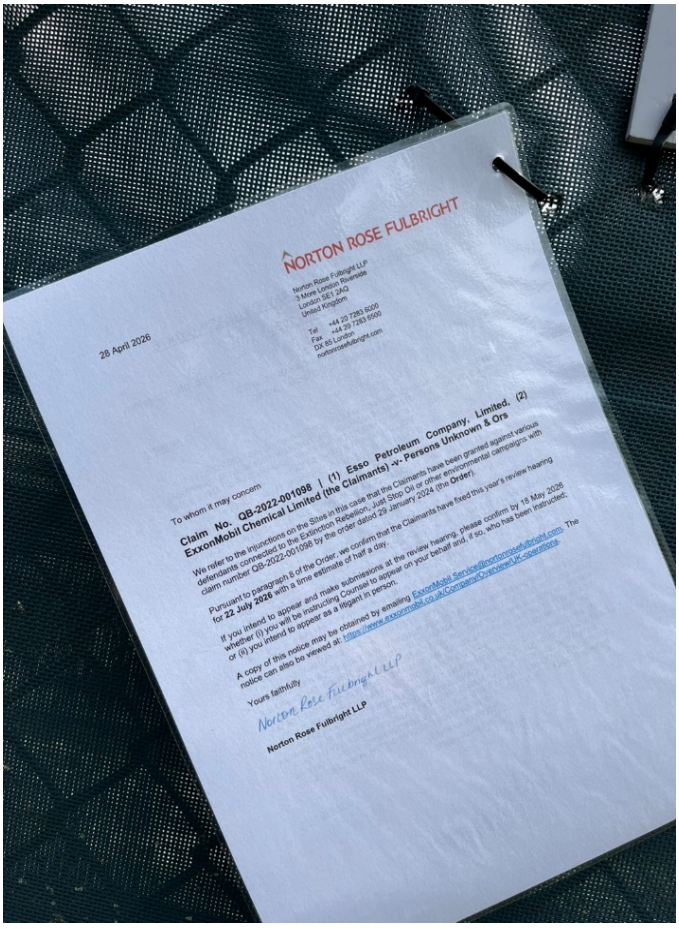
(A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (AS SHOWN EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED FAWLEY PLAN);
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN EDGED RED ON THE ATTACHED HYTHE PLAN);
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED AVONMOUTH PLAN);
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED BIRMINGHAM PLAN);
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PURFLEET PLAN);
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED WEST LONDON PLAN);
(G) HARTLAG PARK LOGISTICS HUB, WILLOW ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED HARTLAND PARK PLAN);
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ALTON COMPOUND PLAN)

(2) 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 SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED 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, ENTER ONTO ANY OF THE SITES (WHERE THERE ARE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES) AND OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES (WHERE THE AREA EDGED BROWN ON THE PURFLEET PLAN) PURPOSE DOES NOT INCLUDE THE:

(4) PAUL BARNES
(5) DIANA HEKT

DEFENDANTS



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Fax +44 20 7283 6500
DX 85 London
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28 April 2026

To whom it may concern

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited (the Claimants) -v- Persons Unknown & Ors

We refer to the injunctions on the Site in this case that the Claimants have been granted against various defendants connected to the Extinction Rebellion, Just Stop Oil or other environmental campaigns with claim number QB-2022-001098 by the order dated 29 January 2024 (the **Order**).

Pursuant to paragraph 6 of the Order, we confirm that the Claimants have fixed this year's review hearing for **22 July 2026** with a time estimate of half a day.

If you intend to appear and make submissions at the review hearing, please confirm by 16 May 2026 whether (i) you will be instructing Counsel to appear on your behalf and, if so, who has been instructed; or (ii) you intend to appear as a litigant in person.

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Yours faithfully

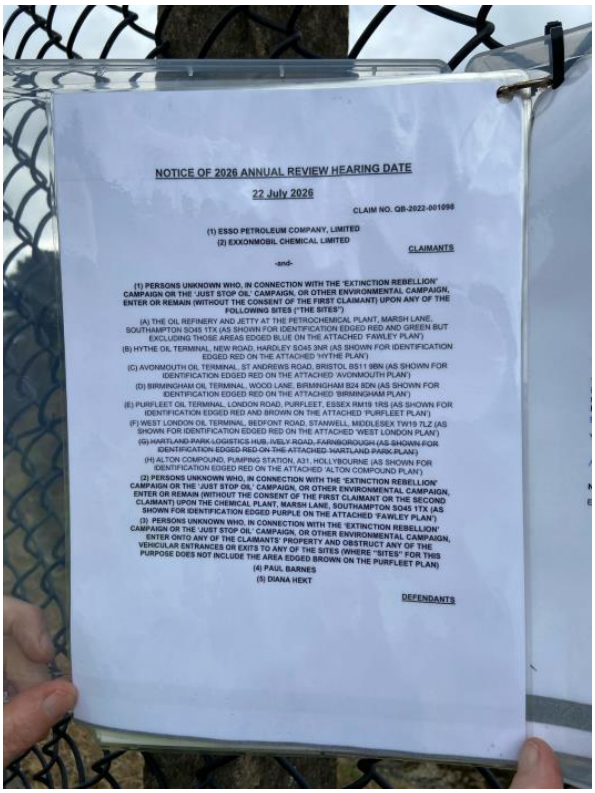
Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Purfleet Oil Terminal – 03.06.26 / 04.06.26

Purfleet Location 1 – Terminal vehicle entry / Entrance side of Main Gate




NOTICE OF 2026 ANNUAL REVIEW HEARING DATE

22 July 2026

CLAIM NO. QB-2022-001098

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

CLAIMANTS

-and-

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(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')

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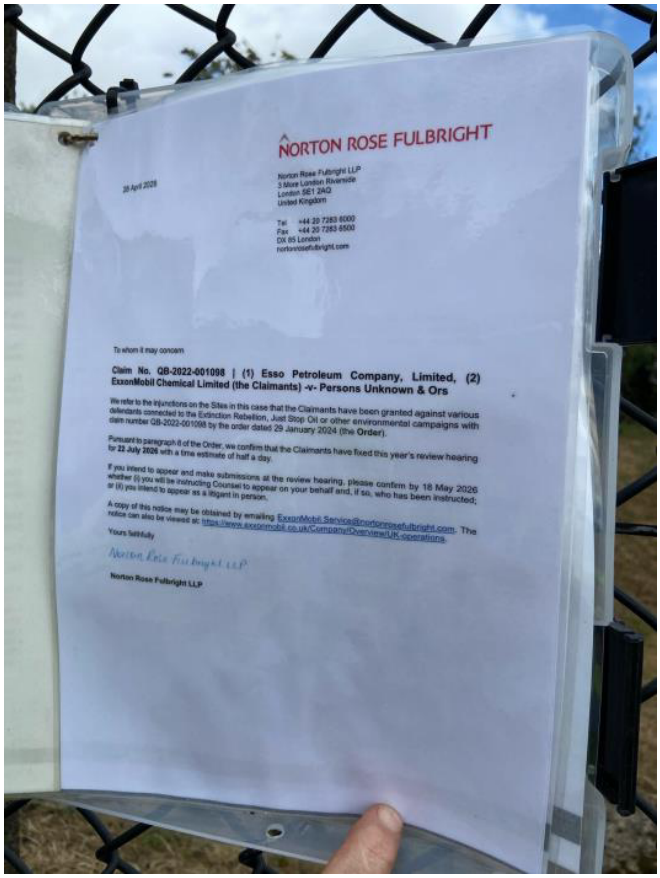
(4) PAUL BARNES
(5) DIANA HEKT

DEFENDANTS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To whom it may concern

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If you intend to appear and make submissions at the review hearing, please confirm by 18 May 2026 whether (i) you will be instructing Counsel to appear on your behalf and, if so, who has been instructed; or (ii) you intend to appear as a litigant in person.

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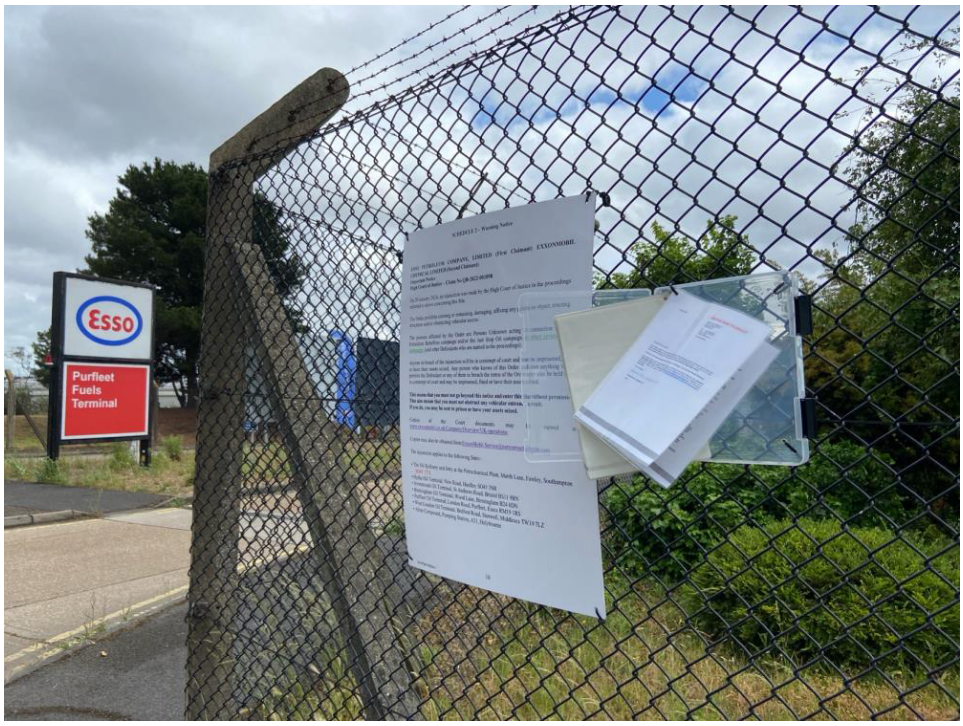
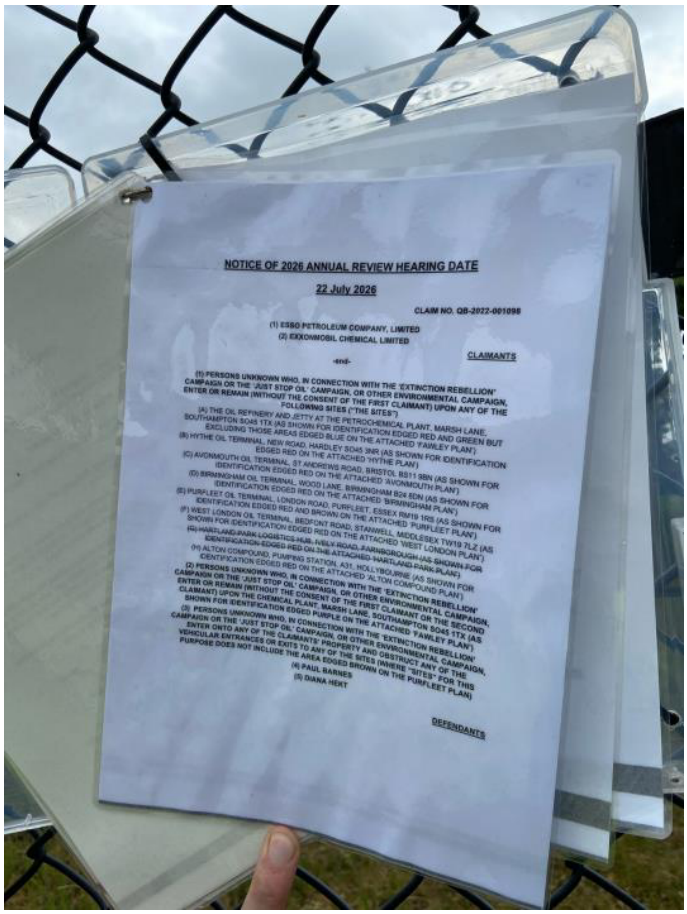
Yours faithfully

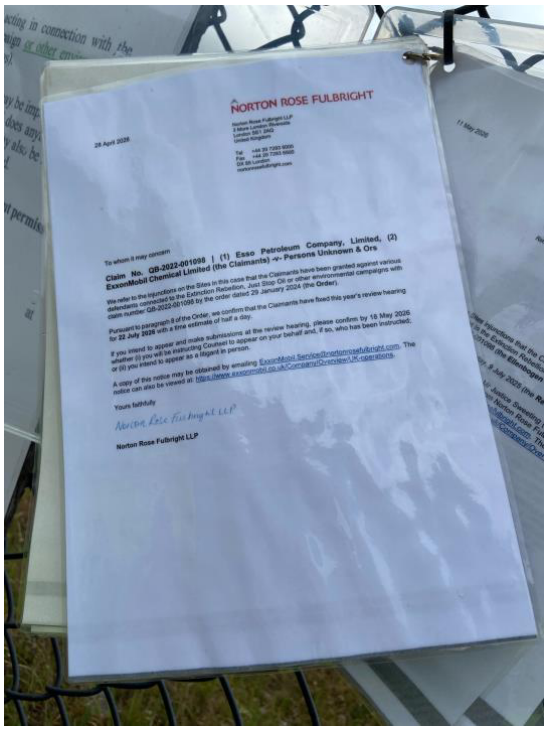
Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

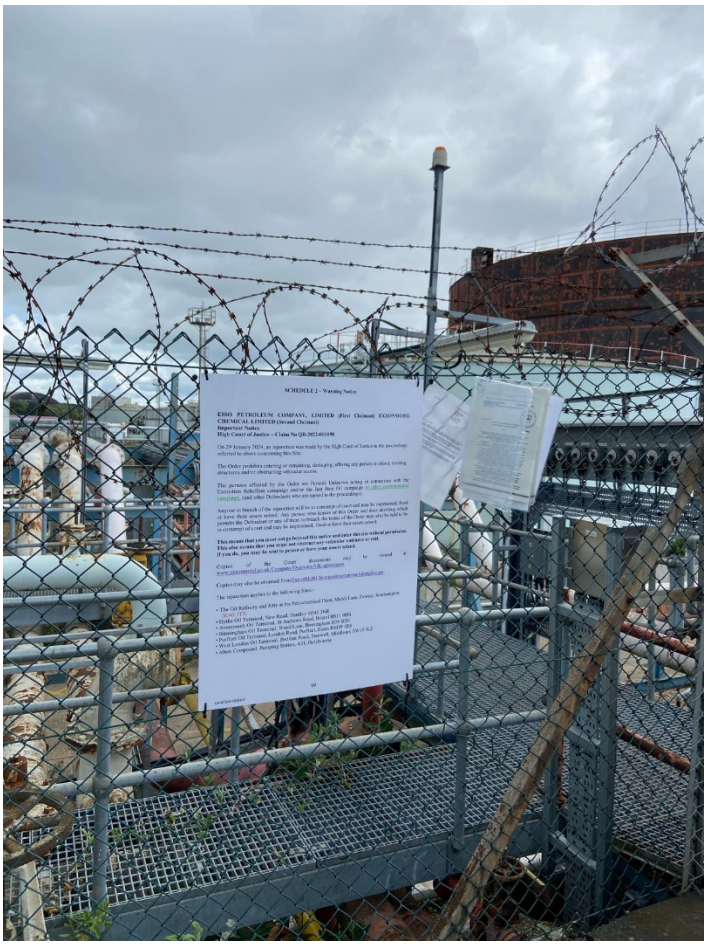
Purfleet Location 2 – Terminal vehicle exit / Exit side of Main Entrance

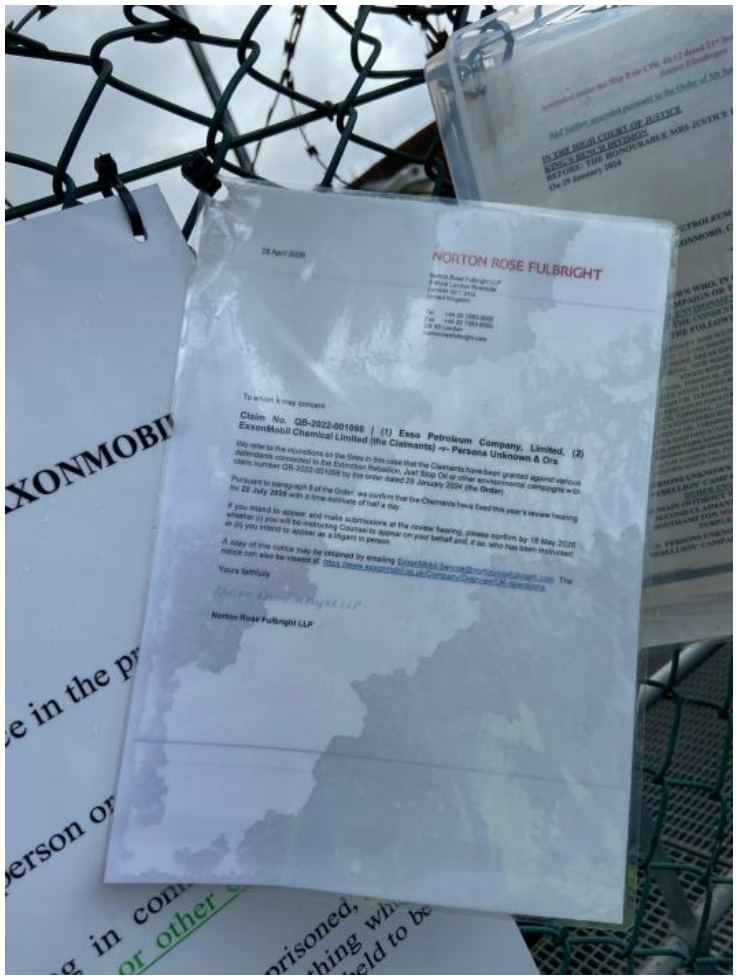


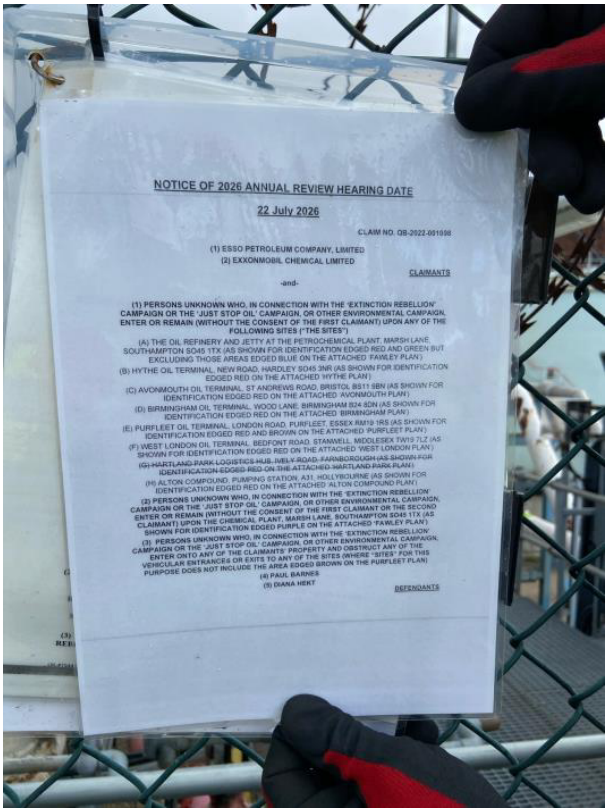


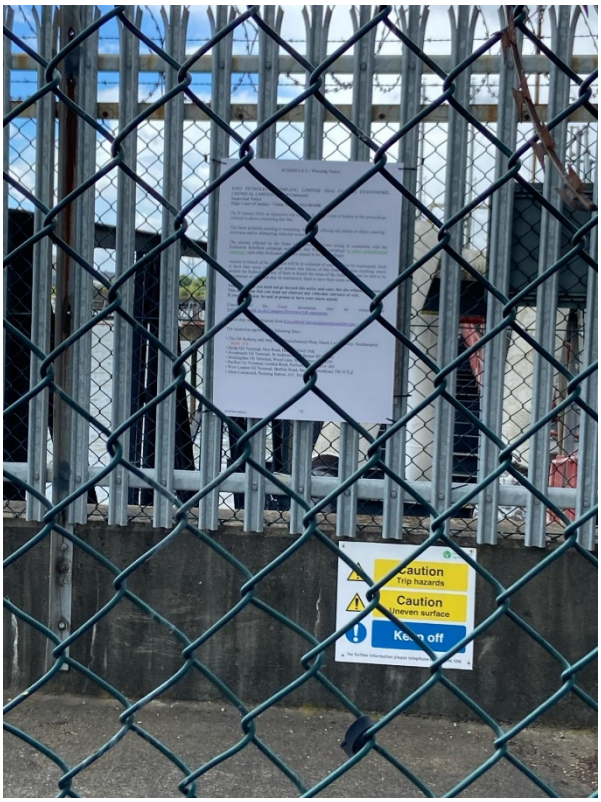


Purfleet Location 3 – Sea wall jetty gate / public footpath

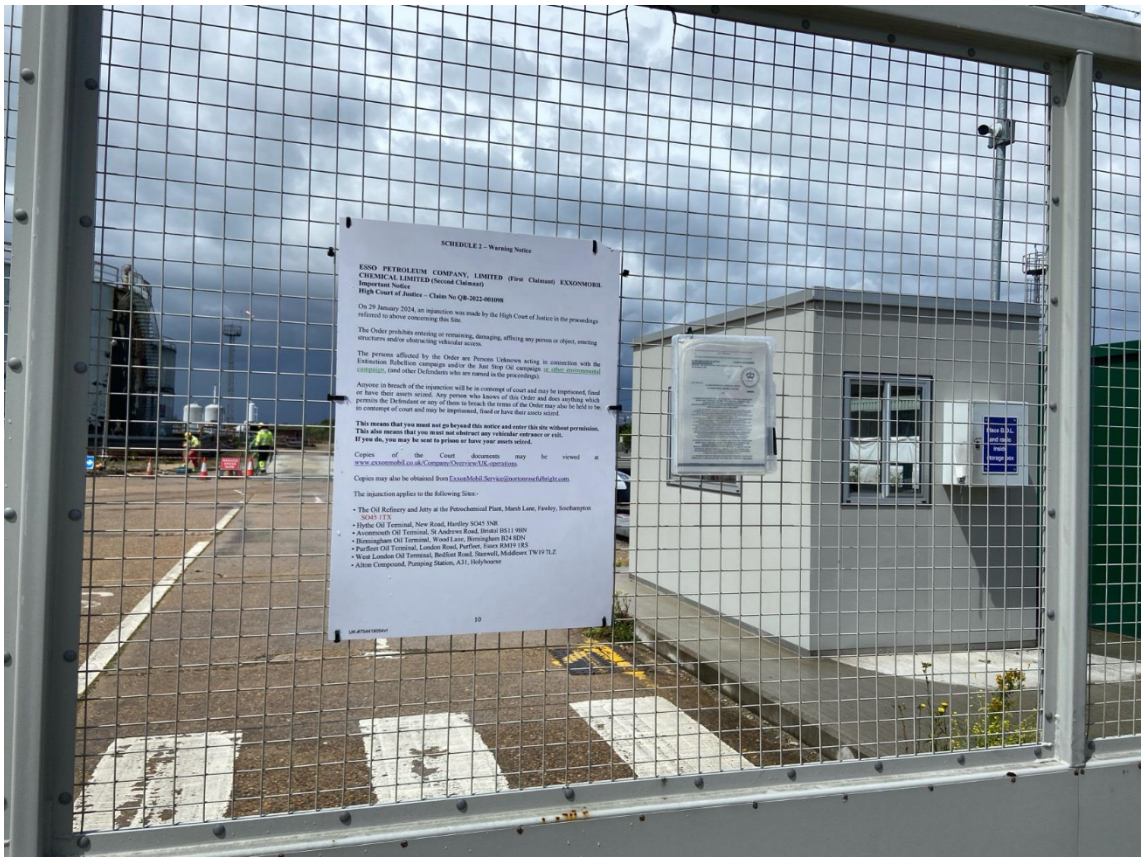


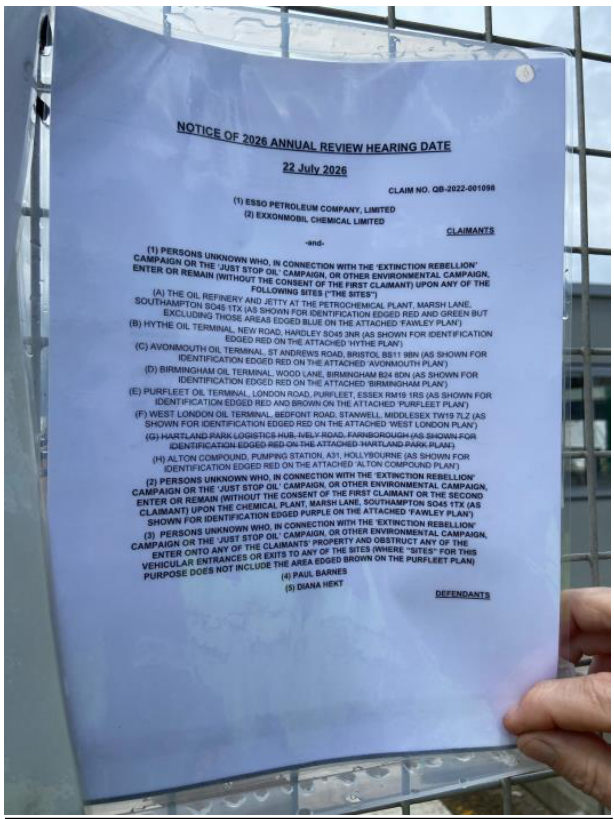


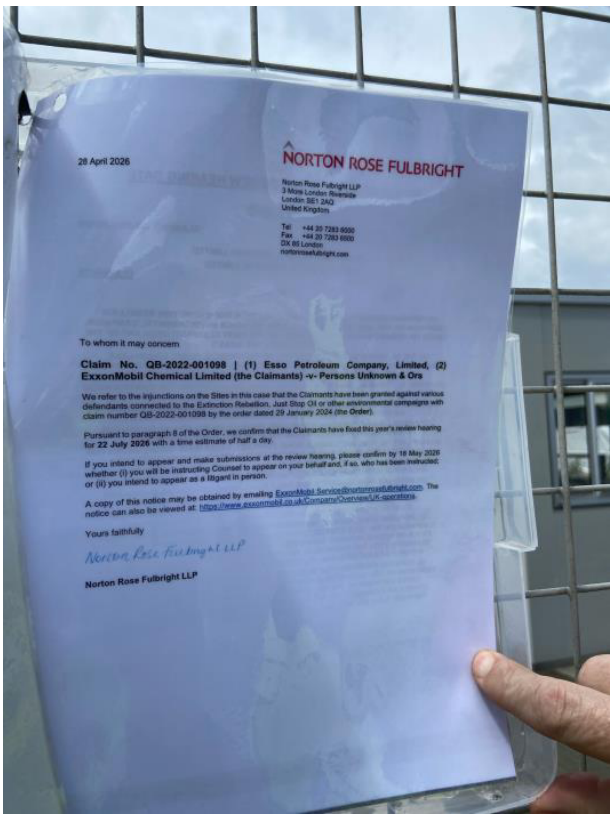




Purfleet Location 4 – Canteen Gate entrance aka exit gate

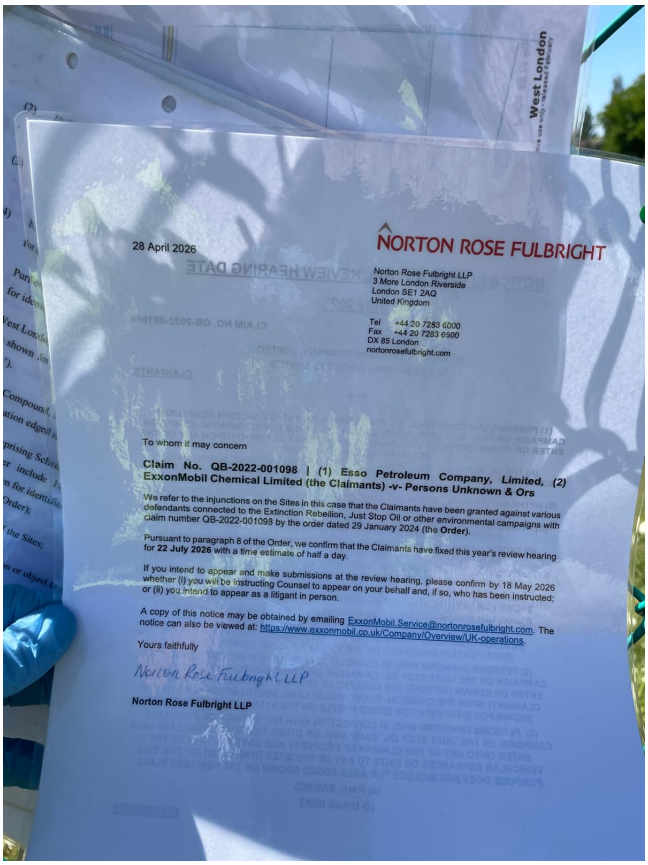




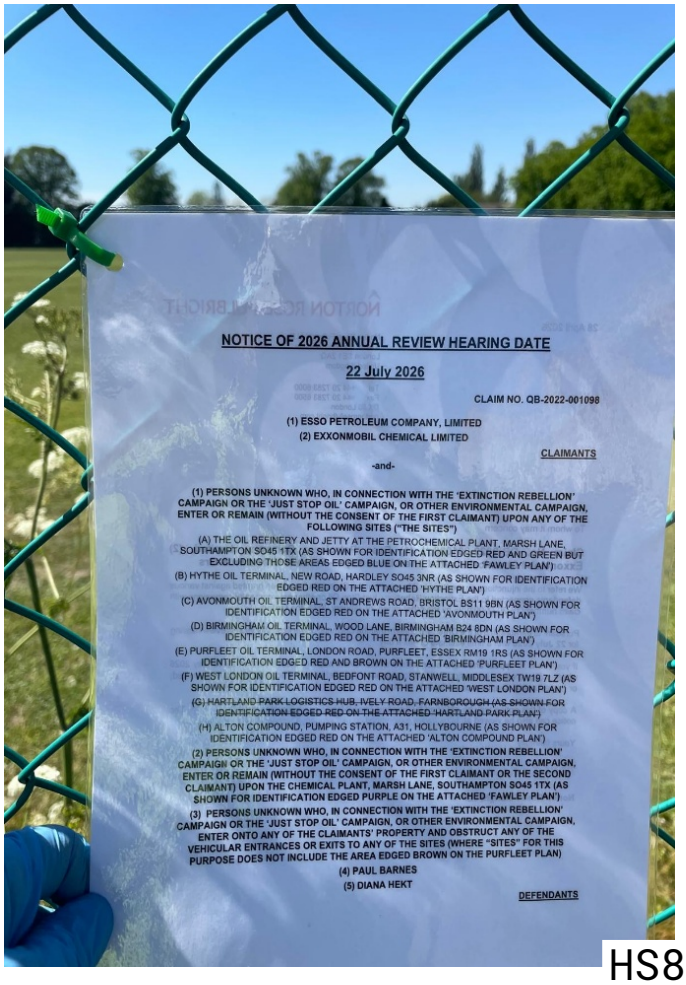


West London Oil Terminal – 30.04.26

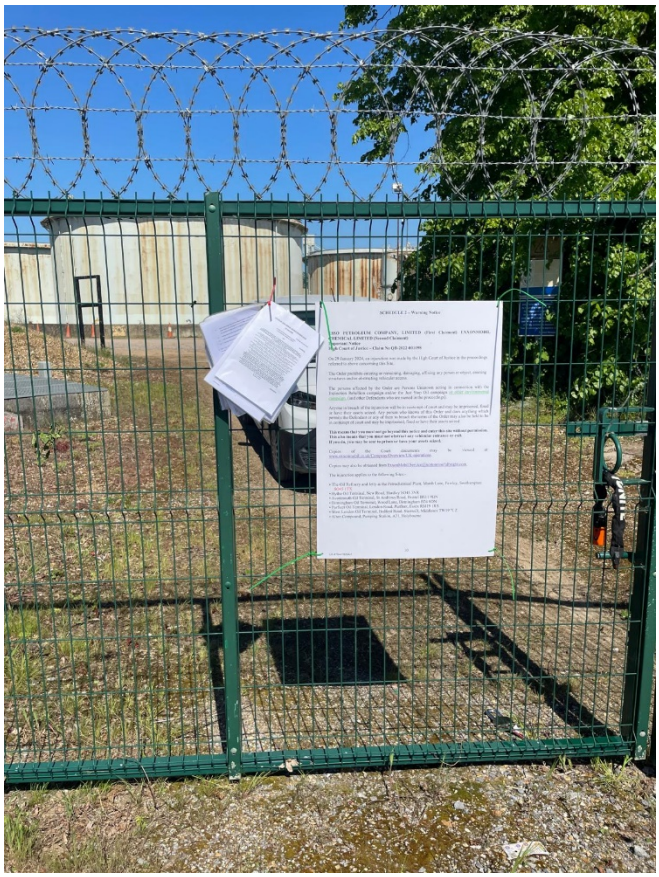
West London Location 1 – West side by the football pitch

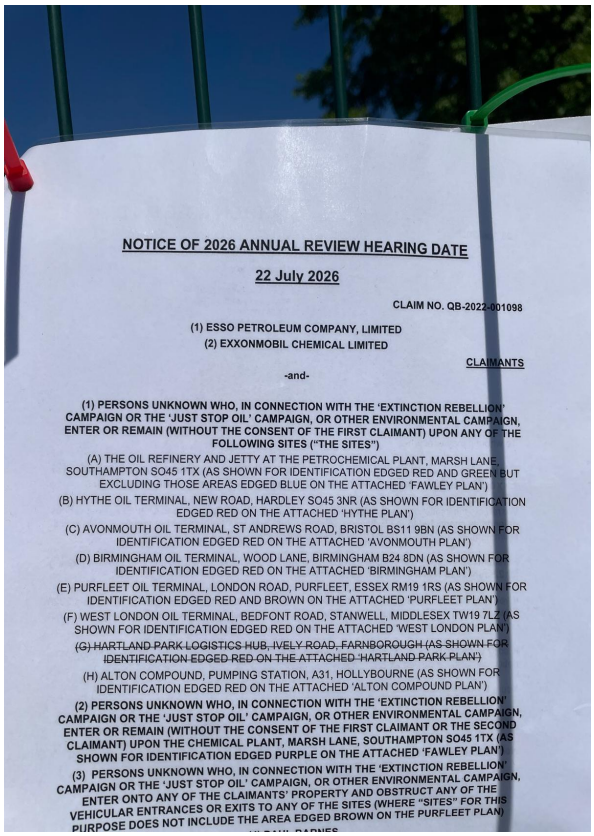






West London Location 2 – Southwest corner by short lane fire gate





NOTICE OF 2026 ANNUAL REVIEW HEARING DATE

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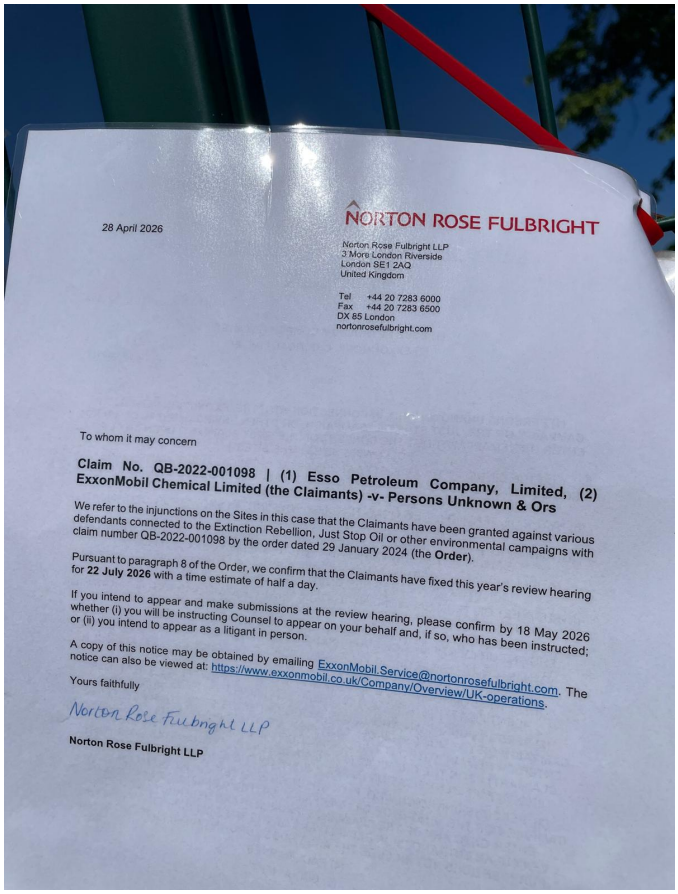

28 April 2026

NORTON ROSE FULBRIGHT

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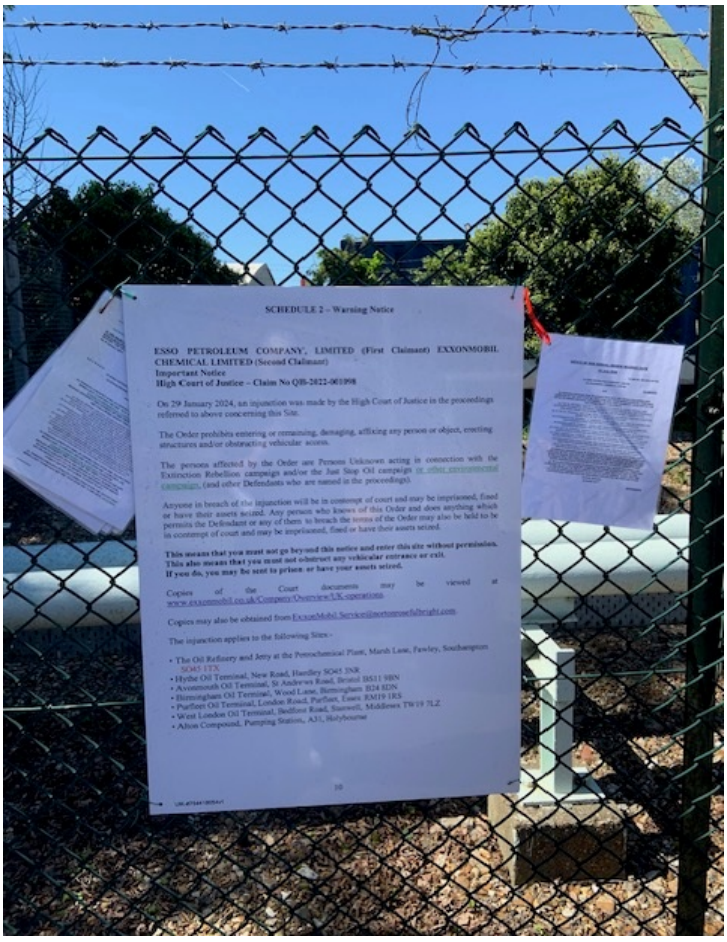
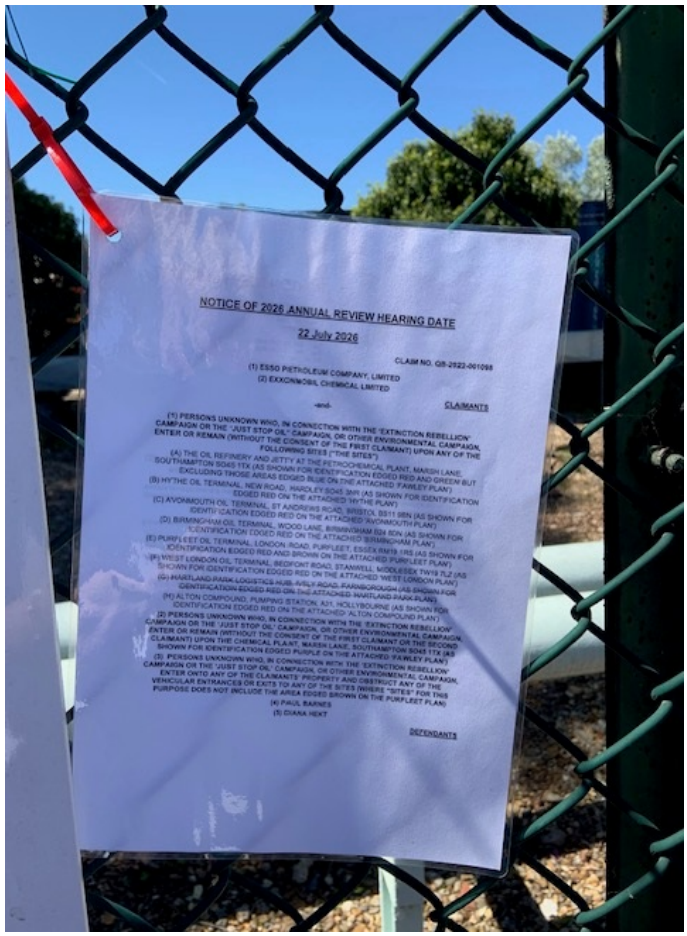
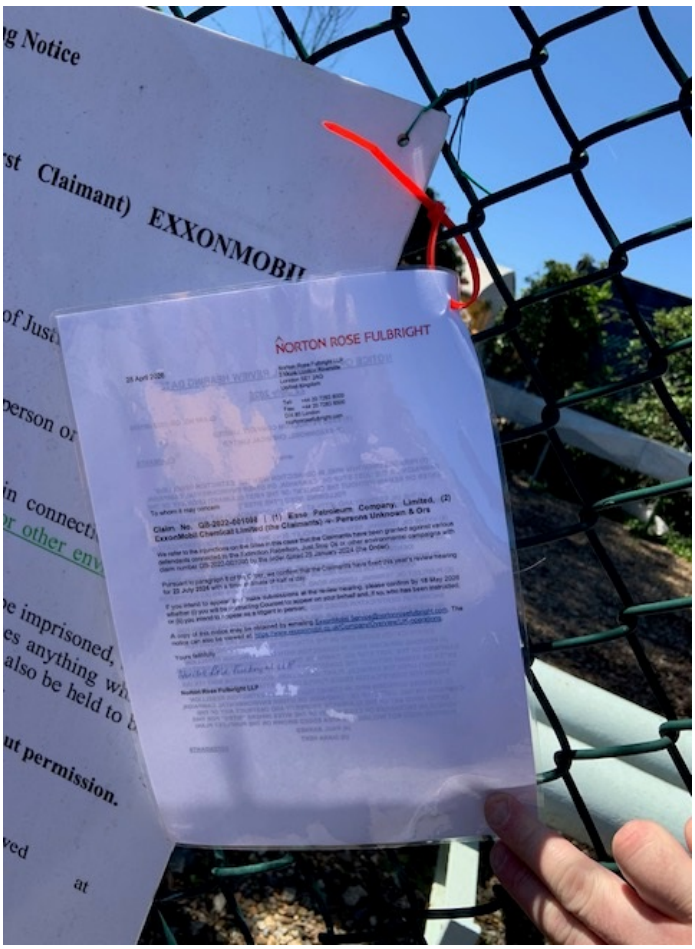
Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

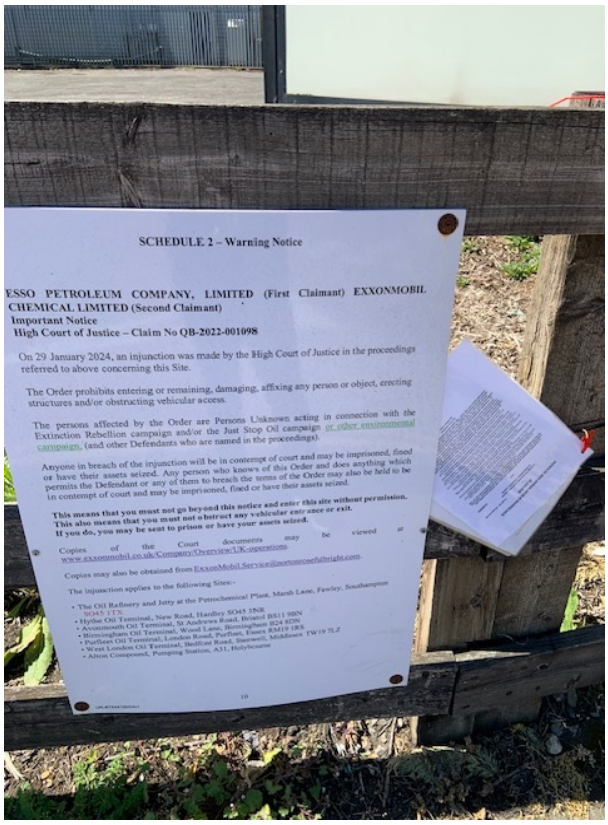
West London Location 3 – Outside the main front of the gatehouse

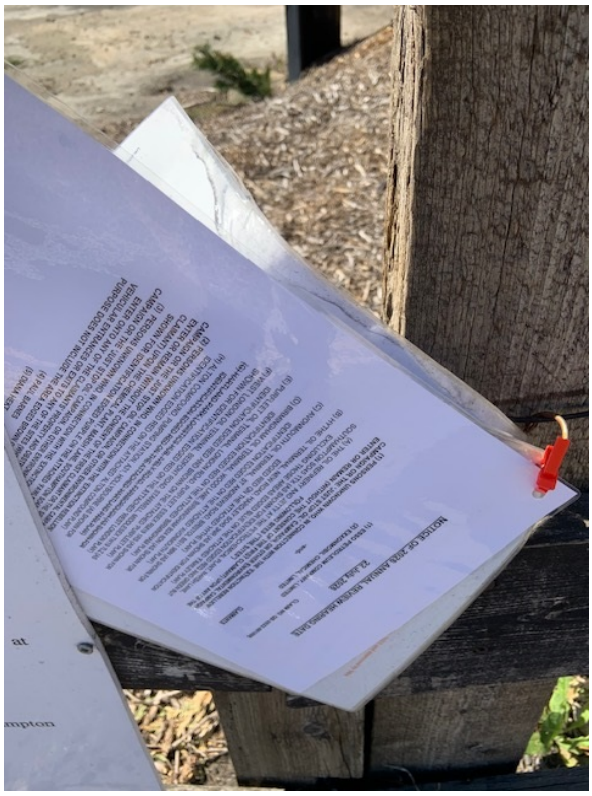


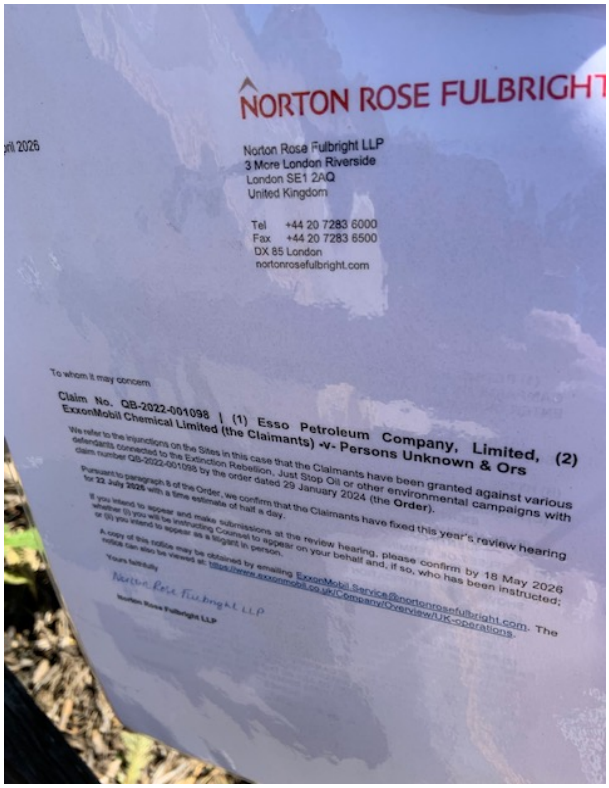


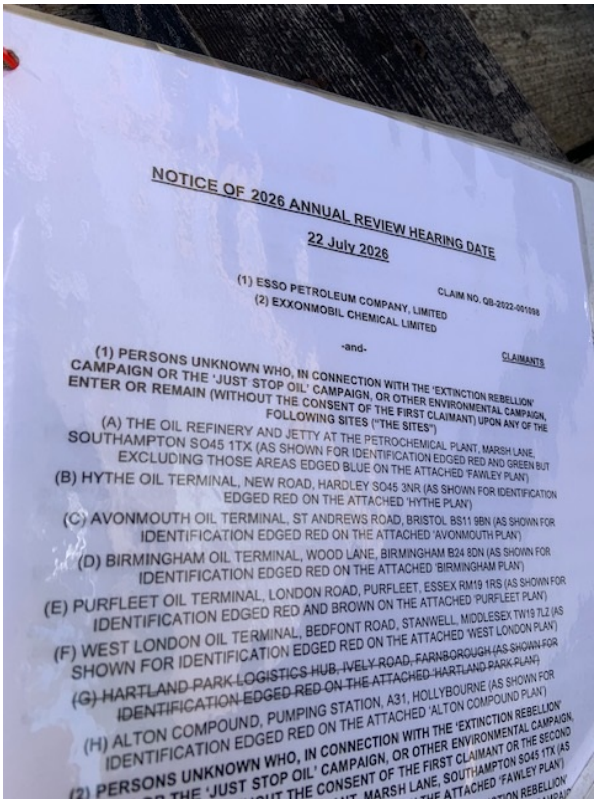


West London Location 4 – Main entrance to the site on the right-hand side of the road









From:	Beatrice Shah Scott
Sent:	01 May 2026 21:45
To:	juststopoilpress@protonmail.com
Cc:	Holly Stebbing
Subject:	Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]
Attachments:	2026.05.01 - Letter from NRF to Just Stop Oil confirming Annual Review Hearing 22 July 2026.pdf

To whom it may concern

Re: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026

Please see the attached correspondence.

Yours faithfully

Norton Rose Fulbright LLP

Beatrice Shah Scott | Associate

Norton Rose Fulbright LLP
3 More London Riverside, London, SE1 2AQ, United Kingdom
Tel +44 20 7444 5081 | Mob +44 7708 298091 | Fax +44 20 7283 6500
beatrice.shahscott@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

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NORTON ROSE FULBRIGHT

1 May 2026

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United Kingdom

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Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Just Stop Oil

By email only: juststopoilpress@protonmail.com

Your reference	**Our reference**
	HMOR/1001267389

To whom it may concern

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors

We refer to our letter dated 23 March 2026 in connection with the abovementioned proceedings in which we requested that you confirm by 4pm on Monday 6 April 2026 whether you intend to appear and make submissions at the 2026 hearing that will be held to review the injunctions pursuant to paragraph 8 of the Order in this claim dated 29 January 2024.

As we did not receive any response to our letter, we confirm that the Claimants have fixed this year's review hearing for **Wednesday, 22 July 2026** with a time estimate of half a day.

If you do intend to appear and make submissions at the review hearing, please confirm by Monday 18 May 2026 (i) if you will be instructing counsel to appear on your behalf and, if so, who has been instructed; or (ii) if you intend to appear as a litigant in person.

A copy of this letter may be obtained by emailing ExxonMobil.Service@nortonrosefulbright.com. The hearing notice can also be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

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From:	Beatrice Shah Scott
Sent:	01 May 2026 21:52
To:	'Extinction Rebellion'; 'xr-legal@riseup.net'
Cc:	Holly Stebbing
Subject:	Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]
Attachments:	2026.05.01 - Letter from NRF to Extinction Rebellion confirming Annual Review Hearing 22 July 2026.pdf

To whom it may concern

Re: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026

Please see the attached correspondence.

Yours faithfully

Norton Rose Fulbright LLP

Beatrice Shah Scott | Associate

Norton Rose Fulbright LLP
3 More London Riverside, London, SE1 2AQ, United Kingdom
Tel +44 20 7444 5081 | Mob +44 7708 298091 | Fax +44 20 7283 6500
beatrice.shahscott@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

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NORTON ROSE FULBRIGHT

1 May 2026

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Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Extinction Rebellion

By email only: enquiries@extinctionrebellion.uk; xr-legal@riseup.net

Your reference	**Our reference**
	HMOR/1001267389

To whom it may concern

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors

We refer to our letter dated 23 March 2026 in connection with the abovementioned proceedings in which we requested that you confirm by 4pm on Monday 6 April 2026 whether you intend to appear and make submissions at the 2026 hearing that will be held to review the injunctions pursuant to paragraph 8 of the Order in this claim dated 29 January 2024.

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A copy of this letter may be obtained by emailing ExxonMobil.Service@nortonrosefulbright.com. The hearing notice can also be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

Yours faithfully

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From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: juststopoilpress@protonmail.com
Sent: 01 May 2026 21:45
Subject: Relayed: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

juststopoilpress@protonmail.com (juststopoilpress@protonmail.com)

Subject: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]

From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: 'Extinction Rebellion'; 'xr-legal@riseup.net'
Sent: 01 May 2026 21:52
Subject: Relayed: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

'Extinction Rebellion' (enquiries@extinctionrebellion.uk)

'xr-legal@riseup.net' (xr-legal@riseup.net)

Subject: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]

From: xr-legal@riseup.net
Sent: 01 May 2026 21:53
To: Beatrice Shah Scott
Subject: Autoreply for XR Legal Support

External email

Hi there,

Thanks for getting in touch with the XR Legal Support Team.

We have received your email and are working on getting a response to you ASAP! We are currently quite low in capacity and so our response to your email(s) might be delayed.

If you don't hear from us within two weeks, please email back and we will do our best to get to you sooner.

In the meantime, please have a look at our website (https://www.informeddissent.info), as this may have information to answer your questions.

If your email is related to an upcoming court appearance, we will prioritise your email and get a response to you ASAP. Please also email the XR Legal Fund team to ensure you have the relevant support (legalfinancialsupport@riseup.net) with the details of your court date.

In Solidarity,
XR Legal Support Team

From:	Beatrice Shah Scott
Sent:	23 March 2026 11:15
To:	'PBHPXR@protonmail.com'
Cc:	Holly Stebbing
Subject:	Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]
Attachments:	2025.03.23 - Letter from NRF to Mr Paul Barnes re Annual Review Hearing.pdf; 2025.07.11 - Sealed Ellenbogen Order (amended description of D1-D3, 2025 review hearing).pdf

Dear Mr Barnes

Re: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing

Please see the attached correspondence.

Yours faithfully

Norton Rose Fulbright LLP

Beatrice Shah Scott | Associate

Norton Rose Fulbright LLP
3 More London Riverside, London, SE1 2AQ, United Kingdom
Tel +44 20 7444 5081 | Mob +44 7708 298091 | Fax +44 20 7283 6500
beatrice.shahscott@nortonrosefulbright.com

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23 March 2026

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United Kingdom

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Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Mr Paul Barnes

By email only: PBHPXR@protonmail.com

Your reference **Our reference**
HMOR/1001267389

Dear Mr Barnes

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown

We write on behalf of Esso Petroleum Company, Limited and ExxonMobil Chemical Limited (the **Claimants**) in connection with the enclosed Operating Sites injunctions that the Claimants have sought and been granted against various defendants connected to the Extinction Rebellion, Just Stop Oil or other environmental campaigns with claim number QB-2022-001098 (the **Order**).

Pursuant to paragraph 8 of the Order, the injunctions are to be reviewed on or around 18 July each year. Should you intend to appear and make submissions at the 2026 review hearing, please confirm (i) whether you will be instructing Counsel to appear on your behalf, and if so who; or (ii) if you intend to appear as a litigant in person, whether there are any dates to avoid in July 2026.

Please provide your response to the above questions by **4pm on Monday, 6 April 2026** by emailing ExxonMobil.Service@nortonrosefulbright.com, so that the Claimants can take steps to fix this year's annual review hearing. If you do not intend to appear and make submissions, there is no need to respond to this letter.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Enc.

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From:	Beatrice Shah Scott
Sent:	23 March 2026 11:18
To:	'hekt@outlook.com'
Cc:	Holly Stebbing
Subject:	Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]
Attachments:	2026.03.23 - Letter from NRF to Ms Diana Hekt re Annual Review Hearing.pdf; 2025.07.11 - Sealed Ellenbogen Order (amended description of D1-D3, 2025 review hearing).pdf

Dear Ms Hekt

Re: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing

Please see the attached correspondence.

Yours faithfully

Norton Rose Fulbright LLP

Beatrice Shah Scott | Associate

Norton Rose Fulbright LLP
3 More London Riverside, London, SE1 2AQ, United Kingdom
Tel +44 20 7444 5081 | Mob +44 7708 298091 | Fax +44 20 7283 6500
beatrice.shahscott@nortonrosefulbright.com

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23 March 2026

Norton Rose Fulbright LLP
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London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Ms Diana Hekt

By email only: hekt@outlook.com

Your reference | **Our reference** HMOR/1001267389

Dear Ms Hekt

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown

We write on behalf of Esso Petroleum Company, Limited and ExxonMobil Chemical Limited (the **Claimants**) in connection with the enclosed Operating Sites injunctions that the Claimants have sought and been granted against various defendants connected to the Extinction Rebellion, Just Stop Oil or other environmental campaigns with claim number QB-2022-001098 (the **Order**).

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Yours faithfully

Norton Rose Fulbright LLP

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From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: 'PBHPXR@protonmail.com'
Sent: 23 March 2026 11:15
Subject: Relayed: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

'PBHPXR@protonmail.com' (PBHPXR@protonmail.com)

Subject: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]

From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: 'hekt@outlook.com'
Sent: 23 March 2026 11:18
Subject: Relayed: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

'hekt@outlook.com' (hekt@outlook.com)

Subject: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]

From: postmaster@outlook.com
Sent: 23 March 2026 11:18
To: Beatrice Shah Scott
Subject: Undeliverable: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]
Attachments: ATT00001; Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]; ATT00002.htm; shield-advisory.png; chevron-light.png; shield-advisory.png; chevron-light.png

Follow Up Flag: Follow up
Flag Status: Flagged

Delivery has failed to these recipients or groups:

'hekt@outlook.com' (hekt@outlook.com)<mailto:hekt@outlook.com>
The recipient's mailbox is full and can't accept messages now. Please try resending your message later, or contact the recipient directly.

Diagnostic information for administrators:

Generating server: DB9P189MB3552.EURP189.PROD.OUTLOOK.COM

hekt@outlook.com
Remote server returned '554 5.2.2 mailbox full;
STOREDRV.Deliver.Exception:QuotaExceededException.MapiExceptionShutoffQuotaExceeded; Failed to process message due to a permanent exception with message [BeginDiagnosticData]The process failed to get the correct properties. 1.84300:02000000, 1.84300:9F000000, 1.84300:A1000000, 1.84300:01000000, 1.84300:08000000, 1.73948:00000000, 5.71140:67000000446F526F70730000, 1.108572:00000000, 0.117068:A4000000, 1.79180:02000000, 1.79180:9F000000, 1.79180:FA000000, 255.73100:14000000, 5.95292:67000000446F526F7073006E, 8.111356:9552F9FE86593ECC1F1F572B2F8F6BAC0BAFA94C, 0.38698:B87CC736, 1.107996:02000000, 1.41134:86000000, 7.36354:010000000000010C86000000, 1.46439:0A000000, 1.115228:00000000, 0.104668:01000000, 0.124060:01000000, 1.41134:86000000, 7.36354:010000000000010C01000000, 1.46439:0A000000, 1.115228:00000000, 0.104668:00000000, 0.34102:86000000, 5.29818:00000000303030333766666652D633862362D653632662D303030302D303030303030303030303030303000000000, 5.55446:00000000333A300086000000, 7.29828:9C08A1230600000086000000, 7.29832:000000C00300000086000000, 4.45884:DD040000, 4.29880:DD040000, 4.59420:DD040000, 7.40840:010000000000010C01000000, 8.45434:FE7F0300B6C82FE60000000000000000000000000, 0.104348:3A373434, 5.46798:040000004D61696C4974656D44656C697665722E485454502E456D61696C001086000000, 7.51330:030C69E0CD88DE081EF80E00, 5.10786:0000000031352E32302E393732332E3030383A4D5256503138394D42333132343A37343434613363372D3939

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Original message headers:

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cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.9723.23; Mon, 23 Mar
2026 11:18:10 +0000
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cipher=TLS_AES_256_GCM_SHA384) id 15.20.9723.31 via Frontend Transport; Mon,
23 Mar 2026 11:18:10 +0000
Authentication-Results: spf=pass (sender IP is 185.58.86.192) smtp.mailfrom=nortonrosefulbright.com; dkim=pass
(signature was verified) header.d=nortonrosefulbright.com;dmarc=pass action=none
header.from=nortonrosefulbright.com;compauth=pass reason=100
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permitted sender) receiver=protection.outlook.com; client-ip=185.58.86.192; helo=eu-smtp-delivery-
192.mimecast.com; pr=C
Received: from eu-smtp-delivery-192.mimecast.com (185.58.86.192) by
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DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=nortonrosefulbright.com;
s=mc1sel20190809; t=1774264690;
h=from:from:reply-to:subject:subject:date:date:message-id:message-id:
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Received: from LO0P265CU003.outbound.protection.outlook.com
(mail-uksouthazon11012049.outbound.protection.outlook.com [52.101.96.49]) by relay.mimecast.com with ESMTP
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23 Mar 2026 11:18:02 +0000
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LO4P265MB6352.GBRP265.PROD.OUTLOOK.COM (2603:10a6:600:2e7::8) with Microsoft SMTP Server (version=TLS1_2,
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cipher=TLS_AES_256_GCM_SHA384) id 15.20.9723.31 via Frontend Transport; Mon,
23 Mar 2026 11:17:33 +0000
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dkim=none (message not signed) header.d=none;dmarc=fail action=oreject header.from=nortonrosefulbright.com
Received: from london.aquilaiajax.com (3.253.208.185) by CW2PEPF000056C0.mail.protection.outlook.com
(10.167.240.23) with Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384)
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15.20.9723.19 via Frontend Transport; Mon, 23 Mar 2026 11:17:53 +0000
Received: from LO3P265CU004.outbound.protection.outlook.com (ip-10-243-242-253.eu-west-1.compute.internal
[10.243.242.253])
by london1.aquilaiajax.com (Haraka) with ESMTPS id 486FAE29-AE89-4CF8-8674-79C68E0DCBDA.1
envelope-from <Beatrice.ShahScott@nortonrosefulbright.com>
tls TLS_ECDHE_RSA_WITH_AES_128_GCM_SHA256;
Mon, 23 Mar 2026 11:17:53 +0000
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LO9P265MB7445.GBRP265.PROD.OUTLOOK.COM (2603:10a6:600:39e::10) with Microsoft SMTP Server
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cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.9723.31; Mon, 23 Mar
2026 11:17:48 +0000
Received: from LOCP265MB8641.GBRP265.PROD.OUTLOOK.COM
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([fe80::a91b:b8d4:d110:b264%4]) with mapi id 15.20.9723.030; Mon, 23 Mar 2026
11:17:48 +0000
From: Beatrice Shah Scott <Beatrice.ShahScott@nortonrosefulbright.com>
To: "'hekt@outlook.com'" <hekt@outlook.com>
CC: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]
Thread-Topic: Claim No. QB-2022-001098 | Fixing Date for Annual Review Hearing [NRF_EMEA-UK.FID3210555]
Thread-Index: Ady6tqxP19h6Oj0fQOqPq+hE5LxqZQ==
Disposition-Notification-To: Beatrice Shah Scott
<Beatrice.ShahScott@nortonrosefulbright.com>
Return-Receipt-To: <Beatrice.ShahScott@nortonrosefulbright.com>
Date: Mon, 23 Mar 2026 11:17:47 +0000
Message-ID: <LOCP265MB864175D0817EDCD02911BF06894BA@LOCP265MB8641.GBRP265.PROD.OUTLOOK.COM>
Accept-Language: en-US
X-MS-Has-Attach: yes
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x-wsguid: NRF_EMEA-da7068c2846c41258d6cc2a1e0a53ebe
imanage.sendandfile.filinglocations: uk!3210555
imanage.sendandfile.filinglocations.firmid: NRF_EMEA
imanage-send-identifier: c69019ca-bf2b-465a-85da-e9a9cfb13ff8
Authentication-Results-Original: dkim=none (message not signed) header.d=none;dmarc=none action=none
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NORTON ROSE FULBRIGHT

23 March 2026

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

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Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Ms Diana Hekt

By email only: hekt@outlook.com

Your reference **Our reference**
HMOR/1001267389

Dear Ms Hekt

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown

We write on behalf of Esso Petroleum Company, Limited and ExxonMobil Chemical Limited (the **Claimants**) in connection with the enclosed Operating Sites injunctions that the Claimants have sought and been granted against various defendants connected to the Extinction Rebellion, Just Stop Oil or other environmental campaigns with claim number QB-2022-001098 (the **Order**).

Pursuant to paragraph 8 of the Order, the injunctions are to be reviewed on or around 18 July each year. Should you intend to appear and make submissions at the 2026 review hearing, please confirm (i) whether you will be instructing Counsel to appear on your behalf, and if so who; or (ii) if you intend to appear as a litigant in person, whether there are any dates to avoid in July 2026.

Please provide your response to the above questions by **4pm on Monday, 6 April 2026** by emailing ExxonMobil.Service@nortonrosefulbright.com, so that the Claimants can take steps to fix this year's annual review hearing. If you do not intend to appear and make submissions, there is no need to respond to this letter.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Enc.

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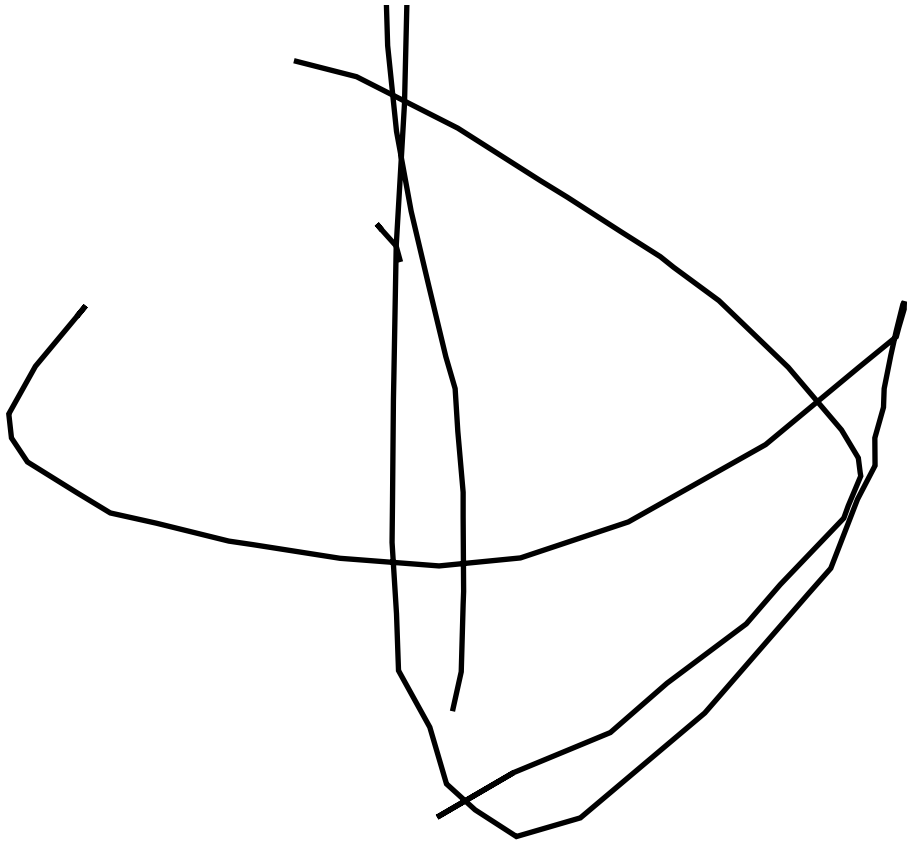

Your item was delivered on **24-03-2026**.

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Delivered at: 12:25, Tuesday 24 March 2026

Print this page

From:	Beatrice Shah Scott
Sent:	01 May 2026 21:47
To:	PBHPXR@protonmail.com
Cc:	Holly Stebbing
Subject:	Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]
Attachments:	2026.05.01 - Letter from NRF to Mr Paul Barnes confirming Annual Review Hearing 22 July 2026.pdf

Dear Mr Barnes

Re: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026

Please see the attached correspondence.

Yours faithfully

Norton Rose Fulbright LLP

Beatrice Shah Scott | Associate

Norton Rose Fulbright LLP
3 More London Riverside, London, SE1 2AQ, United Kingdom
Tel +44 20 7444 5081 | Mob +44 7708 298091 | Fax +44 20 7283 6500
beatrice.shahscott@nortonrosefulbright.com

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NORTON ROSE FULBRIGHT

1 May 2026

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Fax +44 20 7283 6500
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nortonrosefulbright.com

Mr Paul Barnes

By email only: PBHPXR@protonmail.com

Your reference	**Our reference**
	HMOR/1001267389

Dear Mr Barnes

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors

We refer to our letter dated 23 March 2026 in connection with the abovementioned proceedings in which we requested that you confirm by 4pm on Monday 6 April 2026 whether you intend to appear and make submissions at the 2026 hearing that will be held to review the injunctions pursuant to paragraph 8 of the Order in this claim dated 29 January 2024.

As we did not receive any response to our letter, we confirm that the Claimants have fixed this year's review hearing for **Wednesday, 22 July 2026** with a time estimate of half a day.

If you do intend to appear and make submissions at the review hearing, please confirm by Monday 18 May 2026 (i) if you will be instructing counsel to appear on your behalf and, if so, who has been instructed; or (ii) if you intend to appear as a litigant in person.

A copy of this letter may be obtained by emailing ExxonMobil.Service@nortonrosefulbright.com. The hearing notice can also be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

Yours faithfully

Norton Rose Fulbright LLP

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From:	Beatrice Shah Scott
Sent:	01 May 2026 21:50
To:	hekt@outlook.com
Cc:	Holly Stebbing
Subject:	Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]
Attachments:	2026.05.01- Letter from NRF to Ms Diana Hekt confirming Annual Review Hearing 22 July 2026.pdf

Dear Ms Hekt

Re: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026

Please see the attached correspondence.

Yours faithfully

Norton Rose Fulbright LLP

Beatrice Shah Scott | Associate

Norton Rose Fulbright LLP
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NORTON ROSE FULBRIGHT

1 May 2026

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United Kingdom

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Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Ms Diana Hekt

By email only: hekt@outlook.com

Your reference	**Our reference**
	HMOR/1001267389

Dear Ms Hekt

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors

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A copy of this letter may be obtained by emailing ExxonMobil.Service@nortonrosefulbright.com. The hearing notice can also be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

Yours faithfully

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From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: PBHPXR@protonmail.com
Sent: 01 May 2026 21:47
Subject: Relayed: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

PBHPXR@protonmail.com (pbhpxr@protonmail.com)

Subject: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]

From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: hekt@outlook.com
Sent: 01 May 2026 21:50
Subject: Relayed: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

hekt@outlook.com (hekt@outlook.com)

Subject: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]

From: postmaster@outlook.com
Sent: 01 May 2026 21:51
To: Beatrice Shah Scott
Subject: Undeliverable: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]
Attachments: ATT00001; Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 22 July 2026 [NRF_EMEA-UK.FID3210555]; ATT00002.htm; shield-advisory.png; chevron-light.png; shield-advisory.png; chevron-light.png

Delivery has failed to these recipients or groups:

hekt@outlook.com (hekt@outlook.com)<mailto:hekt@outlook.com>
The recipient's mailbox is full and can't accept messages now. Please try resending your message later, or contact the recipient directly.

Diagnostic information for administrators:

Generating server: GV1P189MB3076.EURP189.PROD.OUTLOOK.COM

hekt@outlook.com
Remote server returned '554 5.2.2 mailbox full;
STOREDRV.Deliver.Exception:QuotaExceededException.MapiExceptionShutoffQuotaExceeded; Failed to process message due to a permanent exception with message [BeginDiagnosticData]The process failed to get the correct properties. 1.84300:02000000, 1.84300:9F000000, 1.84300:A1000000, 1.84300:01000000, 1.84300:08000000, 1.73948:00000000, 5.71140:67000000446F526F70730000, 1.108572:00000000, 0.117068:A4000000, 1.79180:02000000, 1.79180:9F000000, 1.79180:FA000000, 255.73100:14000000, 5.95292:67000000446F526F7073006E, 8.111356:9552F9FE86593ECC1F1F572B2F8F6BAC0BAFA94C, 0.38698:29410000, 1.41134:86000000, 7.36354:010000000000010C01000000, 1.46439:0A000000, 1.115228:00000000, 0.104668:00000000, 1.41134:86000000, 7.36354:010000000000010C00000000, 1.46439:0A000000, 1.115228:00000000, 0.104668:874A159B, 0.34102:29B23102, 5.29818:00000000303030333766666652D633862362D653632662D303030302D303030303030303030303030000000000, 5.55446:00000000333A300001000000, 7.29828:F71E7C1D0600000001000000, 7.29832:000000C00300000000000000000, 4.45884:DD040000, 4.29880:DD040000, 4.59420:DD040000, 7.40840:010000000000010C372D3939, 8.45434:FE7F0300B6C82FE60000000000000000037383535, 0.104348:3232343A, 5.46798:040000004D61696C4974656D44656C697665722E485454502E456D61696C0010A4000000, 7.51330:6752ED4EC3A7DE08A4000000, 5.10786:0000000031352E32302E393837302E3032303A4D5256503138394D42333132343A3734343461336337 2D393965322D343537642D393961362D623862613231363738353535623A36373232343A2E4E455420382E302E3236004F000000, 0.39570:4F000000, 1.64146:02000000, 1.33010:02000000, 2.54258:00000000, 0.58802:A4000000, 1.33010:02000000, 2.54258:00000000, 0.58802:14000000, 1.64146:9F000000, 1.33010:9F000000, 2.54258:DD040000, 1.33010:9F000000, 2.54258:DD040000, 255.79500:12000000, 1.79180:A1000000, 1.79180:08000000,

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01 May 2026 21:50:33 +0100
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From: Beatrice Shah Scott <Beatrice.ShahScott@nortonrosefulbright.com>
To: "hekt@outlook.com" <hekt@outlook.com>
CC: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: =?Windows-1252?Q?Claim_No._QB-2022-001098_|_Notice_of_Annual_Review_Heari?=
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Thread-Index: AdzZrCGmkcv749sfRguyClXCEvP1Tw==
Disposition-Notification-To: Beatrice Shah Scott
<Beatrice.ShahScott@nortonrosefulbright.com>
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Date: Fri, 1 May 2026 20:50:26 +0000
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imanage.sendandfile.filinglocations: uk!3210555
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(UTC)
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X-MS-Exchange-Transport-CrossTenantHeadersStamped: GV1P189MB3076

NORTON ROSE FULBRIGHT

1 May 2026

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Ms Diana Hekt

By email only: hekt@outlook.com

Your reference

Our reference
HMOR/1001267389

Dear Ms Hekt

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors

We refer to our letter dated 23 March 2026 in connection with the abovementioned proceedings in which we requested that you confirm by 4pm on Monday 6 April 2026 whether you intend to appear and make submissions at the 2026 hearing that will be held to review the injunctions pursuant to paragraph 8 of the Order in this claim dated 29 January 2024.

As we did not receive any response to our letter, we confirm that the Claimants have fixed this year's review hearing for **Wednesday, 22 July 2026** with a time estimate of half a day.

If you do intend to appear and make submissions at the review hearing, please confirm by Monday 18 May 2026 (i) if you will be instructing counsel to appear on your behalf and, if so, who has been instructed; or (ii) if you intend to appear as a litigant in person.

A copy of this letter may be obtained by emailing ExxonMobil.Service@nortonrosefulbright.com. The hearing notice can also be viewed at https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

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nteed

pm

Additional payment here

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Ms Diana Hekt

[redacted]

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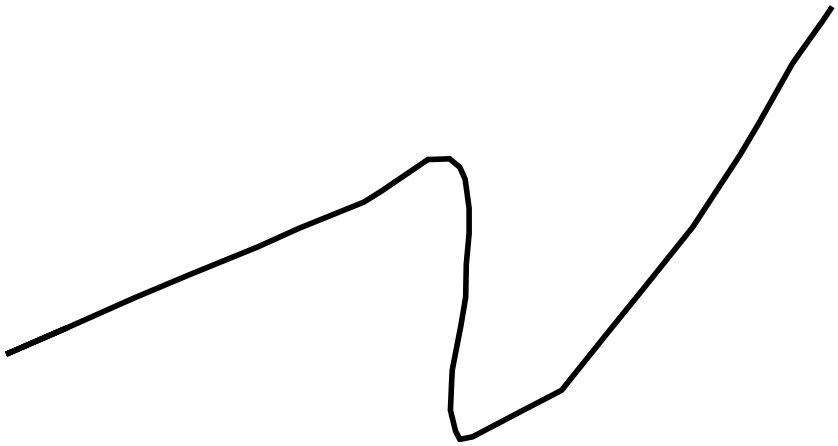

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER (as defined below))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE ORDER)
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE ORDER)
(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 ORDER)
(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 ORDER)
~~G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE ORDER)

(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER)

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

If you the within named Fourth Defendant disobey the Undertaking set out in Schedule 1 of this order or instruct (which includes training, coaching, teaching or educating) others to do the acts which you have undertaken not to do, 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 Fourth Defendant to breach the Undertaking set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE FOURTH DEFENDANT

This order prohibits you from doing the acts set out in the Undertaking at Schedule 1 below.

You should read it very carefully.

UPON the **Fourth Defendant** giving the Undertaking to the Court as set out in Schedule 1 below;

AND UPON the injunctions (the **Injunctions**) granted pursuant to the order of Ellenbogen J dated 29 January 2024 (as amended under the Slip Rule on 21 January 2025 and by the order of Sweeting J dated 10 July 2025) (the **Order**) for a period of five years until 11 July 2028, subject to annual review hearings;

IT IS ORDERED THAT:

1. The Fourth Defendant shall be bound by the Undertaking set out in Schedule 1 to this order.

2. There be no order as to costs.

SCHEDULE 1

UNDERTAKING TO THE COURT

The **Fourth Defendant** undertakes to the Court promising as follows:

1. Not to:

   (a) enter or remain on any part of the Sites (as defined above) without the consent of the First Claimant;

   (b) damage any part of any of the Sites;

   (c) affix themselves or any person or object to any part of any of the Sites; or

   (d) erect any structures on any part of any of the Sites.

2. Not to:

   (a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TX (the "Chemical Plant") (as shown for identification edged purple on the 'Fawley Plan' (as defined above));

   (b) damage any part of the Chemical Plant;

   (c) affix themselves or any person or object at the Chemical Plant; or

   (d) erect any structures on any part of the Chemical Plant.

3. Not to enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THIS UNDERTAKING UNTIL THE LATER OF 31 JULY 2027 OR THE DATE OF THE 2027 ANNUAL REVIEW HEARING

STATEMENT

I understand the Undertaking that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.

_____

Paul Barnes

Fourth Defendant

_____ 2026

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER (as defined below))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE ORDER)
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE ORDER)
(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 ORDER)
(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 ORDER)
~~G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE ORDER)

(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER)

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

If you the within named Fifth Defendant disobey the Undertaking set out in Schedule 1 of this order or instruct (which includes training, coaching, teaching or educating) others to do the acts which you have undertaken not to do, 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 Fifth Defendant to breach the Undertaking set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE FIFTH DEFENDANT

This order prohibits you from doing the acts set out in the Undertaking at Schedule 1 below.

You should read it very carefully.

UPON the **Fifth Defendant** giving the Undertaking to the Court as set out in Schedule 1 below;

AND UPON the injunctions (the **Injunctions**) granted pursuant to the order of Ellenbogen J dated 29 January 2024 (as amended under the Slip Rule on 21 January 2025 and by the order of Sweeting J dated 10 July 2025) (the **Order**) for a period of five years until 11 July 2028, subject to annual review hearings;

IT IS ORDERED THAT:

1. The Fifth Defendant shall be bound by the Undertaking set out in Schedule 1 to this order.

2. There be no order as to costs.

SCHEDULE 1

UNDERTAKING TO THE COURT

The **Fifth Defendant** undertakes to the Court promising as follows:

1. Not to:

   (a) enter or remain on any part of the Sites (as defined above) without the consent of the First Claimant;

   (b) damage any part of any of the Sites;

   (c) affix themselves or any person or object to any part of any of the Sites; or

   (d) erect any structures on any part of any of the Sites.

2. Not to:

   (a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TX (the "Chemical Plant") (as shown for identification edged purple on the 'Fawley Plan' (as defined above));

   (b) damage any part of the Chemical Plant;

   (c) affix themselves or any person or object at the Chemical Plant; or

   (d) erect any structures on any part of the Chemical Plant.

3. Not to enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THIS UNDERTAKING UNTIL THE LATER OF 31 JULY 2027 OR THE DATE OF THE 2027 ANNUAL REVIEW HEARING

STATEMENT

I understand the Undertaking that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.

_____

Diana Hekt

Fifth Defendant

_____ 2026

From: Beatrice Shah Scott
Sent: 03 June 2026 21:18
To: pbhpxr@protonmail.com
Cc: Holly Stebbing
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]
Attachments: Esso injunction - D4 2026 Undertaking (unsigned).pdf

Dear Mr Barnes,

RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others

We refer to our email sent on 1 May 2026 concerning the upcoming review hearing on this matter on 22 July 2026 and the undertaking you provided to the Court on 25 July 2024.

We would be grateful if you would confirm whether you agree to renew the undertaking in the form attached, which can be seen at Schedule 1 to the attached draft order. Should you agree to renew the undertaking, please provide a signed copy of the undertaking by return. We will then provide the signed undertaking and the draft order to the Court for approval and sealing. The order is the one we shall ask the Court to make, but it remains subject to any amendments that the Judge may have. If you do so, you will be in the same position as between 10 July 2024 – 30 June 2025 – i.e. you will not be bound by the injunction but (as a breach of an undertaking is a contempt of court) you will be bound by your undertaking to the Court such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

Yours faithfully,

Norton Rose Fulbright

Beatrice Shah Scott | Associate

Norton Rose Fulbright LLP
3 More London Riverside, London, SE1 2AQ, United Kingdom
Tel +44 20 7444 5081 | Mob +44 7708 298091 | Fax +44 20 7283 6500
beatrice.shahscott@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
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From: Beatrice Shah Scott
Sent: 03 June 2026 21:16
To: hekt@outlook.com
Cc: Holly Stebbing
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]
Attachments: Esso injunction - D5 2026 Undertaking (unsigned).pdf

Dear Ms Hekt,

RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others

We refer to our email sent on 1 May 2026 and our letter delivered on 6 May 2026 concerning the upcoming review hearing on this matter on 22 July 2026 and the undertaking you provided to the Court on 15 June 2025.

We would be grateful if you would confirm whether you agree to renew the undertaking in the form attached, which can be seen at Schedule 1 to the attached draft order. Should you agree to renew the undertaking, please provide a signed copy of the undertaking by return. We will then provide the signed undertaking and the draft order to the Court for approval and sealing. The order is the one we shall ask the Court to make, but it remains subject to any amendments that the Judge may have. If you do so, you will be in the same position as before, following your signature of the undertaking in June 2025 which expires on 31 July 2026 – i.e. you will not be bound by the injunction but (as a breach of an undertaking is a contempt of court) you will be bound by your undertaking to the Court such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

Yours faithfully,

Norton Rose Fulbright

Beatrice Shah Scott | Associate

Norton Rose Fulbright LLP
3 More London Riverside, London, SE1 2AQ, United Kingdom
Tel +44 20 7444 5081 | Mob +44 7708 298091 | Fax +44 20 7283 6500
beatrice.shahscott@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

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From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: pbhpxr@protonmail.com
Sent: 03 June 2026 21:18
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]

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pbhpxr@protonmail.com (pbhpxr@protonmail.com)

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From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: hekt@outlook.com
Sent: 03 June 2026 21:16
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

hekt@outlook.com (hekt@outlook.com)

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]

From: postmaster@outlook.com
Sent: 03 June 2026 21:16
To: Beatrice Shah Scott
Subject: Undeliverable: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]
Attachments: ATT00001; QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]; ATT00002.htm; shield-advisory.png; chevron-light.png

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hekt@outlook.com (hekt@outlook.com)<mailto:hekt@outlook.com>
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hekt@outlook.com
Remote server returned '554 5.2.2 mailbox full;
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(2603:10b6:5:3b4::32) with Microsoft SMTP Server (version=TLS1_3,
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From: Beatrice Shah Scott <Beatrice.ShahScott@nortonrosefulbright.com>
To: "hekt@outlook.com" <hekt@outlook.com>
CC: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]
Thread-Topic: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]
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<Beatrice.ShahScott@nortonrosefulbright.com>
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NORTON ROSE FULBRIGHT

5 June 2026

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Ms Diana Hekt



Your reference

Our reference
HMOR/1001267389

Dear Ms Hekt

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors

We refer to our email sent on 1 May 2026 and our letter delivered on 6 May 2026 concerning the upcoming review hearing on this matter on 22 July 2026 and the undertaking you provided to the Court on 15 June 2025.

We would be grateful if you would confirm whether you agree to renew the undertaking in the form enclosed, which can be seen at Schedule 1 of the enclosed draft order. Should you agree to renew the undertaking, please provide a signed copy of the enclosed undertaking either by emailing a scan of the signed undertaking to ExxonMobil.Service@nortonrosefulbright.com, or by sending the signed undertaking to us at the address stated above using the enclosed, stamped envelope.

We will then provide the signed undertaking and the draft order to the Court for approval and sealing. The order is the one we shall ask the Court to make, but it remains subject to any amendments that the Judge may have. If you sign the undertaking, you will be in the same position as before, following your signature of the undertaking in June 2025 which expires on 31 July 2026 – i.e. you will not be bound by the injunction but you will be bound by your undertaking to the Court such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

We have also sent the enclosed undertaking to you by email, at the address hekt@outlook.com. However, a notification message was received stating the mailbox was full. We are therefore also providing the undertaking to you by post.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Encl.

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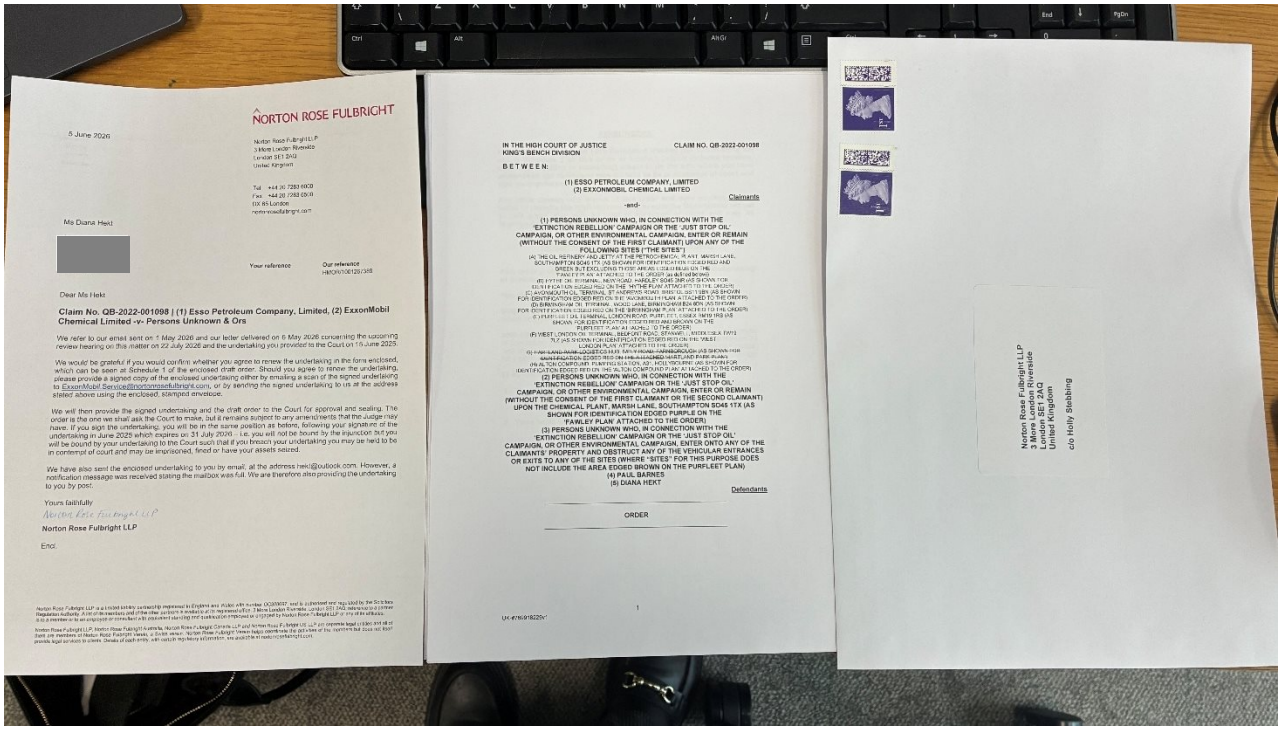

NORTON ROSE FULBRIGHT

5 June 2026

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Ms Diana Hekt

[redacted]

Your reference

Our reference
HMOR/1001267389

Dear Ms Hekt

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors

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Norton Rose Fulbright LLP

Encl.

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(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")

(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER)

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

ORDER

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

c/o Holly Stebbing

SPECIAL DELIVERY

AS 4620 7753 0GB



Delivered by

Royal Mail

05-06-26

£3.95 P86408772

1PM

100g

Ms Diana Hekt

[redacted]

HS8/402

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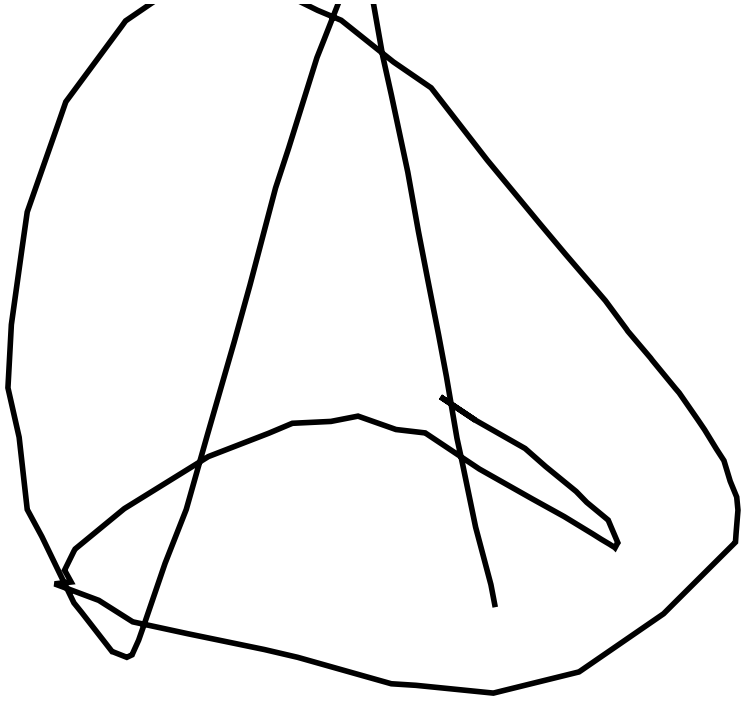

Your item was delivered on **06-06-2026**.

Signed for by: CV19

Service used: Royal Mail Special Delivery Guaranteed 1pm™

Delivered at: 12:44, Saturday 06 June 2026

Print this page

SCHEDULE 1

UNDERTAKING TO THE COURT

The **Fifth Defendant** undertakes to the Court promising as follows:

1. Not to:

   (a) enter or remain on any part of the Sites (as defined above) without the consent of the First Claimant;

   (b) damage any part of any of the Sites;

   (c) affix themselves or any person or object to any part of any of the Sites; or

   (d) erect any structures on any part of any of the Sites.

2. Not to:

   (a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TX (the "Chemical Plant") (as shown for identification edged purple on the 'Fawley Plan' (as defined above));

   (b) damage any part of the Chemical Plant;

   (c) affix themselves or any person or object at the Chemical Plant; or

   (d) erect any structures on any part of the Chemical Plant.

3. Not to enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THIS UNDERTAKING UNTIL THE LATER OF 31 JULY 2027 OR THE DATE OF THE 2027 ANNUAL REVIEW HEARING

STATEMENT

I understand the Undertaking that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.

Diana Hekt

Fifth Defendant

2026

NORTON ROSE FULBRIGHT

17 June 2026

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Mr Paul Barnes

[redacted]

Your reference

Our reference
HMOR/1001267389

Dear Mr Barnes

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors

We refer to our email sent on 1 May 2026 concerning the upcoming review hearing on this matter on 22 July 2026 and the undertaking you provided to the Court on 25 July 2024.

We would be grateful if you would confirm whether you agree to renew the undertaking in the form enclosed, which can be seen at Schedule 1 of the enclosed draft order. Should you agree to renew the undertaking, please provide a signed copy of the enclosed undertaking either by emailing a scan of the signed undertaking to ExxonMobil.Service@nortonrosefulbright.com, or by sending the signed undertaking to us at the address stated above using the enclosed, stamped envelope.

We will then provide the signed undertaking and the draft order to the Court for approval and sealing. The order is the one we shall ask the Court to make, but it remains subject to any amendments that the Judge may have. If you sign the undertaking, you will be in the same position as between 10 July 2024 – 30 June 2025 – i.e. you will not be bound by the injunction but you will be bound by your undertaking to the Court such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

We have also sent the enclosed undertaking to you by email on 3 June 2026, at the address PBHPXR@protonmail.com.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

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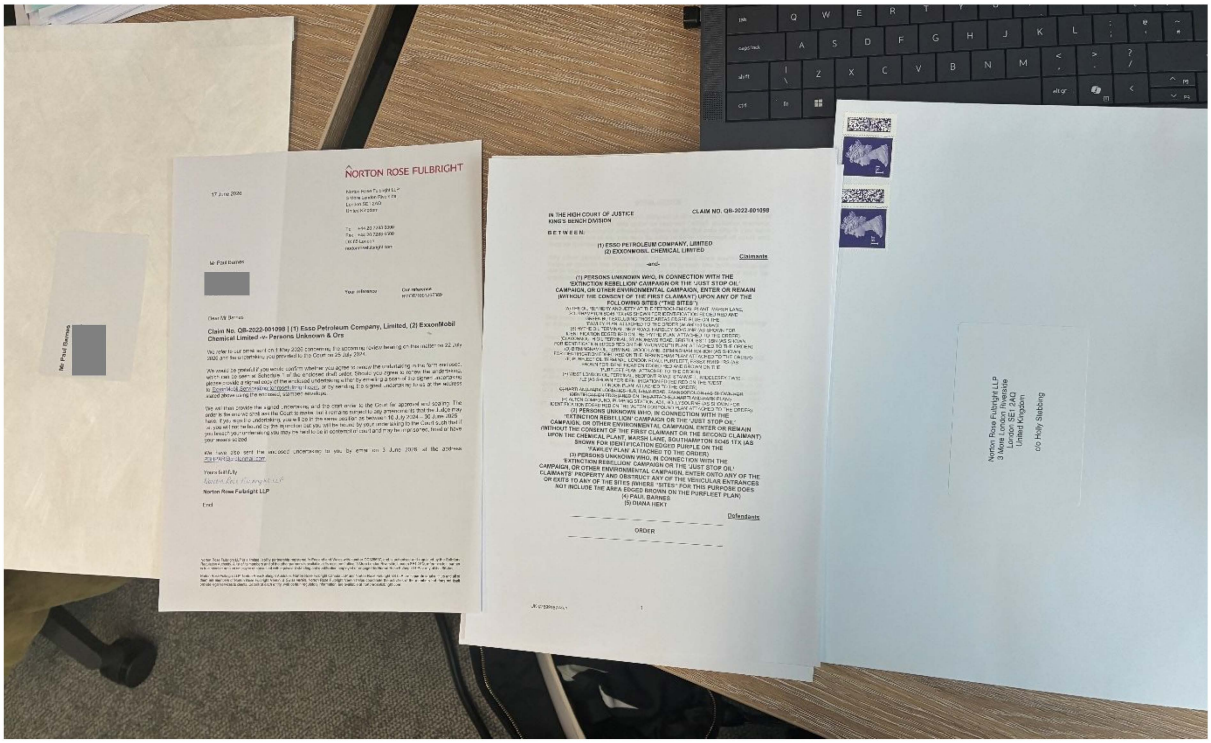
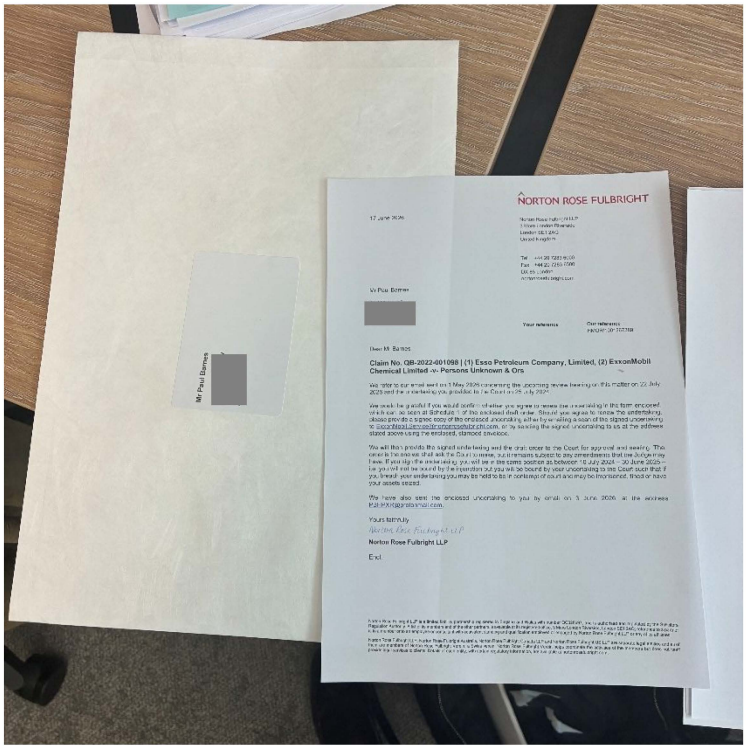
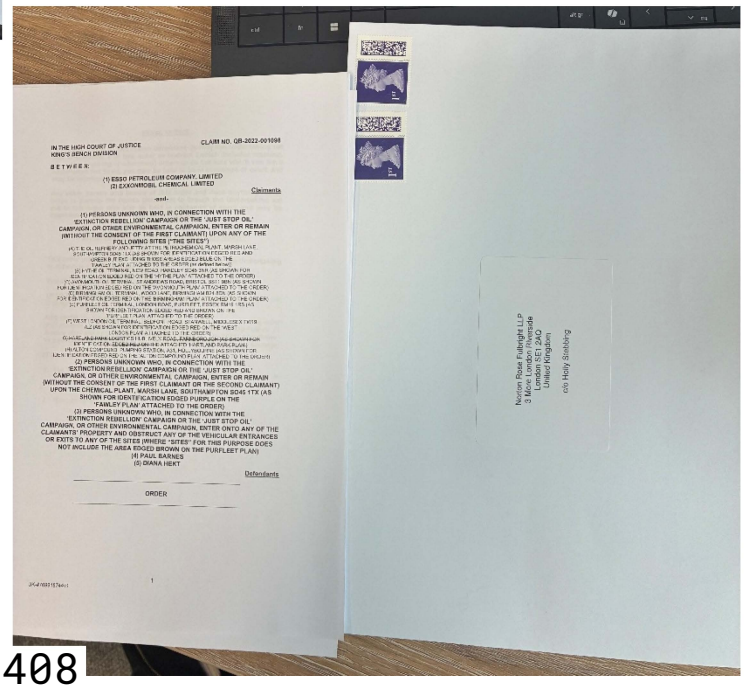

NORTON ROSE FULBRIGHT
Mr Paul Barnes
Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors
Yours faithfully
Norton Rose Fulbright LLP
Encl
IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
CLAIM NO. QB-2022-001098
BETWEEN:
(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED
Claimants
- and -
ORDER
Defendants
Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom
FAO Holly Stebbing


NORTON ROSE FULBRIGHT
Mr Paul Barnes
Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors
Yours faithfully
Norton Rose Fulbright LLP
Encl


CLAIM NO. QB-2022-001098
IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BETWEEN:
(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED
Claimants
- and -
ORDER
Defendants
Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom
FAO Holly Stebbing

Customer Receipt

Tracking ID: AS482077588GB
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SPECIAL DELIVERY 1PM
Recipient: _____
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1.00 750 Standard
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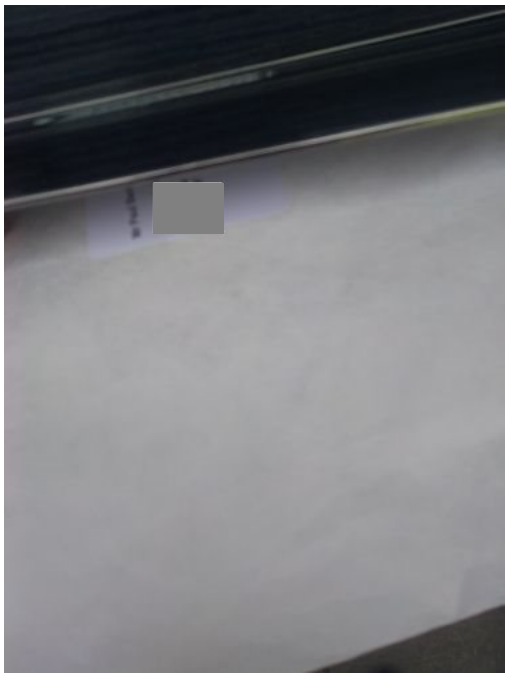

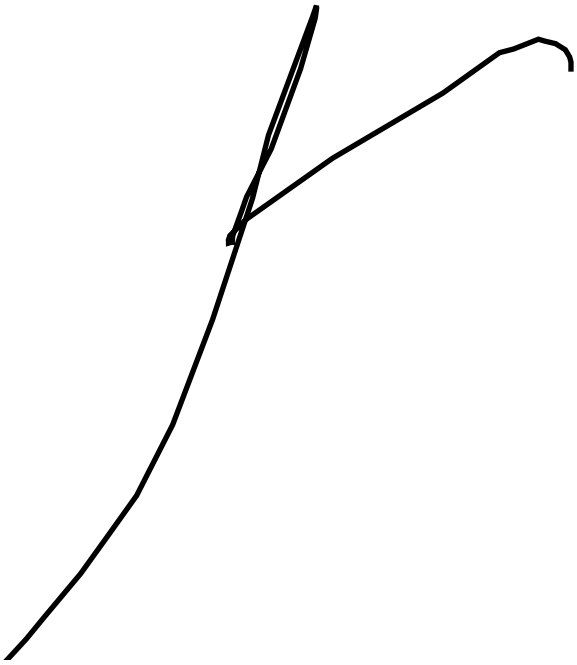

Your item was delivered on **18-06-2026**.

Signed for by: BARNES

Service used: Royal Mail Special Delivery Guaranteed 1pm™

Delivered at: 11:41, Thursday 18 June 2026

Print this page

From: Beatrice Shah Scott
Sent: 25 June 2026 10:42
To: 'pbhpxr@protonmail.com'
Cc: Holly Stebbing
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]
Attachments: Esso injunction - D4 2026 Undertaking (unsigned).pdf

Tracking:

Recipient	Delivery
'pbhpxr@protonmail.com'	
Holly Stebbing	Delivered: 25/06/2026 10:42
'1001267389 _ Esso Operating Sites Injunction Reviews Emails _1001267389_'	

Dear Mr Barnes

RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others

Further to our previous email sent on 3 June 2026 and our letter delivered on 18 June 2026, we would be grateful if you would please confirm whether you agree to renew the undertaking that you provided to the Court on 25 July 2024. Should you agree to the undertaking, please provide a signed copy of the undertaking by return or by sending the undertaking to us at 3 More London Riverside, London, SE1 2AQ using the stamped envelope that we delivered to you.

If you sign the attached undertaking we will provide it to the Court ahead of the hearing on 22 July 2026. As previously noted, this undertaking contains a penal notice meaning that if you breach your undertaking, you may be held in contempt of court and may be imprisoned, fined or have your assets seized.

Yours faithfully

Norton Rose Fulbright LLP

Beatrice Shah Scott | Associate

Norton Rose Fulbright LLP
3 More London Riverside, London, SE1 2AQ, United Kingdom
Tel +44 20 7444 5081 | Mob +44 7708 298091 | Fax +44 20 7283 6500
beatrice.shahscott@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

From: Beatrice Shah Scott
Sent: 03 June 2026 21:18
To: pbhpxr@protonmail.com
Cc: Holly Stebbing
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]

Dear Mr Barnes,

RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others

We refer to our email sent on 1 May 2026 concerning the upcoming review hearing on this matter on 22 July 2026 and the undertaking you provided to the Court on 25 July 2024.

We would be grateful if you would confirm whether you agree to renew the undertaking in the form attached, which can be seen at Schedule 1 to the attached draft order. Should you agree to renew the undertaking, please provide a signed copy of the undertaking by return. We will then provide the signed undertaking and the draft order to the Court for approval and sealing. The order is the one we shall ask the Court to make, but it remains subject to any amendments that the Judge may have. If you do so, you will be in the same position as between 10 July 2024 – 30 June 2025 – i.e. you will not be bound by the injunction but (as a breach of an undertaking is a contempt of court) you will be bound by your undertaking to the Court such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

Yours faithfully,

Norton Rose Fulbright

Beatrice Shah Scott | Associate

Norton Rose Fulbright LLP
3 More London Riverside, London, SE1 2AQ, United Kingdom
Tel +44 20 7444 5081 | Mob +44 7708 298091 | Fax +44 20 7283 6500
beatrice.shahscott@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

From: Microsoft Outlook <MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@nortonrosefulbright.com>
To: 'pbhpxr@protonmail.com'
Sent: 25 June 2026 10:42
Subject: Relayed: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

'pbhpxr@protonmail.com' (pbhpxr@protonmail.com)

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Undertaking [NRF_EMEA-UK.FID3210555]

Once per month, please confirm that the (1) 4 x A2 Warning Notices and (2) the 4 laminated documents are still at four locations at each of the sites - Containers now obsolete with new boards and one laminated set of documents attached to fences in their place x 4.

		Alton				Avonmouth				Birmingham				Fawley			
		Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 4 & Docs	Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 4 & Docs	Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 2 & Docs	Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 4 & Docs
Jan-26	**Date Checked**	08/01/2026	08/01/2026	08/01/2026	08/01/2026	05/01/2026	05/01/2026	05/01/2026	05/01/2026	08/01/2026	08/01/2026	08/01/2026	08/01/2026	07/01/2026	07/01/2026	07/01/2026	07/01/2026
	Location on site	Main gate.	Bottom gate.	Secondary main gate.	West fence line.	Main pedestrian gate to office buildings.	Entrance to main car park and Bristol Port land behind.	Main vehicle gates, next to gatehouse.	Other side of vehicle gates, at the bottom of the site access ramp.	Outside the main entrance, easily accessed from approach on Wood Lane.	To the right-hand side of the pedestrian turnstile entrance.	Main vehicle entrance to the terminal.	On the pedestrian path directly outside the terminal.	Wideload access route / greenbelt side of Fawley site.	Gate 3 access route.	Gate 2 and admin drive access route.	Hythe terminal / gate 1 access route.
	Person Responsible	Michael Bundy	Michael Bundy	Michael Bundy	Michael Bundy	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Jamie Johnson	Jamie Johnson	Jamie Johnson	Jamie Johnson	Martin Weston	Martin Weston	Martin Weston	Martin Weston
Feb-26	**Date Checked**	11/02/2026	11/02/2026	11/02/2026	11/02/2026	03/02/2026	03/02/2026	03/02/2026	03/02/2026	02/02/2026	02/02/2026	02/02/2026	02/02/2026	05/02/2026	05/02/2026	05/02/2026	05/02/2026
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	Person Responsible	Michael Bundy	Michael Bundy	Michael Bundy	Michael Bundy	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Luke Froggatt	Luke Froggatt	Luke Froggatt	Luke Froggatt	Martin Weston	Martin Weston	Martin Weston	Martin Weston
Mar-26	**Date Checked**	05/03/2026	05/03/2026	05/03/2026	05/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026	06/03/2026	06/03/2026	06/03/2026	06/03/2026
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	Person Responsible	Michael Bundy	Michael Bundy	Michael Bundy	Michael Bundy	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Jamie Johnson	Jamie Johnson	Jamie Johnson	Jamie Johnson	Sean Rutter	Sean Rutter	Sean Rutter	Sean Rutter
Apr-26	**Date Checked**	08/04/2026	08/04/2026	08/04/2026	08/04/2026	01/04/2026	01/04/2026	01/04/2026	01/04/2026	01/04/2026	01/04/2026	01/04/2026	01/04/2026	09/04/2026	09/04/2026	09/04/2026	09/04/2026
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	Person Responsible	Jamie Laing	Jamie Laing	Jamie Laing	Jamie Laing	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Luke Froggatt	Luke Froggatt	Luke Froggatt	Luke Froggatt	Sean Rutter	Sean Rutter	Sean Rutter	Sean Rutter
May-26	**Date Checked**	07/05/2026	07/05/2026	07/05/2026	07/05/2026	30/04/2026	30/4/226	30/04/2026	30/04/2026	30/04/2026	30/4/226	30/04/2026	30/04/2026	28/04/2026	28/04/2026	28/04/2026	28/04/2026
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	Person Responsible	Michael Bundy	Michael Bundy	Michael Bundy	Michael Bundy	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Charlie Evans	Charlie Evans	Charlie Evans	Charlie Evans	George Milne	George Milne	George Milne	George Milne
Jun-26	**Date Checked**	26/05/2026	26/05/2026	26/05/2026	26/05/2026	10/06/2026	10/06/2026	10/06/2026	10/06/2026	10/06/2026	10/06/2026	10/06/2026	10/06/2026	09/06/2026	09/06/2026	09/06/2026	09/06/2026
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	Person Responsible	Colin Candy	Colin Candy	Colin Candy	Colin Candy	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Luke Froggatt	Luke Froggatt	Luke Froggatt	Luke Froggatt	Sean Rutter	Sean Rutter	Sean Rutter	Sean Rutter
Jul-26	**Date Checked**																
	Location on site	Main gate.	Bottom gate.	Secondary main gate.	West fence line.	Main pedestrian gate to office buildings.	Entrance to main car park and Bristol Port land behind.	Main vehicle gates, next to gatehouse.	Other side of vehicle gates, at the bottom of the site access ramp.	Outside the main entrance, easily accessed from approach on Wood Lane.	To the right-hand side of the pedestrian turnstile entrance.	Main vehicle entrance to the terminal.	On the pedestrian path directly outside the terminal.	Wideload access route / greenbelt side of Fawley site.	Gate 3 access route.	Gate 2 and admin drive access route.	Hythe terminal / gate 1 access route.
	Person Responsible																
Aug-26	**Date Checked**																
	Location on site	Main gate.	Bottom gate.	Secondary main gate.	West fence line.	Main pedestrian gate to office buildings.	Entrance to main car park and Bristol Port land behind.	Main vehicle gates, next to gatehouse.	Other side of vehicle gates, at the bottom of the site access ramp.	Outside the main entrance, easily accessed from approach on Wood Lane.	To the right-hand side of the pedestrian turnstile entrance.	Main vehicle entrance to the terminal.	On the pedestrian path directly outside the terminal.	Wideload access route / greenbelt side of Fawley site.	Gate 3 access route.	Gate 2 and admin drive access route.	Hythe terminal / gate 1 access route.
	Person Responsible																
Sep-26	**Date Checked**																
	Location on site	Main gate.	Bottom gate.	Secondary main gate.	West fence line.	Main pedestrian gate to office buildings.	Entrance to main car park and Bristol Port land behind.	Main vehicle gates, next to gatehouse.	Other side of vehicle gates, at the bottom of the site access ramp.	Outside the main entrance, easily accessed from approach on Wood Lane.	To the right-hand side of the pedestrian turnstile entrance.	Main vehicle entrance to the terminal.	On the pedestrian path directly outside the terminal.	Wideload access route / greenbelt side of Fawley site.	Gate 3 access route.	Gate 2 and admin drive access route.	Hythe terminal / gate 1 access route.
	Person Responsible																
Oct-26	**Date Checked**																
	Location on site	Main gate.	Bottom gate.	Secondary main gate.	West fence line.	Main pedestrian gate to office buildings.	Entrance to main car park and Bristol Port land behind.	Main vehicle gates, next to gatehouse.	Other side of vehicle gates, at the bottom of the site access ramp.	Outside the main entrance, easily accessed from approach on Wood Lane.	To the right-hand side of the pedestrain turnstile entrance.	Main vehicle entrance to the terminal.	On the pedestrian path directly outside the terminal.	Wideload access route / greenbelt side of Fawley site.	Gate 3 access route.	Gate 2 and admin drive access route.	Hythe terminal / gate 1 access route.
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Nov-26	**Date Checked**																
	Location on site	Main gate.	Bottom gate.	Secondary main gate.	West fence line.	Main pedestrian gate to office buildings.	Entrance to main car park and Bristol Port land behind.	Main vehicle gates, next to gatehouse.	Other side of vehicle gates, at the bottom of the site access ramp.	Outside the main entrance, easily accessed from approach on Wood Lane.	To the right-hand side of the pedestrian turnstile entrance.	Main vehicle entrance to the terminal.	On the pedestrian path directly outside the terminal.	Wideload access route / greenbelt side of Fawley site.	Gate 3 access route.	Gate 2 and admin drive access route.	Hythe terminal / gate 1 access route.
	Person Responsible																
Dec-26	**Date Checked**																
	Location on site	Main gate.	Bottom gate.	Secondary main gate.	West fence line.	Main pedestrian gate to office buildings.	Entrance to main car park and Bristol Port land behind.	Main vehicle gates, next to gatehouse.	Other side of vehicle gates, at the bottom of the site access ramp.	Outside the main entrance, easily accessed from approach on Wood Lane.	To the right-hand side of the pedestrian turnstile entrance.	Main vehicle entrance to the terminal.	On the pedestrian path directly outside the terminal.	Wideload access route / greenbelt side of Fawley site.	Gate 3 access route.	Gate 2 and admin drive access route.	Hythe terminal / gate 1 access route.
	Person Responsible																
		Alton				Avonmouth				Birmingham				Fawley			

Hythe				Purfleet				West London			
Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 4 & Docs	Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 4 & Docs	Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 4 & Docs
02/01/2026	02/01/2026	02/01/2026	02/01/2026	02/01/2026	02/01/2026	02/01/2026	02/01/2026	02/01/2026	02/01/2026	02/01/2026	02/01/2026
Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.
Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Keiron Hudson	Kieron Hudson	Kieron Hudson	Kieron Hudson
02/02/2026	02/02/2026	02/02/2026	02/02/2026	03/02/2026	03/02/2026	03/02/2026	03/02/2026	04/02/2026	04/02/2026	04/02/2026	04/02/2026
Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.
Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Stuart Ward	Stuart Ward	Stuart Ward	Stuart Ward	Kieron Hudson	Charlie Young	Kieron Hudson	Charlie Young
02/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026	02/03/2026
Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.
Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Keiron Hudson	Kieron Hudson	Kieron Hudson	Kieron Hudson
01/04/2026	01/04/2026	01/04/2026	01/04/2026	08/04/2026	08/04/2026	08/04/2026	08/04/2026	01/04/2026	01/04/2026	01/04/2026	01/04/2026
Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.
Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Keiron Hudson	Kieron Hudson	Kieron Hudson	Kieron Hudson
01/05/2026	01/05/2026	01/05/2026	01/05/2026	01/05/2026	01/05/2026	01/05/2026	01/05/2026	30/04/2026	30/04/2026	30/04/2026	30/04/2026
Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.
Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Pia Sylvest	Paul Rendell	Pia Sylvest	Paul Rendell
10/06/2026	10/06/2026	10/06/2026	10/06/2026	04/06/2026	04/06/2026	04/02/2026	04/06/2026	04/06/2026	09/06/2026	04/06/2026	09/06/2026
Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.
Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Pia Sylvest	Mike Oakey	Pia Sylvest	Mike Oakey
Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.
Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.
Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.
Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.
Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.
Hythe				Purfleet				West London			

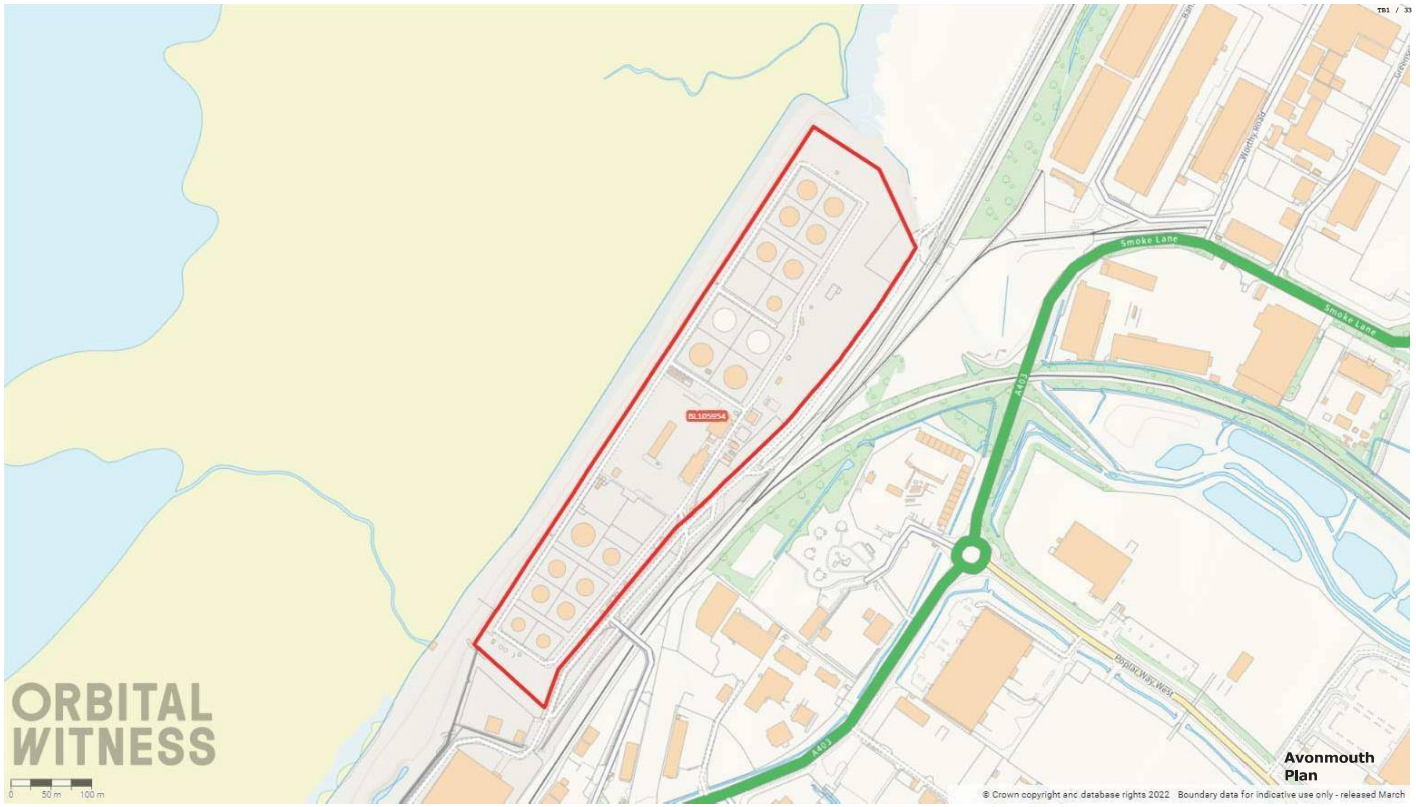
All checked early, as a new document was also addeed to each poster board.

ALTON was checked a couple of days earlier, same date photos were taken for previous request.

Once per month, please confirm that the (1) 4 x A2 Warning Notices and (2) the 4 laminated documents are still at four locations at each of the sites - Containers now obsolete with new boards and one doc attached to fences in their place x 4.

		Alton						Avonmouth						Birmingham						Faw		
		Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 4 & Docs	Container 4	Container 2	Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 4 & Docs	Container 1	Container 2	Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 2 & Docs	Container 1	Container 2	Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs
Mar-25	**Date Checked**	11/03/2025	11/03/2025	11/03/2025	11/03/2025	11/03/2025	11/03/2025	06/03/2025	06/03/2025	06/03/2025	06/03/2025	06/03/2025	06/03/2025	04/03/2025	04/03/2025	04/03/2025	04/03/2025	04/03/2025	04/03/2025	10/03/2025	10/03/2025	10/03/2025
	Location on site	Main entrance gate on the left-hand side.	Back exit gate on the left-hand side.	Side gate on the left-hand side of the main entrance gate.	Transformer end vehicle gates on the right-hand side.	Outside main entrance gate to the left-hand side.	Back exit gate to the left-hand site.	1st Notice Board is by the pedestrian gate entrance.	2nd Notice Board is by the main vehicle entrance.	3rd Notice Board in the car park.	4th Notice Board is by switch room.	Box 1 is by the pedestrian gate entrance.	Box 2 is by the main vehicle entrance.	Main pedestrian entrance for Esso building.	Next to driver pedestrian turnstile.	Eastside of the entrance roundabout.	Westside of the entrance roundabout.	Main pedestrian entrance for Esso building.	Next to driver pedestrian turnstile.	The Wide Load Gate Entrance is on right-hand Side of site perimeter fence inside the outer screening fence. This entrance is off the junction of B3053 & Church Lane.	The Sign is situated to the right-hand Side of the refinery Gate 3 Entrance turnstiles, of Cadland Road, Hardley.	At Gate 3.
	Person Responsible	Michael Bundy	Michael Bundy	Michael Bundy	Michael Bundy	Michael Bundy	Michael Bundy	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Callum Dempsey	Callum Dempsey	Callum Dempsey	Callum Dempsey	Callum Dempsey	Callum Dempsey	Martin Weston	Martin Weston	Martin Weston
Apr-25	**Date Checked**	11/04/2025	11/04/2025	11/04/2025	11/04/2025	11/04/2025	11/04/2025	09/04/2025	09/04/2025	09/04/2025	09/04/2025	09/04/2025	09/04/2025	02/04/2025	02/04/2025	02/04/2025	02/04/2025	02/04/2025	02/04/2025	03/04/2025	03/04/2025	03/04/2025
	Location on site	Main entrance gate on the left-hand side.	Back exit gate on the left-hand side.	Side gate on the left-hand side of the main entrance gate.	Transformer end vehicle gates on the right-hand side.	Main entrance gate to the left-hand side.	Back exit gate to the left-hand site.	1st Notice Board is by the pedestrian gate entrance.	2nd Notice Board is by the main vehicle entrance.	3rd Notice Board in the car park.	4th Notice Board is by switch room.	Box 1 is by the pedestrian gate entrance.	Box 2 is by the main vehicle entrance.	Main pedestrian entrance for Esso building.	Next to driver pedestrian turnstile.	Eastside of the entrance roundabout.	Westside of the entrance roundabout.	Main pedestrian entrance for Esso building.	Next to driver pedestrian turnstile.	The Wide Load Gate Entrance is on right-hand Side of site perimeter fence inside the outer screening fence. This entrance is off the junction of B3053 & Church Lane.	The Sign is situated to the right-hand Side of the refinery Gate 3 Entrance turnstiles, of Cadland Road, Hardley.	At Gate 3.
	Person Responsible	Jon Cranton	Jon Cranton	Jon Cranton	Jon Cranton	Jon Cranton	Jon Cranton	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Jamie Johnson	Jamie Johnson	Jamie Johnson	Jamie Johnson	Jamie Johnson	Jamie Johnson	Martin Weston	Martin Weston	Martin Weston
May-25	**Date Checked**	13/05/2025	13/05/2025	13/05/2025	13/05/2025	13/05/2025	13/05/2025	06/05/2025	06/05/2025	06/05/2025	06/05/2025	06/05/2025	06/05/2025	02/05/2025	02/05/2025	02/05/2025	02/05/2025	02/05/2025	02/05/2025	02/05/2025	02/05/2025	02/05/2025
	Location on site	Main entrance gate on the left-hand side.	Back exit gate on the left-hand side.	Side gate on the left-hand side of the main entrance gate.	Transformer end vehicle gates on the right-hand side.	Main entrance gate to the left-hand side.	Back exit gate to the left-hand site.	1st Notice Board is by the pedestrian gate entrance.	2nd Notice Board is by the main vehicle entrance.	3rd Notice Board in the car park.	4th Notice Board is by switch room.	Box 1 is by the pedestrian gate entrance.	Box 2 is by the main vehicle entrance.	Main pedestrian entrance for Esso building.	Next to driver pedestrian turnstile.	Eastside of the entrance roundabout.	Westside of the entrance roundabout.	Main pedestrian entrance for Esso building.	Next to driver pedestrian turnstile.	The Wide Load Gate Entrance is on right-hand Side of site perimeter fence inside the outer screening fence. This entrance is off the junction of B3053 & Church Lane.	The Sign is situated to the right-hand Side of the refinery Gate 3 Entrance turnstiles, of Cadland Road, Hardley.	At Gate 3.
	Person Responsible	Sam Cranton	Sam Cranton	Sam Cranton	Sam Cranton	Sam Cranton	Sam Cranton	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Jamie Johnson	Jamie Johnson	Jamie Johnson	Jamie Johnson	Jamie Johnson	Jamie Johnson	Martin Weston	Martin Weston	Martin Weston
Jun-25	**Date Checked**	04/05/2025	04/05/2025	04/05/2025	04/05/2025	04/05/2025	04/05/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025
	Location on site	Main entrance gate on the left-hand side.	Back exit gate on the left-hand side.	Side gate on the left-hand side of the main entrance gate.	Transformer end vehicle gates on the right-hand side.	Main entrance gate to the left-hand side.	Back exit gate to the left-hand site.	1st Notice Board is by the pedestrian gate entrance.	2nd Notice Board is by the main vehicle entrance.	3rd Notice Board in the car park.	4th Notice Board is by switch room.	Box 1 is by the pedestrian gate entrance.	Box 2 is by the main vehicle entrance.	Main pedestrian entrance for Esso building.	Next to driver pedestrian turnstile.	Eastside of the entrance roundabout.	Westside of the entrance roundabout.	Main pedestrian entrance for Esso building.	Next to driver pedestrian turnstile.	The Wide Load Gate Entrance is on right-hand Side of site perimeter fence inside the outer screening fence. This entrance is off the junction of B3053 & Church Lane.	The Sign is situated to the right-hand Side of the refinery Gate 3 Entrance turnstiles, of Cadland Road, Hardley.	At Gate 3.
	Person Responsible	Sam Cranton	Sam Cranton	Sam Cranton	Sam Cranton	Sam Cranton	Sam Cranton	Will Wynn	Will Wynn	Will Wynn	Will Wynn	Will Wynn	Will Wynn	Callum Dempsey	Callum Dempsey	Callum Dempsey	Callum Dempsey	Callum Dempsey	Callum Dempsey	Martin Weston	Martin Weston	Martin Weston
Jul-25	**Date Checked**	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025
	Location on site	Main entrance gate on the left-hand side.	Back exit gate on the left-hand side.	Side gate on the left-hand side of the main entrance gate.	Transformer end vehicle gates on the right-hand side.	Main entrance gate to the left-hand side.	Back exit gate to the left-hand site.	1st Notice Board is by the pedestrian gate entrance.	2nd Notice Board is by the main vehicle entrance.	3rd Notice Board in the car park.	4th Notice Board is by switch room.	Box 1 is by the pedestrian gate entrance.	Box 2 is by the main vehicle entrance.	Main pedestrian entrance for Esso building.	Next to driver pedestrian turnstile.	Eastside of the entrance roundabout.	Westside of the entrance roundabout.	Main pedestrian entrance for Esso building.	Next to driver pedestrian turnstile.	The Wide Load Gate Entrance is on right-hand Side of site perimeter fence inside the outer screening fence. This entrance is off the junction of B3053 & Church Lane.	The Sign is situated to the right-hand Side of the refinery Gate 3 Entrance turnstiles, of Cadland Road, Hardley.	At Gate 3.
	Person Responsible	Sam Cranton	Sam Cranton	Sam Cranton	Sam Cranton	Sam Cranton	Sam Cranton	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge	Callum Dempsey	Callum Dempsey	Callum Dempsey	Callum Dempsey	Callum Dempsey	Callum Dempsey	Martin Weston	Martin Weston	Martin Weston
AUGUST 2025 NEW BOARDS & LAMINATED DOCUMENTS	**Date Checked**	01/08/2025	01/08/2025	01/08/2025	01/08/2025			06/08/2025	06/08/2025	06/08/2025	06/08/2025			01/08/2025	01/08/2025	01/08/2025	01/08/2025			01/08/2025	01/08/2025	01/08/2025
	Location on site	Main gate.	Bottom gate.	Secondary main gate.	West fence line.	N/A	N/A	Main pedestrian gate to office buildings.	Entrance to main car park and Bristol Port land behind.	Main vehicle gates, next to gatehouse.	Other side of vehicle gates, at the bottom of the site access ramp.	N/A	N/A	Outside the main entrance, easily accessed from approach on Wood Lane.	To the right-hand side of the pedestrain turnstile entrance.	Main vehicle entrance to the terminal.	On the pedestrian path directly outside the terminal.	N/A	N/A	Wideload access route / greenbelt side of Fawley site.	Gate 3 access route.	Gate 2 and admin drive access route.
	Person Responsible	Sam Cranton	Sam Cranton	Sam Cranton	Sam Cranton			Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge			Luke Froggat	Luke Froggat	Luke Froggat	Luke Froggat			Robert Bohan	Robert Bohan	Robert Bohan
Sep-25	**Date Checked**	04/09/2025	04/09/2025	04/09/2025	04/09/2025			03/09/2025	03/09/2025	03/09/2025	03/09/2025			04/09/2025	04/09/2025	04/09/2025	04/09/2025			03/09/2025	03/09/2025	03/09/2025
	Location on site	Main gate.	Bottom gate.	Secondary main gate.	West fence line.	N/A	N/A	Main pedestrian gate to office buildings.	Entrance to main car park and Bristol Port land behind.	Main vehicle gates, next to gatehouse.	Other side of vehicle gates, at the bottom of the site access ramp.	N/A	N/A	Outside the main entrance, easily accessed from approach on Wood Lane.	To the right-hand side of the pedestrain turnstile entrance.	Main vehicle entrance to the terminal.	On the pedestrian path directly outside the terminal.	N/A	N/A	Wideload access route / greenbelt side of Fawley site.	Gate 3 access route.	Gate 2 and admin drive access route.
	Person Responsible	Michael Bundy	Michael Bundy	Michael Bundy	Michael Bundy			Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge			Jamie Johnson	Jamie Johnson	Jamie Johnson	Jamie Johnson			Martin Weston	Martin Weston	Martin Weston
Oct-25	**Date Checked**	02/10/2025	02/10/2025	02/10/2025	02/10/2025			03/10/2025	03/10/2025	03/10/2025	03/10/2025			02/10/2025	02/10/2025	02/10/2025	02/10/2025			03/10/2025	03/10/2025	03/10/2025
	Location on site	Main gate.	Bottom gate.	Secondary main gate.	West fence line.	N/A	N/A	Main pedestrian gate to office buildings.	Entrance to main car park and Bristol Port land behind.	Main vehicle gates, next to gatehouse.	Other side of vehicle gates, at the bottom of the site access ramp.	N/A	N/A	Outside the main entrance, easily accessed from approach on Wood Lane.	To the right-hand side of the pedestrain turnstile entrance.	Main vehicle entrance to the terminal.	On the pedestrian path directly outside the terminal.	N/A	N/A	Wideload access route / greenbelt side of Fawley site.	Gate 3 access route.	Gate 2 and admin drive access route.
	Person Responsible	Michael Bundy	Michael Bundy	Michael Bundy	Michael Bundy			Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge			Jamie Johnson	Jamie Johnson	Jamie Johnson	Jamie Johnson			Martin Weston	Martin Weston	Martin Weston
Nov-25	**Date Checked**	07/11/2025	07/11/2025	07/11/2025	07/11/2025			07/11/2025	07/11/2025	07/11/2025	07/11/2025			06/11/2025	06/11/2025	06/11/2025	06/11/2025			10/11/2025	10/11/2025	10/11/2025
	Location on site	Main gate.	Bottom gate.	Secondary main gate.	West fence line.	N/A	N/A	Main pedestrian gate to office buildings.	Entrance to main car park and Bristol Port land behind.	Main vehicle gates, next to gatehouse.	Other side of vehicle gates, at the bottom of the site access ramp.	N/A	N/A	Outside the main entrance, easily accessed from approach on Wood Lane.	To the right-hand side of the pedestrain turnstile entrance.	Main vehicle entrance to the terminal.	On the pedestrian path directly outside the terminal.	N/A	N/A	Wideload access route / greenbelt side of Fawley site.	Gate 3 access route.	Gate 2 and admin drive access route.
	Person Responsible	Michael Bundy	Michael Bundy	Michael Bundy	Michael Bundy			Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge			Luke Froggat	Luke Froggat	Luke Froggat	Luke Froggat			Sean Rutter	Sean Rutter	Sean Rutter
Dec-25	**Date Checked**	16/12/2025	16/12/2025	16/12/2025	16/12/2025			10/12/2025	10/12/2025	10/12/2025	10/12/2025			10/12/2025	10/12/2025	10/12/2025	10/12/2025			12/12/2025	12/12/2025	12/12/2025
	Location on site	Main gate.	Bottom gate.	Secondary main gate.	West fence line.	N/A	N/A	Main pedestrian gate to office buildings.	Entrance to main car park and Bristol Port land behind.	Main vehicle gates, next to gatehouse.	Other side of vehicle gates, at the bottom of the site access ramp.	N/A	N/A	Outside the main entrance, easily accessed from approach on Wood Lane.	To the right-hand side of the pedestrain turnstile entrance.	Main vehicle entrance to the terminal.	On the pedestrian path directly outside the terminal.	N/A	N/A	Wideload access route / greenbelt side of Fawley site.	Gate 3 access route.	Gate 2 and admin drive access route.
	Person Responsible	Jordan Channon	Jordan Channon	Jordan Channon	Jordan Channon			Simon Bridge	Simon Bridge	Simon Bridge	Simon Bridge			Jamie Johnson	Jamie Johnson	Jamie Johnson	Jamie Johnson			Martin Weston	Martin Weston	Martin Weston
		Alton						Avonmouth						Birmingham						Faw		

ley			Hythe						Purfleet						West London					
Warning Notice 4 & Docs	Container 1	Container 2	Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 4 & Docs	Container 1	Container 2	Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 4 & Docs	Container 1	Container 2	Warning Notice 1 & Docs	Warning Notice 2 & Docs	Warning Notice 3 & Docs	Warning Notice 4 & Docs	Container 1	Container 2
10/03/2025	10/03/2025	10/03/2025	04/03/2025	04/03/2025	04/03/2025	04/03/2025	04/03/2025	04/03/2025	06/03/2025	06/03/2025	06/03/2025	06/03/2025	06/03/2025	06/03/2025	03/03/2025	03/03/2025	03/03/2025	03/03/2025	03/03/2025	03/03/2025
At Wide Load Gate.	On Left hand side Perimeter fence at the end of Marsh Lane adjacent to Gate 2 and Admin entrance.	On left hand side of fence on land Boundary between public Highway (Cadland Road) and ExxonMobil property.	On outside of fence, next to footpath from lower carpark up towards terminal entrance.	On outside of fence in top carpark, next to south emergency access gate.	On outside of main terminal entrance gate.	On outside of fence, next to north emergency access gate.	On outside of fence, next to footpath from lower carpark up towards terminal entrance.	On outside of fence in top carpark, next to south emergency access gate.	Exit from terminal.	Entrance to terminal.	Canteen gate entrance to tank farm.	Jetty gate – access to tank farm from footpath at southside of site.	Attached to fence on exit of terminal.	Attached to fence on entrance to terminal.	On the right-hand fence just before the Gatehouse entrance to site.	On the right-hand fence further up the entrance road to the site just opposite the pedestrian walkway and car park.	On the approach road to the terminal on the right-hand side fence of the entrance.	On the approach road to the terminal on the left-hand side fence of the entrance.	Box attached to the fence on the approach road to the terminal on the right-hand side of the entrance.	Box attached to the fence on the approach road to the terminal on the left-hand side of the entrance.
Martin Weston	Martin Weston	Martin Weston	Steve Humm	Steve Humm	Steve Humm	Steve Humm	Steve Humm	Steve Humm	Siobhan Robertson	Siobhan Robertson	Siobhan Robertson	Siobhan Robertson	Siobhan Robertson	Siobhan Robertson	Pia Sylvest	Pia Sylvest	Pia Sylvest	Pia Sylvest	Pia Sylvest	Pia Sylvest
03/04/2025	03/04/2025	03/04/2025	08/04/2025	08/04/2025	08/04/2025	08/04/2025	08/04/2025	08/04/2025	09/04/2025	09/04/2025	09/04/2025	09/04/2025	09/04/2025	09/04/2025	01/04/2025	01/04/2025	01/04/2025	01/04/2025	01/04/2025	01/04/2025
At Wide Load Gate.	On Left hand side Perimeter fence at the end of Marsh Lane adjacent to Gate 2 and Admin entrance.	On left hand side of fence on land Boundary between public Highway (Cadland Road) and ExxonMobil property.	On outside of fence, next to footpath from lower carpark up towards terminal entrance.	On outside of fence in top carpark, next to south emergency access gate.	On outside of main terminal entrance gate.	On outside of fence, next to north emergency access gate.	On outside of fence, next to footpath from lower carpark up towards terminal entrance.	On outside of fence in top carpark, next to south emergency access gate.	Exit from terminal.	Entrance to terminal.	Canteen gate entrance to tank farm.	Jetty gate – access to tank farm from footpath at southside of site.	Attached to fence on exit of terminal	Attached to fence on entrance to terminal.	On the right-hand fence just before the Gatehouse entrance to site.	On the right-hand fence further up the entrance road to the site just opposite the pedestrian walkway and car park.	On the approach road to the terminal on the right-hand side fence of the entrance.	On the approach road to the terminal on the left-hand side fence of the entrance.	Box attached to the fence on the approach road to the terminal on the right-hand side of the entrance.	Box attached to the fence on the approach road to the terminal on the left-hand side of the entrance.
Martin Weston	Martin Weston	Martin Weston	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Pia Sylvest	Pia Sylvest	Pia Sylvest	Pia Sylvest	Pia Sylvest	Pia Sylvest
02/05/2025	02/05/2025	02/05/2025	02/05/2025	02/05/2025	02/05/2025	02/05/2025	02/05/2025	02/05/2025	06/05/2025	06/05/2025	06/05/2025	06/05/2025	06/05/2025	06/05/2025	01/05/2025	01/05/2025	01/05/2025	01/05/2025	01/05/2025	01/05/2025
At Wide Load Gate.	On Left hand side Perimeter fence at the end of Marsh Lane adjacent to Gate 2 and Admin entrance.	On left hand side of fence on land Boundary between public Highway (Cadland Road) and ExxonMobil property.	On outside of fence, next to footpath from lower carpark up towards terminal entrance.	On outside of fence in top carpark, next to south emergency access gate.	On outside of main terminal entrance gate.	On outside of fence, next to north emergency access gate.	On outside of fence, next to footpath from lower carpark up towards terminal entrance.	On outside of fence in top carpark, next to south emergency access gate.	Exit from terminal.	Entrance to terminal.	Canteen gate entrance to tank farm.	Jetty gate – access to tank farm from footpath at southside of site.	Attached to fence on exit of terminal	Attached to fence on entrance to terminal.	On the right-hand fence just before the Gatehouse entrance to site.	On the right-hand fence further up the entrance road to the site just opposite the pedestrian walkway and car park.	On the approach road to the terminal on the right-hand side fence of the entrance.	On the approach road to the terminal on the left-hand side fence of the entrance.	Box attached to the fence on the approach road to the terminal on the right-hand side of the entrance.	Box attached to the fence on the approach road to the terminal on the left-hand side of the entrance.
Martin Weston	Martin Weston	Martin Weston	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Kieron Hudson	Kieron Hudson	Kieron Hudson	Kieron Hudson	Kieron Hudson	Kieron Hudson
02/06/2025	02/06/2025	02/06/2025	03/06/2025	03/06/2025	03/06/2025	03/06/2025	03/06/2025	03/06/2025	04/05/2025	04/05/2025	04/05/2025	04/05/2025	04/05/2025	04/05/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025	02/06/2025
At Wide Load Gate.	On Left hand side Perimeter fence at the end of Marsh Lane adjacent to Gate 2 and Admin entrance.	On left hand side of fence on land Boundary between public Highway (Cadland Road) and ExxonMobil property.	On outside of fence, next to footpath from lower carpark up towards terminal entrance.	On outside of fence in top carpark, next to south emergency access gate.	On outside of main terminal entrance gate.	On outside of fence, next to north emergency access gate.	On outside of fence, next to footpath from lower carpark up towards terminal entrance.	On outside of fence in top carpark, next to south emergency access gate.	Exit from terminal.	Entrance to terminal.	Canteen gate entrance to tank farm.	Jetty gate – access to tank farm from footpath at southside of site.	Attached to fence on exit of terminal	Attached to fence on entrance to terminal.	On the right-hand fence just before the Gatehouse entrance to site.	On the right-hand fence further up the entrance road to the site just opposite the pedestrian walkway and car park.	On the approach road to the terminal on the right-hand side fence of the entrance.	On the approach road to the terminal on the left-hand side fence of the entrance.	Box attached to the fence on the approach road to the terminal on the right-hand side of the entrance.	Box attached to the fence on the approach road to the terminal on the left-hand side of the entrance.
Martin Weston	Martin Weston	Martin Weston	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Albert Jackson-Davis	Albert Jackson-Davis	Albert Jackson-Davis	Albert Jackson-Davis	Albert Jackson-Davis	Albert Jackson-Davis	Pia Sylvest	Pia Sylvest	Pia Sylvest	Pia Sylvest	Pia Sylvest	Pia Sylvest
03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025	03/07/2025
At Wide Load Gate.	On Left hand side Perimeter fence at the end of Marsh Lane adjacent to Gate 2 and Admin entrance.	On left hand side of fence on land Boundary between public Highway (Cadland Road) and ExxonMobil property.	On outside of fence, next to footpath from lower carpark up towards terminal entrance.	On outside of fence in top carpark, next to south emergency access gate.	On outside of main terminal entrance gate.	On outside of fence, next to north emergency access gate.	On outside of fence, next to footpath from lower carpark up towards terminal entrance.	On outside of fence in top carpark, next to south emergency access gate.	Exit from terminal.	Entrance to terminal.	Canteen gate entrance to tank farm.	Jetty gate – access to tank farm from footpath at southside of site.	Attached to fence on exit of terminal	Attached to fence on entrance to terminal.	On the right-hand fence just before the Gatehouse entrance to site.	On the right-hand fence further up the entrance road to the site just opposite the pedestrian walkway and car park.	On the approach road to the terminal on the right-hand side fence of the entrance.	On the approach road to the terminal on the left-hand side fence of the entrance.	Box attached to the fence on the approach road to the terminal on the right-hand side of the entrance.	Box attached to the fence on the approach road to the terminal on the left-hand side of the entrance.
Martin Weston	Martin Weston	Martin Weston	Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Tony Warren	Pia Sylvest	Pia Sylvest	Pia Sylvest	Pia Sylvest	Pia Sylvest	Pia Sylvest
01/08/2025			31/07/2025	31/07/2025	31/07/2025	31/07/2025			01/08/2025	01/08/2025	01/08/2025	01/08/2025			01/08/2025	01/08/2025	01/08/2025	01/08/2025		
Hythe terminal / gate 1 access route.	N/A	N/A	Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	N/A	N/A	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	N/A	N/A	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.	N/A	N/A
Robert Bohan			Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple			Tony Warren	Tony Warren	Tony Warren	Tony Warren			Kieron Hudson	Kieron Hudson	Kieron Hudson	Kieron Hudson		
03/09/2025			01/09/2025	01/09/2025	01/09/2025	01/09/2025			03/09/2025	03/09/2025	03/09/2025	03/09/2025			03/09/2025	03/09/2025	03/09/2025	03/09/2025		
Hythe terminal / gate 1 access route.	N/A	N/A	Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	N/A	N/A	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	N/A	N/A	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.	N/A	N/A
Martin Weston			Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple			Tony Warren	Tony Warren	Tony Warren	Tony Warren			Kieron Hudson	Kieron Hudson	Kieron Hudson	Kieron Hudson		
03/10/2025			03/10/2025	03/10/2025	03/10/2025	03/10/2025		03/10/2025	06/10/2025	06/10/2025	06/10/2025	06/10/2025			03/10/2025	03/10/2025	03/10/2025	03/10/2025		
Hythe terminal / gate 1 access route.	N/A	N/A	Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	N/A	N/A	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	N/A	N/A	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.	N/A	N/A
Martin Weston			Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple			Tony Warren	Tony Warren	Tony Warren	Tony Warren			Kieron Hudson	Kieron Hudson	Kieron Hudson	Kieron Hudson		
10/11/2025			05/11/2025	05/11/2025	05/11/2025	05/11/2025			06/11/2025	06/11/2025	06/11/2025	06/11/2025			03/11/2025	06/11/2025	03/11/2025	06/11/2025		
Hythe terminal / gate 1 access route.	N/A	N/A	Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	N/A	N/A	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	N/A	N/A	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.	N/A	N/A
Sean Rutter			Michael Dalrymple	Michael Dalrymple	Michael Dalrymple	Michael Dalrymple			Tony Warren	Tony Warren	Tony Warren	Tony Warren			Pia Sylvest	Des Grundy	Pia Sylvest	Des Grundy		
12/12/2025			04/12/2025	04/12/2025	04/12/2025	04/12/2025			10/12/2025	10/12/2025	10/12/2025	10/12/2025			09/12/2025	12/12/2025	12/12/2025	12/12/2025		
Hythe terminal / gate 1 access route.	N/A	N/A	Located on right of pedestrian walkway from visitor car park up to terminal.	Main truck entrance gate.	North emergency access gate.	South emergency access gate.	N/A	N/A	Canteen entrance / exit gate.	Sea wall jetty gate.	Terminal vehicle exit.	Terminal vehicle entry.	N/A	N/A	Outside the main front of the gatehouse	Southwest corner by Short Lane fire gate	Main entrance to site on the right-hand side of the road.	West side of the terminal by the football pitch.	N/A	N/A
Martin Weston			Bradley Raynsford	Bradley Raynsford	Bradley Raynsford	Bradley Raynsford			Tony Warren	Tony Warren	Tony Warren	Tony Warren			Pia Sylvest	Stephen Nodwell	Stephen Nodwell	Stephen Nodwell		
ley			Hythe						Purfleet						West London					


ORBITAL
WITNESS
Smoke Lane
Smoke Lane
A403
A403
Avonmouth
Plan
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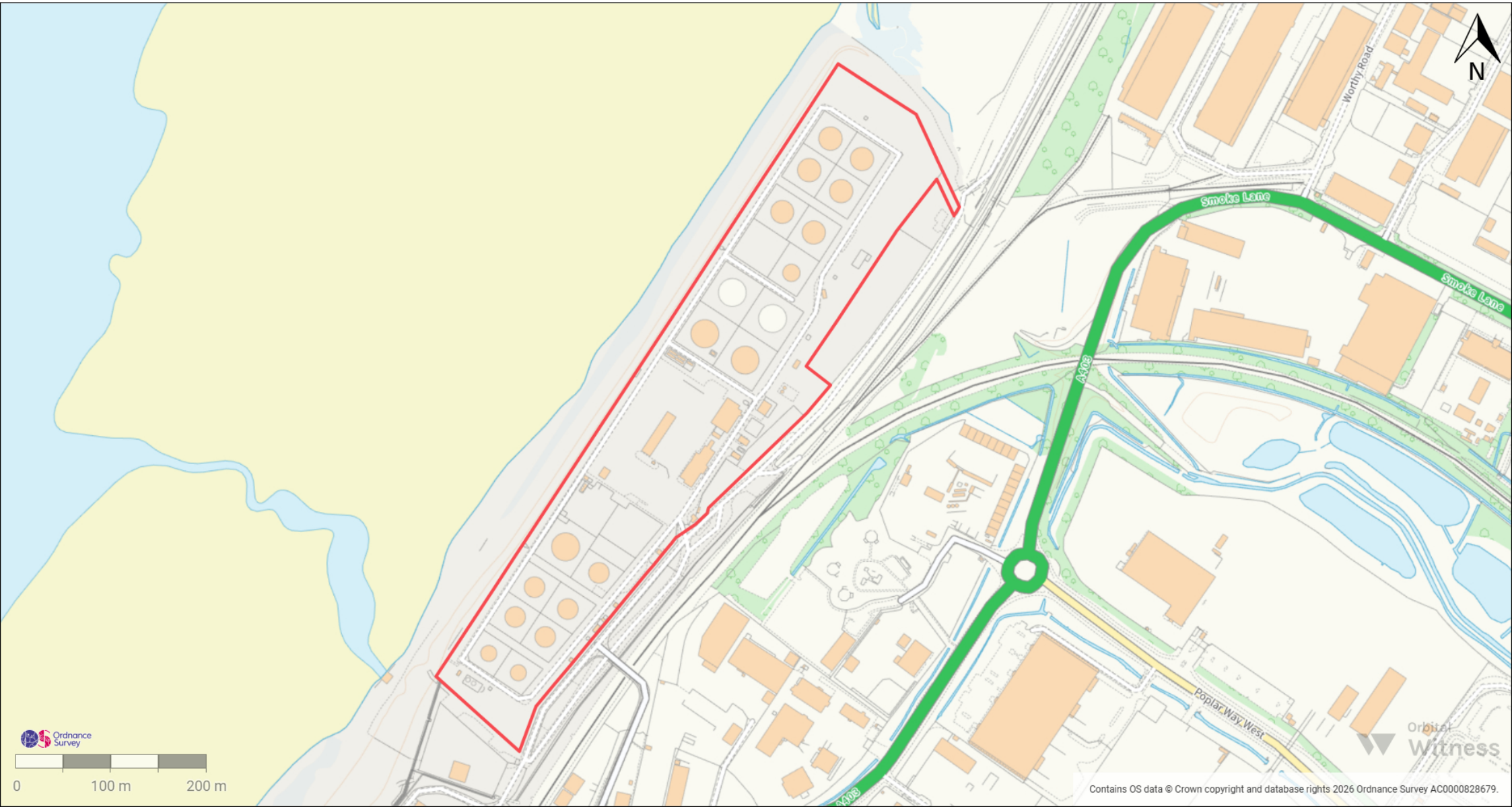
Avonmouth Plan



Allybokus, Nawaaz

From: PBHPXR <PBHPXR@protonmail.com>
Sent: 27 March 2023 13:14
To: Allybokus, Nawaaz
Subject: Fw: CLAIM NUMBER- QB-2022-001098 - ESSO AND ANOTHER VS PERSONS UNKNOWN

Good afternoon,

I hope this email finds you well,

Please see urgent email below. Apologies, I have just been advised to email you also.

Many thanks,

Paul Barnes.

Sent with Proton Mail secure email.

------- Forwarded Message -------
From: PBHPXR <PBHPXR@protonmail.com>
Date: On Monday, March 27th, 2023 at 12:59
Subject: CLAIM NUMBER- QB-2022-001098 - ESSO AND ANOTHER VS PERSONS UNKNOWN
To: stuartwortley@eversheds-sutherland.com <stuartwortley@eversheds-sutherland.com>
CC: gbjudgeslistingoffice@justice.gov.uk <gbjudgeslistingoffice@justice.gov.uk>, exxonmobil.service@eversheds-sutherland.com <exxonmobil.service@eversheds-sutherland.com>

CLAIM NUMBER- QB-2022-001098 - ESSO AND ANOTHER VS PERSONS UNKNOWN

Good afternoon,

I am emailing with upmost urgency as I am aware this needs to be heard by 2pm today.

My name is **Paul Barnes** and I am contacting you regarding having my name removed from this injunction as I do not believe it is in the publics best interest as I do not intend to return to the Esso site in BIRMINGHAM.

I also only received the paperwork on Friday the 24th of March, which has not given me any time to obtain legal advise.

Solicitors Ref: ALLYBOM/066758-010081

Thank you, Paul Barnes.

Sent with Proton Mail secure email.

Allybokus, Nawaaz

From: Allybokus, Nawaaz
Sent: 28 March 2023 11:53
To: PBHPXR@protonmail.com
Cc: stuartwortley@eversheds-sutherland.com
Subject: CLAIM NUMBER- QB-2022-001098 - ESSO AND ANOTHER VS PERSONS UNKNOWN [ES-CLOUD_UK.FID8053152]

Importance: High

Paul,

I am a colleague of Stuart Wortley.

So that I may take instructions from my client, please can you confirm that you do not intend to breach the injunction in relation to all Sites covered by the injunction.

Your email on 27.03.23 refers to Birmingham only, which is not sufficient for my client to agree for you to be removed from the injunction.

I look forward to hearing from you as a matter of urgency, as we need to file a draft Order shortly.

Kind regards,
Nawaaz

Nawaaz Allybokus | Associate | Real Estate Dispute Resolution | Eversheds Sutherland (International) LLP

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www.eversheds-sutherland.com

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---

From: Wortley, Stuart
Sent: 27 March 2023 22:11
To: 'PBHPXR' <PBHPXR@protonmail.com>
Subject: RE: CLAIM NUMBER- QB-2022-001098 - ESSO AND ANOTHER VS PERSONS UNKNOWN

Paul

Thank you for your email message.

Please note that at today's hearing you were not joined as a named Defendant to the proceedings.

Regards

Stuart

Stuart Wortley | Partner – Real Estate Dispute Resolution | Eversheds Sutherland

M: + 44 771 288 1393

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EC2V 7WS
United Kingdom

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F: +44 20 7919 4919
DX 154280 Cheapside 8

eversheds-sutherland.com

Paul Barnes

[redacted]

Date: 3 April 2023
Your Ref:
Our Ref: ALLYBOM\066758-010081
Direct: +44 7920 590944
Email: NawaazAllybokus@eversheds-sutherland.com

By First Class Post

Dear Sir,

ESSO AND ANOTHER v PERSONS UNKNOWN
Claim Number QB-2022-001098

A trial took place before Mrs Justice Collins Rice sitting in the High Court on 27 March 2023, following which an order was made to effect the continuation of the Order dated 27 April 2022 made by His Honour Judge Bennathan, until trial or further order.

You were added as a Defendant to the claim as a consequence of your involvement in the protests at the Claimants' Birmingham Terminal.

Accordingly, we enclose herewith upon you by way of service:-

1. Order dated 27 March 2023 (sealed 30 March 2023);
2. Re-Re-Amended Claim Form; and
3. Re-Re-Amended Particulars of Claim.

Copies of the documents listed above numbered 1-3 may be viewed at the following website:-

https://www.exxonmobil.co.uk/company/overview/uk-operations

We repeat our recommendation that you seek independent legal advice.

Yours faithfully

Eversheds Sutherland

Eversheds Sutherland (International) LLP

Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales (number OC304065), registered office One Wood Street, London EC2V 7WS. Authorised and regulated by the Solicitors Regulation Authority (SRA number 383181). A list of the members' names and their professional qualifications is available for inspection at the above office.

Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities under Eversheds Sutherland. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.

Allybokus, Nawaaz

From: Allybokus, Nawaaz
Sent: 21 May 2023 09:53
To: 'PBHPXR@protonmail.com'
Cc: stuartwortley@eversheds-sutherland.com
Subject: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]
Attachments: Notice of Trial date 10.07.23(213816763.1).pdf

Dear Sir

Further to our letter to you dated 3 April 2023 the trial has now been listed to be heard on either Monday 10 or Tuesday 11 July 2023, with a time estimate of 1 day (see attached notice of trial).

As we said in our letter dated 3 April, you were added as a Defendant to the claim as a consequence of your involvement in the protests at the Birmingham Terminal. In Nawaaz Allybokus' email dated 28 March 2023 @ 11:53, we invited you to agree not to enter any of the Sites which are the subject of these proceedings. Whilst you had previously sent an email agreeing not to enter the Birmingham Terminal, our client would require an undertaking not to enter any of the Sites.

If you are willing to give such an undertaking, we will invite the Court to remove you from the scope of the injunction.

If you are unwilling to give such an undertaking, please note that the date / time, court room number and the name of the Judge will be confirmed by the listing office at around 2.00 pm on the working day before the hearing.

We are preparing a trial bundle and will serve this on all named Defendants closer to the trial window.

To avoid the need for us to send you printed copies of these documents by first class post, please confirm that you will accept service of documents relating to these proceedings by email to this address.

We repeat our recommendation that you seek independent legal advice.

Yours faithfully

Eversheds Sutherland (International) LLP

Nawaaz Allybokus **|** Associate **|** Real Estate Dispute Resolution **|** Eversheds Sutherland (International) LLP

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www.eversheds-sutherland.com

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Allybokus, Nawaaz

From: Diana Hekt <hekt@outlook.com>
Sent: 30 March 2023 11:06
To: ExxonMobil.Service
Cc: Allybokus, Nawaaz
Subject: Wrongly named on Exxon Injunction

https://www.exxonmobil.co.uk/Company/Overview/UK-operations

https://www.exxonmobil.co.uk/-/media/unitedkingdom/files/witness-statement-of-martin-pullman-dated-27-february-2023-with-exhibits.pdf

Dear Administrator

I write in response to this injunction in which you have seen fit to name me as a defendant and to publish my name and address online.

I have been found guilty of Aggravated Trespass for my part in a protest on 3rd April 2022, and duly charged with Court costs etc (no fine because the judge sympathised with our protest). This action predated the injunction you have instigated.

I have made my point during that action on 3rd April and have no intention of returning to an Exxon site, therefore I see absolutely no reason why my name should be included as a defendant, especially as I understand you have removed the other people who were present on that date.

Therefore please remove my name. I would appreciate confirmation that you have done so as soon as possible.

With thanks

Diana Hekt

Sent from Mail for Windows

Allybokus, Nawaaz

From: Allybokus, Nawaaz
Sent: 30 March 2023 13:03
To: Diana Hekt; ExxonMobil.Service
Cc: stuartwortley@eversheds-sutherland.com
Subject: RE: Wrongly named on Exxon Injunction [ES-CLOUD_UK.FID8053152]
Attachments: Sealed Order dated 27.03.23 (redacted).pdf

Dear Diana,

Thank you for your email.

At the hearing on 27.03.23, the injunction was extended and you and Paul Barnes were added as named Defendants.

The reason your and Paul Barnes' names were added was because of your involvement in the Birmingham Terminal protest.

The Judge didn't consider it necessary to add other named Defendants who were the subject of our application because each of them provided a written assurance not to breach the injunction before the hearing.

As the Order has now been made (see attached) you have been added to the claim. Our clients would, with the agreement of the Court, be willing to remove you as a Defendant following your written confirmation that you do not intend to breach the injunction. However, that will not occur until the preparation for the next hearing, which has not yet been listed. You will receive notice of the next hearing in due course and can raise this again at that stage.

We repeat our recommendation that you seek independent legal advice.

Yours sincerely,

Nawaaz Allybokus **|** Associate **|** Real Estate Dispute Resolution **|** Eversheds Sutherland (International) LLP

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www.eversheds-sutherland.com

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---

From: Diana Hekt <hekt@outlook.com>
Sent: 30 March 2023 11:06
To: ExxonMobil.Service <ExxonMobil.Service@eversheds-sutherland.com>
Cc: Allybokus, Nawaaz <NawaazAllybokus@eversheds-sutherland.com>
Subject: Wrongly named on Exxon Injunction

https://www.exxonmobil.co.uk/Company/Overview/UK-operations

https://www.exxonmobil.co.uk/-/media/unitedkingdom/files/witness-statement-of-martin-pullman-dated-27-february-2023-with-exhibits.pdf

Dear Administrator

Eversheds Sutherland (International) LLP
One Wood Street
London
EC2V 7WS
United Kingdom

T: +44 20 7497 9797
F: +44 20 7919 4919
DX 154280 Cheapside 8

eversheds-sutherland.com

Diana Hekt

[redacted]

First Class Post

Date: 3 April 2023
Your Ref:
Our Ref: ALLYBOM\066758-010081
Direct: +44 7920 590944
Email: NawaazAllybokus@eversheds-sutherland.com

Dear Madam,

ESSO AND ANOTHER v PERSONS UNKNOWN
Claim Number QB-2022-001098

A trial took place before Mrs Justice Collins Rice sitting in the High Court on 27 March 2023, following which an order was made to effect the continuation of the Order dated 27 April 2022 made by His Honour Judge Bennathan, until trial or further order.

You were added as a Defendant to the claim as a consequence of your involvement in the protests at the Claimants' Birmingham Terminal.

Accordingly, we enclose herewith upon you by way of service:-

1. Order dated 27 March 2023 (sealed 30 March 2023);
2. Re-Re-Amended Claim Form; and
3. Re-Re-Amended Particulars of Claim.

Copies of the documents listed above numbered 1-3 may be viewed at the following website:-

https://www.exxonmobil.co.uk/company/overview/uk-operations

We repeat our recommendation that you seek independent legal advice.

Yours faithfully

Eversheds Sutherland

Eversheds Sutherland (International) LLP

Encl.

Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales (number OC304065), registered office One Wood Street, London EC2V 7WS. Authorised and regulated by the Solicitors Regulation Authority (SRA number 383181). A list of the members' names and their professional qualifications is available for inspection at the above office.

Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities under Eversheds Sutherland. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.

Allybokus, Nawaaz

From: Allybokus, Nawaaz
Sent: 21 May 2023 09:55
To: 'hekt@outlook.com'
Cc: stuartwortley@eversheds-sutherland.com
Subject: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]
Attachments: Notice of Trial date 10.07.23(213816763.1).pdf

Dear Madam

Further to our letter to you dated 3 April 2023 the trial has now been listed to be heard on either 10 or 11 July 2023, with a time estimate of 1 day (see attached notice of trial).

As we explained in our email to you dated 30 March @ 13:03, if you are willing to provide written confirmation that you do not intend to breach the injunction, we will ask the court to remove you from the scope of the injunction.

If you are unwilling to provide this confirmation, please note that the date / time, court room number and the name of the Judge will be confirmed by the listing office at around 2.00 pm on the working day before the hearing.

We are preparing a trial bundle and will serve this on all named Defendants closer to the trial window.

To avoid the need for us to send you printed copies of these documents by first class post, please confirm that you will accept service of all documents relating to these proceedings by email using this address.

We repeat our recommendation that you seek independent legal advice.

Yours faithfully,

Eversheds Sutherland (International) LLP

Nawaaz Allybokus **|** Associate **|** Real Estate Dispute Resolution **|** Eversheds Sutherland (International) LLP

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Driscoll, Jade

From: PBHPXR <PBHPXR@protonmail.com>
Sent: 25 May 2023 19:52
To: Allybokus, Nawaaz
Cc: Wortley, Stuart
Subject: Re: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]

I am willing to give an undertaking.

I do this because you threaten me, and my family. You threaten my way of life both in the short term and longer term. You threaten all life on earth and force me to not defend my children's lives so you and the company you represent can continue profiting from killing people around the world.

You should think carefully about what you are doing and your part in all this.

The science is clear. I am sure you and fossil fuel company's will see their day in court in the near future for crimes against humanity.

The death and loss of everything is hard to top.

Please confirm officially in writing that I will not be liable for ANY costs

Sent with Proton Mail secure email.

Driscoll, Jade

From: Wortley, Stuart
Sent: 01 June 2023 12:23
To: PBHPXR
Cc: Allybokus, Nawaaz
Subject: QB-2022-001098 Esso v Persons Unknown

Dear Sir

Thank you for your email message.

We will provide you with a draft Order (incorporating a draft undertaking) shortly.

The undertaking will mirror the terms of the current injunction (which prevents entry onto the claimants' land without consent).

Provided the terms of the Order are agreed, we confirm that you will not be liable for any costs.

It would be helpful to know whether or not you intend to seek independent legal advice.

Yours faithfully

Stuart Wortley | Partner – Real Estate Dispute Resolution | Eversheds Sutherland

M: + 44 771 288 1393

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(TB2/653-664 NOT INCLUDED IN "MP3")

Allybokus, Nawaaz

From: Wortley, Stuart
Sent: 06 June 2023 12:39
To: PBHPXR
Cc: Allybokus, Nawaaz
Subject: QB-2022-001098 Esso v Persons Unknown
Attachments: Esso - undertakings v2.doc

Dear Sir

Further to our email dated 1 June 2023, we attach a draft Order which incorporates undertakings which mirror the terms of the existing order against Persons Unknown.

Provided you give these undertakings and confirm that service may be effected on you using this email address, we confirm that our client will not seek an injunction or an order for costs against you. This is recorded in paragraph 1 of the draft Order.

Our client is willing to agree the same terms with Diane Hekt but we have not yet heard from her.

Please let us know whether you intend to seek independent legal advice.

Yours faithfully

Stuart Wortley | Partner – Real Estate Dispute Resolution | Eversheds Sutherland

M: + 44 771 288 1393

www.eversheds-sutherland.com

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Allybokus, Nawaaz

From: Wortley, Stuart
Sent: 06 June 2023 13:31
To: Diana Hekt
Cc: Allybokus, Nawaaz
Subject: QB-2022-001098 Esso v Persons Unknown
Attachments: Esso - undertakings v2.doc; RE: Wrongly named on Exxon Injunction [ES-CLOUD_UK.FID8053152]

Dear Madam

We note that we have not heard from you since our email message to you dated 31 March 2023 (in which we explained why you had been added as a Fifth Defendant to these proceedings).

We attach a draft Order which incorporates undertakings which mirror the terms of the existing order against Persons Unknown.

Provided you give these undertakings and confirm that service may be effected on you using this email address, we confirm that our client will not seek an injunction or an order for costs against you. This is recorded in paragraph 1 of the draft Order.

Our client has offered precisely the same terms to Paul Barnes the Fourth Defendant.

Please let us know whether you intend to seek independent legal advice.

Yours faithfully

Stuart Wortley | Partner – Real Estate Dispute Resolution | Eversheds Sutherland

M: + 44 771 288 1393

www.eversheds-sutherland.com

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Allybokus, Nawaaz

From: Diana Hekt <hekt@outlook.com>
Sent: 08 June 2023 17:57
To: Wortley, Stuart
Cc: Allybokus, Nawaaz
Subject: Re: QB-2022-001098 Esso v Persons Unknown
Attachments: Esso injunction undertaking signed.doc

Dear Stuart Wortley

Thank you for your emails keeping me informed and for sending me the Undertaking, which I have signed and attached.

I hope this is all in order and my name will be removed from the injunction. Can you please confirm when this has been done?

Best wishes

Diana Hekt

Get Outlook for Android

From: Wortley, Stuart <StuartWortley@eversheds-sutherland.com>
Sent: Tuesday, June 6, 2023 1:31:00 PM
To: Diana Hekt <hekt@outlook.com>
Cc: Allybokus, Nawaaz <NawaazAllybokus@eversheds-sutherland.com>
Subject: QB-2022-001098 Esso v Persons Unknown

Dear Madam

We note that we have not heard from you since our email message to you dated 31 March 2023 (in which we explained why you had been added as a Fifth Defendant to these proceedings).

We attach a draft Order which incorporates undertakings which mirror the terms of the existing order against Persons Unknown.

Provided you give these undertakings and confirm that service may be effected on you using this email address, we confirm that our client will not seek an injunction or an order for costs against you. This is recorded in paragraph 1 of the draft Order.

Our client has offered precisely the same terms to Paul Barnes the Fourth Defendant.

Please let us know whether you intend to seek independent legal advice.

Yours faithfully

Stuart Wortley | Partner – Real Estate Dispute Resolution | Eversheds Sutherland

M: + 44 771 288 1393

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Allybokus, Nawaaz

From: Allybokus, Nawaaz
Sent: 08 June 2023 18:19
To: 'Diana Hekt'; Wortley, Stuart
Subject: RE: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]
Attachments: Esso injunction undertaking signed.doc

Dear Madam,

Thank you for returned the Undertaking duly signed.

Unfortunately, it was not dated. Please confirm that I have your authority to date the Undertaking as at today's date.

Yours faithfully,

Eversheds Sutherland (International) LLP

Nawaaz Allybokus | Associate | Real Estate Dispute Resolution | Eversheds Sutherland (International) LLP

M: +44 7920 590 944
www.eversheds-sutherland.com

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From: Diana Hekt <hekt@outlook.com>
Sent: 08 June 2023 17:57
To: Wortley, Stuart <StuartWortley@eversheds-sutherland.com>
Cc: Allybokus, Nawaaz <NawaazAllybokus@eversheds-sutherland.com>
Subject: Re: QB-2022-001098 Esso v Persons Unknown

Dear Stuart Wortley

Thank you for your emails keeping me informed and for sending me the Undertaking, which I have signed and attached.

I hope this is all in order and my name will be removed from the injunction. Can you please confirm when this has been done?

Best wishes

Diana Hekt

Get Outlook for Android

From: Wortley, Stuart <StuartWortley@eversheds-sutherland.com>
Sent: Tuesday, June 6, 2023 1:31:00 PM
To: Diana Hekt <hekt@outlook.com>

Allybokus, Nawaaz

From: Wortley, Stuart
Sent: 08 June 2023 21:11
To: PBHPXR
Cc: Allybokus, Nawaaz
Subject: RE: QB-2022-001098 Esso v Persons Unknown
Attachments: Esso - undertakings v2.doc

Dear Sir

Subject to whether or not you are taking / intend to take legal advice, it would be very helpful if you could sign and return the draft Order attached to our email dated 6 June 2023.

We obviously can't advise you but if you have any questions about the draft Order we may well be able to assist.

Diana Hekt has returned the signed draft Order to us today.

Yours faithfully

Stuart Wortley | Partner – Real Estate Dispute Resolution | Eversheds Sutherland

M: + 44 771 288 1393

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From: Wortley, Stuart
Sent: 06 June 2023 12:36
To: 'PBHPXR' <PBHPXR@protonmail.com>
Cc: Allybokus, Nawaaz <NawaazAllybokus@eversheds-sutherland.com>
Subject: QB-2022-001098 Esso v Persons Unknown

Dear Sir

Further to our email dated 1 June 2023, we attach a draft Order which incorporates undertakings which mirror the terms of the existing order against Persons Unknown.

Provided you give these undertakings and confirm that service may be effected on you using this email address, we confirm that our client will not seek an injunction or an order for costs against you. This is recorded in paragraph 1 of the draft Order.

Our client is willing to agree the same terms with Diane Hekt but we have not yet heard from her.

Please let us know whether you intend to seek independent legal advice.

Yours faithfully

Stuart Wortley | Partner – Real Estate Dispute Resolution | Eversheds Sutherland

M: + 44 771 288 1393

www.eversheds-sutherland.com

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Allybokus, Nawaaz

From: Diana Hekt <hekt@outlook.com>
Sent: 09 June 2023 10:33
To: Allybokus, Nawaaz
Subject: RE: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]

Dear Nawaaz Allybokus

Thank you for your email.

Yes, please do add yesterday's date to my signed undertaking. I'm sorry I omitted to add it myself.

Best wishes

Diana

Sent from Mail for Windows

From: Allybokus, Nawaaz
Sent: 08 June 2023 18:20
To: Diana Hekt; Wortley, Stuart
Subject: RE: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]

Dear Madam,

Thank you for returned the Undertaking duly signed.

Unfortunately, it was not dated. Please confirm that I have your authority to date the Undertaking as at today's date.

Yours faithfully,

Eversheds Sutherland (International) LLP

Nawaaz Allybokus **|** Associate **|** Real Estate Dispute Resolution **|** Eversheds Sutherland (International) LLP

M: +44 7920 590 944
www.eversheds-sutherland.com

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From: Diana Hekt <hekt@outlook.com>
Sent: 08 June 2023 17:57
To: Wortley, Stuart <StuartWortley@eversheds-sutherland.com>
Cc: Allybokus, Nawaaz <NawaazAllybokus@eversheds-sutherland.com>
Subject: Re: QB-2022-001098 Esso v Persons Unknown

Dear Stuart Wortley

Allybokus, Nawaaz

From: Allybokus, Nawaaz
Sent: 09 June 2023 12:15
To: 'Diana Hekt'
Subject: RE: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]

Dear Madam,

Thank you for confirming.

We shall date the undertaking on your behalf and update you following the trial in w/c 10 July.

Yours faithfully,

Eversheds Sutherland (International) LLP

Nawaaz Allybokus | Associate | Real Estate Dispute Resolution | Eversheds Sutherland (International) LLP

M: +44 7920 590 944
www.eversheds-sutherland.com

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From: Diana Hekt <hekt@outlook.com>
Sent: 09 June 2023 10:33
To: Allybokus, Nawaaz <NawaazAllybokus@eversheds-sutherland.com>
Subject: RE: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]

Dear Nawaaz Allybokus

Thank you for your email.

Yes, please do add yesterday's date to my signed undertaking. I'm sorry I omitted to add it myself.

Best wishes

Diana

Sent from Mail for Windows

From: Allybokus, Nawaaz
Sent: 08 June 2023 18:20
To: Diana Hekt; Wortley, Stuart
Subject: RE: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]

Dear Madam,

Thank you for returned the Undertaking duly signed.

Unfortunately, it was not dated. Please confirm that I have your authority to date the Undertaking as at today's date.

Allybokus, Nawaaz

From: PBHPXR <PBHPXR@protonmail.com>
Sent: 12 June 2023 08:22
To: Wortley, Stuart; pbhpxr@protonmail.com
Cc: Allybokus, Nawaaz
Subject: RE: QB-2022-001098 Esso v Persons Unknown
Attachments: 20230612080814870.pdf

Stuart,

See attached signed document.

Please confirm you have received it, and confirm you will not intimidate and threaten me again.

Paul Barnes

------- Original Message -------
On Thursday, June 8th, 2023 at 21:10, Wortley, Stuart <StuartWortley@eversheds-sutherland.com> wrote:

> Dear Sir
>
> Subject to whether or not you are taking / intend to take legal advice, it would be very helpful if you could sign and return the draft Order attached to our email dated 6 June 2023.
>
> We obviously can't advise you but if you have any questions about the draft Order we may well be able to assist.
>
> Diana Hekt has returned the signed draft Order to us today.
>
> Yours faithfully
>
> Stuart Wortley **|** Partner – Real Estate Dispute Resolution **|** Eversheds Sutherland
>
> M: + 44 771 288 1393
>
> www.eversheds-sutherland.com
>
> **Eversheds Sutherland**

Allybokus, Nawaaz

From: PBHPXR <PBHPXR@protonmail.com>
Sent: 12 June 2023 08:37
To: Reeman, Rachael; Wortley, Stuart; Allybokus, Nawaaz
Subject: Fw: RE: QB-2022-001098 Esso v Persons Unknown
Attachments: 20230612080814870.pdf

Rachael,

Please see email response in Stuarts absence.

Can you confirm the end of this matter,

Paul Barnes

------- Forwarded Message -------
From: PBHPXR <PBHPXR@protonmail.com>
Date: On Monday, June 12th, 2023 at 08:21
Subject: RE: QB-2022-001098 Esso v Persons Unknown
To: Wortley, Stuart <StuartWortley@eversheds-sutherland.com>, pbhpxr@protonmail.com <pbhpxr@protonmail.com>
CC: Allybokus, Nawaaz <NawaazAllybokus@eversheds-sutherland.com>

Stuart,

See attached signed document.

Please confirm you have received it, and confirm you will not intimidate and threaten me again.

Paul Barnes

------- Original Message -------
On Thursday, June 8th, 2023 at 21:10, Wortley, Stuart <StuartWortley@eversheds-sutherland.com> wrote:

Dear Sir

Subject to whether or not you are taking / intend to take legal advice, it would be very helpful if you could sign and return the draft Order attached to our email dated 6 June 2023.

We obviously can't advise you but if you have any questions about the draft Order we may well be able to assist.

Diana Hekt has returned the signed draft Order to us today.

Allybokus, Nawaaz

From: Allybokus, Nawaaz
Sent: 12 June 2023 09:12
To: 'PBHPXR'
Cc: Reeman, Rachael; Wortley, Stuart
Subject: RE: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]

Dear Mr Barnes,

I am assisting Stuart in this matter.

Please confirm that I can date the undertaking as at today's date as it was not dated.

Kind regards,
Nawaaz

Nawaaz Allybokus | Associate | Real Estate Dispute Resolution | Eversheds Sutherland (International) LLP

M: +44 7920 590 944
www.eversheds-sutherland.com

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---

From: PBHPXR <PBHPXR@protonmail.com>
Sent: 12 June 2023 08:37
To: Reeman, Rachael <RachaelReeman@eversheds-sutherland.com>; Wortley, Stuart <StuartWortley@eversheds-sutherland.com>; Allybokus, Nawaaz <NawaazAllybokus@eversheds-sutherland.com>
Subject: Fw: RE: QB-2022-001098 Esso v Persons Unknown

Rachael,

Please see email response in Stuarts absence.

Can you confirm the end of this matter,

Paul Barnes

------- Forwarded Message -------
From: PBHPXR <PBHPXR@protonmail.com>
Date: On Monday, June 12th, 2023 at 08:21
Subject: RE: QB-2022-001098 Esso v Persons Unknown
To: Wortley, Stuart <StuartWortley@eversheds-sutherland.com>, pbhpxr@protonmail.com <pbhpxr@protonmail.com>
CC: Allybokus, Nawaaz <NawaazAllybokus@eversheds-sutherland.com>

Stuart,

See attached signed document.

Please confirm you have received it, and confirm you will not intimidate and threaten me again.

Allybokus, Nawaaz

From: PBHPXR <PBHPXR@protonmail.com>
Sent: 12 June 2023 09:14
To: Allybokus, Nawaaz
Cc: Reeman, Rachael; Wortley, Stuart
Subject: RE: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]

I confirm

Sent from Proton Mail for iOS

On Mon, Jun 12, 2023 at 09:12, Allybokus, Nawaaz <NawaazAllybokus@eversheds-sutherland.com> wrote:

> Dear Mr Barnes,
>
> I am assisting Stuart in this matter.
>
> Please confirm that I can date the undertaking as at today's date as it was not dated.
>
> Kind regards,
>
> Nawaaz
>
> Nawaaz Allybokus **|** Associate **|** Real Estate Dispute Resolution **|** Eversheds Sutherland (International) LLP
>
> M: +44 7920 590 944
>
> www.eversheds-sutherland.com
>
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Allybokus, Nawaaz

From: Allybokus, Nawaaz
Sent: 12 June 2023 09:16
To: 'PBHPXR'
Cc: Reeman, Rachael; Wortley, Stuart
Subject: RE: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]

Thank you.

We will bring the Undertaking to the Court's attention at trial next month.

regards,
Nawaaz

Nawaaz Allybokus | Associate | Real Estate Dispute Resolution | Eversheds Sutherland (International) LLP

M: +44 7920 590 944
www.eversheds-sutherland.com

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---

From: PBHPXR <PBHPXR@protonmail.com>
Sent: 12 June 2023 09:14
To: Allybokus, Nawaaz <NawaazAllybokus@eversheds-sutherland.com>
Cc: Reeman, Rachael <RachaelReeman@eversheds-sutherland.com>; Wortley, Stuart <StuartWortley@eversheds-sutherland.com>
Subject: RE: QB-2022-001098 Esso v Persons Unknown [ES-CLOUD_UK.FID8053152]

I confirm

Sent from Proton Mail for iOS

On Mon, Jun 12, 2023 at 09:12, Allybokus, Nawaaz <NawaazAllybokus@eversheds-sutherland.com> wrote:

> Dear Mr Barnes,
>
> I am assisting Stuart in this matter.
>
> Please confirm that I can date the undertaking as at today's date as it was not dated.
>
> Kind regards,
>
> Nawaaz

From: PBHPXR <PBHPXR@protonmail.com>
Sent: 26 July 2024 08:52
To: Scott Speirs
Cc: Holly Stebbing
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]
Attachments: 20240726080926443.pdf

Hi,

Please see attached 'Undertaking'.

Paul Barnes

Sent with Proton Mail secure email.

On Thursday, 25 July 2024 at 11:35, Scott Speirs <Scott.Speirs@nortonrosefulbright.com> wrote:

> Dear Paul
>
> Thank you for agreeing. We would be grateful if you would sign and return the attached undertaking. Should you agree the attached, we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.
>
> Please note, pursuant to paragraph 2 of the attached undertaking, we will be able to serve you with bundles by email or by email referencing the ExxonMobil website when the Court requires us to serve documents on you.
>
> Yours sincerely
>
> Norton Rose Fulbright
>
> **Scott Speirs** | Associate
>
> Norton Rose Fulbright LLP
> Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
> Tel +44 20 7444 2441 | Mob +44 75111 76603
> scott.speirs@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

From: PBHPXR <PBHPXR@protonmail.com>
Sent: 22 July 2024 14:39
To: Scott Speirs <Scott.Speirs@nortonrosefulbright.com>
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

I wish to sign the undertaking please.

I just needed to seek legal advice.

Kind regards

Paul Barnes.

Ps. I would also be greatful that I am not sent any more 'bundles' and reams of paperwork that are irrelevant to someone that has signed an undertaking.

Sent from Proton Mail for iOS

On Fri, Jul 19, 2024 at 17:11, Scott Speirs <Scott.Speirs@nortonrosefulbright.com> wrote:

> Dear Paul

Please find attached by way of service the Order of Justice Tipples maintaining the injunction.

We draw your particular attention to the final recital (beginning "AND UPON the Claimants having received assurances from Diana Hekt..."), paragraph 3 and paragraph 5.

We would be grateful if you would let us know if you intend to provide the undertaking referred to below and we will inform the Court accordingly.

Yours sincerely

Norton Rose Fulbright

Scott Speirs | Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
Tel +44 20 7444 2441 | Mob +44 75111 76603
scott.speirs@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

From: Scott Speirs
Sent: 17 July 2024 12:06
To: PBHPXR <PBHPXR@protonmail.com>
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Dear Paul

We would be grateful to know when you expect to be in a position to respond.

Yours sincerely

Norton Rose Fulbright

Scott Speirs | Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
Tel +44 20 7444 2441 | Mob +44 75111 76603
scott.speirs@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

From: PBHPXR <PBHPXR@protonmail.com>
Sent: 16 July 2024 18:52
To: Scott Speirs <Scott.Speirs@nortonrosefulbright.com>
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

I would be grateful if you could give me more time please.

Paul

Sent from Proton Mail for iOS

On Mon, Jul 15, 2024 at 17:51, Scott Speirs <Scott.Speirs@nortonrosefulbright.com> wrote:

> Dear Paul
>
> **QB-2022-001098 Esso Petroleum and another v Persons Unknown and others**
>
> Further to the below email, we would be grateful to know if you will agree to the attached undertaking.

Yours sincerely

Norton Rose Fulbright

Scott Speirs | Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
Tel +44 20 7444 2441 | Mob +44 75111 76603
scott.speirs@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

From: Scott Speirs
Sent: 09 July 2024 16:46
To: PBHPXR@protonmail.com
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Dear Paul

QB-2022-001098 Esso Petroleum and another v Persons Unknown and others

We refer to the undertaking you provided to the Court on this matter in June 2023 (the **2023 Undertaking**). The 2023 Undertaking was referenced in the Order of Justice Linden of 10 July 2023 (the **Order**) as well as in his judgment.

The 2023 Undertaking expired on 30 June 2024. We, therefore, invite you provide a new undertaking on the same terms to the Court, that will expire on 30 June 2025. Please find attached a draft undertaking. Should you agree the attached, we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may

be held to be in contempt of court and may be imprisoned, fined or have your assets seized and documents can be served by email.

Yours sincerely

Norton Rose Fulbright

Scott Speirs | Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
Tel +44 20 7444 2441 | Mob +44 75111 76603
scott.speirs@nortonrosefulbright.com

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From: Scott Speirs
Sent: 19 July 2024 17:08
To: Diana Hekt
Cc: Holly Stebbing
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF_EMEA-UK.FID3210555]
Attachments: King's Bench Associate's-Order.pdf

Dear Diana

Thank you for the below assurance, which has been accepted by the court.

Please find attached by way of service the Order of Justice Tipples maintaining the injunction. We draw your particular attention to the final recital (beginning "AND UPON the Claimants having received assurances from Diana Hekt..."), paragraph 2 and paragraph 5.

Yours sincerely
Norton Rose Fulbright

Scott Speirs | Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
Tel +44 20 7444 2441 | Mob +44 75111 76603
scott.speirs@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

-----Original Message-----
From: Diana Hekt <hekt@outlook.com>
Sent: 10 July 2024 11:37
To: Scott Speirs <Scott.Speirs@nortonrosefulbright.com>
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: Re: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF_EMEA-UK.FID3210555]

Dear Norton Rose Norton

I request to be removed from the 2024-2025 injunction above. I undertake not to break the injunction at any of the listed Esso sites.

Undertaking:

I undertake to the Court promising as
follows:
4. Not to:
(a) enter or remain on any part of the Sites (as defined above) without the Consent of the First Claimant.
(b) damage any part of any of the Sites;
(c) affix themselves or any person or object to any part of any of the Sites;
(d) erect any structures on any part of any of the Sites.
5. Not to:
(a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH (the "Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');
(b) damage any part of the Chemical Plant;
(c) affix themselves or any person or object at the Chemical Plant; 6. Not to enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.
AND TO BE BOUND BY THESE PROMISES UNTIL 30 June 2025

Signed
Diana Hekt

I hope this is what you require from me in order to be removed from the injunction for another year.

With thanks

Yours sincerely

Diana Hekt

_____
From: Scott Speirs <Scott.Speirs@nortonrosefulbright.com>
Sent: 09 July 2024 16:41
To: Diana Hekt
Cc: Holly Stebbing
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF_EMEA-UK.FID3210555]

Dear Diana

QB-2022-001098 Esso Petroleum and another v Persons Unknown and others

We refer to the undertaking you provided to the Court on this matter in June 2023 (the 2023 Undertaking). The 2023 Undertaking was referenced in the Order of Justice Linden of 10 July 2023 (the Order) as well as in his judgment.

The 2023 Undertaking expired on 30 June 2024. We, therefore, invite you provide a new undertaking on the same terms to the Court, that will expire on 30 June 2025. Please find attached a draft undertaking. Should you agree the attached, we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and documents can be served by email.

Yours sincerely

Norton Rose Fulbright

Scott Speirs | Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom Tel +44 20 7444 2441 | Mob +44 75111 76603 scott.speirs@nortonrosefulbright.com
NORTON ROSE FULBRIGHT
Law around the world
nortonrosefulbright.com<http://www.nortonrosefulbright.com/>
From: Diana Hekt <hekt@outlook.com>
Sent: 09 July 2024 15:15
To: Scott Speirs <Scott.Speirs@nortonrosefulbright.com>
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: Re: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF_EMEA-UK.FID3210555]

Dear Norton Rose Fulbright

Thank you for your email. As a named defendant on the above injunction I would very much like to opt for the documents you are apparently obliged to send me to be referenced at

https://www.exxonmobil.co.uk/company/overview/uk-operations<https://www.exxonmobil.co.uk/company/overview/uk-operations>)

or to be emailed to me (at hekt@outlook.com<mailto:hekt@outlook.com>) rather than continuing to have hard copies sent through the post.

Better still I would like to request at tomorrow's court hearing that my name be removed from the injunction altogether. I have no intention of breaching this injunction or any other.

I hope to hear your response soon.

With thanks

Diana Hekt

Get Outlook for Android<https://aka.ms/ghei36>

_____

From: Scott Speirs <Scott.Speirs@nortonrosefulbright.com<mailto:Scott.Speirs@nortonrosefulbright.com>>
Sent: Tuesday, July 9, 2024 9:33:43 am
To: hekt@outlook.com<mailto:hekt@outlook.com> <hekt@outlook.com<mailto:hekt@outlook.com>>
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com<mailto:Holly.Stebbing@nortonrosefulbright.com>>
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF_EMEA-UK.FID3210555]

Dear Diana

We have received a copy of your email sent to ExxonMobil.Service@nortonrosefulbright.com<mailto:ExxonMobil.Service@nortonrosefulbright.com>.

The Claimants are required by the Court to serve documents upon you as a Defendant in the injunction. In order to avoid being served with hard copy documents, we invite you to agree to accept service by email.

You can do this by confirming by return email that you will accept service of all documents related to this matter at the email address "hekt@outlook.com<mailto:hekt@outlook.com>" and larger documents by email referencing that they can be found at https://www.exxonmobil.co.uk/company/overview/uk-operations<https://www.exxonmobil.co.uk/company/overview/uk-operations>.

Given there is an annual review hearing listed in this matter tomorrow, if you provide the confirmation above by return we can raise your request with the Court at the hearing.

Yours sincerely

Norton Rose Fulbright

Scott Speirs | Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom Tel +44 20 7444 2441 | Mob +44 75111 76603 scott.speirs@nortonrosefulbright.com<mailto:scott.speirs@nortonrosefulbright.com>
NORTON ROSE FULBRIGHT
Law around the world
nortonrosefulbright.com<http://www.nortonrosefulbright.com/>

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Beatrice Shah Scott

From: Beatrice Shah Scott
Sent: 09 July 2024 15:09
To: Beatrice Shah Scott
Subject: Application for my name to be removed from Injunction, Claim no QB-2022-001098

-----Original Message-----
From: Diana Hekt <hekt@outlook.com>
Sent: 04 July 2024 13:58
To: LON Exxon Mobil Service <ExxonMobil.Service@nortonrosefulbright.com>
Subject: Application for my name to be removed from Injunction, Claim no QB-2022-001098

[External Email – Use Caution]

Dear Administrator

I'm writing to ask that my name be removed from the above injunction please. I'm not sure why my name and that of Paul Barnes remain on it, but this seems to necessitate your sending reams of documents to me (and presumably Paul too) that I don't understand or want.

I would like to copy in ExxonMobil/Esso to this email request but unfortunately I don't have an email address for them.

Please can you instruct me as to the course of action I need to take to have my name removed?

I look forward to your reply

With thanks

Diana Hekt

From: Scott Speirs
Sent: 12 June 2025 10:32
To: PBHPXR@protonmail.com
Cc: Holly Stebbing
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]
Attachments: 2025.04.09 - Esso injunction - D4 2025 Undertaking (unsigned).pdf; 20240726 - Paul Barnes signed undertaking.pdf

Dear Mr Barnes

RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others

We refer to our emails sent on 10 April and 7 May 2025 concerning the upcoming review hearing on this matter on 9 July 2025 and the undertaking you provided to the Court on 25 July 2024.

We would be grateful if you would confirm if you agree to renew the undertaking in the form attached. Should you agree to the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email.

Yours faithfully
Norton Rose Fulbright

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
Tel +44 20 7444 2441 | Mob +44 75111 76603
scott.speirs@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

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nortonrosefulbright.com

From: Scott Speirs
Sent: 07 May 2025 16:50
To: PBHPXR@protonmail.com
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Dear Mr Barnes

RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others

We refer to our email sent on 10 April 2025 concerning the upcoming review hearing on this matter on 9 July 2025 and the undertaking you provided to the Court on 25 July 2024.

We would be grateful if you would confirm if you agree to renew the undertaking in the form attached. Should you agree to the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email.

Yours faithfully
Norton Rose Fulbright

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
Tel +44 20 7444 2441 | Mob +44 75111 76603
scott.speirs@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

From: Scott Speirs
Sent: 10 April 2025 10:33
To: PBHPXR@protonmail.com
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Dear Mr Barnes

QB-2022-001098 Esso Petroleum and another v Persons Unknown and others

Review Hearing

Further to our letter of 20 February 2025 (**attached**), we write to inform you that the Court has confirmed the annual review hearing for this case will be held on **Wednesday 9 July 2025** with a time estimate of half a day. The hearing date has been confirmed, and can be viewed at: https://www.exxonmobil.co.uk/Company/Overview/UK-operations.

Undertakings

We refer to the undertaking you provided to the Court on this matter on 25 July 2024 (**attached**).

The undertaking will expire on 30 June 2025. We, therefore, invite you provide a new undertaking on the same terms to the Court, that will expire on 31 July 2026 or the date of the next review hearing, whichever comes later.

Please find **attached** a draft undertaking in the identical form to your previous undertaking. Should you agree to the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email.

Yours faithfully
Norton Rose Fulbright

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom
Tel +44 20 7444 2441 | Mob +44 75111 76603
scott.speirs@nortonrosefulbright.com

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

DRAFT ORDER

PENAL NOTICE

If you the within named Fourth Defendant disobey the undertakings set out in this order or instruct (which includes training, coaching,

teaching or educating) others to do the acts which you have undertaken not to do, 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 Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE FOURTH DEFENDANT

This order prohibits you from doing the acts set out in paragraphs 3, 4 and 5 below.

You should read it very carefully.

UPON the **Fourth Defendant** having agreed to an order in the terms set out below

AND UPON the **Fourth Defendant** giving undertakings to the Court as set out below

AND UPON the Order of Ellenbogen J dated 29 January 2024;

IT IS ORDERED THAT:

1. There be no order as to costs.

2. Pursuant to CPR r.6.15, r.6.27 and r.81.4(2)(c)-(d), service of this Order and any subsequent court documents in these proceedings on the Fourth Defendant may be effected by alternative means by email to PBHPXR@protonmail.com, and/or by an email to PBHPXR@protonmail.com referencing that the documents can be found at https://www.exxonmobil.co.uk/company/overview/uk-operations, and such service shall be deemed to be good and sufficient service on the Fourth Defendant. Any such document shall be deemed served on the date the email is sent.

UNDERTAKINGS TO THE COURT

The **Fourth Defendant** undertakes to the Court promising as follows:

3. Not to:

(a) enter or remain on any part of the Sites (as defined above) without the Consent of the First Claimant.

(b) damage any part of any of the Sites;

(c) affix themselves or any person or object to any part of any of the Sites;

(d) erect any structures on any part of any of the Sites.

4. Not to:

(a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH (the "Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

(b) damage any part of the Chemical Plant;

(c) affix themselves or any person or object at the Chemical Plant;

5. Not to enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THESE PROMISES UNTIL THE LATER OF 31 July 2026 OR THE DATE OF THE NEXT ANNUAL REVIEW HEARING

STATEMENT

I understand the undertakings that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.

_____

Paul Barnes

Fourth Defendant

_____2025

We consent to an order in these terms

_____

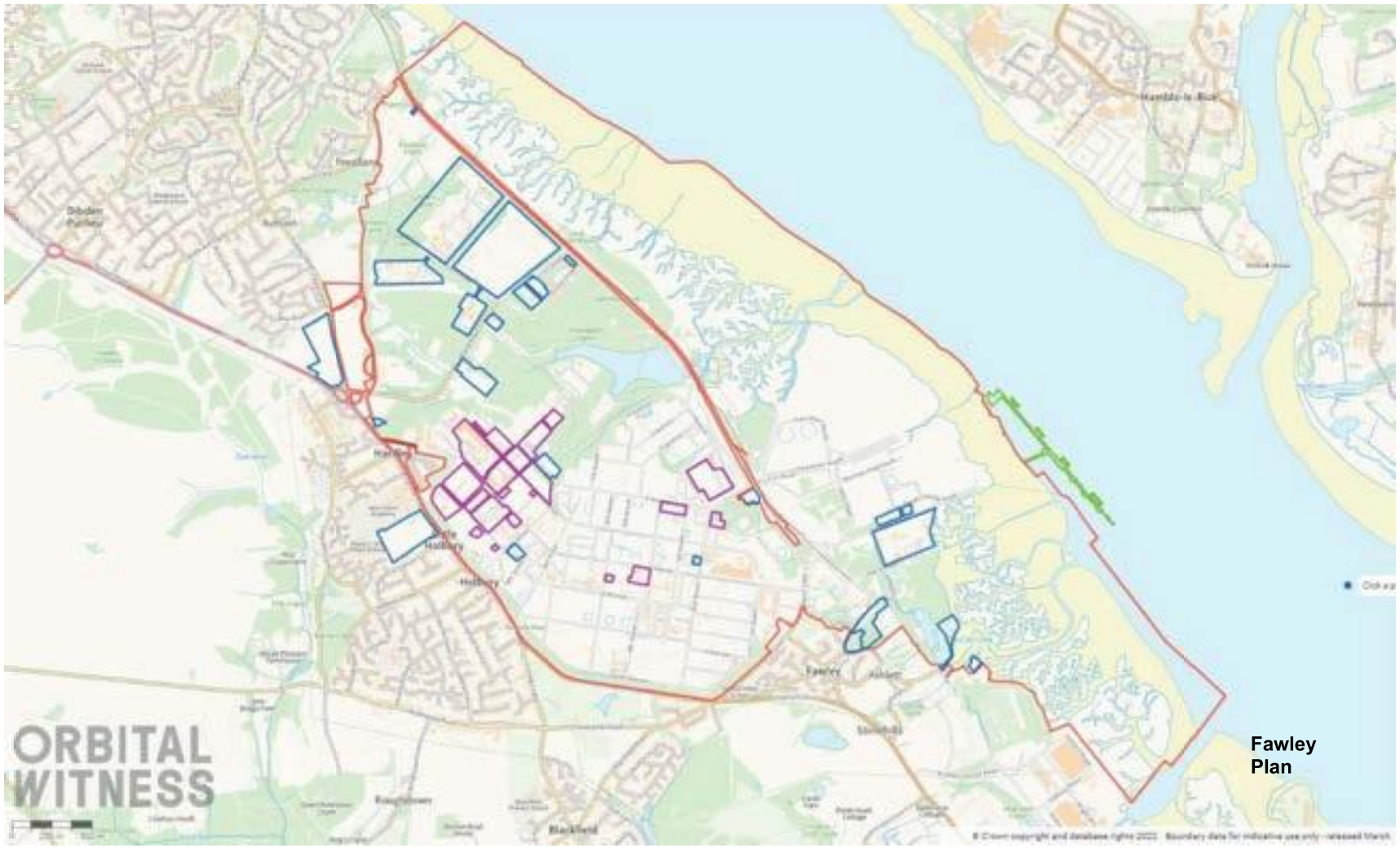
Norton Rose Fulbright LLP

Solicitors for the Claimants

_____2025

QB-2022-001098

Fawley Plan



NORTON ROSE FULBRIGHT

20 February 2025

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Mr Paul Barnes

By email only: PBHPXR@protonmail.com

Your reference	**Our reference**
	HMOR/1001267389

Dear Mr Barnes

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown

We write on behalf of Esso Petroleum Company, Limited and ExxonMobil Chemical Limited (the **Claimants**) in connection with the enclosed Operating Sites injunctions that the Claimants have sought and been granted against various defendants connected to the Extinction Rebellion or Just Stop Oil campaigns with claim number QB-2022-001098 (the **Order**).

Pursuant to paragraph 8 of the Order, the injunctions are to be reviewed on or around 18 July each year. Should you intend to appear and make submissions at the 2025 review hearing, please confirm (i) whether you will be instructing Counsel to appear on your behalf, and if so who; or (ii) if you intend to appear as a litigant in person, whether there are any dates to avoid in July 2025.

Please provide your response to the above questions by **4pm on Thursday, 6 March 2025** by writing to Norton Rose Fulbright LLP at the address stated above (Ref: Holly Stebbing, tel: 020 7283 6000) or by emailing ExxonMobil.Service@nortonrosefulbright.com, so that the Claimants can take steps to fix this year's annual review hearing. If you do not intend to appear and make submissions, there is no need to respond to this letter.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Enc.

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From: Scott Speirs
Sent: 16 June 2025 14:36
To: Diana Hekt
Cc: Holly Stebbing
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Dear Diana

We confirm this has been received and we will inform the Court accordingly.

Yours faithfully
Norton Rose Fulbright

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom Tel +44 20 7444 2441 | Mob +44 75111 76603 scott.speirs@nortonrosefulbright.com
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nortonrosefulbright.com

-----Original Message-----
From: Diana Hekt <hekt@outlook.com>
Sent: 15 June 2025 23:39
To: Scott Speirs <Scott.Speirs@nortonrosefulbright.com>
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: Re: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Dear Norton Rose Fulbright

Thanks for your email.

Please find the attached undertaking signed as requested.

With thanks

Diana Hekt

_____
From: Scott Speirs <Scott.Speirs@nortonrosefulbright.com>
Sent: 12 June 2025 10:58
To: Diana Hekt
Cc: Holly Stebbing
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Dear Diana

I hope you have had time to consider the below email.

As explained in the below email, the attached document is the undertaking I referred to. It is intended to replace the previous undertaking you provided, which expires on 30 June 2025. As previously noted, this contains a penal notice meaning if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

If you sign the attached undertaking (called "2025.04.09 – Esso injunction – D5 2025 Undertaking (unsigned).pdf") we will provide it to the court ahead of the hearing. You should be able to copy and paste the signature from your letter onto this document if you choose to sign it.

Yours faithfully

Norton Rose Fulbright

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom Tel +44 20 7444 2441 | Mob +44 75111 76603 scott.speirs@nortonrosefulbright.com
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From: Scott Speirs
Sent: 15 May 2025 10:18
To: Diana Hekt <hekt@outlook.com>
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Dear Diana

There appears to be some confusion. The word document you have provided and signed (called "Dear Norton Rose Fulbright dated") is a different document to the PDF document (called "2025.04.09 – Esso injunction – D5 2025 Undertaking (unsigned).pdf") we have attached to our previous emails.

Further to our previous email, the attached document is the undertaking I referred to. It is intended to replace the previous undertaking you provided, which expires on 30 June 2025. As previously noted, this contains a penal notice meaning if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

I am not aware that we did ask for the undertaking to be returned immediately. As previously noted, the court hearing is on 9 July 2025. If you sign the attached undertaking (called “2025.04.09 – Esso injunction – D5 2025 Undertaking (unsigned).pdf”) we will provide it to the court ahead of the hearing. You should be able to copy and paste the signature from your letter onto this document if you choose to sign it.

Yours faithfully

Norton Rose Fulbright

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom Tel +44 20 7444 2441 | Mob +44 75111 76603 scott.speirs@nortonrosefulbright.com<mailto:scott.speirs@nortonrosefulbright.com>
NORTON ROSE FULBRIGHT
Law around the world
nortonrosefulbright.com<http://www.nortonrosefulbright.com/>

-----Original Message-----
From: Diana Hekt <hekt@outlook.com<mailto:hekt@outlook.com>>
Sent: 14 May 2025 14:50
To: Scott Speirs <Scott.Speirs@nortonrosefulbright.com<mailto:Scott.Speirs@nortonrosefulbright.com>>
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com<mailto:Holly.Stebbing@nortonrosefulbright.com>>
Subject: Re: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Dear Scott Spiers

I find your emails very opaque!

I have already signed the letter you attach, and though you have changed the wording I see no reason why my signature can't be applied to this version.

I don't understand why you have sent the letter twice nor why you asked me to email it immediately the first time. I'll be grateful if you can answer my concerns.

Looking forward to hearing from you.

Diana

_____

From: Scott Speirs <Scott.Speirs@nortonrosefulbright.com<mailto:Scott.Speirs@nortonrosefulbright.com>>

Sent: 13 May 2025 15:13

To: Diana Hekt

Cc: Holly Stebbing

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Dear Diana

Thank you for your email and attached letter.

Please note, as noted in our previous email, the hearing for this matter is on 9 July 2025. The court has not yet announced a listing time or court room number, but we will provide once we have it, should you wish to attend.

The undertaking you previously provided expires on 30 June 2025. The court may order at the upcoming hearing you will be subject to the injunction again. If you wish to continue to be subject to your undertaking and not the injunction then we ask you sign the attached which is in the form the court will expect.

Yours faithfully

Norton Rose Fulbright

Scott Speirs | Senior Associate

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NORTON ROSE FULBRIGHT

Law around the world

nortonrosefulbright.com

-----Original Message-----

From: Diana Hekt <hekt@outlook.com<mailto:hekt@outlook.com>>

Sent: 08 May 2025 00:48

To: Scott Speirs <Scott.Speirs@nortonrosefulbright.com<mailto:Scott.Speirs@nortonrosefulbright.com>>

Subject: Re: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Dear Scott Spiers

Thank you for your email albeit allowing little time for me to respond.

Please find attached my latest signed undertaking as advised. I trust it will be in time to be included in the court hearing.

With best wishes

Diana Hekt

_____

From: Scott Speirs

Sent: Wednesday, May 07, 2025 16:55

To: Diana Hekt

Cc: Holly Stebbing

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555]

Dear Ms Hekt RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others We refer to our email sent on 10 April 2025 concerning the upcoming review hearing on this matter on 9 July 2025 and the undertaking you provided to the Court on 10 July 2024. We would be grateful if you would confirm if you agree to renew the undertaking in the form attached. Should you agree the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by

the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email. Yours faithfullyNorton Rose Fulbright Scott Speirs | Senior AssociateNorton Rose Fulbright LLPQuayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United KingdomTel +44 20 7444 2441 | Mob +44 75111
76603scott.speirs@nortonrosefulbright.comNORTON<mailto:76603scott.speirs@nortonrosefulbright.comNORTON<mailto:76603scott.speirs@nortonrosefulbright.comNORTON%3cmailto:76603scott.speirs@nortonrosefulbright.comNORTON>> ROSE FULBRIGHTLaw around the worldnortonrosefulbright.com From: Scott Speirs Sent: 10 April 2025 10:35To: Diana Hekt
<hekt@outlook.com<mailto:hekt@outlook.com<mailto:hekt@outlook.com%3cmailto:hekt@outlook.com>>>Cc: Holly Stebbing
<Holly.Stebbing@nortonrosefulbright.com<mailto:Holly.Stebbing@nortonrosefulbright.com<mailto:Holly.Stebbing@nortonrosefulbright.com%3cmailto:Holly.Stebbing@nortonrosefulbright.com>>>Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF_EMEA-UK.FID3210555] Dear Ms Hekt QB-2022-001098 Esso Petroleum and another v Persons Unknown and others Review Hearing Further to our letter of 20 February 2025 (attached), we write to inform you that the Court has confirmed the annual review hearing for this case will be held on Wednesday 9 July 2025 with a time estimate of half a day. The hearing date has been confirmed and can be viewed at: https://www.exxonmobil.co.uk/Company/Overview/UK-
operations<https://www.exxonmobil.co.uk/Company/Overview/UK-
operations<https://www.exxonmobil.co.uk/Company/Overview/UK-
operations%3chttps:/www.exxonmobil.co.uk/Company/Overview/UK-operations>>. Undertakings We refer to the assurance you provided to the Court on this matter on 10 July 2024 (attached). The assurance will expire on 30 June 2025. We, therefore, invite you to provide an undertaking to the Court, that will expire on 31 July 2026 or the date of the next review hearing, whichever comes later. Please find attached a draft undertaking in materially identical form to your previous undertaking. Should you agree the attached, please provided a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email. Yours faithfully Norton Rose Fulbright Scott Speirs | Senior AssociateNorton Rose Fulbright LLPQuayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United KingdomTel +44 20 7444 2441 | Mob +44 75111
76603scott.speirs@nortonrosefulbright.comNORTON<mailto:76603scott.speirs@nortonrosefulbright.comNORTON<mailto:76603scott.speirs@nortonrosefulbright.comNORTON%3cmailto:76603scott.speirs@nortonrosefulbright.comNORTON>> ROSE FULBRIGHTLaw around the worldnortonrosefulbright.com CONFIDENTIALITY NOTICE: This email, including any attachments, is confidential and may be privileged. If you are not the intended recipient please notify the sender immediately, and please delete it; you should not copy it or use it for any purpose or disclose its contents to any other person. Norton Rose Fulbright LLP and its affiliates reserve the right to monitor all email communications through their networks. Norton Rose Fulbright LLP is a limited liability partnership registered in England and Wales with number OC328697, and is authorised and regulated by the Solicitors Regulation Authority. A list of its members and of the other partners is available at its registered office, 3 More London Riverside, London SE1 2AQ; reference to a partner is to a member or to an employee or consultant with equivalent standing and qualification employed or engaged by Norton Rose Fulbright LLP or any of its affiliates. Norton Rose Fulbright LLP, Norton Rose Fulbright Australia, Norton Rose Fulbright Canada LLP, Norton Rose Fulbright South Africa Inc and Norton Rose Fulbright US LLP are separate legal entities and all of them are members of Norton Rose Fulbright Verein, a Swiss verein. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself provide legal services to clients. Details of each entity, with certain regulatory information, are available at nortonrosefulbright.com.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')

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

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

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

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

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

~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~

(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

DRAFT ORDER

PENAL NOTICE

If you the within named Fifth Defendant disobey the undertakings set out in this order or instruct (which includes training, coaching,

teaching or educating) others to do the acts which you have undertaken not to do, 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 Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE FIFTH DEFENDANT

This order prohibits you from doing the acts set out in paragraphs 3, 4 and 5 below.

You should read it very carefully.

UPON the **Fifth Defendant** having agreed to an order in the terms set out below

AND UPON the **Fifth Defendant** giving undertakings to the Court as set out below

AND UPON the Order of Ellenbogen J dated 29 January 2024;

IT IS ORDERED THAT:

1. There be no order as to costs.

2. Pursuant to CPR r.6.15, r.6.27 and r.81.4(2)(c)-(d), service of this Order and any subsequent court documents in these proceedings on the Fifth Defendant may be effected by alternative means by email to hekt@outlook.com, and/or by an email to hekt@outlook.com referencing that the documents can be found at https://www.exxonmobil.co.uk/company/overview/uk-operations, and such service shall be deemed to be good and sufficient service on the Fifth Defendant. Any such document shall be deemed served on the date the email is sent.

UNDERTAKINGS TO THE COURT

The **Fifth Defendant** undertakes to the Court promising as follows:

3. Not to:

(a) enter or remain on any part of the Sites (as defined above) without the Consent of the First Claimant.

(b) damage any part of any of the Sites;

(c) affix themselves or any person or object to any part of any of the Sites;

(d) erect any structures on any part of any of the Sites.

4. Not to:

(a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH (the "Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

(b) damage any part of the Chemical Plant;

(c) affix themselves or any person or object at the Chemical Plant;

5. Not to enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THESE PROMISES UNTIL THE LATER OF 31 July 2026 OR THE DATE OF THE NEXT ANNUAL REVIEW HEARING

STATEMENT

I understand the undertakings that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.

_____

Diana Hekt

Fifth Defendant

_____ 2025

We consent to an order in these terms

_____

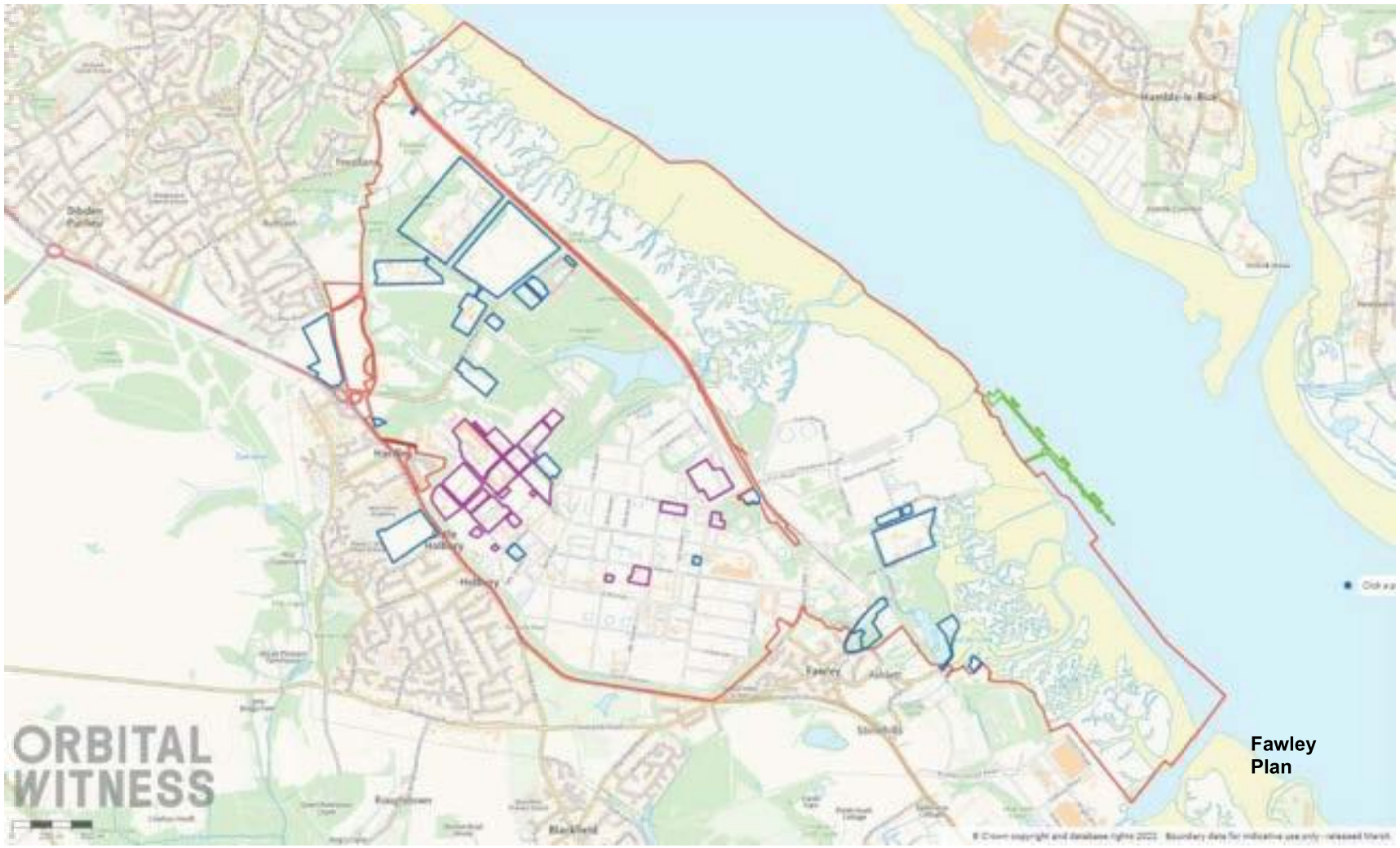
Norton Rose Fulbright LLP

Solicitors for the Claimants

_____ 2025

QB-2022-001098

Fawley Plan



UK-#762456388v1

NORTON ROSE FULBRIGHT

20 February 2025

Norton Rose Fulbright LLP
3 More London Riverside
London SE1 2AQ
United Kingdom

Tel +44 20 7283 6000
Fax +44 20 7283 6500
DX 85 London
nortonrosefulbright.com

Ms Diana Hekt

By email only: hekt@outlook.com

Your reference	**Our reference**
	HMOR/1001267389

Dear Ms Hekt

Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown

We write on behalf of Esso Petroleum Company, Limited and ExxonMobil Chemical Limited (the **Claimants**) in connection with the enclosed Operating Sites injunctions that the Claimants have sought and been granted against various defendants connected to the Extinction Rebellion or Just Stop Oil campaigns with claim number QB-2022-001098 (the **Order**).

Pursuant to paragraph 8 of the Order, the injunctions are to be reviewed on or around 18 July each year. Should you intend to appear and make submissions at the 2025 review hearing, please confirm (i) whether you will be instructing Counsel to appear on your behalf, and if so who; or (ii) if you intend to appear as a litigant in person, whether there are any dates to avoid in July 2025.

Please provide your response to the above questions by **4pm on Thursday, 6 March 2025** by writing to Norton Rose Fulbright LLP at the address stated above (Ref: Holly Stebbing, tel: 020 7283 6000) or by emailing ExxonMobil.Service@nortonrosefulbright.com, so that the Claimants can take steps to fix this year's annual review hearing. If you do not intend to appear and make submissions, there is no need to respond to this letter.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Enc.

Norton Rose Fulbright LLP is a limited liability partnership registered in England and Wales with number OC328697, and is authorised and regulated by the Solicitors Regulation Authority. A list of its members and of the other partners is available at its registered office, 3 More London Riverside, London SE1 2AQ; reference to a partner is to a member or to an employee or consultant with equivalent standing and qualification employed or engaged by Norton Rose Fulbright LLP or any of its affiliates.

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7th May 2025

Dear Norton Rose Fulbright

Thank you for your email. As a named defendant on the above injunction I would very much like to opt for the documents you are apparently obliged to send me to be referenced at https://www.exxonmobil.co.uk/company/overview/uk-

operations<https://www.exxonmobil.co.uk/company/overview/uk-operations>)

or to be emailed to me (at hekt@outlook.com<mailto:hekt@outlook.com>) rather than continuing to have hard copies sent through the post.

Better still I would like to request at tomorrow's court hearing that my name be removed from the injunction altogether. I have no intention of breaching this injunction or any other.

I hope to hear your response soon.

With thanks



Diana Hekt

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

DRAFT ORDER

PENAL NOTICE

If you the within named Fifth Defendant disobey the undertakings set out in this order or instruct (which includes training, coaching,

teaching or educating) others to do the acts which you have undertaken not to do, 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 Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE FIFTH DEFENDANT

This order prohibits you from doing the acts set out in paragraphs 3, 4 and 5 below.

You should read it very carefully.

UPON the **Fifth Defendant** having agreed to an order in the terms set out below

AND UPON the **Fifth Defendant** giving undertakings to the Court as set out below

AND UPON the Order of Ellenbogen J dated 29 January 2024;

IT IS ORDERED THAT:

1. There be no order as to costs.

2. Pursuant to CPR r.6.15, r.6.27 and r.81.4(2)(c)-(d), service of this Order and any subsequent court documents in these proceedings on the Fifth Defendant may be effected by alternative means by email to hekt@outlook.com, and/or by an email to hekt@outlook.com referencing that the documents can be found at https://www.exxonmobil.co.uk/company/overview/uk-operations, and such service shall be deemed to be good and sufficient service on the Fifth Defendant. Any such document shall be deemed served on the date the email is sent.

UNDERTAKINGS TO THE COURT

The **Fifth Defendant** undertakes to the Court promising as follows:

3. Not to:

(a) enter or remain on any part of the Sites (as defined above) without the Consent of the First Claimant.

(b) damage any part of any of the Sites;

(c) affix themselves or any person or object to any part of any of the Sites;

(d) erect any structures on any part of any of the Sites.

4. Not to:

(a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH (the "Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

(b) damage any part of the Chemical Plant;

(c) affix themselves or any person or object at the Chemical Plant;

5. Not to enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THESE PROMISES UNTIL THE LATER OF 31 July 2026 OR THE DATE OF THE NEXT ANNUAL REVIEW HEARING

STATEMENT

I understand the undertakings that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.



Diana Hekt

Fifth Defendant

15/06/2025

We consent to an order in these terms



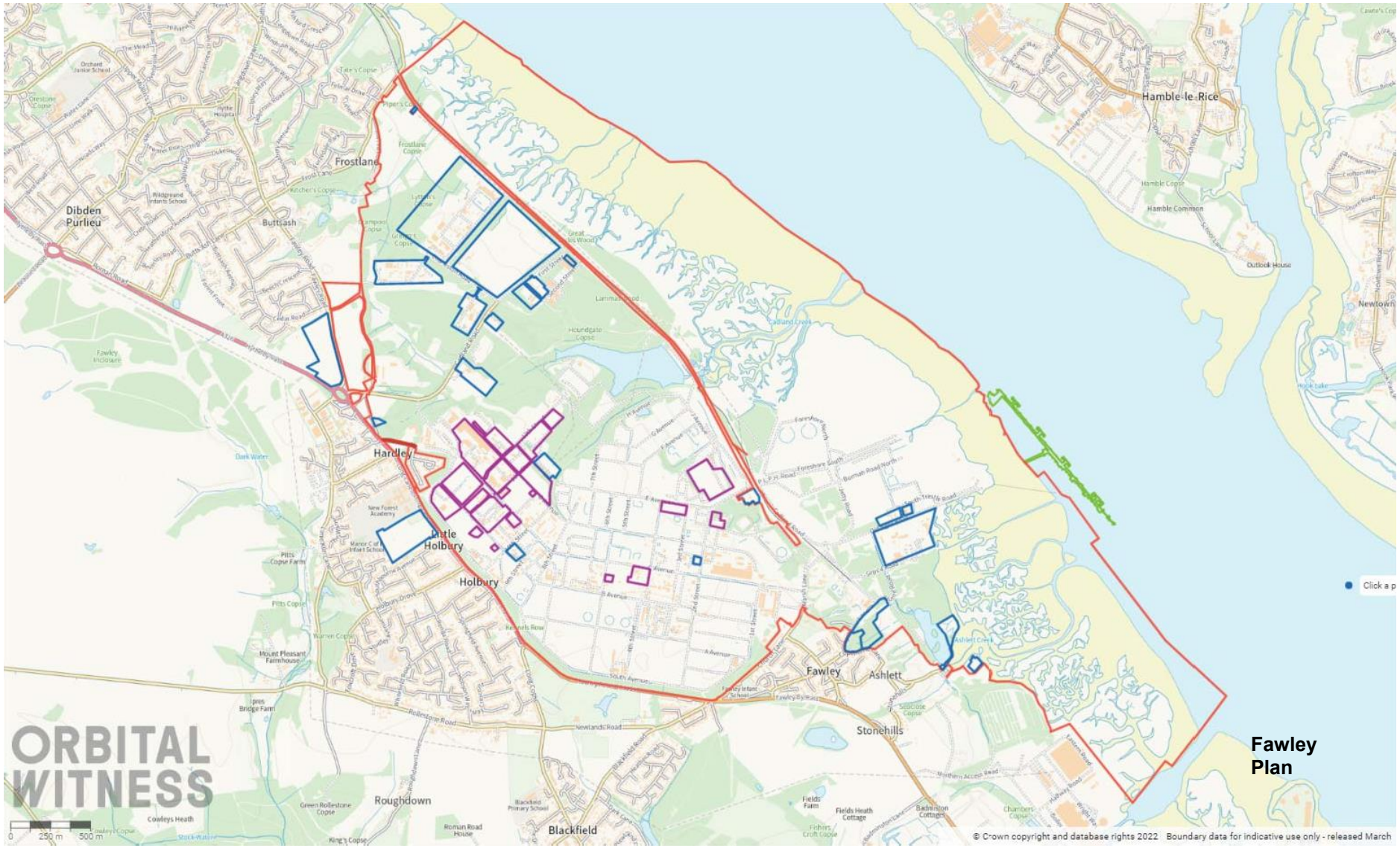
Norton Rose Fulbright LLP

Solicitors for the Claimants

16 June 2025

QB-2022-001098

Fawley Plan



Certificate of service

Name of court **HIGH COURT OF JUSTICE, KING'S BENCH DIVISION**	**Claim No.** QB-2022-001098

Names of Claimants
(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

On what day did you serve?	Various (see below)
The date of service is	0 1 / 0 8 / 2 0 2 5

Names of Defendants
(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER (as defined below))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE ORDER)
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE ORDER)
(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 ORDER)
(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 ORDER)
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE ORDER)
(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE 'FAWLEY PLAN')
(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

The Order of Mr Justice Sweeting (the **Sweeting Order**), dated 10 July 2025 (sealed 11 July 2025)

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Persons Unknown in accordance with paragraph 8 of the Sweeting Order and paragraph 15.2-15.3 Mrs Justice Ellenbogen DBE's order dated 29 January 2024

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(as amended on 21 January 2025 and on 10 July 2025, the **Order**) (Defendants (1) – (3))

How did you serve the documents?
(please tick the appropriate box)

[ ] by first class post or other service which provides for delivery on the next business day

[ ] by delivering to or leaving at a permitted place

[ ] by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*

[ ] by other means permitted by the court *(please specify)*

[ ] By Document Exchange

[ ] by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

[✓] by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

By email at 13:05 on 1 August 2025

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

In accordance with paragraph 8 of the Sweeting Order and paragraph 15 of the Order (enclosed):

1. The Sweeting Order was posted on the following website: https://www.exxonmobil.co.uk/Company/Overview/UK-operations by 1 August 2025; and
2. The emails for Defendants (1) – (3) were sent to Extinction Rebellion and Just Stop Oil at 13:05 on 1 August 2025 at the following email addresses:
   Extinction Rebellion
   i. xr-legal@riseup.net
   ii. enquiries@extinctionrebellion.uk
   Just Stop Oil
   iii. juststopoilpress@protonmail.com

Being the:

[ ] Defendant's usual residence
[ ] last known residence
[ ] Claimants' place of business
[ ] principal place of business
[ ] last known place of business
[ ] last known principal place of business
[ ] principal office of the partnership
[ ] principal office of the corporation
[ ] principal office of the company
[ ] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
[✓] other *(please specify)*

Defendants (1)-(3)'s email addresses, as provided in paragraph 15.3 of the Order.

I believe that the facts stated in this certificate of service are true.
I understand that proceedings for contempt of court may be brought against anyone 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.

Full name: HOLLY STEBBING

Signed: 

Claimants' solicitor

Position or office held: PARTNER

(If signing on behalf of firm or company)

Date: 0 8 | 0 7 | 2 0 2 6

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	**Deemed day of service**
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

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Certificate of service

Name of court	Claim No.
HIGH COURT OF JUSTICE, KING'S BENCH DIVISION	QB-2022-001098

Names of Claimants
(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

On what day did you serve?	Various (see below)
The date of service is	0 1 / 0 8 / 2 0 2 5

Names of Defendants
(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER OF MRS JUSTICE ELLENBOGEN DATED 29 JANUARY 2024, AS AMENDED ON 21 JANUARY 2025 AND ON 10 JULY 2025 (THE **ORDER**))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE ORDER)
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE ORDER)
(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 ORDER)
(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 ORDER)
(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HARTLAND PARK PLAN' ATTACHED TO THE ORDER)
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE ORDER)
(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE 'FAWLEY PLAN')
(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

The Order of Mr Justice Sweeting (the **Sweeting Order**), dated 10 July 2025 (sealed 11 July 2025).

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On whom did you serve?
(If appropriate include their position e.g. partner, director).

Paul Barnes and Diana Hekt (Defendants (4)-(5)) in accordance with:
a. Paragraph 9 of the Sweeting Order (the **Sweeting Order**)
b. Paragraphs 2 and 3 of the Consent Order dated 10 July 2023, sealed on 19 July 2023 (the **Consent Order**)

How did you serve the documents?
(please tick the appropriate box)

[✓] by first class post or other service which provides for delivery on the next business day

[ ] by delivering to or leaving at a permitted place

[ ] by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*

[ ] by other means permitted by the court *(please specify)*

[ ] By Document Exchange

[ ] by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

[✓] by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

By email at 13:53 and 13:50 on 1 August 2025

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

In accordance with paragraph 9 of the Sweeting Order and paragraphs 2 and 3 of the Consent Order, emails were sent to Defendants (4)-(5) at the following email addresses:
a. PBHPXR@protonmail.com (Defendant (4))
b. hekt@outlook.com (Defendant (5))

Being the:

[ ] Defendant's usual residence
[ ] last known residence
[ ] Claimants' place of business
[ ] principal place of business
[ ] last known place of business
[ ] last known principal place of business
[ ] principal office of the partnership
[ ] principal office of the corporation
[ ] principal office of the company
[ ] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
[✓] other *(please specify)*

Defendants (4)-(5)'s email addresses, as provided in paragraphs 2 and 3 of the Consent Order dated 10 July 2023 (sealed on 19 July 2023)

I believe that the facts stated in this certificate of service are true.
I understand that proceedings for contempt of court may be brought against anyone 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.

Full name: HOLLY STEBBING

Signed: 

Claimants' solicitor

Position or office held: PARTNER

(If signing on behalf of firm or company)

Date: 0 8 | 0 7 | 2 0 2 6

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	**Deemed day of service**
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
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Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

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Certificate of service

Name of court	Claim No.
HIGH COURT OF JUSTICE, KING'S BENCH DIVISION	QB-2022-001098

Names of Claimants
(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

On what day did you serve?	Various (see below)
The date of service is	26 / 05 / 2026

Names of Defendants
(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER (as defined below))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE ORDER)
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE ORDER)
(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 ORDER)
(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 ORDER)
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE ORDER)
(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE 'FAWLEY PLAN')
(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

The order of Mrs Justice Ellenbogen DBE dated 29 January 2024, as amended on 21 January 2025 and on 10 July 2025, as sealed on 11 July 2025 (the **Order**), and the accompanying notice specified in paragraph 12.1 of the Order

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Persons Unknown in accordance with paragraph 8 of the order of Mr Justice Sweeting dated 10 July 2025 (sealed on 11 July 2025) (the **Sweeting Order**) and

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paragraph 12 of the Order (Defendants (1) – (3))

How did you serve the documents?
(please tick the appropriate box)

[ ] by first class post or other service which provides for delivery on the next business day

[✓] by delivering to or leaving at a permitted place

[ ] by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*

[ ] by other means permitted by the court *(please specify)*

[ ] By Document Exchange

[ ] by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

[✓] by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

By email at 13:05 on 1 August 2025

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

In accordance with paragraph 8 of the Sweeting Order and paragraph 12 of the Order:

1. The Order was posted on the following website: https://www.exxonmobil.co.uk/Company/Overview/UK-operations by no later than 1 August 2025.
2. The Emails for Defendants (1) – (3) were sent to Extinction Rebellion and Just Stop Oil at 13:05 on 1 August 2025 at the following email addresses:
   Extinction Rebellion
   i. xr-legal@riseup.net
   ii. enquiries@extinctionrebellion.uk
   Just Stop Oil
   iii. juststopoilpress@protonmail.com.
3. Copies the Order were laminated and clipped onto the fences at 4 locations on the perimeter on each of the Sites by no later than 6 August 2025.
4. 4 large warning notices in the form annexed to the Order were fixed in conspicuous places around the perimeter of the Sites by no later than 6 August 2025.
5. Copies of the notice accompanying the Order, as described in paragraph 12.1 of the Order, were laminated and clipped onto the fences at 4 locations on the perimeter on each of the Sites by no later than 26 May 2026.

Being the:

[ ] Defendant's usual residence
[ ] last known residence
[ ] Claimants' place of business
[ ] principal place of business
[ ] last known place of business
[ ] last known principal place of business
[ ] principal office of the partnership
[ ] principal office of the corporation
[ ] principal office of the company
[ ] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
[✓] other *(please specify)*

Defendants (1)-(3)'s email addresses, as provided in paragraph 12.4 of the Order.

I believe that the facts stated in this certificate of service are true.
I understand that proceedings for contempt of court may be brought against anyone 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.

Full name: HOLLY STEBBING

Signed: 

Claimants' solicitor

Position or office held: PARTNER

(If signing on behalf of firm or company)

Date: 0 8 | 0 7 | 2 0 2 6

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	**Deemed day of service**
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

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Certificate of service

Name of court **HIGH COURT OF JUSTICE, KING'S BENCH DIVISION**	**Claim No.** QB-2022-001098

Names of Claimants
(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

On what day did you serve?	Various (see below)
The date of service is	0 1 / 0 8 / 2 0 2 5

Names of Defendants
(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER (as defined below))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE ORDER)
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE ORDER)
(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 ORDER)
(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 ORDER)
(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HARTLAND PARK PLAN' ATTACHED TO THE ORDER)
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE ORDER)
(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE 'FAWLEY PLAN')
(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

The order of Mrs Justice Ellenbogen DBE dated 29 January 2024, as amended on 21 January 2025 and on 10 July 2025, as sealed on 11 July 2025 (the **Order**)

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Paul Barnes and Diana Hekt (Defendants (4)-(5)) in accordance with:
a. Paragraph 9 of the order of Mr Justice Sweeting dated 1 July 2025

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(sealed on 11 July 2025) (the **Sweeting Order**)

b. Paragraphs 2 and 3 of the Consent Order dated 10 July 2023, sealed on 19 July 2023 (the **Consent Order**)

How did you serve the documents?

(please tick the appropriate box)

[ ] by first class post or other service which provides for delivery on the next business day

[ ] by delivering to or leaving at a permitted place

[ ] by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*

[ ] by other means permitted by the court *(please specify)*

[ ] By Document Exchange

[ ] by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

[✓] by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

By email at 13:53 and 13:50 on 1 August 2025

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

In accordance with paragraph 9 of the Sweeting Order and paragraphs 2 and 3 of the Consent Order, emails were sent to Defendants (4)-(5) at the following email addresses:

a. PBHPXR@protonmail.com (Defendant (4))

b. hekt@outlook.com (Defendant (5))

Being the:

[ ] Defendant's usual residence

[ ] last known residence

[ ] Claimants' place of business

[ ] principal place of business

[ ] last known place of business

[ ] last known principal place of business

[ ] principal office of the partnership

[ ] principal office of the corporation

[ ] principal office of the company

[ ] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

[✓] other *(please specify)*

Defendants (4)-(5)'s email addresses, as provided in paragraphs 2 and 3 of the Consent Order dated 10 July 2023 (sealed on 19 July 2023)

I believe that the facts stated in this certificate of service are true.
I understand that proceedings for contempt of court may be brought against anyone 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.

Full name: HOLLY STEBBING

Signed: 

Claimants' solicitor

Position or office held: PARTNER

(If signing on behalf of firm or company)

Date: 0 8 | 0 7 | 2 0 2 6

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	**Deemed day of service**
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Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
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In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

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Certificate of service

Name of court **HIGH COURT OF JUSTICE, KING'S BENCH DIVISION**	**Claim No.** QB-2022-001098

Names of Claimants
(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

On what day did you serve?	Various (see below)
The date of service is	0 2 / 0 7 / 2 0 2 6

Names of Defendants
(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER (as defined below))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE ORDER)
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE ORDER)
(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 ORDER)
(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 ORDER)
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE ORDER)
(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE 'FAWLEY PLAN')
(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Holly Stebbing's eighth witness statement dated 2 July 2026 (the **Witness Statement**), and the exhibits referred to in the Witness Statement (the **Exhibits** and, with the Witness Statement, the **Evidence**) (filed with the court on 7 July 2026 in accordance with paragraph 8 of the order of Mrs Justice Ellenbogen 29 January 2024 (as amended on 21 January 2025 and on 10 July 2025, as sealed on 11 July (the **Order**))

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On whom did you serve?
(If appropriate include their position e.g. partner, director).

Persons Unknown in accordance with paragraph 15 of the Order (Defendants (1) – (3))

How did you serve the documents?
(please tick the appropriate box)

[ ] by first class post or other service which provides for delivery on the next business day

[ ] by delivering to or leaving at a permitted place

[ ] by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*

[ ] by other means permitted by the court *(please specify)*

[ ] By Document Exchange

[ ] by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

[✓] by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

By email at 16:42 and 16:43 on 2 July 2026

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

In accordance with paragraph 15 of the Order (enclosed):

1. The Evidence was posted on the following website by no later than 2 July 2026: https://www.exxonmobil.co.uk/Company/Overview/UK-operations on 2 July 2026; and
2. The Emails for Defendants (1) – (3) were sent to Extinction Rebellion and Just Stop Oil at 16:42 and 16:43 on 2 July 2026 at the following email addresses:
   Extinction Rebellion
   i. xr-legal@riseup.net
   ii. enquiries@extinctionrebellion.uk
   Just Stop Oil
   iii. juststopoilpress@protonmail.com

Being the:

[ ] Defendant's usual residence
[ ] last known residence
[ ] Claimants' place of business
[ ] principal place of business
[ ] last known place of business
[ ] last known principal place of business
[ ] principal office of the partnership
[ ] principal office of the corporation
[ ] principal office of the company
[ ] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
[✓] other *(please specify)*

Defendants (1)-(3)'s email addresses, as provided in paragraph 15 of the Order.

I believe that the facts stated in this certificate of service are true.
I understand that proceedings for contempt of court may be brought against anyone 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.

Full name: HOLLY STEBBING

Signed: 

Claimants' solicitor

Position or office held: PARTNER

(If signing on behalf of firm or company)

Date: 0 8 | 0 7 | 2 0 2 6

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	**Deemed day of service**
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

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Certificate of service

Name of court **HIGH COURT OF JUSTICE, KING'S BENCH DIVISION**	**Claim No.** QB-2022-001098

Names of Claimants
(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

On what day did you serve?	Various (see below)
The date of service is	0 2 / 0 7 / 2 0 2 6

Names of Defendants
(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER (as defined below))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE ORDER)
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE ORDER)
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(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HARTLAND PARK PLAN' ATTACHED TO THE ORDER)
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(4) PAUL BARNES
(5) DIANA HEKT

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Holly Stebbing's eighth witness statement dated 2 July 2026 (the **Witness Statement**), and the exhibits referred to in the Witness Statement (the **Exhibits** and, with the Witness Statement, the **Evidence**) (filed with the court on 7 July 2026 in accordance with paragraph 8 of the order of Mrs Justice Ellenbogen DBE dated 29 January 2024, as amended on 21 January 2025 and on 10 July 2025, as sealed on 11 July 2025 (the **Order**))

N215 Certificate of service (09.11) This form is reproduced from *http://hmctsformfinder.justice.gov.uk/HMCTS/FormFinder.do* and is subject to Crown copyright protection. Contains public sector information licensed under the Open Government Licence v2.0

On whom did you serve?
(If appropriate include their position e.g. partner, director).

Paul Barnes and Diana Hekt (Defendants (4)-(5)) in accordance with paragraphs 2 and 3 of the Consent Order dated 10 July 2023, sealed on 19 July 2023 (the **Consent Order**)

How did you serve the documents?
(please tick the appropriate box)

[✓] by first class post or other service which provides for delivery on the next business day

[ ] by delivering to or leaving at a permitted place

[ ] by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*

[ ] by other means permitted by the court *(please specify)*

[ ] By Document Exchange

[ ] by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

[✓] by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

By email at 16:46 and 16:53 on 2 July 2026

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

In accordance with paragraphs 2 and 3 of the Consent Order, emails were sent to Defendants (4)-(5) at the following email addresses:

a. PBHPXR@protonmail.com (Defendant (4))
b. hekt@outlook.com (Defendant (5))

Being the:

[ ] Defendant's usual residence
[ ] last known residence
[ ] Claimants' place of business
[ ] principal place of business
[ ] last known place of business
[ ] last known principal place of business
[ ] principal office of the partnership
[ ] principal office of the corporation
[ ] principal office of the company
[ ] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

[✓] other *(please specify)*

Defendants (4)-(5)'s email addresses, as provided in paragraphs 2 and 3 of the Consent Order.

I believe that the facts stated in this certificate of service are true.
I understand that proceedings for contempt of court may be brought against anyone 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.

Full name: HOLLY STEBBING

Signed: 

Claimants' solicitor

Position or office held: PARTNER

(If signing on behalf of firm or company)

Date: 0 8 | 0 7 | 2 0 2 6

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

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In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

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N244

Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter

Name of court	**Claim no.**
HIGH COURT OF JUSTICE, KING'S BENCH DIVISION	QB-2022-001098

Claimants' names (including ref.)
(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Defendants' names (including ref.)

(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE ELLENBOGEN ORDER (as defined below))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE ELLENBOGEN ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE ELLENBOGEN ORDER)
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(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE ELLENBOGEN ORDER)

(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE 'FAWLEY PLAN')

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Date	08-07-2026

1. What is your name or, if you are a legal representative, the name of your firm?

NORTON ROSE FULBRIGHT LLP

2. Are you a ☐Claimant ☐Defendant ☒Legal Representative

☐Other (please specify)

If you are a legal representative whom do you represent? CLAIMANTS (1) & (2)

3. What order are you asking the court to make and why?

We request that:
(1) the application should be dealt with at the third annual reviewing hearing listed on 22 July 2026, and
(2) an order should be made that the Avonmouth Plan in Schedule 1 of Mrs Justice Ellenbogen's order dated 29 January 2024 (as amended on 21 January 2025 and on 10 July 2025) (the **Ellenbogen Order**) shall be varied to reflect the correct boundaries of the land registered to the First Claimant, by striking through the existing Avonmouth Plan in Schedule 1 and adding the revised plan appended to the Eighth Witness Statement of Holly Stebbing [Exhibit HS8/420].

4. Have you attached a draft of the order you are applying for? ☒Yes ☐No

5. How do you want to have this application dealt with? ☒at a hearing ☐without a hearing

☐at a remote hearing

6. How long do you think the hearing will last? Is this time estimate agreed by all parties? 2 Hours 30 Minutes

☒Yes ☐No

7. Give details of any fixed trial date or period: Review hearing listed on 22 July 2026 with a time estimate of 2.5 hours

8. What level of Judge does your hearing need? High Court Judge

9. Who should be served with this application? Defendants (1)-(5)

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9. See paragraph 15 of the Ellenbogen Order

10. What information will you be relying on, in support of your application?

☒the attached witness statement

☐the statement of case

☐the evidence set out in the box below

We shall rely on the attached Eighth Witness Statement of Holly Stebbing, filed on 7 July 2026 in support of the third annual review hearing listed on 22 July 2026.

11. 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

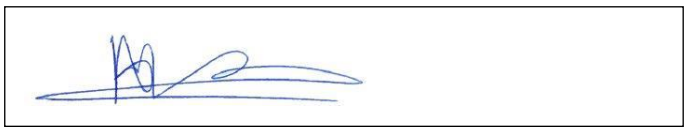
Statement of Truth

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.

☐ **I believe** that the facts stated in section 10 (and any continuation sheets) are true.

☒ **The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature



☐ Applicant

☐ Litigation friend (where applicant is a child or a Protected Party)

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

Date

Day	Month	Year
08	07	2026

Full name

HOLLY STEBBING

Name of applicant's legal representative's firm

NORTON ROSE FULBRIGHT LLP

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

PARTNER

Applicant's address to which documents should be sent.

Building and street

NORTON ROSE FULBRIGHT LLP

Second line of address

3 MORE LONDON RIVERSIDE

Town or city

LONDON

County (optional)

Postcode

S E 1 2 A Q

If applicable

Phone number

020 7283 6000

Fax phone number

DX number

DX 85 LONDON

Your Ref.

1001267389

Email

HOLLY.STEBBING@NORTONROSEFULBRIGHT.COM

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

Before [ ]

On 22 July 2026

B E T W E E N: **(1) ESSO PETROLEUM COMPANY, LIMITED**
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(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")

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(H) **ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE ELLENBOGEN ORDER)**

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(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN ENTER ONTO ANY OF THE

CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

[DRAFT] ORDER

RECITALS

UPON the Order of Linden J, dated 18 July 2023 (as amended on 21 July 2023 and 16 October 2023) granting the Claimants final injunctive relief until 11 July 2028 (the "Linden Order")

AND UPON the Order of Ellenbogen J, dated 29 January 2024, maintaining the relief granted in the Linden Order but superseding that Order following a review in light of the Supreme Court judgment in *Wolverhampton CC v London Gypsies & Travellers* [2023] UKSC 47 (the "Ellenbogen Order")

AND UPON the Order of Tipples J, dated 10 July 2024, following the first review hearing, making no order as to the continuing effect of the Ellenbogen Order

AND UPON the Order of Sweeting J, dated 10 July 2025, following the second review hearing, making no order as to the continuing effect of the Ellenbogen Order

AND UPON a further review hearing being listed on 22 July 2026 for a review of the Ellenbogen Order, pursuant to paragraph 8 of the Ellenbogen Order (the "Review Hearing")

AND UPON hearing Timothy Morshead KC for the Claimants and the Defendants [not] appearing

AND UPON reading the evidence and the Claimants' skeleton argument

AND UPON the Court being satisfied that proper and effective service of the Ellenbogen Order, pursuant to paragraph 12 of the Ellenbogen Order, and the documents prepared for the Review Hearing, pursuant to the steps set out in paragraph 15 of the Ellenbogen Order, had been effected on all Defendants

AND UPON the Court reviewing the Ellenbogen Order and being satisfied that, in respect of the First to Third Defendants, there had been no material change in circumstances warranting the setting aside of the relief granted in the Ellenbogen Order

AND UPON the Claimants having received assurances from Diana Hekt [and Paul Barnes] that [she/they does/do] not intend to breach any injunction covering the Sites (as defined in the Ellenbogen Order) [but not having received any response from Paul Barnes]

IT IS ORDERED THAT:

1. Subject to the following provisions of this Order, no order shall be made as to the continuing effect of the Ellenbogen Order.

2. In view of the assurance given by her mentioned above, expiring on 31 July 2027 or the date of the next annual review hearing, the Fifth Defendant (Diana Hekt) is not to be subject to the injunctions set out in the Ellenbogen Order, without further order.

3. [In view of the assurance given by him mentioned above, expiring on 31 July 2027 or the date of the next annual review hearing, the Fourth Defendant (Paul Barnes) is not to be subject to the injunctions set out in the Ellenbogen Order, without further order / The Fourth Defendant (Paul Barnes) is not to be subject to the injunctions set out in the Ellenbogen Order, but the Claimants have liberty to apply to make him subject to those injunctions in the absence of receiving assurances from him to like effect as those given by him in July 2024 and lasting until 30 June 2025.]

4. The Ellenbogen Order be amended (the "Amended Ellenbogen Order") to reflect the change to the boundary of the Avonmouth Terminal described in the Claimants' evidence mentioned above.

5. The Amended Ellenbogen Order shall be notified to the First to Third Defendants pursuant to paragraph 12 of the Ellenbogen Order, except that in relation to paragraph 12.1 of the Ellenbogen Order copies of the Amended Ellenbogen Order may be fixed by a method other than in clear transparent sealed containers. This Order shall be notified to the First to Third Defendants pursuant to the steps in paragraph 15.2-15.3 of the Ellenbogen Order.

6. The Amended Ellenbogen Order and this Order shall be served on the Fourth and Fifth Defendants by email, pursuant to paragraphs 2 and 3 of the Consent Order sealed on 19 July 2023.

Dated 22 July 2026

Amended under the Slip Rule CPR 40.12 dated 21st January 2025 and approved by Mrs Justice Ellenbogen

And further amended pursuant to the Order of Mr Justice Sweeting, dated 10 July 2025

And further amended pursuant to the order of [ ], dated [ ] July 2026

IN THE HIGH COURT OF JUSTICE **CLAIM NO. QB-2022-001098**
KING'S BENCH DIVISION
BEFORE: THE HONOURABLE MRS JUSTICE ELLENBOGEN DBE
On 29 January 2024

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED

(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
(E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
~~(G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) 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 1TX (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, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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

(5) DIANA HEKT

Defendants

DRAFT ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY 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 ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANT

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible.

If you disobey this Order you may be found guilty of contempt of court and you may be sent to prison or your assets seized.

You have the right to apply to the court to vary or discharge this Order (which is explained below).

RECITALS

FOLLOWING the order of Linden J dated 18 July 2023 (as amended under the Slip Rule on 21 July 2023 and 16 October 2023) (the **"Linden Order**")

AND FOLLOWING the judgment of the Supreme Court in *Wolverhampton CC v London Gypsies & Travellers* [2023] UKSC 47 being handed down on 29 November 2023

AND UPON the Claimants' application, dated 13 December 2023:

(1) pursuant to paragraph 9 of the Linden Order, for a review of that order in light of the above judgment of the Supreme Court; and

(2) for a variation of the Linden Order (a) to remove the Hartland Park site from the scope of that order, and (b) to amend the area comprising the Birmingham Terminal, as shown in the 'Birmingham Plan' attached to that order.

AND FOLLOWING the order of Freedman J dated 14 December 2023, subsequent to which no written representations have been received in accordance with paragraphs 2 and 3 of that order

AND UPON reading the Second Witness Statement of Holly Stebbing dated 13 December 2023

AND UPON reading the Claimants' skeleton argument dated 12 December 2023

AND UPON the Court being satisfied that it is appropriate to consider the Claimants' application on the papers

AND UPON the Court further being satisfied that:

(1) the judgment of the Supreme Court has marked no material change in the law in relation to injunctions of the nature granted by Linden J; and

(2) the removal of the Hartland Park site from the scope of the Linden Order and the amendment of the Birmingham Plan are appropriate, for the reasons set out by the Claimants

IT IS ORDERED THAT:

NAMED DEFENDANTS

1 In view of the assurances given by them to Linden J and recited in the Linden Order, Paul Barnes and Diana Hekt, respectively the Fourth and Fifth Defendants, are not to be subject to the injunctions set out in paragraphs 2, 3 and 4 below, without further order.

THE INJUNCTIONS

2 Until 11 July 2028, or further order in the meantime, the First Defendant must not:

1. enter or remain upon any part of the First Claimant's properties ("the Sites") without the consent of the First Claimant at:

(1) the Oil Refinery and Jetty at the Petrochemical Complex, Marsh Lane, Southampton SO45 1TX (as shown for identification edged red and green but excluding those areas edged blue on the attached 'Fawley Plan').

(2) Hythe Terminal, New Road, Hardley, SO45 3NR (as shown for identification edged red on the attached 'Hythe Plan').

(3) Avonmouth Terminal, St Andrews Road, Bristol BS11 9BN (as shown for identification edged red on the attached 'Avonmouth Plan').

(4) Birmingham Terminal, Wood Lane, Birmingham B24 8DN (as shown for identification edged red on the attached, revised 'Birmingham Plan').

(5) Purfleet Terminal, London Road, Purfleet, Essex RM19 1RS (as shown for identification edged red and brown on the attached 'Purfleet Plan').

(6) West London Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ (as shown for identification edged red on the attached 'West London Plan').

(7) Alton Compound, Pumping Station, A31, Hollybourne (as shown for identification edged red on the attached 'Alton Compound Plan')

all such plans comprising Schedule 1 to this Order. For the avoidance of doubt, the Sites no longer include Hartland Park Logistics Hub, Ively Road, Farnborough (as shown for identification edged red on the 'Hartland Park Plan' attached to the Linden Order);

2. damage any part of any of the Sites;

3. affix themselves or any person or object to any part of any of the Sites;

4. erect any structures on any part of any of the Sites;

3 Until 11 July 2028, or further order in the meantime, the Second Defendant must not without the consent of the First Claimant or Second Claimant:

1. enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TX ("the Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');

2. damage any part of the Chemical Plant;

3. affix themselves or any person or object at the Chemical Plant;

4. erect any structures on any part of the Chemical Plant;

4 Until 11 July 2028, or further order in the meantime, the Third Defendant must not enter onto the Claimants' property and 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, or Hartland Park Logistics Hub) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

VARIATION OR DISCHARGE OF THIS ORDER

5 The Defendants may apply to vary or discharge this Order at any time upon giving not less than 3 clear days' notice to the Claimant's solicitors, Norton Rose Fulbright LLP, by emailing ExxonMobil.Service@nortonrosefulbright.com. Any evidence to be relied upon in support of such an application must be communicated in writing to the Claimants' solicitors at least 2 clear days before the hearing.

6 Any person applying to vary or discharge this Order must provide his or her full name and address, an address for service.

7 The Claimants have liberty to apply.

REVIEW HEARINGS

8 The injunctions made herein shall be reviewed on each anniversary of the Linden Order (that is, on 18 July each year, or so close thereto as is convenient having regard to the Court's list and the need for such review to take place on a working day) with a time estimate of 2.5hrs (plus reading time). The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing.

9 The Claimants shall file and serve a trial bundle not less than 7 days before the review hearing.

10 Skeleton arguments on behalf of any represented party shall be lodged and exchanged, with bundle of authorities, not less than 3 days before the review hearing.

INTERPRETATION OF THIS ORDER

11 A Defendant who is ordered not to do something must not do it him/herself/themselves or in any other way. He/she/they must not do it through another acting on his/her/their behalf or on his/her/their instructions or with his/her/their encouragement.

SERVICE OF THIS ORDER

12 Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of this Order shall be effected on the First, Second and Third Defendants as follows:

1. fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that a copy of the Order may be obtained from the Claimants' solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email: ExxonMobil.Service@nortonrosefulbright.com; and (b) that a copy of the Order may be viewed at the website referred to in Paragraph 12.2 of this Order;

2. posting the Order on the following website: https://www.exxonmobil.co.uk/Company/Overview/UK-operations;

3. fixing a minimum of four large warning notices in the forms annexed to this Order at Schedule 2 in conspicuous places around the perimeters of the Sites. Such notices must be a minimum of A2 size; and

4. sending an email to each of the following email addresses: (i) with the information that a copy of the Order may be viewed at the website referred to in Paragraph 12.2 of this Order; and/or (ii) enclosing a copy of this Order (whether by Mimecast link or otherwise):

   (a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

13 Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), this Order shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in Paragraph 12 above have been completed.

14 Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 12 of this Order shall stand as good service of the Order on the First, Second and Third Defendants.

SERVICE OF OTHER DOCUMENTS

15 Pursuant to CPR 6.15 and 6.27 and 81.4(2)(c) and (d), service of any other documents in these proceedings by the Claimants ("the Further Documents") shall be effected on the First, Second and Third Defendants as follows:

~~1. fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that copies of the Further Documents may be obtained from the Claimants' solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email: ExxonMobil.Service@nortonrosefulbright.com; and (b) that copies of the Further Documents may be viewed at the website referred to in Paragraph 15.2 of this Order;~~

2. posting the Further Documents on the following website: https://www.exxonmobil.co.uk/Company/Overview/UK-operations; and

3. sending an email to each of the following email addresses: (i) with the information that copies of the Further Documents may be viewed at the website referred to in Paragraph 15.2 of this Order; and/or (ii) enclosing copies of the Further Documents (whether by Mimecast link or otherwise):

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

4. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the Further Documents shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in Paragraph 15 above have been completed.

5. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 15 of this Order shall stand as good service of the Further Documents on the First, Second and Third Defendants.

6. Pursuant to CPR 81.4(2)(c) and (d), the Court dispenses with the requirement for personal service in relation to the Fifth Defendant.

COSTS

16 No order as to costs.

THE COURT

17 The Court will provide sealed copies of this Order for service to the Claimants' solicitors, whose details are set out in Paragraphs 12.1 ~~and 15.1~~ of this Order.

18 All communications to the Court about this Order should be sent to:

- King's Bench Division, Royal Courts of Justice, Strand WC2A 2LL
- The office is open between 10.00am and 4.30pm Monday to Friday (except Bank Holidays)
- The telephone number is 020 3936 8957
- The email address is kbjudgeslistingoffice@justice.gov.uk

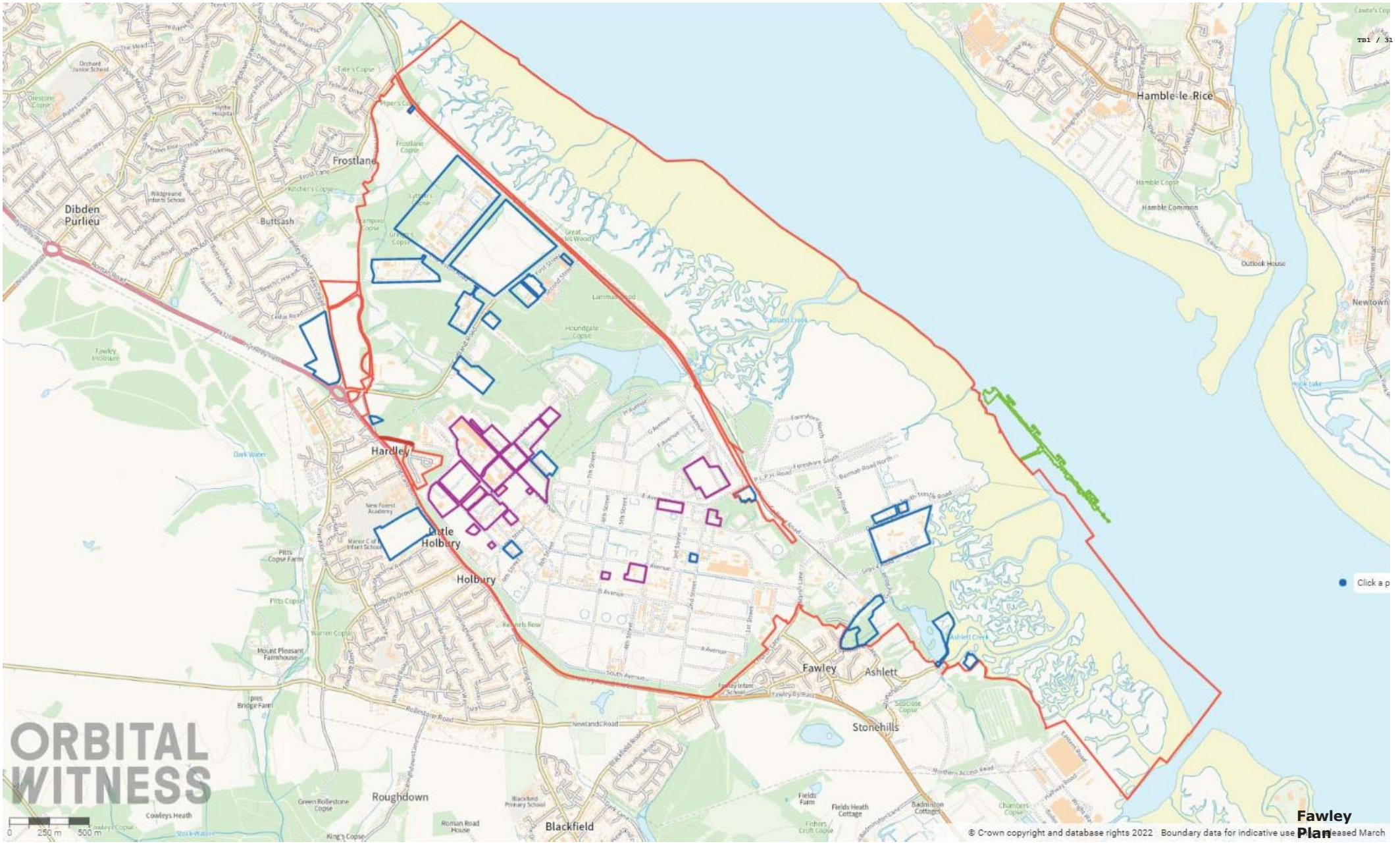
SERVICE OF THE ORDER

19 This Order shall be served by the Claimants on all Defendants.

29 January 2024

SCHEDULE 1 - Plans

1. Fawley Plan
2. Hythe Plan
3. Avonmouth Plan
4. Birmingham Plan
5. Purfleet Plan
6. West London Plan
7. Alton Compound Plan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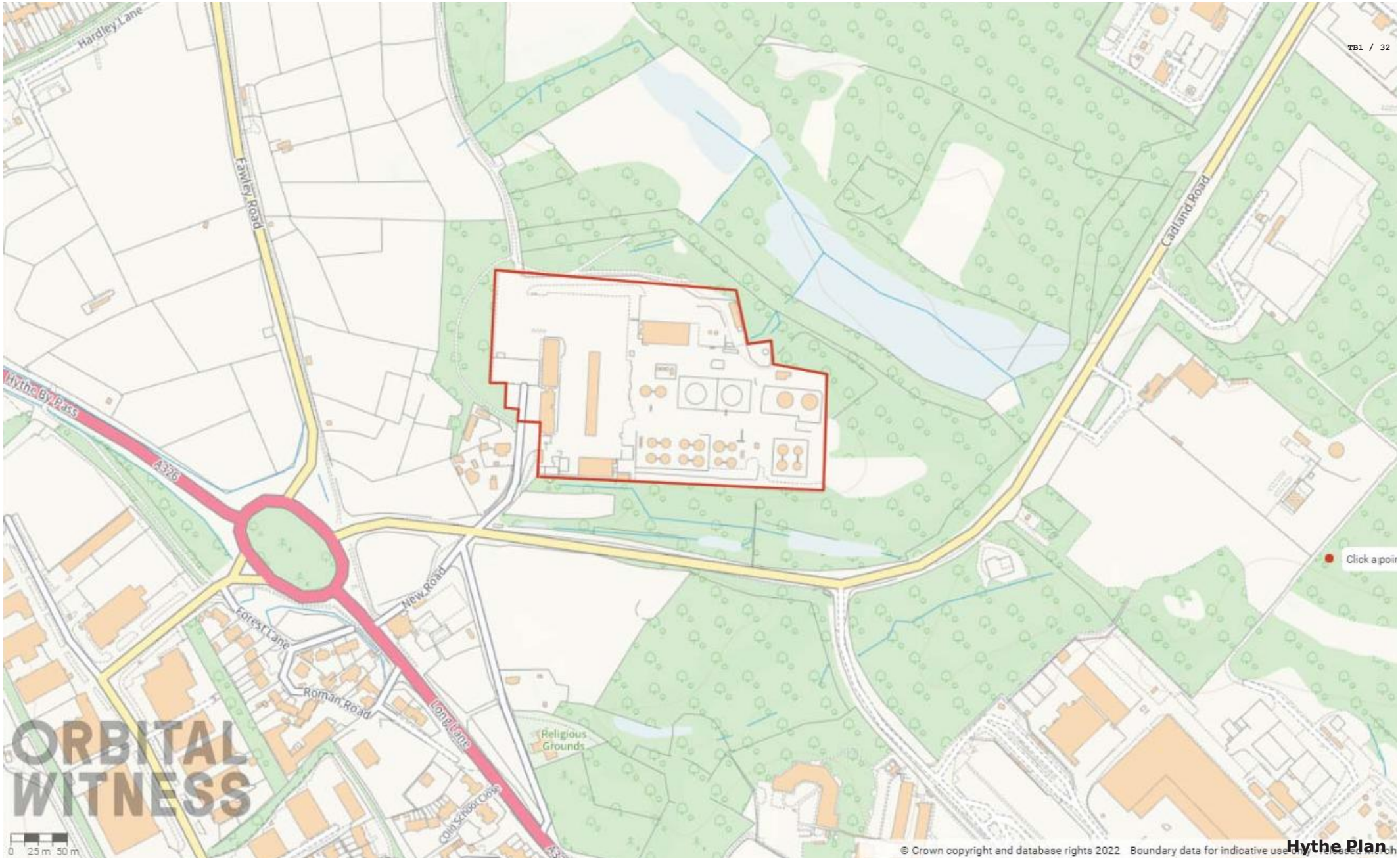
Frostlane
Dibden Purlieu
Buttsash
Hardley
Little Holbury
Holbury
Fawley
Ashlett
Stonehills
Roughdown
Blackfield
Newtown
ORBITAL WITNESS
0 250 m 500 m
© Crown copyright and database rights 2022 Boundary data for indicative use
Fawley Plan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Fawley Road
Cadland Road
Hythe By Pass
A326
New Road
Forest Lane
Roman Road
Long Lane
Religious Grounds
Cold School Close
ORBITAL WITNESS
0 25 m 50 m
TB1 / 32
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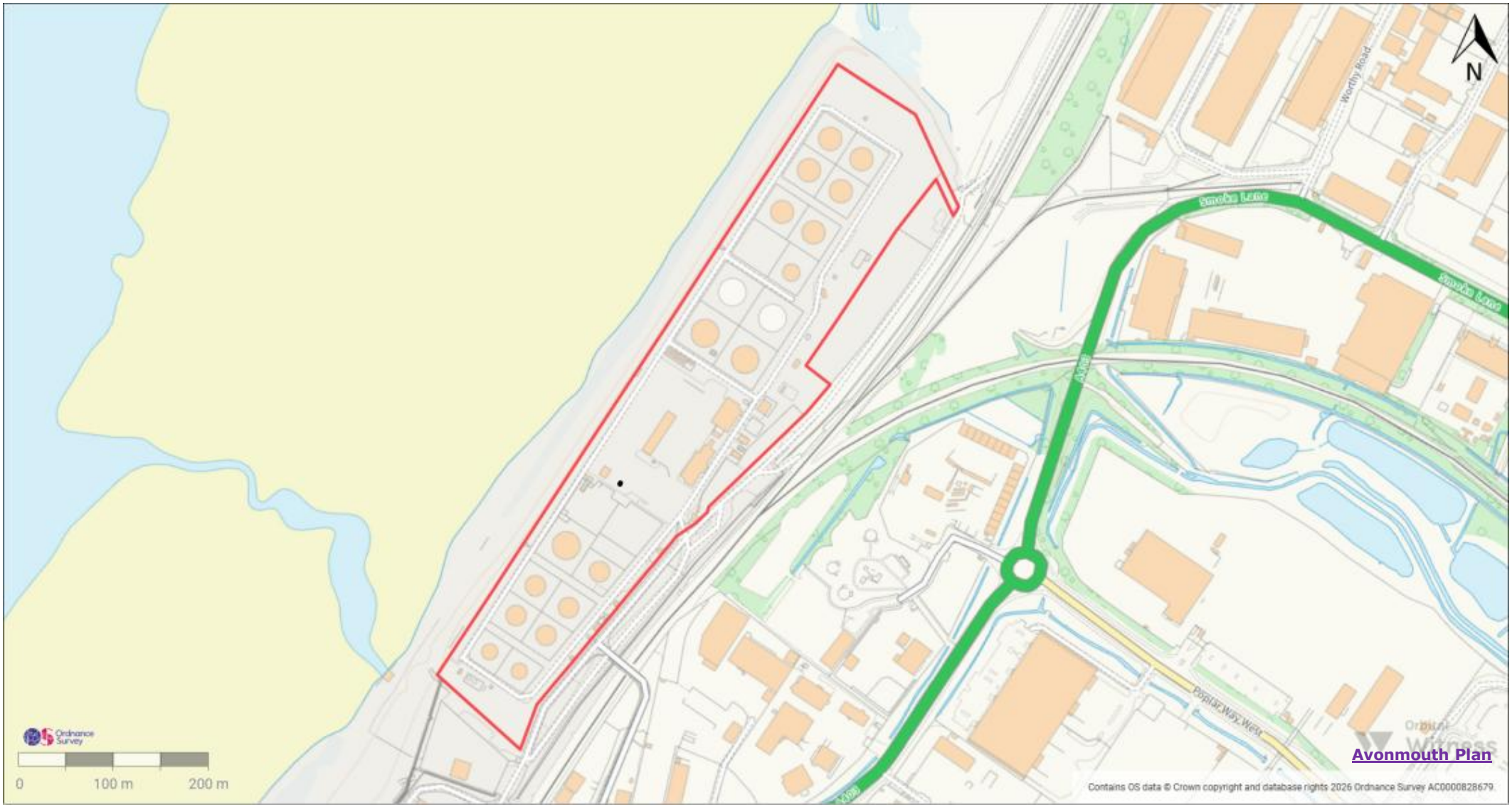
© Crown copyright and database rights 2022 Boundary data for indicative use only

Hythe Plan

Avonmouth Plan



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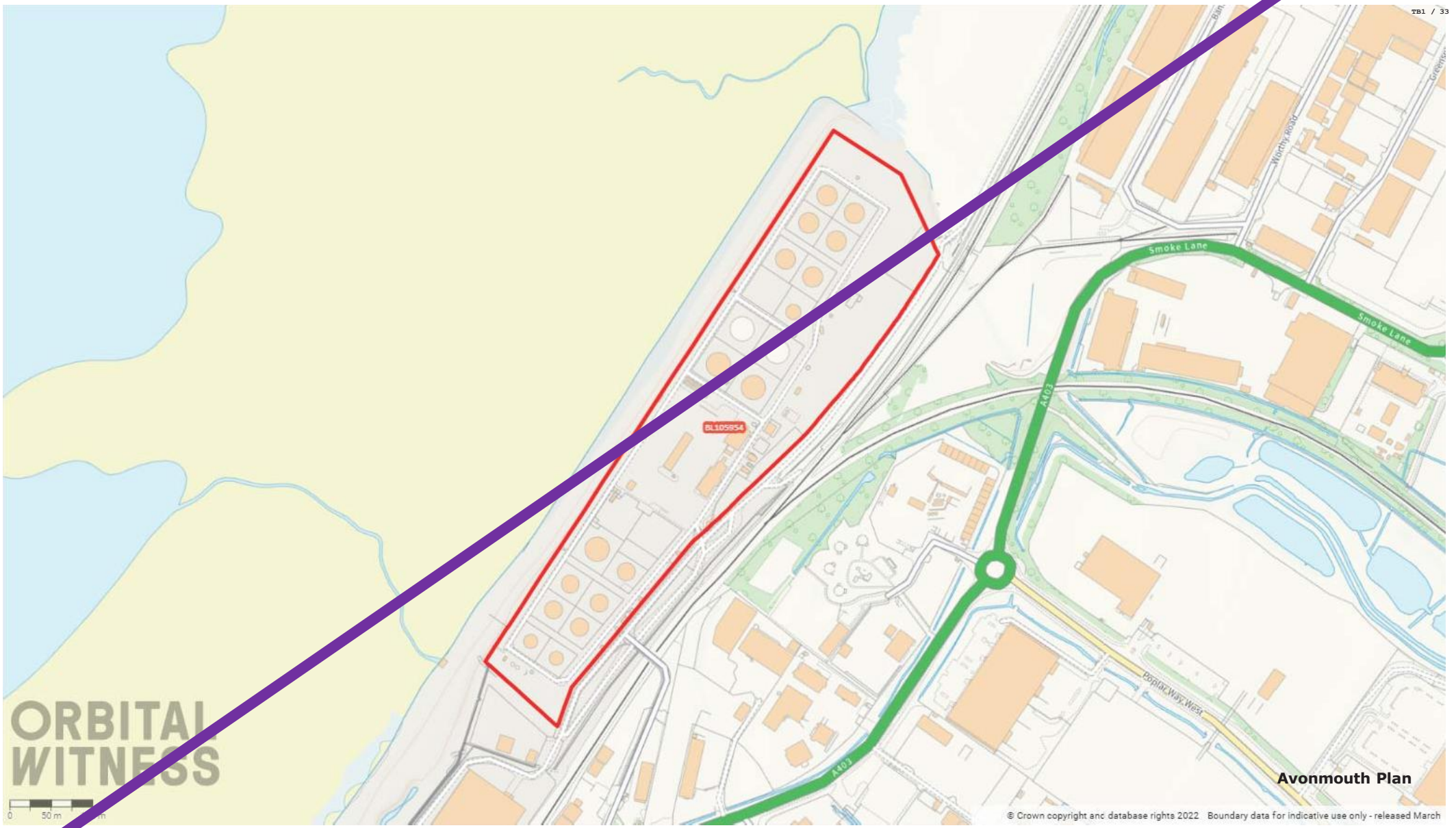
TB1 / 33
Smoke Lane
Smoke Lane
A403
A403
Poplar Way West
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ORBITAL WITNESS
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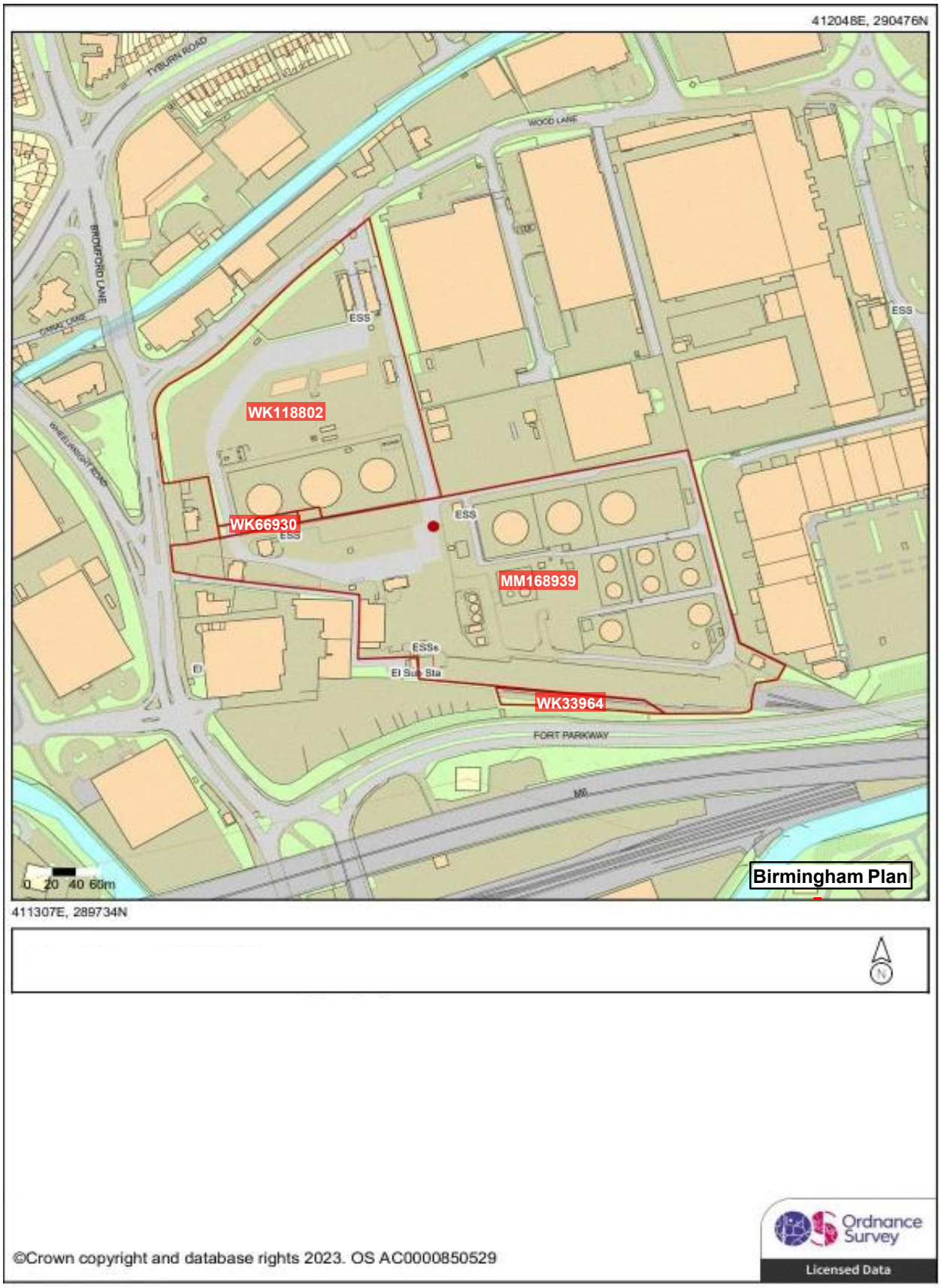
50 m
Avonmouth Plan
© Crown copyright and database rights 2022 Boundary data for indicative use only - released March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FORT PARKWAY
M6
0 20 40 60m
Birmingham Plan
411307E, 289734N
©Crown copyright and database rights 2023. OS AC0000850529
Ordnance Survey
Licensed Data


TB1 / 36
Harris Academy Riverside
Purfleet Baptist Church
London Road Purfleet
EX869956
Purfleet Thames Terminal
ORBITAL WITNESS
PurfleetPlan
0 25 m 50 m
© Crown copyright and database rights 2022 Boundary data for indicative use only - released March


TB1 / 37
Purfleet Baptist Church
London Road Purfleet
Linden Close
Lockyer Road
Purfleet Thames Terminal
ORBITAL WITNESS
0 25 m 50 m
Purfleet Plan B
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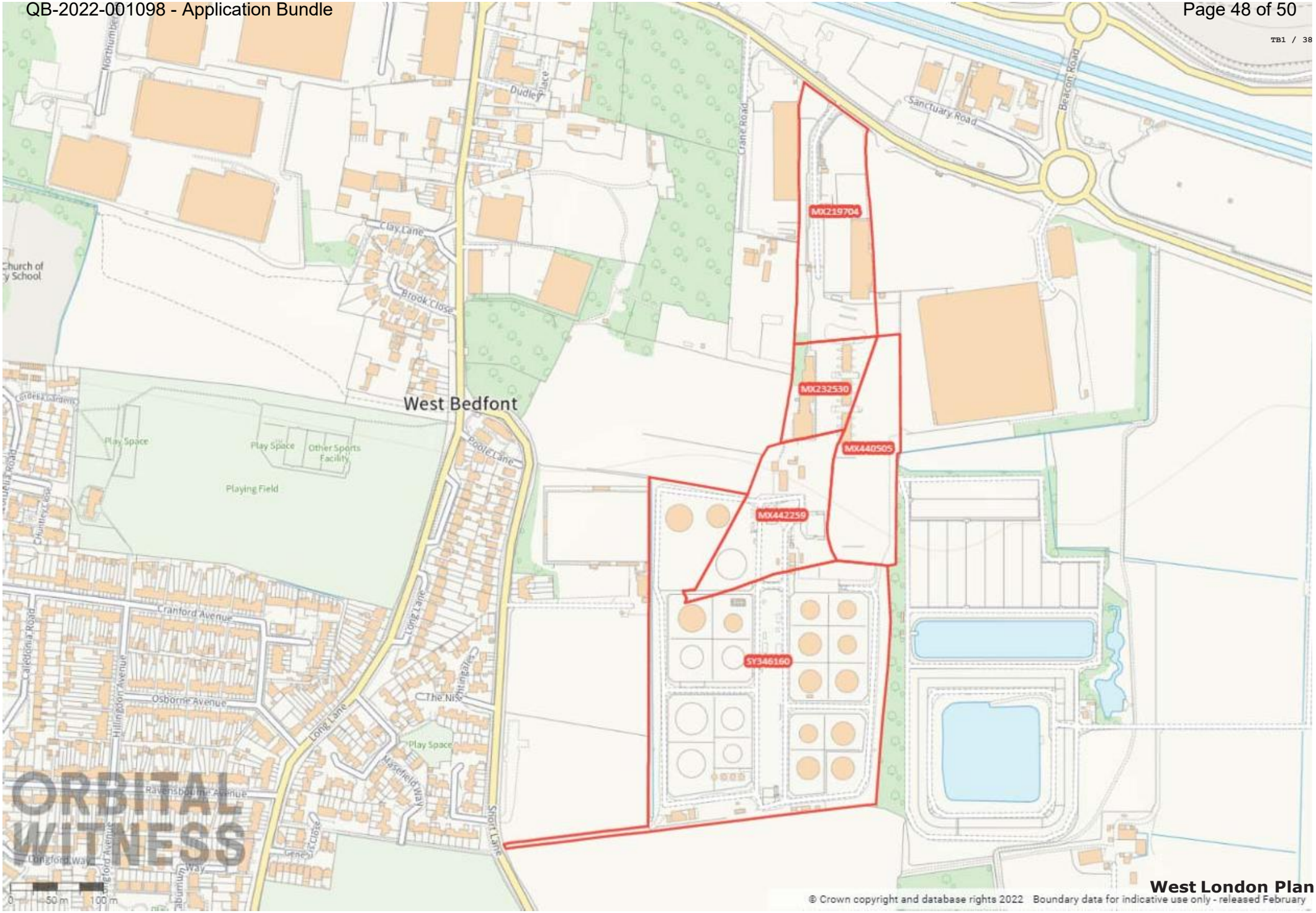

West London Plan

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Alton Compound Plan

SCHEDULE 2 – Warning Notice

ESSO PETROLEUM COMPANY, LIMITED (First Claimant) EXXONMOBIL CHEMICAL LIMITED (Second Claimant)
Important Notice
High Court of Justice – Claim No QB-2022-001098

On 29 January 2024, an injunction was made by the High Court of Justice in the proceedings referred to above concerning this Site.

The Order prohibits entering or remaining, damaging, affixing any person or object, erecting structures and/or obstructing vehicular access.

The persons affected by the Order are Persons Unknown acting in connection with the Extinction Rebellion campaign and/or the Just Stop Oil campaign or other environmental campaign, (and other Defendants who are named in the proceedings).

Anyone in breach of the injunction will be in contempt of court and may be imprisoned, fined or have their assets seized. Any person who knows of this Order and does anything which permits the Defendant or any of them to breach the terms of the Order may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

This means that you must not go beyond this notice and enter this site without permission.
This also means that you must not obstruct any vehicular entrance or exit.
If you do, you may be sent to prison or have your assets seized.

Copies of the Court documents may be viewed at www.exxonmobil.co.uk/Company/Overview/UK-operations.

Copies may also be obtained from ExxonMobil.Service@nortonrosefulbright.com.

The injunction applies to the following Sites:-

- The Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Fawley, Southampton SO45 1TX
- Hythe Oil Terminal, New Road, Hardley SO45 3NR
- Avonmouth Oil Terminal, St Andrews Road, Bristol BS11 9BN
- Birmingham Oil Terminal, Wood Lane, Birmingham B24 8DN
- Purfleet Oil Terminal, London Road, Purfleet, Essex RM19 1RS
- West London Oil Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ
- Alton Compound, Pumping Station, A31, Holybourne

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER (as defined below))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE ORDER)
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE ORDER)
(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 ORDER)
(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 ORDER)
~~G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE ORDER)

(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER)

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

If you the within named Fourth Defendant disobey the Undertaking set out in Schedule 1 of this order or instruct (which includes training, coaching, teaching or educating) others to do the acts which you have undertaken not to do, 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 Fourth Defendant to breach the Undertaking set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE FOURTH DEFENDANT

This order prohibits you from doing the acts set out in the Undertaking at Schedule 1 below.

You should read it very carefully.

UPON the **Fourth Defendant** giving the Undertaking to the Court as set out in Schedule 1 below;

UPON the Court, [despite non-attendance from the Fourth Defendant at the hearing on 22 July 2026,] accepting the Undertaking from the Fourth Defendant.

AND UPON the injunctions (the **Injunctions**) granted pursuant to the order of Ellenbogen J dated 29 January 2024 (as amended under the Slip Rule on 21 January 2025 and by the order of Sweeting J dated 10 July 2025) (the **Order**) for a period of five years until 11 July 2028, subject to annual review hearings;

IT IS ORDERED THAT:

1. The Fourth Defendant shall be bound by the Undertaking set out in Schedule 1 to this order.

2. There be no order as to costs.

SCHEDULE 1

UNDERTAKING TO THE COURT

The **Fourth Defendant** undertakes to the Court promising as follows:

1. Not to:

   (a) enter or remain on any part of the Sites (as defined above) without the consent of the First Claimant;

   (b) damage any part of any of the Sites;

   (c) affix themselves or any person or object to any part of any of the Sites; or

   (d) erect any structures on any part of any of the Sites.

2. Not to:

   (a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TX (the "Chemical Plant") (as shown for identification edged purple on the 'Fawley Plan' (as defined above));

   (b) damage any part of the Chemical Plant;

   (c) affix themselves or any person or object at the Chemical Plant; or

   (d) erect any structures on any part of the Chemical Plant.

3. Not to enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THIS UNDERTAKING UNTIL THE LATER OF 31 JULY 2027 OR THE DATE OF THE 2027 ANNUAL REVIEW HEARING

STATEMENT

I understand the Undertaking that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.

_____

Paul Barnes

Fourth Defendant

_____ 2026

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

(1) ESSO PETROLEUM COMPANY, LIMITED
(2) EXXONMOBIL CHEMICAL LIMITED

Claimants

-and-

(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 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER (as defined below))
(B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'HYTHE PLAN' ATTACHED TO THE ORDER)
(C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'AVONMOUTH PLAN' ATTACHED TO THE ORDER)
(D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'BIRMINGHAM PLAN' ATTACHED TO THE ORDER)
(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 ORDER)
(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 ORDER)
~~G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE 'ALTON COMPOUND PLAN' ATTACHED TO THE ORDER)

(2) 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 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE 'FAWLEY PLAN' ATTACHED TO THE ORDER)

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND 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
(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

If you the within named Fifth Defendant disobey the Undertaking set out in Schedule 1 of this order or instruct (which includes training, coaching, teaching or educating) others to do the acts which you have undertaken not to do, 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 Fifth Defendant to breach the Undertaking set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE FIFTH DEFENDANT

This order prohibits you from doing the acts set out in the Undertaking at Schedule 1 below.

You should read it very carefully.

UPON the **Fifth Defendant** giving the Undertaking to the Court as set out in Schedule 1 below;

UPON the Court, [despite non-attendance of the Fifth Defendant at the hearing on 22 July 2026,] accepting the Undertaking from the Fifth Defendant.

AND UPON the injunctions (the **Injunctions**) granted pursuant to the order of Ellenbogen J dated 29 January 2024 (as amended under the Slip Rule on 21 January 2025 and by the order of Sweeting J dated 10 July 2025) (the **Order**) for a period of five years until 11 July 2028, subject to annual review hearings;

IT IS ORDERED THAT:

1. The Fifth Defendant shall be bound by the Undertaking set out in Schedule 1 to this order.

2. There be no order as to costs.

SCHEDULE 1

UNDERTAKING TO THE COURT

The **Fifth Defendant** undertakes to the Court promising as follows:

1. Not to:

   (a) enter or remain on any part of the Sites (as defined above) without the consent of the First Claimant;

   (b) damage any part of any of the Sites;

   (c) affix themselves or any person or object to any part of any of the Sites; or

   (d) erect any structures on any part of any of the Sites.

2. Not to:

   (a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TX (the "Chemical Plant") (as shown for identification edged purple on the 'Fawley Plan' (as defined above));

   (b) damage any part of the Chemical Plant;

   (c) affix themselves or any person or object at the Chemical Plant; or

   (d) erect any structures on any part of the Chemical Plant.

3. Not to enter onto the Claimants' property and 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) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THIS UNDERTAKING UNTIL THE LATER OF 31 JULY 2027 OR THE DATE OF THE 2027 ANNUAL REVIEW HEARING

STATEMENT

I understand the Undertaking that I have given, and that if I break any of my promises to the Court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.

_____

Diana Hekt

Fifth Defendant

_____ 2026