

B E T W E E N :

HEATHROW AIRPORT LIMITED

Claimant

-and-

(1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT’S CONSENT) UPON ‘LONDON HEATHROW AIRPORT’ AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM

(2) – (26) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND BY THE ORDER OF MR JUSTICE RITCHIE DATED 14 FEBRUARY 2025, AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS OF CLAIM

Defendants

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HEARING DATE: 23 JULY 2025

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IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KINGS BENCH DIVISION

Before:

On: 23 July 2025

B E T W E E N:

HEATHROW AIRPORT LIMITED

Claimant

-and-

(1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT’S CONSENT) UPON ‘LONDON HEATHROW AIRPORT’ AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM

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Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the Injunction made by the Order dated 9 July 2024 of Mr Justice Julian Knowles (“**the Injunction**”)

AND UPON the Orders dated 11 December 2024 of Mr Justice Dexter Dias (“**the Dias J Order**”) and dated 14 February 2025 of Mr Justice Ritchie (“**the Ritchie J Order**”) joining the 2nd to 26th Defendants as named Defendants to these proceedings

AND UPON the review hearing which took place on 23 July 2025 (as listed pursuant to paragraph 3 of the Injunction)

AND UPON READING the witness evidence filed by the Claimant in support of the continuation of the Injunction, in the form of: (i) the First Witness Statement of Philip Keith Spencer; and (ii) the First Witness Statement of Tonia Fielding, both dated 7 July 2025

AND UPON HEARING Mr Tom Roscoe, Counsel for the Claimant [and there being no other attendance]

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted in the Injunction (as extended to apply to the 2nd – 26th Defendants by the Dias J Order and the Ritchie J Order)

IT IS ORDERED THAT:

1. The Injunction shall remain in full force and effect, subject to the variations thereto set out in the schedule to this Order to reflect the effect of the Dias J Order and the Ritchie J Order (and subject to review, as provided for in paragraph 3 of the Injunction).
2. The Court will provide sealed copies of this order to the Claimant’s solicitors for service or notification in accordance with paragraphs 9 and 14 of the Injunction (as varied in the schedule hereto).

Dated: 23 July 2025

Service:

The Court provided sealed copies of this order to the serving party:

Bryan Cave Leighton Paisner
Governor's House
5 Laurence Pountney Hill
London
EC4R 0BR

akhil.markanday@bclplaw.com

phil.spencer@bclplaw.com

Solicitors for the Claimant

VARIED PURSUANT TO THE ORDER OF [] DATED 23 JULY 2025

IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KINGS BENCH DIVISION

Before The Honourable Mr Justice Julian Knowles

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

-and-

(1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT’S CONSENT) UPON ‘LONDON HEATHROW AIRPORT’ AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM

(2) – (26) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND BY THE ORDER OF MR JUSTICE RITCHIE DATED 14 FEBRUARY 2025, AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS OF CLAIM

Defendants

VARIED ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

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

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

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

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

AND UPON HEARING Leading Counsel and Junior Counsel for the Claimant

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

AND UPON the Orders dated 11 December 2024 of Mr Justice Dexter Dias ("the Dias J Order") and dated 14 February 2025 of Mr Justice Ritchie ("the Ritchie J Order") joining the 2nd to 26th Defendants as named defendants to these proceedings

AND UPON the first annual review of this Order having taking place on 23 January 2025 in accordance with paragraph 3 herein.

IT IS ORDERED THAT:

INJUNCTION

1. Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 ("Plan A").
2. In respect of paragraph 1, the Defendants must not (a) do it himself/herself/themselves in any other way (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
3. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the

Court's list) with a time estimate of 1 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing.

VARIATION

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

SERVICE AND NOTIFICATION

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

9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to the **First Defendants** by the Claimant carrying out each of the following steps:
 - 9.1 Uploading a copy of the Order on to the following website:
www.heathrow.com/injunction
 - 9.2 Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
 - 9.3 Affixing a copy of the Order in A4 size in a clear plastic envelope at each of the locations shown with a red dot on Plan B.
 - 9.4 Affixing warning notices of A2 size at those locations marked with a red dot on Plan B, substantially in the form of the notice at Schedule 5.
10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to the **First Defendants** of any further applications shall be effected by the Claimant carrying out each of the following steps:
 - 10.1 Uploading a copy of the application on to the following website:
www.heathrow.com/injunction
 - 10.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
 - 10.3 Affixing a notice at these locations marked with a red dot on Plan B stating that the application has been made and where it can be accessed in hard copy and online.
11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to the **First Defendants** may be effected by carrying out the steps set out in paragraphs 10.1 and 10.2 only.
12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8.3, 9.3 and 10.3, effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.
14. Pursuant to CPR r.6.15, 6.27 and 81.4(2)(c), it is directed that service of this Order and any further document(s) to be served in these proceedings (including any contempt application in respect of alleged breaches of the Injunction, and any notice of further hearing) shall be effected on Defendants 2 – 26 as follows:
 - 14.1 by first class post to the addresses listed in the Re-Amended Particulars of Claim dated 18 February 2025;
 - 14.2 in respect of any such Defendant who the Claimant has reasonable cause to believe (after due enquiry) is in prison (whether on remand or otherwise), the Claimant shall (in addition) seek to establish the prison that they are in (via the Government's 'find a prisoner' service or otherwise) and effect service by first class post to that prison;
 - 14.3 in either case, by email to juststopoil@protonmail.com; juststopoilpress@protonmail.com; and info@juststopoil.org; and
 - 14.4 by posting copies on to the following website: www.heathrow.com/injunction.
15. Copies of the documents emailed or posted in accordance with paragraphs 14.3 and 14.4 above shall be redacted to remove the addresses of the Defendants.
16. The steps taken pursuant to paragraph 14 above shall be verified by a certificate of service and/or witness statement, and deemed service shall occur (in respect of each such Defendant) seven working days after the taking of the last relevant step in respect of such Defendant.
17. In the event that any of Defendants 2 – 26 provides in writing to the Claimant's solicitors (whose details are set out below) a postal or an email address for service, service of all documents shall be by first class post or email to such address (as appropriate) and the ordinary provisions as to in the Civil Procedure Rules (including as to the deemed date) shall apply.

FURTHER DIRECTIONS

18. Liberty to apply.

COSTS

19. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

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

- (1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

- (2) Phil Spencer

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

Dated: 9 July 2024

Varied: 23 July 2025

SCHEDULE 1 – UNDERTAKINGS

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

SCHEDULE 2 – PLAN A

SCHEDULE 3 – EMAIL ADDRESSES

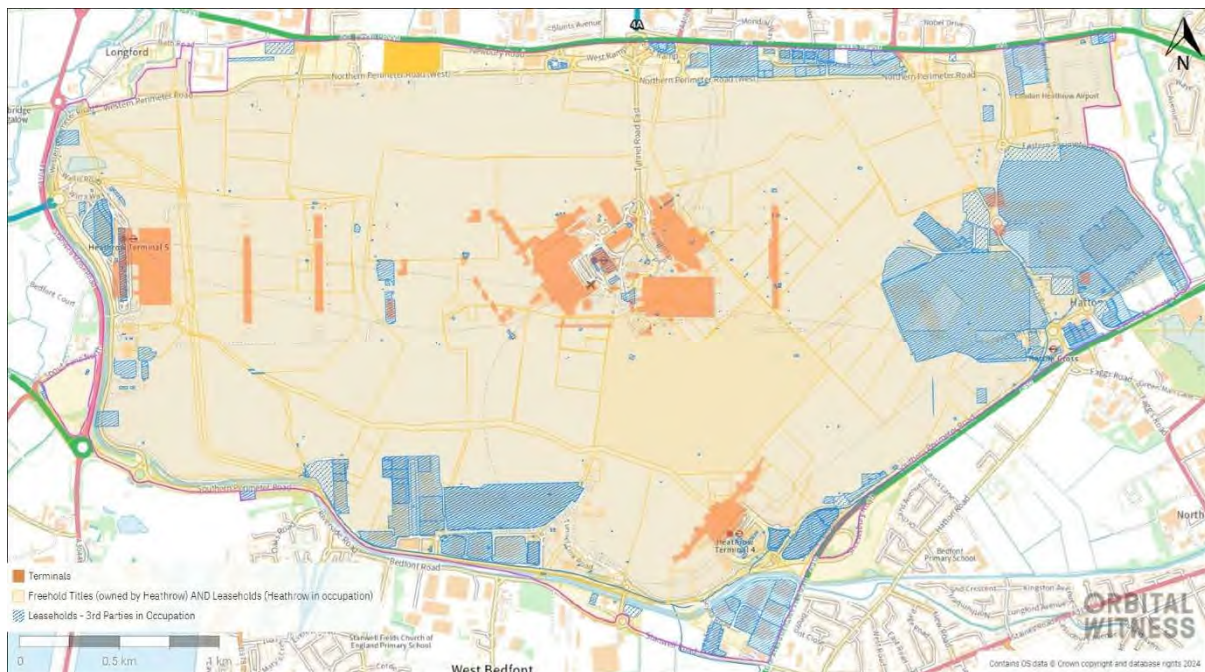
1. juststopoil@protonmail.com
2. juststopoilpress@protonmail.com
3. info@juststopoil.org

SCHEDULE 4 – PLAN B

SCHEDULE 5 – NOTICE
WARNING – NOTICE OF COURT INJUNCTION

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

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



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

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

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

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



Claim Form

In the High Court of Justice King's Bench Division	
Fee Account no.	PBA0076972
Help with Fees - Ref no. (if applicable)	H W F - -

Amended pursuant to the Order of Mr Justice Dexter Dias dated 11 December 2024 and further amended pursuant to the Order of Mr Justice Ritchie dated 14 February 2025

You may be able to issue your claim online which may save time and money. Go to www.moneyclaim.gov.uk to find out more.

For court use only	
Claim no.	KB - 2024 - 002210
Issue date	

Claimant(s) name(s) and address(es) including postcode
Heathrow Airport Limited (company no. 01991017)
The Compass Centre, Nelson Road, Hounslow, Middlesex, TW6 2GW



Defendant(s) name and address(es) including postcode
(1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON LONDON HEATHROW AIRPORT AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE **RE-AMENDED PARTICULARS OF CLAIM**

(2) - (26) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND BY THE ORDER OF MR JUSTICE RITCHIE DATED 14 FEBRUARY 2025, AND WHOSE NAMES ARE SET OUT IN SCHEDULE 1 TO THIS CLAIM FORM

KB-2024-002210
DATE OF ISSUE
07/07/2024

Brief details of claim

The Claimant seeks an injunction to restrain the Defendants from acts of trespass or nuisance on the Claimant's land, as more particularly described in the **re-amended** Particulars of Claim.

Value

This is a non-monetary claim

Defendant's name and address for service including postcode

N/A

	£
Amount claimed	
Court fee	626
Legal representative's costs	TBA
Total amount	

Claim no.

KB - 2024 - 002210

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

King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL

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.	
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Particulars of Claim

- ☒ attached
- ☐ to follow

Statement of truth

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

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

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

Signature

DocuSigned by:
Philip Spencer
656A85CC3CB44E1...

- ☐ Claimant
- ☐ Litigation friend (where claimant is a child or protected party)
- ☒ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

1 8

Month

0 2

Year

2 0 2 5

Full name

Philip Keith Spencer

Name of claimant's legal representative's firm

Bryan Cave Leighton Paisner LLP

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

Senior Associate

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

Building and street

Governor's House

Second line of address

5 Laurence Pountney Hill

Town or city

London

County (optional)

Postcode

E C 4 R 0 B R

If applicable

Phone number

020 3400 3119

DX number

Your Ref.

AMRK/PSPE/20H0904.140

Email

phil.spencer@bclplaw.com

SCHEDULE 1**THE NAMED DEFENDANTS**

By order of Mr Justice Dexter Dias dated 11 December 2024 and by order of Mr Justice Ritchie dated 14 February 2025 the following Named Defendants were joined as Defendants to these proceedings:

<u>Def #</u>	<u>Name</u>	<u>Address</u>
<u><i>Alleged to have been involved in activities at the Airport on 24 July 2024</i></u>		
<u>2</u>	<u>Rory Wilson</u>	
<u>3</u>	<u>Adam Beard</u>	
<u>4</u>	<u>Sean O’Callaghan</u>	
<u>5</u>	<u>Sally Davidson</u>	
<u>6</u>	<u>Hannah Schafer</u>	
<u>7</u>	<u>Luke Elson</u>	
<u>8</u>	<u>Luke Watson</u>	
<u><i>Alleged to have been involved in activities at the Airport on 27 July 2024</i></u>		
<u>9</u>	<u>Monday Rosenfeld</u>	
<u><i>Alleged to have been involved in activities at the Airport on 30 July 2024</i></u>		
<u>10</u>	<u>Phoebe Plummer</u>	
<u>11</u>	<u>Jane Touil</u>	
<u><i>Alleged to have been involved in activities at the Airport on 1 August 2024</i></u>		
<u><i>Groups 1 & 2</i></u>		
<u>12</u>	<u>Barbara Lund</u>	
<u>13</u>	<u>Rhiannon Wood</u>	

<u>14</u>	<u>Diane Bligh</u>	
<u>15</u>	<u>Ruth Cook</u>	
<u>16</u>	<u>Malcolm Allister</u>	
<u>17</u>	<u>Susanne Brown</u>	
<u>18</u>	<u>Christina Jenkins</u>	
<u>19</u>	<u>Jack Williams</u>	
<u>20</u>	<u>Paul Raithby</u>	
<u>Group 3</u>		
<u>21</u>	<u>Melanie Griffith</u>	
<u>22</u>	<u>Virginia Barrett</u>	
<u>23</u>	<u>Pauline Hazel Smith</u>	
<u>24</u>	<u>Rosemary Robinson</u>	
<u>25</u>	<u>Irfan Mamun</u>	
<u>26</u>	<u>Callum Cronin</u>	

Amended pursuant to the order of Mr Justice Dexter Dias dated 11 December 2024 and further amended pursuant to the Order of Mr Justice Ritchie dated 14 February 2025

IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KINGS BENCH DIVISION

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

-and-

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

(2) – (26) THE NAMED DEFENDANTS JOINED BY ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND BY THE ORDER OF MR JUSTICE RITCHIE DATED 14 FEBRUARY 2025, AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS

Defendants

RE-AMENDED PARTICULARS OF CLAIM

THE CLAIMANT

1. The Claimant is the operator of the 'London Heathrow Airport', Hounslow, Middlesex ("the Airport"), as shown edged purple on Plan A annexed to the Re-Amended Particulars of Claim ("Plan A").
2. As the operator of the Airport:
 - 2.1 The Claimant holds a certificate for operation of the Airport issued by the UK Civil Aviation Authority ("CAA") dated 6 April 2016, with reference number UK: EGLL – 00;

- 2.2 The Claimant has the benefit of an Economic Licence granted by the CAA under Part 1 of the Civil Aviation Act 2012; and
- 2.3 The Claimant has made the 'Heathrow Airport – London Byelaws 2014' ("the Byelaws") pursuant to section 63 and 64 of the Airports Act 1986 regulating the use and operation of the Airport and the conduct of all persons while within the Airport, which came into force on 13 April 2014.

THE LAND TO WHICH THE CLAIM RELATES

3. The land and property to which the Claim relates is the Airport. It does not include residential property.
4. The Claimant is the owner of the Airport pursuant to the titles listed in Schedule 1 to the Re-Amended Particulars of Claim.
5. The Claimant has granted various leases and licences in respect of certain parts of the Airport. The areas in respect of which the Claimant has a right to immediate possession, pursuant either to the Claimant's freehold ownership or immediate leasehold interests are shown shaded yellow on Plan A (excluding the areas hatched blue and shaded orange) ("the Yellow Land").
6. As the operator of the Airport, as set out in Paragraphs 1 and 2 above, the Claimants still retains sufficient control over those parts of the Airport in respect of which it has granted leases and licences, to entitle it to exercise control over the Airport in relation to any persons trespassing thereon.

THE DEFENDANTS

7. The Defendants are environmental activists associated with the Just Stop Oil campaign (or other environmental campaigns) who have committed to engaging in campaign of disruptive direct action at airports across the United Kingdom, including, in the case of the 2nd to 26th Defendants ("the Named Defendants"), at the Airport. Save for the Named Defendants, the Claimant does not know the names of the Defendants.

8. At a meeting in Birmingham in early March 2024, the environmental campaigners associated with the ‘Just Stop Oil’ campaign discussed the taking of direct action at airports across the UK in the summer of 2024.
9. The homepage of the website of Just Stop Oil emphasises the plans to target action on airports during the summer of 2024 and a video was published on 5 May 2024 at <https://www.youtube.com/watch?v=tbvYQFGAY48> which discloses an intention to disrupt airports in the UK in the summer months of 2024. In particular, the said video evidences that the Airport is a specific target of disruption by showing a screen shot of a road sign on the highway immediately adjacent to the perimeter of the Airport (with directions to Terminal 5 and Terminals 2, 3 and 4).
10. Furthermore, multiple messages sent from the official Instagram account of Just Stop Oil demonstrate how campaigners associated with Just Stop Oil intend to target airports by direct action activities.
11. In support of their aim to disrupt airports in the summer months, two Just Stop Oil fundraising pages have been set up, namely:
 - 11.1 “Fund Radical Climate Action — Just Stop Oil | Chuffed | Non-profit charity and social enterprise fundraising” (which has raised £149,000 as of 1 July 2024) and states:

“We're escalating our campaign this summer to take action at airports.”
 - 11.2 “Cat’s out the bag. Just Stop Oil will take action at airports  | Chuffed | Non-profit charity and social enterprise fundraising” (which has raised £24,000 as of 1 July 2024) states:

*“Cat’s out the bag. Just Stop Oil will take action at airports
The secret is out — and our new actions are going to be big.
We’re going so big that we can’t even tell you the full plan, but know this — Just Stop Oil will be taking our most radical action yet this summer. We’ll be taking action at sites of key importance to the fossil fuel industry; super-polluting airports.”*
12. There has also been extensive media coverage of the Just Stop Oil plans and the danger they pose. A Daily Mail online article entitled ‘Exclusive Revealed: The eco mob plot to

ruin the summer holidays with activists planning to disrupt flights by gluing themselves to major airport runways’ states that Just Stop Oil have advocated the following means of protest:

- *“Cutting through fences and gluing themselves to runway tarmac;*
- *Cycling in circles on runways*
- *Climbing on to planes to prevent them from taking off*
- *Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.”*

12A. On 24 July 2024, 27 July 2024, 30 July 2024 or 1 August 2024 each of the Named Defendants entered onto the Airport without the consent of the Claimant in order to carry out acts of disruptive direct action in connection with the Just Stop Oil campaign. Further particulars of those incidents are set out in Schedule 2 to the Re-Amended Particulars of Claim.

THE POTENTIAL EFFECTS OF THE THREATENED DIRECT ACTION

13. In summary, the potential risks and/or effects of the activities carried out by the Named Defendants and further the apprehended activities of any Defendant have or may include the following:

- 13.1 A real risk to life and limb;
- 13.2 Significant disruption to passengers;
- 13.3 Significant disruption to airlines;
- 13.4 Significant impact on businesses and the wider economy;
- 13.5 Consequential effects on the infrastructure network around the Airport;
- 13.6 The need for deployment of additional Police resources at the Airport;
- 13.7 Substantial economic losses to the Claimant.

THE THREATENED ACTS OF TRESPASS AND/OR NUISANCE

14. By reason of the foregoing, the Claimant apprehends that unless restrained by this Honourable Court, there is a serious and imminent risk that the Defendants will commit

further acts of trespass and nuisance by way of ‘direct action’ activities, for which they have no permission or licence to enter upon the Airport.

15. Members of the public have an implied consent to enter the Airport for air-travel and directly related purposes. All persons entering the Airport are subject to the Byelaws which regulate the use and operation of the Airport and the conduct of all persons while within the airport
16. By Byelaw 3.19 of the Byelaws, no person shall organise or take part in any demonstration, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the safety of passengers or persons using the Airport.
17. By Byelaw 3.21 of the Byelaws, no person shall intentionally obstruct or interfere with the proper use of the Airport or with any person acting in the execution of his duty in relation to the operation of the Airport.
18. Accordingly, although members of the public have an implied consent to enter the Airport for the purpose of travelling by air and for directly related purposes, they do not have permission to enter or remain or occupy any land thereon for the purposes of:
 - 18.1 Organising or taking part in any demonstration, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the safety of passengers or persons using the Airport (Byelaw 3.19).
 - 18.2 Intentionally obstructing or interfering with the proper use of the Airport (Byelaw 3.21).
19. Further and/or alternatively, the threatened acts referred to above would amount to a nuisance, in that they would give rise to an unreasonable interference with the use and operation of the Airport.
20. Further and/or alternatively, the nuisance referred to at Paragraph 19 above would also constitute a public nuisance in that the acts referred to above would substantially affect members of the public, including, but not limited, to persons wishing to use the Airport for the purpose of air travel as well as the Claimant. As such, the nuisance would

‘materially affect the reasonable comfort and convenience of a class of His Majesty’s subjects’ and the Claimant would suffer ‘special damage’ in respect thereof given the loss and damage referred to in Paragraph 13 above would constitute foreseeable and substantial damage over and above that suffered by the public at large.

21. Accordingly, as the operator of the Airport and by reason of the matters set out in Paragraph 6 above, the Claimant seeks injunctive relief restraining the apprehended acts of trespass and/or nuisance in respect of the Airport.

HUMAN RIGHTS

22. Reliance by the Defendants on rights of freedom of expression and/or assembly within Articles 10 and/or 11 of the European Convention of Human Rights would not provide a defence in the particular circumstances of this claim.

AND THE CLAIMANT CLAIMS

- (1) An order that the Defendants must not, without the consent of the Claimant, enter, occupy or remain upon any part of the Airport;
- (2) Further or other relief as the Court thinks fit;
- (3) Costs.

KATHARINE HOLLAND KC
JACQUELINE LEAN
Landmark Chambers

TOM ROSCOE
Wilberforce Chambers

DANIEL SCOTT
Wilberforce Chambers

Statement of Truth

The Claimant believes that the facts stated in this re-amended 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.

DocuSigned by:

.....656A85CC3CB44E1.....

Philip Keith Spencer

Senior Associate, Bryan Cave Leighton Paisner LLP

7 July 2024

13 December 2024

18 February 2025

SCHEDULE 1**FREEHOLD TITLES OWNED BY THE CLAIMANT**

Title	Description
AGL101701	Land on the north side of Wessex Road, Hillingdon
AGL105601	land and buildings on and lying to the east of Western Perimeter road, London Heathrow Airport
AGL118218	Land at Southern Perimeter Road, Stanwell, Staines
AGL119941	Land on the North West side of Southern Perimeter Road, Stanwell, Staines
AGL125841	Land lying to the east of Western Perimeter Road, London Heathrow Airport
AGL138033	The Duke of Northumberland's River, West Drayton
AGL139852	Part of World Business Centre Phase, 2 Newall Road, London Heathrow Airport, Hounslow
AGL142943	Land and buildings lying to the south of Perry Oaks Drive, West Drayton
AGL153197	land at London Heathrow Airport, London
AGL159358	Land at Perry Oaks Drive, West Drayton
AGL159912	land at London Heathrow Airport, London
AGL166776	Land lying to the south west of 576 Bath Road, West Drayton
AGL166778	Land lying to the East of Spout Lane North, Staines
AGL166779	Land lying to the North East of Spout Lane North, Staines
AGL166780	Land lying to the East of Spout Lane North, Staines
AGL166781	Land lying to the south east of Spout Lane North, Staines
AGL167758	Land on the North side of Stanwell Road, Feltham
AGL187778	subsoil beneath the Duke of Northumberland's river London Heathrow Airport, London
AGL187782	part of the former course of the Duke of Northumberland's River, London Heathrow Airport, London
AGL188780	Land on the south side of Southern Perimeter Road, London Heathrow Airport, Hounslow
AGL196517	subsoil beneath the Duke of Northumberland's River, Heathrow Airport, London
AGL204428	Land at London Heathrow Airport, London
AGL204430	Land at London Heathrow Airport, London

AGL3033	land lying to the West of Hatton Road, Feltham
AGL31061	Heathrow Hotel, Terminal 4, Heathrow Airport
AGL32323	land on the south side of Bath Road, Harlington
AGL41684	Land and buildings on the south side of Bath Road and on the South West side of Hatton Road, Heathrow Airport
AGL41685	Land and buildings on the west side of Cranford Lane, Heathrow Airport
AGL41686	Land and buildings on the West side of Sheffield Way, Heathrow Airport
AGL47788	Land on the east side of Airport Way, South East side of Spout Lane, Stanwell
AGL49922	Land on the south side of Bath Road, Hillingdon
AGL53628	Land on the north side of Bedfont Road, Bedfont, Stanwell
AGL55260	Part of Heathrow Airport, London
AGL57950	World Business Centre, Newall Road, Heathrow Airport
AGL58193	Building 1071, London Heathrow Airport, Hounslow (TW6 3AQ)
AGL58194	The Compass Centre, Nelson Road, London Heathrow Airport, TW6 2QQ
AGL58197	Renaissance London Heathrow Hotel, Bath Road, Heathrow, Hounslow (TW6 2AQ)
AGL58200	B521 Southampton House, Southampton Road, World Cargo Centre, Heathrow Airport
AGL58829	Building 717, Southern Perimeter Road, London Heathrow Airport, Hounslow (TW6 3SY)
AGL66857	9 North Hatton Road
AGL66862	United House Building, 451 Southern Perimeter Road, London Heathrow Airport, Hounslow (TW6 3LP)
AGL66864	World Business Centre Phase II, Newall Road, London Heathrow Airport, Hounslow (TW6 2RQ)
AGL69297	the Visitor Centre, Bath Road, Heathrow Airport, Hounslow (TW6 2AP)
AGL71479	Contractor's Compound, Sanctuary Road, Stanwell
AGL75860	Land at The Police Station, Northside
AGL7637	2 Perry Oaks Drive, West Drayton (UB7 0EP)
AGL86703	3 Burrow Hill Close, Heathrow, Hounslow (TW6 2ND)
AGL89018	4 Burrow Hill Close, Heathrow, Hounslow (TW6 2ND)
AGL92309	Land on the South side of Bath Road, London
AGL92311	Land and Building on the South side of Bath Road, London

MX102958	Land forming part of Heathrow Airport
MX102959	Heathrow Airport, London
MX118060	land lying to the north of Stanwell Road
MX121799	Land forming part of Heathrow Airport
MX122309	Land forming part of Heathrow Airport
MX124923	Land forming part of Heathrow Airport
MX129648	The Cyclists Rest, Hatton Road
MX131029	Land at Heathrow Airport
MX131030	Land forming part of Heathrow Airport
MX131532	land on the south side of Bath Road, forming part of Heathrow Airport
MX132446	part of London (Heathrow) Airport
MX133485	West Ramp Coach Park, London Heathrow Airport, Hounslow, TW6 2QU
MX134218	land forming part of London Heathrow Airport, Hounslow
MX134561	Part of Heathrow Airport
MX13479	Land on the North side of the Southern Perimeter Road, London Heathrow Airport, Hounslow
MX135107	land forming part of London Heathrow Airport, Hounslow
MX135983	Land on the south of Bath Road, Harmondsworth
MX136678	Land forming part of London Heathrow Airport, Stanwell
MX137020	Land on the north side of Stanwell Road, East Bedfont
MX138008	situate on the south side of Bath Road
MX138125	Land on the South side of Bath Road
MX138184	land forming part of London (Heathrow) Airport
MX138476	Land forming part of Heathrow Airport
MX140009	Land at Heathrow Airport
MX140064	land on the south side of Bath Road, Hayes
MX140158	Land forming part of Heathrow Airport
MX141558	447 Hatton Road, Feltham (TW14 9QP)
MX143545	Land forming part of Heathrow Airport
MX148884	part of Heathrow Airport
MX149634	Land forming part of Heathrow Airport
MX154289	land lying to the north of Stanwell Road

MX154382	part of London Heathrow Airport
MX155712	Land lying to the south of Northern Perimeter Road, Heathrow, Hounslow
MX156037	Land lying to the south of Northern Perimeter Road, Heathrow, Hounslow
MX156056	Land forming part of Heathrow Airport
MX156057	Land lying to the south of Northern Perimeter Road, Heathrow, Hounslow
MX156230	Land forming part of Heathrow Airport
MX156982	Land and building on the south side of Bath Road and south west side of Hatton Road
MX160406	Land forming part of Heathrow Airport
MX160655	land at Heathrow Airport
MX160662	Land at Heathrow Airport
MX160771	land forming part of Heathrow Airport
MX162010	Land forming part of Heathrow airport
MX163122	land adjoining White's Stores, Hatton Road, Hatton Cross
MX163524	land forming part of Heathrow Airport
MX164507	Magpie Place and Magpie Cottages, Bath Road
MX164508	Land at Heathrow Airport
MX164815	Long stay car park eastern perimeter road, London Heathrow Airport, Hounslow (TW6 2SB)
MX168921	land on the North-West side of Great South-West Road forming part of London (Heathrow) Airport, Hounslow
MX173710	part of Heathrow Airport, London
MX175692	Land forming part of Heathrow Airport
MX179450	land forming part of Heathrow Airport
MX180695	land forming part of Heathrow Airport, London
MX180748	land lying to the West of Hatton Road
MX186386	Heathrow Airport, London
MX193394	Land forming part of Heathrow Airport
MX194062	Land forming part of Heathrow Airport
MX203143	LAND ON THE NORTH SIDE OF Southern Perimeter Road, Heathrow, Hounslow
MX207871	Site Offices, Wessex Road, London Heathrow Airport, Hounslow (TW6 2QX)

MX2168	land and buildings on the north side of Spout Lane and south-west side of Longford River, Stanwell
MX217949	land lying between Longford River and Duke of Northumberland's River, Harmondsworth
MX224711	Land forming part of Heathrow Airport
MX224983	Land at Viscount Way, London Heathrow Airport, Hounslow
MX228536	known as Mayfield House lying to the north of Stanwell Road
MX230168	Land and buildings at Hatton
MX230476	land on the West side of Spout Lane, Staines
MX230979	land forming part of Heathrow Airport
MX231190	Land forming part of Heathrow Airport
MX232436	land at the junction of Bath Road and Hatton Road, Hounslow
MX235083	Land forming part of Heathrow Airport
MX235182	LAND ON THE NORTH EAST SIDE OF Ensign Close, London Heathrow Airport, Hounslow
MX236213	land at Heathrow Airport (formerly Oddfellows Cottages, Bath Road)
MX237577	Land at Heathrow Airport
MX237801	forms part of London Heathrow Airport
MX238906	land lying to the south of Bath Road, Harmondsworth
MX239071	Part of London (Heathrow) Airport, Harlington
MX243750	Land forming part of Heathrow Airport
MX243751	Land forming part of Heathrow Airport
MX244292	Land forming part of Heathrow Airport
MX244632	1 to 4 Oak Cottages and 1 to 4 Oaks Common Cottages, Heathrow Road, Harmondsworth
MX245592	Land forming part of Heathrow Airport
MX246727	Land forming part of Heathrow Airport
MX248915	Land forming part of Heathrow Airport
MX248916	land forming part of Heathrow Airport-London
MX249443	Land forming part of Heathrow Airport
MX250939	Land on the east side of Whitemead Lane and on the West side of Long Lane Harmondsworth
MX252007	Land forming part of Heathrow Airport

MX255590	Land forming part of Heathrow Airport
MX255892	Land forming part of Heathrow Airport
MX257835	the Site of 1, 2 and 3 Wells Cottages, Hatton Road
MX260728	Land forming part of Heathrow Airport
MX266089	Land forming part of Heathrow Airport
MX266090	land at Heathrow Airport
MX266394	LAND ON THE NORTH WEST SIDE OF Great South West Road, Bedfont, Feltham
MX269198	building 478, London Heathrow Airport, Hounslow (TW6 2EB)
MX276514	land at Heathrow Airport, Stanwell Road
MX278681	Land forming part of Heathrow Airport
MX303848	Land forming part of Heathrow Airport
MX304585	Land forming part of Heathrow Airport
MX306324	northside staff car park Northwood Road, London Heathrow Airport, Hounslow (TW6 2QW)
MX315988	Part of Heathrow Airport, London
MX320053	Land forming part of Heathrow Airport
MX320054	Land forming part of Heathrow Airport
MX321518	LAND ON THE NORTH SIDE OF Spout Lane, Staines
MX324155	LAND LYING TO THE WEST OF Great South West Road, London
MX328832	Land on the South side of Bath Road, Hayes
MX332258	Land part of Heathrow Airport
MX335978	445 Hatton Road, Feltham (TW14 9QP)
MX347243	land forming part of Heathrow Airport - London
MX349378	on the North West Side of Great South-West Road, Harmondsworth
MX352105	car park World Business Centre, Newall Road, London Heathrow Airport, Hounslow
MX356761	Fuel Depot, Ensign Close, London Heathrow Airport, Hounslow TW6 2PL
MX398707	Land lying to the South of Bath Road, Hounslow
MX401217	part of London Heathrow Airport
MX404168	Land at Heathrow Airport
MX441141	Land forming part of Heathrow Airport

MX75444	Land forming part of Heathrow Airport
MX79662	land forming part of Heathrow Airport, London
MX82957	LAND ON THE NORTH SIDE OF Spout Lane, Staines
MX86544	Land forming part of Heathrow Airport
MX94106	Land forming part of Heathrow Airport
NGL111084	land on the south side of Bath Road, Harmondsworth
NGL134306	land lying to the north of Perry Oaks Drive, West Drayton
NGL162048	Land forming part of Heathrow Airport
NGL21439	the Control Tower at London (Heathrow) Airport
NGL219053	60 and 62 The Gardens and being land lying to the south east of Great South-West Road
NGL22718	BEING LAND ON THE NORTH-WEST SIDE OF Great South West Road, Bedfont, Feltham
NGL235431	Hatton Road, Harlington
NGL24166	land lying to the south of Bath Road, Hounslow
NGL309951	land lying on the South side of the Southern Perimeter Road, Heathrow Airport
NGL332589	Perry Oaks Sewage Works
NGL35047	Land on the south side of Bath Road, West Drayton
NGL352644	Unit 1, 1 Bath Road, Heathrow, Hounslow (TW6 2AA)
NGL36628	Land forming part of Heathrow Airport
NGL369608	Land and buildings on the south side of Bath Road, West Drayton
NGL386170	3 Perry Oaks Drive, West Drayton
NGL392895	1 Perry Oaks Drive, Stanwell Moor Road, Longford, West Drayton
NGL526360	4 Perry Oaks Drive, West Drayton (UB7 0EP)
NGL94380	Land on the West side of Whitemead Lane, Longford
NGL97189	land lying to the South East of Bath Road and on the East side of Whitemead Lane, Longford
SY347180	part of the site of the Duke of Northumberland's River
SY348507	Land on the South side of Southern Perimeter Road, Stanwell, Staines
SY367470	Land forming part of Heathrow Airport
SY367471	land forming part of London Heathrow Airport, Stanwell
SY383943	Land on the north side of Stanwell Road and part of the site of Stanwell Road

SY397637	part of London Heathrow Airport, Stanwell
SY397639	forming part of London (Heathrow) Airport
SY397640	Land forming part of Heathrow Airport
SY397641	Land forming part of Heathrow Airport
SY397642	Land forming part of Heathrow Airport
SY397643	part of London (Heathrow) Airport, Stanwell
SY397644	Land forming part of Heathrow Airport
SY397645	being part of London Heathrow Airport
SY397646	land forming part of Heathrow Airport
SY397647	Land forming part of Heathrow Airport
SY433510	land lying to the south of Western Perimeter Road
SY508277	land lying to the south of The Western Perimeter Road, Heathrow Airport, London
SY606410	land and buildings lying on the North side of Stanwell Road, Stanwell
SY611949	5 Burrow Hill Close, Heathrow, Hounslow (TW6 2ND)
SY723927	LAND ON THE EAST SIDE OF Stanwell Moor Road, Staines

LEASEHOLD TITLES OWNED BY THE CLAIMANT

Title	Description
AGL139838	The Compass Centre, Nelson Road, London Heathrow Airport, TW6 2QQ
AGL190191	East Point, The Compass Centre, Nelson Road, London Heathrow Airport, Hounslow, TW6 2QQ
AGL190192	West Point, The Compass Centre, Nelson Road, London Heathrow Airport, Hounslow, TW6 2QQ
AGL190193	Meridian, The Compass Centre, Nelson Road, London Heathrow Airport, Hounslow, TW6 2QQ
AGL192576	Car Park, T5 Hotel, Wentworth Drive, London Heathrow Airport, Hounslow
AGL193608	pipelines lying on the south side of Southern Perimeter Road, Heathrow Airport, London
AGL193610	Land on the east side of Northern Perimeter Road, London Heathrow Airport, Hounslow
AGL41690	Substation 59 (which includes HV Switchgear and Transformer 1) and High Voltage Cables
AGL41692	An Electricity Sub Station, Newall Road, London Heathrow Airport, Hounslow
AGL46927	Car park to the south of Trident House, Bath Road, Heathrow
AGL478117	Fleet Support Unit, London Heathrow Airport, Hounslow
AGL54954	British Midland Maintenance Hangar, Exeter Way, London Heathrow Airport, Hounslow (TW6 2SY)
AGL554065	Pionair Centre Car Park, Northern Perimeter Road, London Heathrow Airport, Hounslow (TW6 2RG)

SCHEDULE 2**THE NAMED DEFENDANTS**

- 1 By order of Mr Justice Dexter Dias dated 11 December 2024 and by order of Mr Justice Ritchie dated 14 February 2025 the following Named Defendants were joined as Defendants to these proceedings:

<u>Def #</u>	<u>Name</u>	<u>Address</u>
<u><i>Alleged to have been involved in activities at the Airport on 24 July 2024</i></u>		
<u>2</u>	<u>Rory Wilson</u>	
<u>3</u>	<u>Adam Beard</u>	
<u>4</u>	<u>Sean O’Callaghan</u>	
<u>5</u>	<u>Sally Davidson</u>	
<u>6</u>	<u>Hannah Schafer</u>	
<u>7</u>	<u>Luke Elson</u>	
<u>8</u>	<u>Luke Watson</u>	
<u><i>Alleged to have been involved in activities at the Airport on 27 July 2024</i></u>		
<u>9</u>	<u>Monday Rosenfeld</u>	
<u><i>Alleged to have been involved in activities at the Airport on 30 July 2024</i></u>		
<u>10</u>	<u>Phoebe Plummer</u>	
<u>11</u>	<u>Jane Touil</u>	
<u><i>Alleged to have been involved in activities at the Airport on 1 August 2024</i></u>		
<u><i>Groups 1 & 2</i></u>		
<u>12</u>	<u>Barbara Lund</u>	
<u>13</u>	<u>Rhiannon Wood</u>	
<u>14</u>	<u>Diane Bligh</u>	

<u>15</u>	<u>Ruth Cook</u>	
<u>16</u>	<u>Malcolm Allister</u>	
<u>17</u>	<u>Susanne Brown</u>	
<u>18</u>	<u>Christina Jenkins</u>	
<u>19</u>	<u>Jack Williams</u>	
<u>20</u>	<u>Paul Raithby</u>	
<u>Group 3</u>		
<u>21</u>	<u>Melanie Griffith</u>	
<u>22</u>	<u>Virginia Barrett</u>	
<u>23</u>	<u>Pauline Hazel Smith</u>	
<u>24</u>	<u>Rosemary Robinson</u>	
<u>25</u>	<u>Irfan Mamun</u>	
<u>26</u>	<u>Callum Cronin</u>	

- 2 Each of the Named Defendants is a member of and/or associates themselves with the campaign(s) of Just Stop Oil.

24 July 2024

- 3 At around or shortly before 9am on 24 July 2024, the 2nd to 8th Named Defendants entered onto the Airport in the vicinity of the Northern Perimeter Road West. They each did so:

- 3.2 without the express consent of the Claimant;

- 3.3 acting in concert with one another, for the purposes of carrying out disruptive direct action in the name of “Just Stop Oil”, and in any case for the purposes of environmental campaign;
- 3.4 equipped for the purposes of, and with the intention of, cutting through the perimeter fence or otherwise gaining access to the operational areas of the Airport;
- 3.5 with the intention thereby of disrupting the operations at the Airport, or with full knowledge that their actions would cause such disruption;
- 3.6 in those circumstances, otherwise than in accordance with the implied licence and the Bye-Laws pleaded at paragraphs 14 to 18 of the Re-Amended Particulars of Claim (“RAPoC”);
- 3.7 in the circumstances, as a trespasser;
- 3.8 with the intention of carrying out activities which would have amounted to a nuisance, as pleaded at paragraphs 19 to 20 of the RAPoC
- 4 The said intentions of the 2nd to 8th Defendants were prevented from being seen through to completion because each of those Defendants was arrested by the Police before breaching the perimeter fence.

27 July 2024

- 5 Before 10.43am on 27 July 2024, the 9th Named Defendant entered the Airport and was, by that time, in the Terminal 5 departures area. She did so and was so present:
 - 5.2 without the express consent of the Claimant;
 - 5.3 for the purposes of carrying out disruptive direct action in the name of “Just Stop Oil”; further or alternatively, in connection with or in support of the “Just Stop Oil” campaign; and in any case acting for the purposes of environmental campaign;
 - 5.4 in possession and displaying an orange “Oil Kills” sign for the purposes of, and with the intention of, demonstrating opposition to the activities of the Airport and/or persons using the Airport;
 - 5.5 in those circumstances, otherwise than in accordance with the implied licence and the Bye-Laws pleaded at paragraphs 14 to 18 of the RAPoC;
 - 5.6 in the circumstances, as a trespasser.

- 6 The 9th Defendant left the Airport upon request, under police supervision.

30 July 2024

- 7 At or around 8.30am on 30 July 2024, the 10th and 11th Named Defendants entered the Terminal 5 departures hall of the Airport. They each did so:
- 7.2 without the express consent of the Claimant;
- 7.3 acting in concert with one another, for the purposes of carrying out disruptive direct-action in the name of “Just Stop Oil”, and in any case for the purposes of environmental campaign;
- 7.4 equipped for the purposes of, and with the intention of, opposing and/or obstructing the operations of the Airport and/or damaging equipment at the Airport;
- 7.5 which intention they then demonstrated by each spraying the ceiling, wall and floors of the terminal, and the electronic departure screen, with orange paint dispensed from fire extinguishers bearing the words “Just Stop Oil”;
- 7.6 in those circumstances, otherwise than in accordance with the implied licence and the Bye-Laws pleaded at paragraphs 14 to 18 of the RAPoC;
- 7.7 in the circumstances, as a trespasser;
- 7.8 so as to carry out activities which amounted to a nuisance, as pleaded at paragraphs 19 to 20 of the RAPoC.
- 8 The said intentions of the 10th and 11th Named Defendants were not further realised, because each of those Defendants was arrested by the Police before causing further damage or disruption.

1 August 2024

- 9 Between approximately 7am and 7.40am on 1 August 2024, the 12th to 20th Named Defendants (‘Groups 1 & 2’ in the table at Paragraph 1 of this Schedule 2) entered the Airport in the vicinity of the Terminal 5 London Underground Station. Each of them was then promptly arrested by the Police and removed from the Airport.
- 10 By around 8.50am on 1 August 2024, the 21st to 25th Named Defendants (‘Group 3’ in the table referenced above) had also entered the Airport and, by this time, had positioned themselves so as to block access to or egress from the Terminal 5 South departure gates via the electronic gates for

the checking of boarding passes. They were arrested and removed by the Police by approximately 9.13am.

11 The 12th to 25th Named Defendants each so entered the Airport and, in the case of the 21st to 25th Named Defendants so blocked access to or egress from the said departure gates:

11.1 without the express consent of the Claimant;

11.2 acting in concert with one another, for the purposes of carrying out disruptive direct action in the name of “Just Stop Oil”; further or alternatively, in connection with or in support of the “Just Stop Oil” campaign; and in any case, for the purposes of environmental campaign;

11.3 equipped with orange clothing and banners for the purposes of advertising their connection with “Just Stop Oil” and/or their environmental causes;

11.4 with the intention of disrupting the operations at the Airport, or with full knowledge that their actions would cause such disruption;

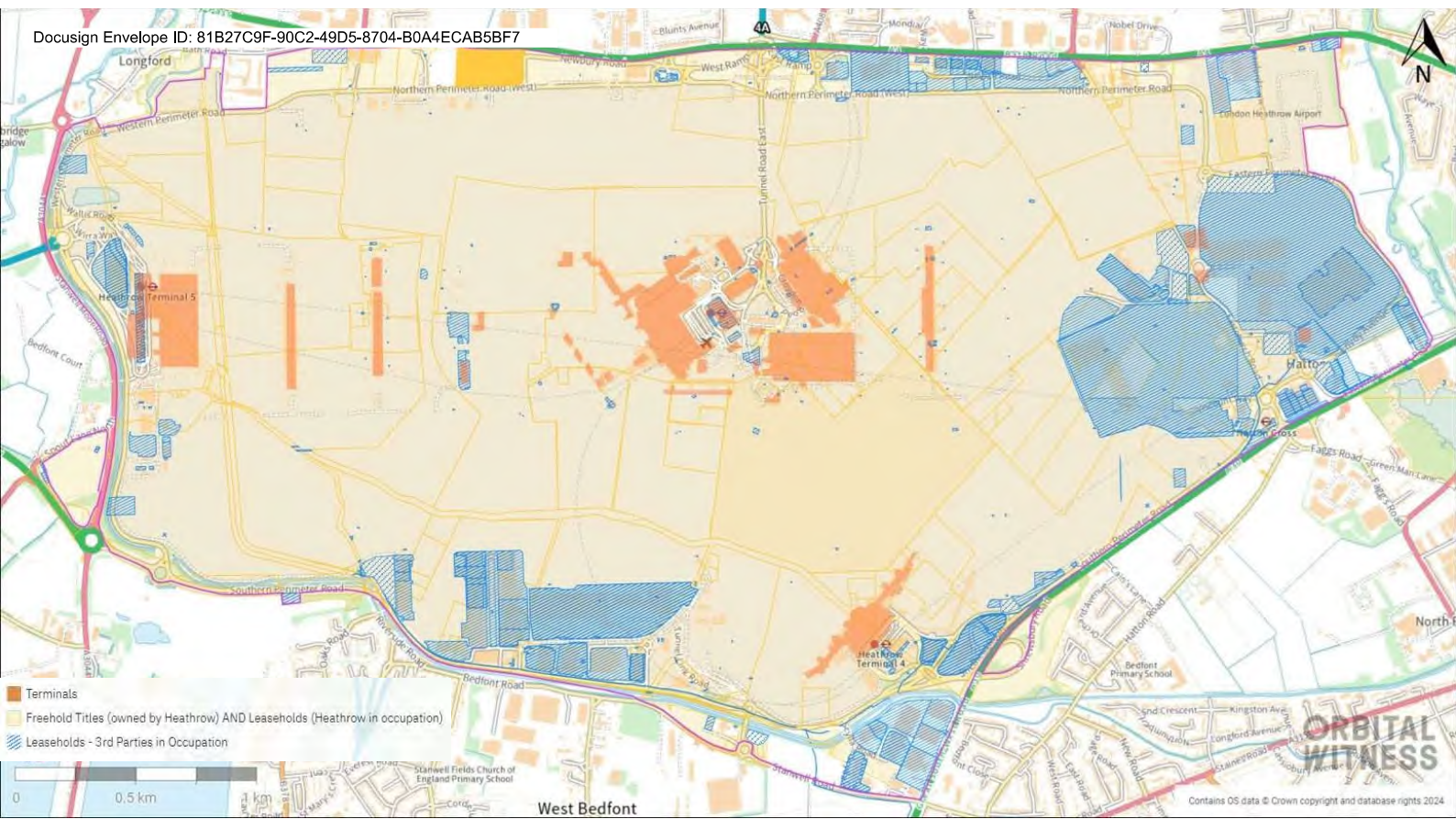
11.5 in those circumstances, otherwise than in accordance with the implied licence and the Bye-Laws pleaded at paragraphs 14 to 18 of the RAPoC;

11.6 in the circumstances, as a trespasser;

11.7 with the intention of carrying out activities which would have amounted to a nuisance, as pleaded at paragraphs 19 to 20 of the RAPoC

12 The said intentions of the 12th to 25th Named Defendants were not or not further realised, because each of those Defendants was, as aforesaid, arrested by the Police before causing any or any further disruption.

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IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KINGS BENCH DIVISION

Before The Honourable Mr Justice Julian Knowles

BETWEEN:

HEATHROW AIRPORT LIMITED

-and-

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



Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

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

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

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

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

AND UPON HEARING Leading Counsel and Junior Counsel for the Claimant

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

IT IS ORDERED THAT:

INJUNCTION

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

VARIATION

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

SERVICE AND NOTIFICATION

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

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

12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8.3, 9.3 and 10.3, effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

14. Liberty to apply.

COSTS

15. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

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

- (1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

- (2) Phil Spencer

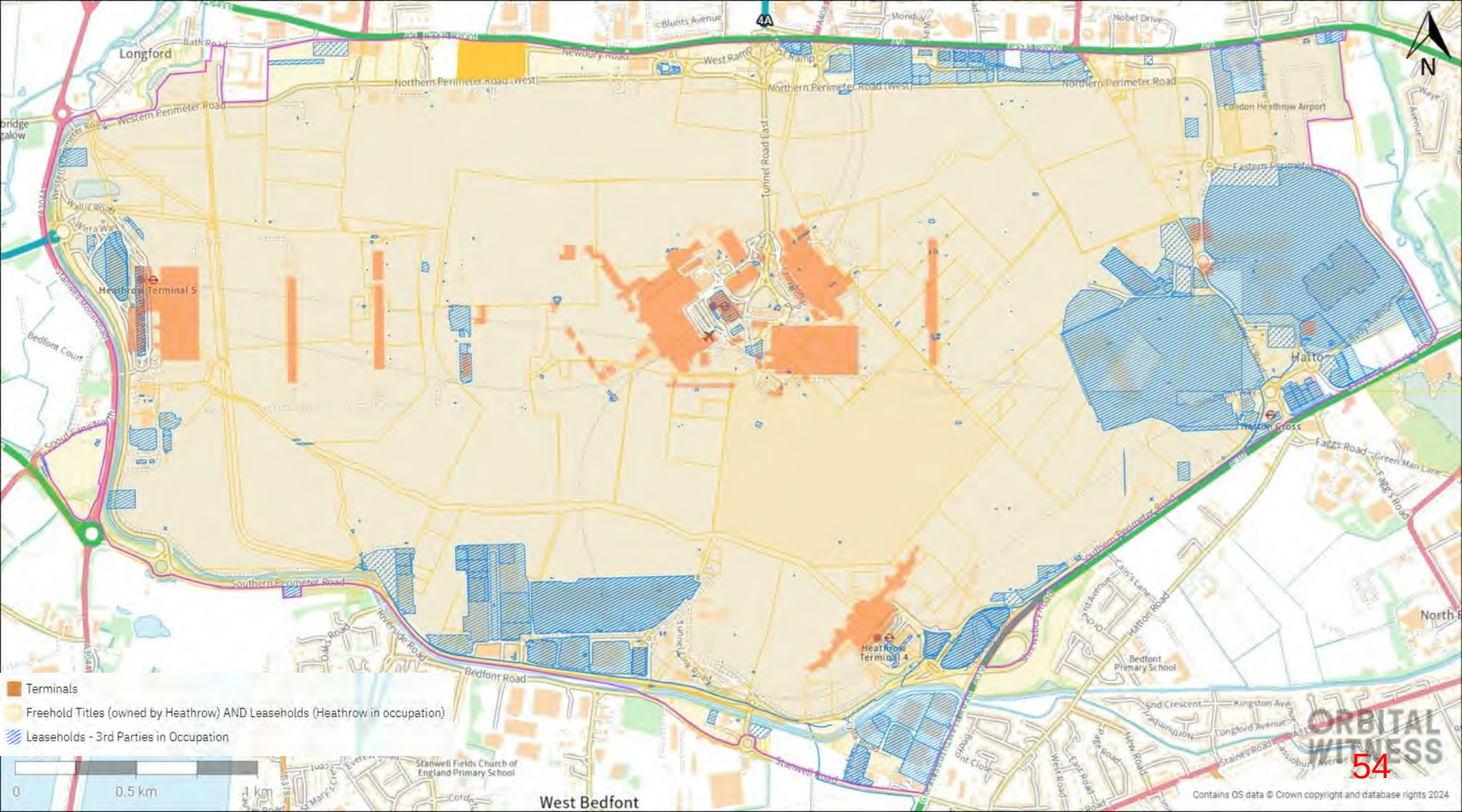
Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

Dated: 9 July 2024

SCHEDULE 1 – UNDERTAKINGS

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

SCHEDULE 2 – PLAN A



- Terminals
- Freehold Titles (owned by Heathrow) AND Leaseholds (Heathrow in occupation)
- Leaseholds - 3rd Parties in Occupation

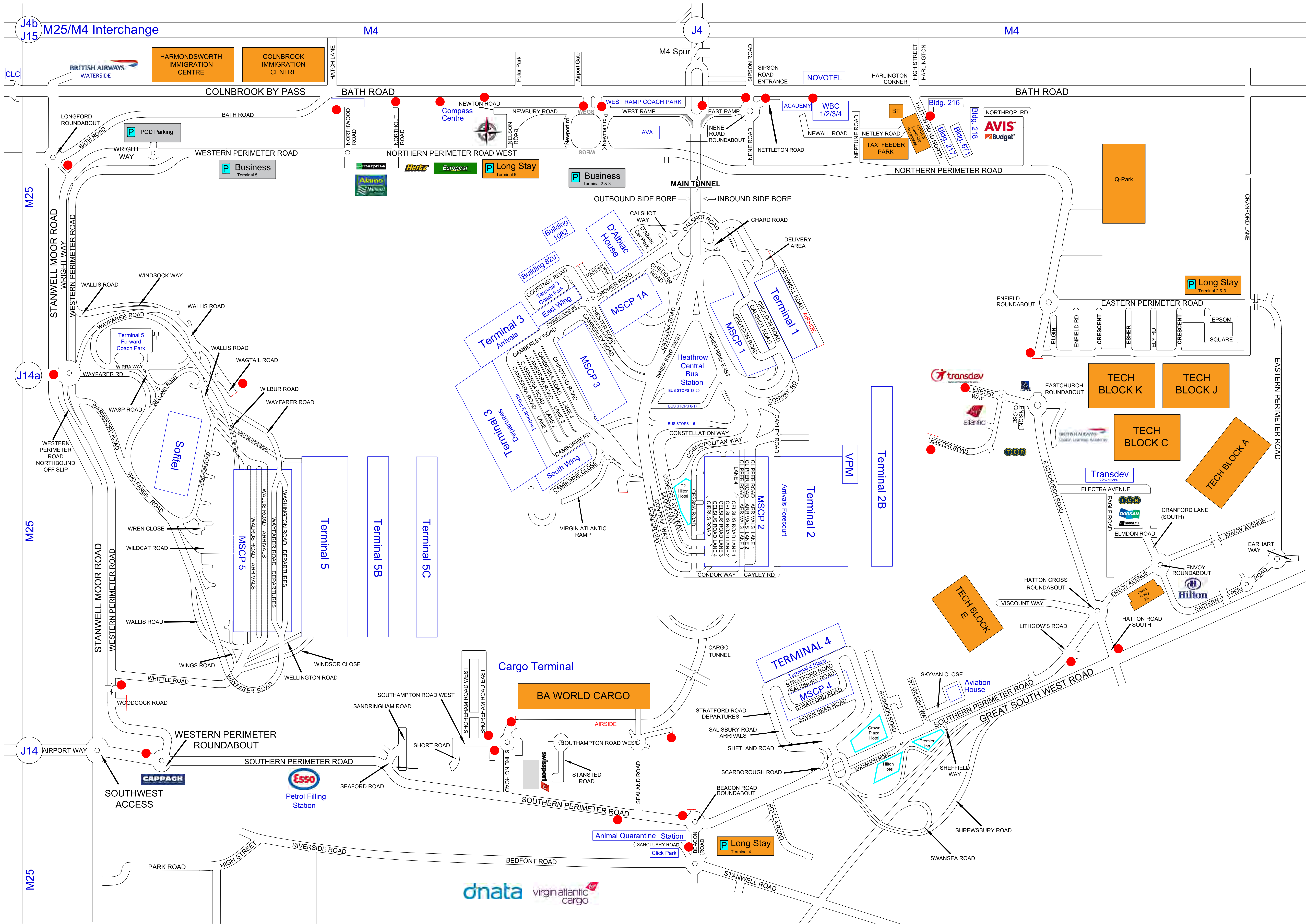
0 0.5 km

West Bedfont

SCHEDULE 3 – EMAIL ADDRESSES

1. juststopoil@protonmail.com
2. juststopoilpress@protonmail.com
3. info@juststopoil.org

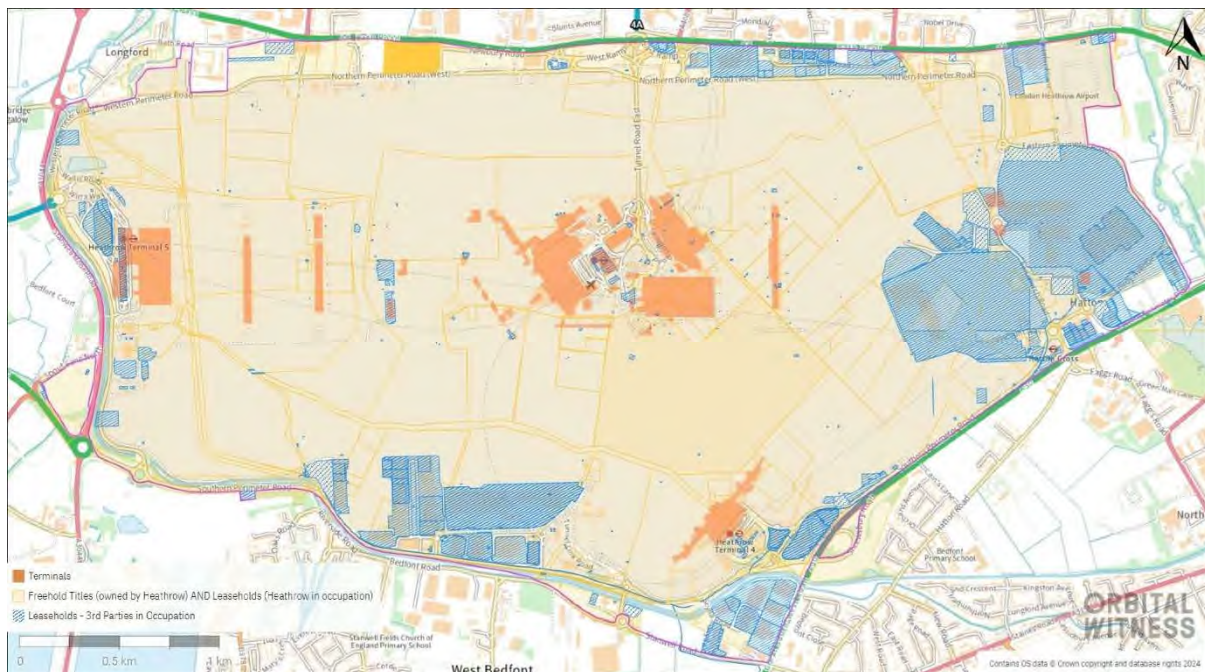
SCHEDULE 4 – PLAN B



SCHEDULE 5 – NOTICE
WARNING – NOTICE OF COURT INJUNCTION

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

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



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

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

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

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

IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KINGS BENCH DIVISION

Before: Mr Justice Dexter Dias

On: 11 December 2024



KB-2024-002210

B E T W E E N:

HEATHROW AIRPORT LIMITED

Claimant

-and-

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

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the Claimant having issued this Claim by a Claim Form dated 7 July 2024 (“the **Claim**”)

AND UPON the Court granting, on the Claimant’s application dated 7 July 2024, a without notice injunction dated 9 July 2024 (“the **Injunction**”) prohibiting the Defendants from trespassing at Heathrow Airport (as defined in the Injunction; “the **Airport**”)

AND UPON the Claimant’s application dated 16 September 2024 for the joinder of additional Defendants to the Claim and further case management directions (“the **Joinder Application**”)

AND UPON READING the Second Witness Statement of Akhil Markanday dated 16 September 2024, the Second Witness Statement of Jonathan Coen dated 29 November 2024 and the First Witness Statement of Robert Hodgson dated 2 December 2024

AND UPON HEARING Tom Roscoe, Counsel for the Claimant and Mr Elliot Bannister, a solicitor at the firm of Deighton Pierce Glynn, for the proposed 27th Defendant, Mr Joe Magowan

AND UPON reading a letter to the Court from the proposed 3rd Defendant, Mr Adam Beard

AND UPON Mr Joe Magowan offering via his solicitor to provide a written undertaking to the Court not to carry out acts prohibited by the Injunction, and the Court accepting such undertaking on the condition that the form of undertaking records that Mr Magowan has had explained to him by his solicitor, and understands, the meaning of the undertaking and the consequences of failing to breach his promises.

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

AND UPON THE COURT noting, and recording in these recitals for the benefit of the Named Defendants (defined in paragraph 1 below) that:

- (i) The Claimant intends to bring committal proceedings against some of the Named Defendants for alleged contempt of court by their alleged breaches of the Injunction.
- (ii) Nothing in this Order amounts to any finding as to whether any such allegations are or would be well founded.
- (iii) The Named Defendants, in response to any such application (if made), have rights:
 - (a) to be legally represented in any contempt proceedings;
 - (b) to a reasonable opportunity to obtain legal representation and to apply for legal aid which may be available without any means test;
 - (c) to the services of an interpreter if required;
 - (d) to a reasonable time to prepare for the hearing of any such contempt application;
 - (e) to give written and oral evidence in their defence (but with no obligation to do so); a right to remain silent and to decline to answer any question which may incriminate them.
- (iv) The Named Defendants should also be aware that:
 - (a) the Court may proceed in a defendant's absence if they do not attend but (whether or not they attend) will only find the defendant in contempt if satisfied beyond reasonable doubt of the facts constituting contempt and that they do constitute contempt;
 - (b) if the Court is satisfied that a defendant has committed a contempt, the court may punish the defendant by a fine, imprisonment, confiscation of assets or other punishment under the law;
 - (c) if a defendant admits the contempt and wishes to apologise to the court, that is likely to reduce the seriousness of any punishment by the Court;
 - (d) the Court's findings will be provided in writing as soon as practicable after the hearing;
 - (e) the Court will sit in public, unless and to the extent that the court orders otherwise, and that its findings will be made public

IT IS ORDERED THAT:

1. The following 24 individuals be joined as the Second to 25th Defendants to these proceedings, with the corresponding Defendant number (“the **Named Defendants**”):

Def #	Name	Address
Alleged to have been involved in activities at the Airport on 24 July 2024		
2	Rory Wilson	
3	Adam Beard	
4	Sean O’Callaghan	
5	Sally Davidson	
6	Hannah Schafer	
7	Luke Elson	
8	Luke Watson	
Alleged to have been involved in activities at the Airport on 27 July 2024		
9	Monday Rosenfeld	
Alleged to have been involved in activities at the Airport on 30 July 2024		
10	Phoebe Plummer	
11	Jane Touil	
Alleged to have been involved in activities at the Airport on 1 August 2024		
Groups 1 & 2		
12	Barbara Lund	
13	Rhiannon Wood	
14	Diane Bligh	
15	Ruth Cook	
16	Malcolm Allister	
17	Susanne Brown	
18	Christina Jenkins	

19	Jack Williams	
20	Paul Raithby	
Group 3		
21	Melanie Griffith	
22	Virginia Barrett	
23	Pauline Hazel Smith	
24	Rosemary Robinson	
25	Irfan Mamun	
26	Callum Cronin	

2. The Joinder Application, as relates to the proposed 3rd Defendant (Mr Adam Beard), be adjourned to a further hearing to be listed on the first available date after 13 January 2025 with a time estimate of 1 hour. The Claimant's solicitors are to liaise with the Court's Listing Office to arrange the listing of that hearing.

3. The Claimant, as soon as reasonably practicable, is to attempt to re-send to Mr Beard at HMP Wormwood Scrubs all relevant documents in relation to the Joinder Application, and is to inform him (by covering letter): (a) of the further hearing to be listed in accordance with paragraph 2 above; (b) that if he does not respond to the following queries as directed that the Court may proceed in his absence at the hearing without regard to any submissions he may wish to make; and (c) that the Court requires him, if so advised, to inform the Court in writing or by a representative in person or at the further hearing to be listed in accordance with paragraph 2 above, to explain:
 - 3.1 What documents he has received from the Claimant;
 - 3.2 When he received them; and
 - 3.3 What his position is on the Joinder Application, including whether he opposes it and, if so, the grounds of such opposition.

4. Save as expressly provided for herein, the terms of the Injunction shall continue to apply to each of the Named Defendants as if each was expressly named as a person to whom the Injunction applied. Accordingly:
 - 4.1 Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Named Defendants must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 (“Plan A”).
 - 4.2 In respect of paragraph 4.1, the Named Defendants must not (a) do it himself/herself/themselves in any other way (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
 - 4.3 The injunction set out at paragraph 4.1 of this Order shall be reviewed annually on each anniversary of the Injunction (or as close to this date as is convenient having regard to the Court’s list) in accordance with the directions at paragraph 3 of the Injunction.
5. The Claimant has permission to amend the Claim Form to reflect (by way of a schedule, or in other convenient manner) the joinder of the Named Defendants.
6. The Claimant has permission to amend the Particulars of Claim in the form contained at Tab 6 of the Hearing Bundle, with such further amendments as are required to reflect: (a) the adjournment of the Joinder Application against Mr Beard; and (b) the fact that Mr Magowan has not been joined as D27. The Claimant shall file such Amended Claim Form and Particulars of Claim by 4pm on 20 December 2024, and serve them as soon as reasonably practicable following receipt from the Court of a sealed copy of the Amended Claim Form.

Service

7. The Claimant shall not be required to re-serve the Amended Claim Form, Amended Points of Claim or this Order on the First Defendant (i.e. persons unknown) in the manner provided for in paragraph 8 of the Injunction or otherwise.

8. Pursuant to CPR r.6.15 & 6.27 (and to the extent that the addresses listed in respect of each Named Defendant in the table under paragraph 1 above do not represent their usual or last known residences), the steps taken by the Claimant to draw the Claim and the Joinder Application to the attention of the Named Defendants amount to good service of the Claim and the Application. The deemed date of service in each case is 8 November 2024.
9. Pursuant to CPR r.6.15, 6.27 and 81.4(2)(c), it is directed that service of this Order and any further document(s) to be served in these proceedings (including any contempt application in respect of alleged breaches of the Injunction, and any notice of further hearing) shall be effected on the Named Defendants as follows:
 - 9.1 by first class post to the addresses listed in the table under paragraph 1 above;
 - 9.2 in respect of any Named Defendant who the Claimant has reasonable cause to believe (after due enquiry) is in prison (whether on remand or otherwise), the Claimant shall (in addition) seek to establish the prison that they are in (via the Government's 'find a prisoner' service or otherwise) and effect service by first class post to that prison;
 - 9.3 in either case, by email to juststopoil@protonmail.com; juststopoilpress@protonmail.com; and info@juststopoil.org; and
 - 9.4 by posting copies on to the following website: www.heathrow.com/injunction.
10. Copies of the documents emailed or posted in accordance with paragraphs 9.3 and 9.4 above shall be redacted to remove the addresses of the Named Defendants.
11. The steps taken pursuant to paragraph 9 above shall be verified by a certificate of service and/or witness statement, and deemed service shall occur (in respect of each Named Defendant) seven working days after the taking of the last relevant step in respect of such Defendant.
12. In the event that any Named Defendant provides in writing to the Claimant's solicitors (whose details are set out below) a postal or an email address for service, service of all documents shall be by first class post or email to such address (as appropriate) and the

ordinary provisions as to in the Civil Procedure Rules (including as to the deemed date) shall apply.

13. In accordance with paragraph 9 above, the requirement for personal service of any contempt application in respect of alleged breaches of the Injunction before the date of this Order is dispensed with.
14. Notwithstanding paragraphs 7 to 13 above, the Court will review at any further hearing the adequacy of the steps taken by the Claimant to draw the Claim, this Order, any contempt application and any other relevant document upon the Named Defendant and, if they do not attend, whether or the extent to which it is in all of the circumstances appropriate to make further orders against them in their absence. The Claimant has liberty to seek orders for alternative service pursuant to CPR r.6.15, 6.27 and 81.4(2)(c) at any future hearing without having to file further or separate application notice.

Responses by the Named Defendants

15. Any Named Defendant who wishes: (i) to oppose their being named as a defendant to these proceedings; or (ii) defend the claim against them set out in the Amended Particulars of Claim served upon them pursuant to paragraph 6 above, shall:
 - 15.1 file an Acknowledgment of Service within 21 days of being served with the Amended Particulars of Claim, including a postal or email address for service; and
 - 15.2 file any points of Defence to the Amended Particulars of Claim and/or any witness statement upon which they wish to rely (in either case verified by a statement of truth) within 56 days of being served with the Amended Particulars of Claim.
16. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.
17. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

18. Liberty to apply.

COSTS

19. There be no order as to costs of the Joinder Application as against Mr Joe Magowan.

20. Costs otherwise reserved.

COMMUNICATIONS WITH THE CLAIMANT

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

(1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

(2) Phil Spencer

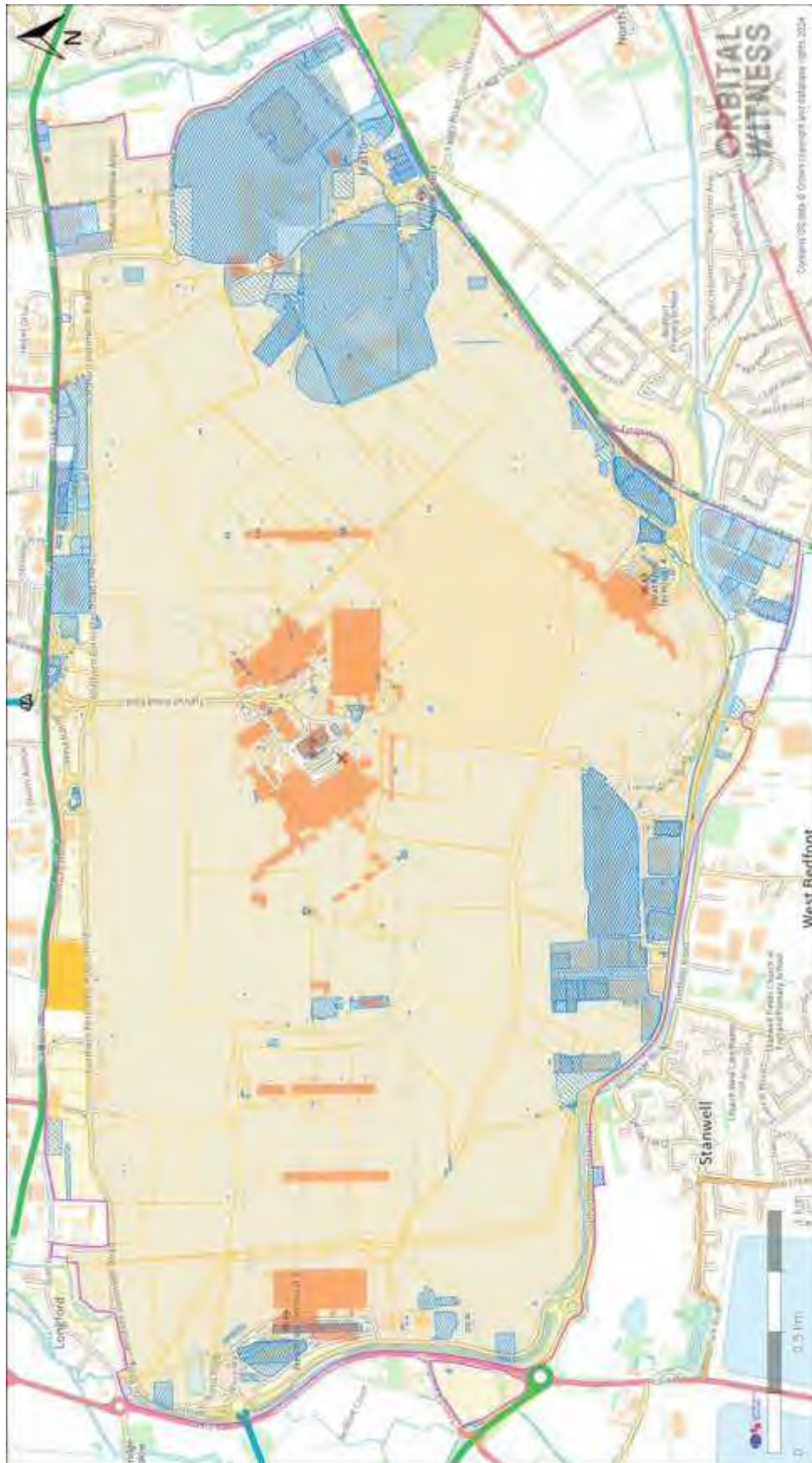
Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

Dated: 11 December 2024

SCHEDULE 1 – UNDERTAKINGS

1. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 4 of this Order has caused loss to a Named Defendant and the Court finds that the Named Defendant ought to be compensated for that loss.

SCHEDULE 2 – PLAN A



IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KINGS BENCH DIVISION

B E T W E E N:

HEATHROW AIRPORT LIMITED

-and-

- (1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE PARTICULARS OF CLAIM**
- (2) – (25) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE AMENDED PARTICULARS OF CLAIM DATED 13 DECEMBER 2024**



Defendants

ADAM BEARD

Proposed third Defendant

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

BEFORE the Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, London on 13 February 2025.

UPON the Claimant having issued this Claim by a Claim Form dated 7 July 2024 (“the **Claim**”).

AND UPON the Court granting, on the Claimant’s application dated 7 July 2024, a without notice injunction dated 9 July 2024 (“the **Injunction**”) prohibiting the Defendants from trespassing at Heathrow Airport (as defined in the Injunction; “the **Airport**”).

AND UPON the Claimant’s application dated 16 September 2024 for the joinder of additional Defendants to the Claim and further case management directions (“the **Joinder Application**”).

AND UPON READING the Second Witness Statement of Akhil Markanday dated 16 September 2024, the Second Witness Statement of Jonathan Coen dated 29 November 2024 and the First Witness Statement of Robert Hodgson dated 2 December 2024.

AND UPON the Court having granted the Joinder Application as against the Proposed Second Defendant and the Proposed Fourth to 26th Defendants (the “**Named Defendants**”) by the Order dated 11 December 2024 and adjourning the Joinder Application as against the Proposed Third Defendant, Adam Beard.

AND UPON the Court being satisfied that the Claimant has complied with paragraph 3 of the Order dated 11 December 2024.

AND UPON HEARING Daniel Scott, Counsel for the Claimant and no one appearing for Adam Beard.

AND UPON the Claimant re-affirming and the Court accepting the undertakings set out in Schedule 1 to this Order.

AND UPON THE COURT noting, and recording in these recitals for the benefit of Adam Beard that:

- (i) The Claimant intends to bring committal proceedings against some of the Named Defendants for alleged contempt of court by their alleged breaches of the Injunction.

- (ii) Nothing in this Order amounts to any finding as to whether any such allegations are or would be well founded.
- (iii) Adam Beard, in response to any such application (if made), has rights:
 - (a) to be legally represented in any contempt proceedings;
 - (b) to a reasonable opportunity to obtain legal representation and to apply for legal aid which may be available without any means test;
 - (c) to the services of an interpreter if required;
 - (d) to a reasonable time to prepare for the hearing of any such contempt application;
 - (e) to give written and oral evidence in his defence (but with no obligation to do so); a right to remain silent and to decline to answer any question which may incriminate them.
- (iv) Adam Beard should also be aware that:
 - (a) the Court may proceed in a defendant's absence if they do not attend but (whether or not they attend) will only find the defendant in contempt if satisfied beyond reasonable doubt of the facts constituting contempt and that they do constitute contempt;
 - (b) if the Court is satisfied that a defendant has committed a contempt, the court may punish the defendant by a fine, imprisonment, confiscation of assets or other punishment under the law;
 - (c) if a defendant admits the contempt and wishes to apologise to the court, that is likely to reduce the seriousness of any punishment by the Court;
 - (d) the Court's findings will be provided in writing as soon as practicable after the hearing;
 - (e) the Court will sit in public, unless and to the extent that the court orders otherwise, and that its findings will be made public.

NOW IT IS ORDERED THAT:

1. Adam Beard (whose provided address was [REDACTED]) shall be joined as the Third Defendant to these proceedings.

2. Save as expressly provided for herein, the terms of the Injunction shall continue to apply henceforth to the Third Defendant as a named person and it applied previously to him as an unknown person if he came within the scope of the prohibitions. Accordingly:
 - 2.1 Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Third Defendant must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 (“Plan A”).
 - 2.2 In respect of paragraph 2.1, the Third Defendant must not (a) do it himself in any other way (b) do it by means of another person acting on his behalf, or acting on his instructions.
 - 2.3 The injunction set out at paragraph 2.1 of this Order shall be reviewed annually on each anniversary of the Injunction (or as close to this date as is convenient having regard to the Court’s list) in accordance with the directions at paragraph 3 of the Injunction.
3. The Claimant has permission to amend the Amended Claim Form and Amended Particulars of Claim to reflect (by way of a schedule, or in other convenient manner) the joinder of the Third Defendant. The Claimant shall file such Re-Amended Claim Form and Re-Amended Particulars of Claim by 4pm on 27 February 2025, and serve them as soon as reasonably practicable on the Third Defendant following receipt from the Court of a sealed copy of the Re-Amended Claim Form.

Service

4. The Claimant shall not by this Order be required to re-serve the Re-Amended Claim Form, Re-Amended Particulars of Claim or this Order on the First Defendant or on the other Named Defendants.
5. Pursuant to CPR r.6.15 & 6.27 (and to the extent that the address listed in paragraph 1 does not represent the Third Defendant’s usual or last known residence), the steps taken by the Claimant to draw the Claim and the Joinder Application to the attention of the

Third Defendant amount to good service of the Claim and the Application. The deemed date of service is 8 November 2024.

6. Pursuant to CPR r.6.15, 6.27 and 81.4(2)(c), it is directed that service of this Order and any further document(s) to be served in these proceedings shall be effected on the Third Defendant as follows:
 - 6.1 by first class post to the address listed in paragraph 1 above;
 - 6.2 if the Third Defendant is in prison (whether on remand or otherwise), the Claimant shall (in addition) seek to establish the prison that he is in (via the Government's 'find a prisoner' service or otherwise) and effect service by first class post to that prison;
 - 6.3 in either case, by email to juststopoil@protonmail.com; juststopoilpress@protonmail.com; and info@juststopoil.org; and
 - 6.4 by posting copies on to the following website: www.heathrow.com/injunction.
7. Copies of the documents emailed or posted in accordance with paragraphs 6.3 and 6.4 above shall be redacted to remove the address of the Third Defendant.
8. The steps taken pursuant to paragraph 6 above shall be verified by a certificate of service and/or witness statement, and deemed service shall occur seven working days after the taking of the last relevant step in respect of such Defendant.

Responses by the Third Defendant

9. If the Third Defendant wishes to defend the claim against him set out in the Re-Amended Particulars of Claim served upon him pursuant to paragraph 3 above, then he shall:
 - 9.1 file an Acknowledgment of Service within 21 days of being served with the Re-Amended Particulars of Claim, including a postal or email address for service; and
 - 9.2 file any points of Defence to the Re-Amended Particulars of Claim and/or any witness statement upon which he wishes to rely (in either case verified by a statement of truth) within 56 days of being served with the Re-Amended Particulars of Claim.

10. The Third Defendant may apply to the Court at any time to vary or discharge this Order or so much of it as affects him but he must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.

COSTS

11. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

The Claimant's solicitors and their contact details are:

- (1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

- (2) Phil Spencer

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

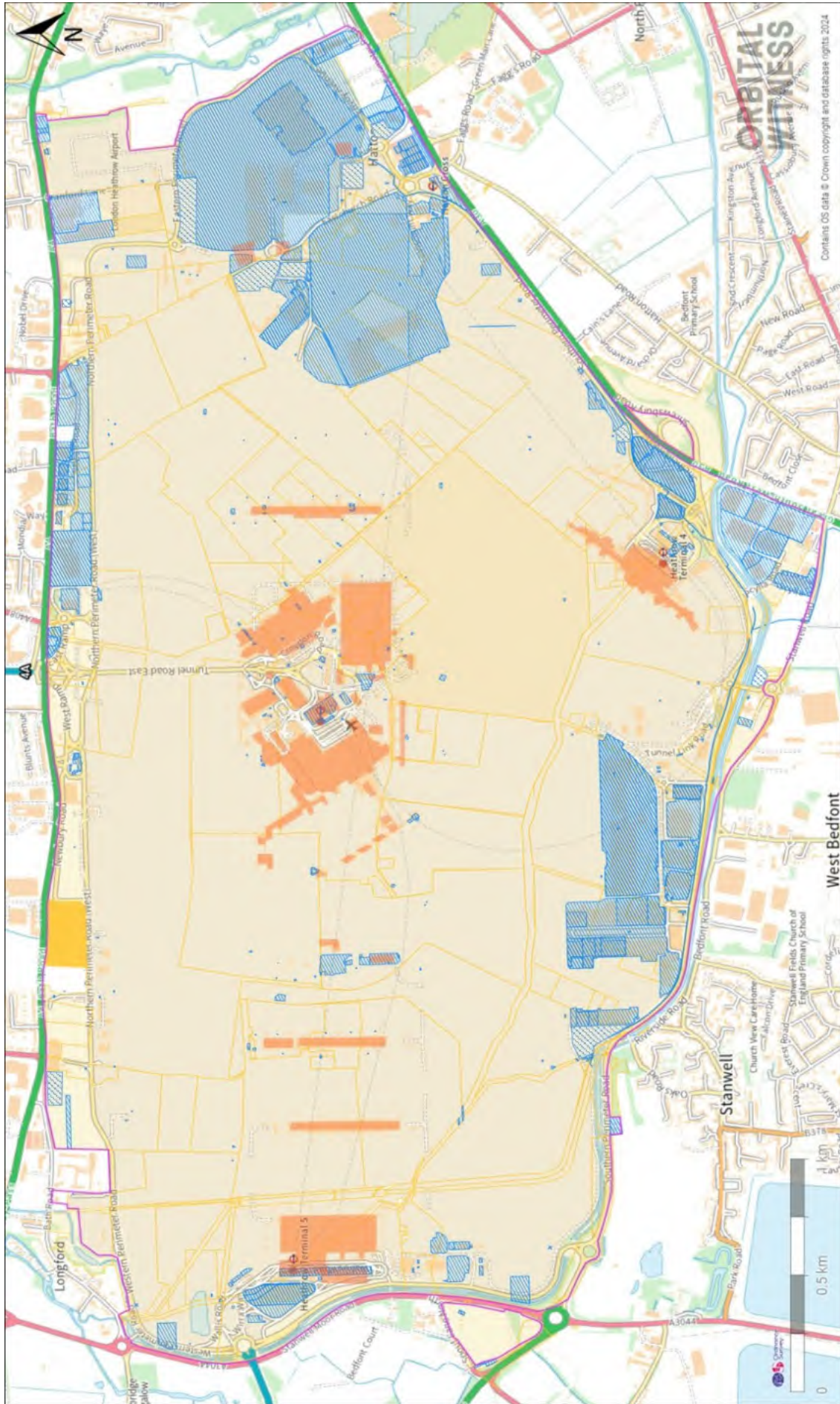
Signed: Ritchie J

Dated: 13 February 2025

SCHEDULE 1 – UNDERTAKINGS

1. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 2 of this Order has caused loss to a Named Defendant and the Court finds that the Named Defendant ought to be compensated for that loss.

SCHEDULE 2 – PLAN A



Sent: 06 March 2025 10:28

To: Leire Bardaji <Leire.Bardaji@bclplaw.com>

Subject: KB-2024-002210 Heathrow Airport Limited v Persons Unknown Who (in connection with Just Stop Oil or other environ...

Importance: High

Dear Sirs,

Further to your email, the annually reviewed injunction is listed for 23rd July 2025 for 1.5 hours, before a High Court Judge, in person.

Please notify all parties.

The Judge and start time will be confirmed on the cause list the working day before.

Kind Regards,

Aysha Begum

Administrative Officer

King's Bench Judges Listing Office, Room E03

King's Bench Division | HMCTS | Royal Courts of Justice | Strand, London | WC2A 2LL

Phone: 020 3936 8957

Web: www.gov.uk/hmcts



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For information on how HMCTS uses personal data about you please see:

<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Made on behalf of the Claimant

Witness: Tonia Fielding

Number of Statement: First

Dated: 7 July 2025

IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION

Claim No.: KB-2024-002210

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

- and -

(1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT’S CONSENT) UPON ‘LONDON HEATHROW AIRPORT’ AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM

(2) – (26) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND BY THE ORDER OF MR JUSTICE RITCHIE DATED 14 FEBRUARY 2025, AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS OF CLAIM

Defendants

FIRST WITNESS STATEMENT OF TONIA FIELDING

I, **TONIA FIELDING**, of Heathrow Airport Limited, the Compass Centre, Nelson Road, Hounslow, Middlesex, TW6 2GW , **will say as follows:**

1. I am the Director of Security at Heathrow Airport Limited (“**Heathrow**”) with oversight of all aspects of security in respect of physical security, infrastructure, people and intelligence. This is my first witness statement in these proceedings.

2. Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge.
3. Where facts and matters referred to in this statement are not within my own knowledge they are based on documents and other information, the source of which I identify.
4. In my capacity as Director of Security, I rely upon a number of key subject matter experts covering all aspects of the security landscape. In turn I am the main contact for security matters to the executive function of Heathrow Airport (the “**Airport**”), and sit on various groups and committees, engaging with internal stakeholders and external agencies.
5. I have held this role since the summer of 2024, and was appraised of the response to the activist activity at the Airport during July and August 2024.

Ongoing threat

6. Heathrow is a well-recognised international brand with a significant physical footprint in West London. The Airport, as the hub airport for the United Kingdom, carries the status of Critical National Infrastructure. As a result, the Airport is always a potential target for various actors, including activists.
7. The Airport has long been a target for activists, the most recent being in relation to the events of last summer, which are outlined in more detail in the Second Witness Statement of Akhil Markanday dated 16 September 2024.
8. Activist activity in isolation can outwardly appear as having limited impact, however Heathrow’s operation is complex and interconnected, with any interruption at one part of the physical area or operational activity highly likely to have a consequential impact on another part of the Airport. This is particularly relevant for security planning and mitigation, with the reallocation of resources and personnel, drawing those staff and agencies from potentially significant operational and security concerns.
9. For context, Heathrow operates a year-round operation, with a maximum 480,000 air traffic movements a year. This number of air traffic movements corresponds to approximately 83 million passengers either arriving, transiting or departing the Airport each year. An aircraft will be arriving or departing the Airport approximately every 45 seconds. The Airport is staffed by approximately 80,000 people across multiple

organisations, all of which work collectively to manage the time critical nature of the aviation business.

10. Alongside the daily operational concerns, Heathrow is mindful of wider domestic and geopolitical concerns, and as a result the security posture at the Airport is set high.
11. The Airport has a dedicated armed policing operation, significant security personnel presence and engagement with other law enforcement and border protection agencies. Any potential breach of security is considered a serious risk, as was evidenced by the proactive policing during last year's activist events and the deployment of armed police in response when activist events did occur. It is reasonable to state that any potential breach of the secure areas of the Airport will attract a significant and firm response by both Heathrow Security, and the dedicated armed Aviation Policing presence.
12. The risk outlook to Heathrow remains considerable and continues in various forms, as more detailed in the First Witness Statement of Philip Keith Spencer ("**Spencer 1**"), a copy of which I have seen. It is possible that the risk has actually heightened since last year as a result of domestic and international politics and the continued focus on environmental issues and concerns.

Enforcement

13. Heathrow was subject to four incidents of environmental related activist activity on the 24, 27th and 30th July, and the 1st August 2024. Those incidents ranged in scale and complexity, from potential attempted breaching of the perimeter fence, to preventing passenger access to the security search areas of Terminal 5.
14. As a result of the incidents, which had varying impacts on the policing and security posture and some impact on the overall operation, Heathrow applied to the Court to join 26 defendants to the original Injunction Order. The outcome of Heathrow's joinder application is also covered by Spencer 1.
15. Heathrow considered the option to bring committal proceedings against a number of the persons involved in the four incidents referred to above. On consideration of the facts, the impact of the protest activity and subsequent police actions including the facts that:
 - i. The majority of Defendants were subject to parallel criminal proceedings and/or were otherwise in custody;

- ii. The limited prospects of recovering costs associated with any committal proceedings; and
- iii. The cessation of further direct action by the same individuals after the initial four instances,

Heathrow concluded that in these particular instances it was not proportionate to commence committal proceedings, but reserves its position to consider any and all future incidents on the particular facts.

Airport Expansion

- 16. Heathrow will be submitting a proposal to government in July 2025 in relation to the government's expressed support for Heathrow Expansion.
- 17. There is current policy support for expansion at Heathrow through the Airports National Policy Statement which we expect the government to review and update as part of their review of National Policy statements.
- 18. This continued engagement on expansion has historically seen levels of engagement and activism, including direct action at the Airport. We expect further announcements from government in relation to expansion through 2025 and 2026.

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.

Name: Tonia Fielding

Signed:  Signed by:
Tonia Fielding
GEAG3C37DE2G4FF...

Dated: 7 July 2025

Made on behalf of the Claimant
Witness: Philip Keith Spencer
Number of Statement: First
Exhibit: PS1
Dated: 7 July 2025

IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION

Claim No: KB-2024-002210

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

- and -

(1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT’S CONSENT) UPON ‘LONDON HEATHROW AIRPORT’ AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM

(2) – (26) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND BY THE ORDER OF MR JUSTICE RITCHIE DATED 14 FEBRUARY 2025, AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS OF CLAIM

Defendants

FIRST WITNESS STATEMENT OF PHILIP KEITH SPENCER

I, **PHILIP KEITH SPENCER**, of Governor’s House, 5 Laurence Pountney Hill, London EC4R 0BR, **will say as follows:**

1. I am a senior associate in the firm of Bryan Cave Leighton Paisner LLP (“**BCLP**”). BCLP act for the Claimant (“**Heathrow**”) in this matter. I am duly authorised to make this witness statement on behalf of Heathrow. This is my first witness statement in these proceedings.

2. Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge.
3. Where facts and matters referred to in this statement are not within my own knowledge they are based on instructions, documents and information supplied to me in my capacity as solicitor for the Claimant and are true to the best of my knowledge and belief.
4. I refer to a paginated bundle of documents, attached as Exhibit “PS1”. Where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit “PS1”.
5. At various points in this statement I refer back to earlier witness statements that have been filed on behalf of Heathrow in these proceedings. To avoid unnecessary duplication, I do not exhibit those earlier statements (or their exhibits). The earlier statements (but not, in the interests of proportionality, their exhibits) will be included in the hearing bundle for the review hearing (which will also be made available electronically at: <https://www.heathrow.com/injunction>). In the meantime, and pending production of that hearing bundle, those witness statements – as well as their exhibits – can also already be found at that same website. If any reader of this witness statement is struggling to access any relevant documents, they should contact BCLP for assistance. The relevant contact details are set out in the Injunction (as defined below) at paragraph 16.
6. This witness statement adopts the following structure:
 - 6.1. Firstly, I set out briefly the background to the Injunction which now falls to be reviewed. In this context, I also outline the approach recently taken by the Court to the renewal of similar injunctions in favour of 10 other airports.
 - 6.2. Secondly, I explain how the Injunction was breached in late July and early August 2024 (shortly after it was granted) by 26 individuals, and the procedural steps whereby 25 of those 26 individuals thereafter came to be joined as named Defendants to these proceedings.

6.3. Thirdly, I outline the reasons why Heathrow considers that there has been no material change to (and certainly no material diminishment of) the risk of unlawful direct action activities being targeted by “Just Stop Oil” (“**JSO**”) or other environmental campaigns at Heathrow. In this context, I update the Court on the status of JSO.

6.4. Fourthly, I address events surrounding the Shell AGM, held at a hotel at Heathrow Airport in May 2025.

6.5. Finally, I address various procedural matters.

I. BACKGROUND

The Original Injunction & The Review Hearing

7. By a without notice injunction granted by Mr Justice Julian Knowles on 9 July 2024 (“the **Injunction**”), the Court prohibited a class of “Persons Unknown” (as defined as the First Defendants to the Claim) from entering or remaining on Heathrow Airport (“the **Airport**”) in connection with the JSO campaign (or other environmental campaign) without Heathrow’s consent. That application was sought by Heathrow in connection with a high-profile campaign of ‘direct action’ disruption threatened (and in some instances, carried out) by JSO. The background to the Injunction is summarised within the First Witness Statement of Akhil Markanday in these proceedings dated 6 July 2024 (“**Markanday 1**”).
8. The reasons for the grant of the Injunction are recorded in the approved judgment of Mr Justice Julian Knowles dated 14 October 2024 (exhibited at **PS1/1-12**).
9. The steps undertaken by Heathrow to effect service of the Injunction, in accordance with its terms, are set out within the Second Witness Statement of Jonathan Coen in these proceedings dated 29 November 2024.
10. Pursuant to paragraph 3 of the Injunction, the Injunction is to be reviewed on each anniversary (or as close to this date as is convenient having regard to the Court’s list) with a time estimate of 1 ½ hours. That review hearing has now been listed for 23 July 2025. I make this witness statement for the purposes of the review hearing. Heathrow seeks the continuation of the Injunction at this hearing.

The Review Hearing for 10 other Airports

11. The Claimant is aware that 12 other airports in the UK obtained similar injunctions to the Injunction in the summer of 2024, each of which also contained mechanisms for annual review. On 24 June 2025, Mr Justice Bourne conducted a review hearing for the following 10 airports heard on a joint basis: London City Airport, Manchester Airport, Stansted Airport, East Midlands Airport, Leeds Bradford Airport, Luton Airport, Newcastle Airport, Birmingham Airport, Bristol Airport and Liverpool Airport (the other 2 airports with injunctions being London Southend Airport and London Gatwick Airport). Representatives of Heathrow attended that hearing, including an associate of this firm (Robert Hodgson).
12. Mr Justice Bourne ordered that each of the injunctions be continued without change (apart from a minor alteration to the geographical extent of the injunction in respect of London City Airport, as requested by London City Airport due to a change in the layout of that site). The papers in relation to the review hearing on 24 June 2025 can be obtained on the London City Airport website (<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>), along with a copy of the Order of Mr Justice Bourne made at that hearing. For ease of reference, I exhibit a copy of Mr Justice Bourne's 24 June 2025 Order at **PS1/13-30**.
13. Mr Justice Bourne's reasons for continuing the injunctions were set out in an *ex tempore* judgment. I exhibit at **PS1/31-32** a brief report of the decision (with citation [2025] 6 WLUK 499).

II. BREACHES OF THE INJUNCTION AND JOINDER OF NAMED DEFENDANTS

Incidents in July / August 2024

14. At the time the Injunction was sought, Heathrow did not know the names of the individuals who threatened to commit acts of direct action at the Airport. That is why the claim was brought only against "Persons Unknown", in a form now widely described as a 'newcomer injunction'.

15. Since that time, there have been four incidents at Heathrow Airport during which 26 people have breached (or at least very arguably breached) the Injunction. Each of those 26 people (with the exception of Monday Rosenfield, now the 9th Defendant), was arrested by the Police at the time of and in connection with incidents at the Airport.
16. The four incidents all took place shortly after the Injunction was granted, over the course of a week at the end of July and early August 2024: on 24th July, 27 July, 30th July and 1 August 2024. Details of those incidents are set out within the Second Witness Statement of Akhil Markanday (“**Markanday 2**”) dated 16 September 2024. By way of summary only, the four incidents involved:
 - 16.1. **24 July 2024:** 8 people connected with JSO were arrested by Police at two separate locations at the perimeter fence to the Airport in possession of items which indicated an intention to breach the perimeter fence and commit acts of disruption. It was fortunate that the Police were able to arrest the 8 people involved in this incident before they were able to access the Airport’s runways, as my understanding is any incursion would likely have been treated as a serious incident by Heathrow’s security team.
 - 16.2. **27 July 2024:** An individual identified by the Police as Ms Monday Rosenfeld entered Terminal 5 of the Airport holding an “Oil Kills” sign and was asked to leave by Heathrow’s Airport Operation Manager.
 - 16.3. **30 July 2024:** 2 people connected with JSO entered the Terminal 5 departures hall at the Airport and each began spraying orange paint from fire-extinguishers over the ceiling, walls, floor and the electronic departure board screens.
 - 16.4. **1 August 2024:** 9 individuals connected with JSO were intercepted and arrested by Police travelling into the Airport and found with orange t-shirts and banners and on the same day a further 6 individuals were arrested by Police for blocking the entrance to the security area in Terminal 5 departures.
17. Following those incidents, Heathrow came to learn the identity of the individuals involved from the Police. As explained in Markanday 2, Heathrow considered

that it was obliged (and that it was in any case appropriate for it) at that juncture to seek to join those individuals as named Defendants to these proceedings. Heathrow accordingly issued a joinder application dated 16 September 2024 in respect of all 26 proposed named defendants (the “**Joinder Application**”).

18. Details of the service of the Joinder Application were set out in the Second and the Third Witness Statements of Robert Hodgson of this firm.

Hearing on 11 December before Mr Justice Dexter Dias

19. The Joinder Application was first heard before Mr Justice Dexter Dias on 11 December 2024.
20. As set out within the Order of Mr Justice Dexter Dias dated 11 December 2024 (the “**First Joinder Order**”) (exhibited at **PS1/33-43**), 24 of the Named Defendants were joined to the proceedings on that occasion. The exceptions were Joe Magowan and Adam Beard, whose position I explain below.
21. Joe Magowan attended the hearing on 11 December 2024 and was represented by a solicitor from the firm Deighton Pierce Glynn. Mr Magowan’s solicitor explained that Mr Magowan attended the incident on 1 August 2024 as JSO’s photographer for the event and was not a member of JSO. Mr Magowan offered to provide an undertaking to the Court in like terms to the effect of the Injunction. In those circumstances, Heathrow agreed not to pursue the Joinder Application against him. An undertaking was duly provided and filed with the Court on 11 December 2024.
22. Adam Beard was on remand in prison at the time of the hearing on 11 December 2024 following his arrest at the incident at the Airport on 24 July 2024. Someone who I understood to be a friend of Mr Beard attended the hearing and provided a letter to the Judge, which explained that due to the prison printing any documents sent to prisoners in black and white, Mr Beard was experiencing difficulties reading plans sent to Mr Beard as part of the Joinder Application (in particular the red line on the plan showing the geographical extent of the Injunction).
23. In light of this, Mr Justice Dexter Dias adjourned the hearing in respect of Mr Beard to a further hearing to be listed on the first available date after 13 January

2025 with a time estimate of 1 hour and ordered that the Claimant re-serve Mr Beard, as soon as reasonably practicable, in prison with all relevant documents in relation to the Joinder Application as set out at paragraphs 2 and 3 of the First Joinder Order.

24. On 23 December 2024, BCLP arranged for service on Mr Beard in prison in accordance with paragraph 3 of the First Joinder Order. The re-served documents included an additional hatched plan which could be read more easily in black and white.
25. At paragraph 6 of the First Joinder Order, the Claimant was granted permission to file and serve an amended Claim Form and amended Particulars of Claim (which reflected the inclusion of the new Named Defendants). Both of these were filed on 13 December 2024. Details of the service of the First Joinder Order, the amended Claim Form dated 13 December 2024 and the amended Particulars of Claim dated 13 December 2024 are set out within the Third Witness Statement of Robert Hodgson of this firm.
26. There has been no response from any of the Named Defendants (excluding Mr Beard, as further explained below) following this service.

Hearing on 13 February 2025 before Mr Justice Ritchie

27. The adjourned hearing in respect of the joinder of Mr Beard was heard on 13 February 2025 before Mr Justice Ritchie.
28. By way of Order dated 13 February 2025 (the “**Beard Joinder Order**”) (exhibited at **PS1/44-53**), Mr Beard was joined to the proceedings as the Third Named Defendant.
29. At paragraph 3 of the Beard Joinder Order, Heathrow was granted permission to amend the Amended Claim Form and Amended Particulars of Claim to reflect of the joinder of Mr Beard.
30. Details of the service of the Beard Joinder Order, the re-amended Claim Form dated 18 February 2025 and the re-amended Particulars of Claim dated 18

February 2025 are set out within the Fourth Witness Statement of Robert Hodgson of this firm.

31. There has been no response from Mr Beard following this service.

Committal proceedings

32. As explained in the First Witness Statement of Robert Hodgson, as well as being noted within recitals to the First Joinder Order and the Beard Joinder Order, Heathrow was at that juncture considering bringing committal proceedings against at least some of the Named Defendants in respect of breaches of the Injunction.
33. To update the Court, Heathrow has carefully considered (including with the benefit of legal advice, the privilege in which is not waived) whether to pursue any of the Named Defendants for committal. Heathrow has now decided not, on this occasion, to bring committal proceedings against the Named Defendants for their breaches (or alleged breaches) to date. In fairness to the Named Defendants, they have each been informed of that decision by letters dated 25 June 2025 (an example letter is exhibited at **PS1/53-54**). Further explanation of Heathrow's approach is set out within the First Witness Statement of Tonia Fielding dated 7 July 2025 ("**Fielding 1**").
34. The Claimant reserves its position on bringing committal proceedings in respect of any future breaches of the Injunction.

Paragraph 13 of the First Joinder Order

35. I also note, in connection with committal, that at the hearing on 13 February 2025 (concerning the joinder of Mr Beard) Ritchie J asked that Heathrow notify the Judge at the review hearing that he had concerns over the wording at paragraph 13 of the First Joinder Order. I therefore draw this, in particular, to the Court's attention in this statement.
36. Paragraph 13 of the First Joinder Order states:

“In accordance with paragraph 9 above, the requirement for personal service of any contempt application in respect of alleged breaches of the Injunction before the date of this Order is dispensed with.”

37. That paragraph of the First Joinder Order had been sought, and granted, in circumstances where Heathrow had raised at the hearing of the Joinder Application before Mr Justice Dexter Dias the question of whether it required the Court’s permission to commence (then anticipated) committal proceedings (it was held that they did not) and/or whether there were any aspects of case management in connection with the potential commencement of committal proceedings which ought to be addressed, including as to the timing of committal hearings vs. other hearings in these proceedings and service of documents.
38. It was also sought and granted in circumstances where: (i) several of the Named Defendants were in prison (on remand, or serving a term of imprisonment for other offences), such as to present impediments to personal service; and (ii) paragraph 14 expressly reserved further consideration of the adequacy of the steps taken for service to any future hearing.
39. Whilst I raise this point, as directed by Mr Justice Richie, I also note that – in circumstances where Heathrow has now indicated that it is *not* pursuing committal proceedings in respect of any previous breaches, any concerns about paragraph 13 of the First Joinder Order now seem academic.

III. CONTINUING RISK OF DIRECT ACTION

40. Heathrow’s position, in common with the position of the 10 airports whose injunctions were considered at the review hearing before Mr Justice Bourne on 24 June 2025, is that the risk of unlawful direct action activities being directed at Heathrow by JSO or other environmental campaigners has not abated since the Injunction was granted.
41. I have already referred to Markanday 1 and the judgment of Mr Justice Julian Knowles giving reasons for the original Injunction, which set out the risks of such activities as they then stood.

42. The incidents in late July and early August 2024, to which I refer above, further serve to demonstrate that the risks identified at the time of the original Injunction were not overstated: regrettably, they materialised notwithstanding the terms of the Injunction. Whilst primarily matters for submissions, I observe:

42.1. The fact that the Injunction was breached, and therefore has not in all respects been successful, should not in principle count against the Injunction being continued.

42.2. Whilst it is impossible to know the thought-processes of those involved in these four incidents, it is possible that – in the fairly short time between the Injunction having been made (9 July 2024) and these activities (24 July to 1 August 2024) – the existence, effect or the potential consequences of breaching the Injunction had not been fully recognised or appreciated by the Named Defendants. Or, equally, it is possible that they were ‘caught up’ in the momentum of the campaign against the aviation industry in the summer of 2024 and did not properly reflect on the potential consequences to them of persisting with a breach of the Injunction.

42.3. Whatever the reasons for the then breaches of the Injunction, the fact remains that there have *not* been further breaches of the Injunction since 1 August 2024.

42.4. Whilst it might be argued that the subsequent lack of direct action against UK airports since then represents a diminution of the risk of such activities, this may also be due (and Heathrow believes it to be in substantial part due) to the success of the Injunction (and other like injunctions in favour of the other main UK airports) in deterring such activities.

42.5. The reasons for that belief, i.e. the belief that the underlying risk of unlawful direct action retains materially unchanged, is set out below.

Other UK activist activity

43. Heathrow is aware of the following events involving other UK airports that have occurred from June 2024 to date (I also note that there have been other activities

carried out by the groups below not involving airports within the UK, but in an effort to keep the evidence presented to the Court proportionate, these are not covered by this statement):

2 June 2024: Extinction Rebellion conducted a protest at Farnborough Air Show which involved blocking the 3 main gates and parking the Extinction Rebellion pink boat across the Gulfstream gate.

25 June 2024: Four JSO activists were arrested at Gatwick Airport.

27 July 2024: a JSO action which was planned for London City Airport was relocated to the Department of Transport on Horseferry Lane.

29 July 2024: Eight JSO activists were arrested at Gatwick Airport on suspicion of interfering with public infrastructure.

31 July 2024: JSO and Free Fossil London (“**FFL**”) took action at the Docklands Light Railway station at City Airport.¹

5 August 2024: Five JSO activists were arrested on their way to Manchester Airport equipped with bolt cutters, angle grinders, glue, sand and banners carrying slogans including “oil kills”.

2 February 2025: Extinction Rebellion held a demonstration at Farnborough Airport following a consultation period in relation to Farnborough Airport’s expansion plans which ended in October 2024.

17 February 2025: Extinction Rebellion held a demonstration at Inverness Airport waving banners with “Ban Private Jets” and “We’re in a climate emergency, we need to step up and take action”.

27 June 2025: Four people in connection with a pro-Palestine group broke into an RAF base at Brize Norton and vandalised military aircraft.

¹ I have obtained the information in respect of this incident from the Witness Statement of Stuart Sherbrooke Wortley dated 6 June 2025 which was provided to the Court in support of the London City Airport and others’ review hearing on 24 June 2024 and is available on the following website: <https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>

44. Copies of media articles detailing the events referred to above are exhibited at **PS1/55-86**).

Current status of JSO

45. On 27 March 2025, JSO made the following announcement on its website, headed ‘We are hanging up the Hi Vis’:

“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”

46. A copy of this announcement is exhibited at **PS1/87-89**.
47. On 18 May 2025, GB News reported (both on television and on their website) that JSO were planning to make a comeback.
48. Ben Leo of GB News reported on television the following:

“...I can exclusively reveal that Just Stop Oil is plotting a very big comeback.

On Ben Leo Tonight, we have gained access to secret Just Stop Oil meetings, where members are discussing a dramatic U-turn— planning to cause absolute chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and even carrying out “citizens’ arrests” on so-called climate criminals.

Speaking during an online meeting on Thursday night, one coordinator—known only as “Dave”—said protests should remain “action-based” and warned against becoming more peaceful, like Greenpeace.

The meeting continued with Dave insisting that it was essential to keep doing what he called the “spicy and naughty stuff” to generate media attention.

The group also discussed how to feed new protest ideas back to what they referred to as a “core team”. There was frustration over communication with this mysterious leadership group, with some suggesting using 50-word briefs to make it easier for them to process ideas.

It raises serious questions: Who exactly is this core team? Who are these professional protesters reporting to—and who’s funding them?

Chillingly, the group also spoke about carrying out citizen’s arrests on so-called climate deniers. There was some introspection as well, with members questioning whether their public image was doing more harm than good.

But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to proceed with Just Stop Oil’s revival, including talk of keeping protesters in safe houses to maintain morale....”

49. A copy of the news article is exhibited at **PS1/90-93** and a link to the television report can be accessed on the following website:
<https://www.gbnews.com/opinion/ben-leo-opinion-just-stop-oil>.
50. Heathrow is aware from the review hearing for the 10 other Airports on 24 June 2025 that JSO had emailed London City Airport’s solicitor in response to the article confirming that “*GB News was right for once*” and that JSO are “*plotting a very big comeback*”. A copy of this email from JSO to Stuart Wortley of Eversheds was provided to the Court as part of London City Airport and others’ evidence ahead of the review hearing on 24 June 2025 and was referred to by Bourne J when granting his order. We have obtained a copy of this correspondence from the London City Airport website and have exhibited a copy at PS1/94-95 for ease of reference.

Other environmental / climate campaign groups

51. Regardless of what JSO have said, and the precise risk presented by that group in particular, there are also several other environmental campaign groups whose behaviour poses a risk to airports, including Heathrow. Of primary concern to Heathrow are the following:

Youth Demand

52. In January 2024 a group called ‘Youth Demand’ was formed. The press has described Youth Demand as “JSO 2.0” (news article exhibited at **PS1/96-105**).
53. Youth Demand’s website states:

“In 2024, we built a national youth resistance organisation. We mobilised over a thousand people to pull off 60 actions, from blockading central London during the summer, plastering a picture from the Gaza genocide on a Picasso painting and shutting down five UK cities in November”.

54. The group remains active and its website lists that it is arranging “nonviolence training” on 6 July 2025 and “Volunteer Training” on 12 July 2025.

FFL

55. FFL is a climate activist group that was formed around 2019.
56. FFL’s website states:

“Fossil Free London is a climate justice organisation dedicated to disrupting the fossil fuel industry here in our city.

Through direct action, strategic campaigning, and movement building, we challenge the social licence of elites and corporate polluters. We advocate for a rapid and just transition towards a sustainable and equitable society.”

57. On 30 April 2025, activists associated with FFL disrupted Heathrow’s panel appearance at the Innovation Zero conference at Olympia London. I return to that at paragraph 68 below. As mentioned above, FFL was also involved in direct action at the Docklands Light Railway station at London City Airport on 31 July 2025.

Extinction Rebellion

58. Extinction Rebellion remains a very active climate activist group, which has publicised an intention to take further action this summer, including the targeting of airports.
59. As noted above, Extinction Rebellion has already taken action at UK airports including Farnborough Airport and Inverness Airport.
60. Its website includes an article dated 19 June 2025 headed “Summer of Action” (copied below), which includes planned activity Oxford Airport:

“A Summer of Action

While politicians supported airport expansions, degraded our environmental laws and parliament tightened its chokehold on climate activists, global average temperatures in 2024 blew past 1.5°C. Now the UK has recorded its warmest spring on record and its driest in over 50 years.

Rebels are refusing to be silenced. XR local and community groups all over the nations and regions of the UK are getting ready for a summer filled with defiant action. Creative, colourful, bold actions are being planned everywhere – join them, raise your voice in protest this summer.

Join in joy or join in despair, but let it be in unity, community, and curiosity. The sun will be a totem that we rally together around, never forgetting that it is a death sentence for millions on the frontlines of climate and ecological collapse.

There has never been a more vital time to act. It will be a rebellious summer.”

Insure Our Survival – Without insurance, fossil fuel companies can’t extract more oil, coal and gas. A Week of Action from **5th-12th July** – targeting insurers takes place with local groups across the UK planning actions.

Stop Private Jets – Join XR Oxford on **Saturday July 5th** in a march to Oxford Airport and say No to Private Jets. Find out more.

Heat Strike – A week of action **14th-20th July** to highlight rising temperatures’ impact on workers, as we pressure government and employers to take action. Learn more and get involved.

Funeral for Nature – Dress in black for a solemn march through **Bournemouth** on **Sunday July 27th**. This visual action mourning the destruction of nature will be silent apart from a drumbeat.

Don’t Pay for Dirty Water – Last year, sewage was discharged into UK waterways over 1,000 times a day. We are withholding payment of the sewerage charge portion of our bills until the UK government and water companies stop poisoning and start cleaning up coasts and waterways across the UK. Join the boycott **now!**

World Water Wedding – *Water is sacred in many cultures. Water is fundamental to life. Wherever clean water flows, life grows. Water represents emotions, renewal and life, which all ebb and flow. Constantly evolving, ebbing and flowing, it reminds us that we can too. Commit to water for life on **August 24th**.*

*For advice on the latest safety, legal and action support information, please join one of our online Prepare for Action workshops, upcoming on **26th June and 1st July**.*

61. A copy of this article is exhibited at **PS1/106-108**.

Shut the System

62. Shut the System is a new group that does not appear to have a website.
63. It does have an Instagram account, and it posted on 16 April 2025 the following:

“A new type of movement is needed.

Our plan and pledge: Shut down the fossil fuel economy.

We pledge to target property and machinery of the destructive industries owned by the wealthiest and most responsible for the greatest crises humanity has ever faced. Our strategy is to disable the physical infrastructure of significant carbon emitters; whether emissions occur directly, or through their support for upstream business operation.”

64. In January 2025, Shut the System group cut fibre optic cables to Lloyds of London and prominent buildings involved in the insurance sector on Fenchurch Street, Threadneedle Street, Leadenhall Street and Lime Street in London (and in Birmingham, Leeds and Sheffield). I exhibit a press report about this action at **PS1/109-110**.

V. THE SHELL AGM

65. Without reference to Heathrow, Shell PLC (“**Shell**”) arranged for its annual general meeting (the “**Shell AGM**”) to be held at the Sofitel London Heathrow Hotel – Terminal 5 at the Airport at 10:00am on 20 May 2025. The Sofitel Hotel falls within the geographical scope of the Injunction.
66. Notice of the Shell AGM was sent to its shareholders on 16 April 2025. I exhibit a copy of the Notice at **PS1/111**. I also note that the Notice sets out details for remote, video-attendance at the AGM.

67. Heathrow has no reason to believe that Shell arranged to hold the Shell AGM at the Airport in order to seek to obtain any benefit from the Injunction. Shell has publicly stated that it did not choose the location for the AGM because of the Injunction and that the locations was chosen “purely based on availability”: see, for example, a press report to that effect at **PS1/112-120**.
68. On 30 April 2025, activists associated with FFL disrupted Heathrow’s panel appearance at the Innovation Zero conference at Olympia London. Activists disrupted the event by shouting at Heathrow’s director of carbon strategy, Matthew Gorman, that the Injunction would prevent anyone from protesting at the Shell AGM. A copy of a news article reporting on the event is exhibited at **PS1/121-123**. Until 10 May 2025, no further contact was made to Heathrow by FFL (or any other person) in respect of the Shell AGM.
69. On 10 May 2025, BCLP received a letter from a Mr Andrew Rawstron, which stated that he was a shareholder of Shell PLC and asked Heathrow to confirm that Heathrow consents to the *“presence of any Shell shareholders, within the area identified in the Injunction Order, for the purposes of traveling to/from (and attending) the Shell AGM at the Sofitel Hotel on 20 May 2025”* (letter exhibited at **PS1/124-125**).
70. BCLP responded by way of letter to Mr Rawstron on 12 May 2025 stating that Heathrow had no issue with any Shell shareholder lawfully attending the Shell AGM on 20 May 2025, nor did Heathrow consider that the terms of the Injunction prohibited such lawful attendance at the Shell AGM (email exhibited at **PS1/126**).
71. Mr Rawstron responded by email on 12 May asking BCLP for clarification as to why BCLP stated that Heathrow considered that ‘activist shareholders’ would not risk being found to be in breach of the Injunction and thus risk being in contempt of court. Mr Rawstron also stated that he would confirm the following day whether he intended to apply to the Court to seek a variation of the Injunction (email exhibited at **PS1/127-128**).
72. Mr Rawstron then sent a follow up email on 13 May seeking further clarification and also raising concerns about the scope of the Injunction. Mr Rawstorn also sought Heathrow’s agreement to vary the Injunction, by proposing to add the

following wording to the Injunction, “*Nothing in this Order shall have the effect of prohibiting or restricting the attendance of any shareholder at the Shell plc AGM on 20 May 2025*”. Mr Rawstron also stated that his email should be taken as ‘*notice of a potential application [to Court to vary to the Injunction]*’ (email exhibited at **PS1/129-131**).

73. BCLP responded to Mr Rawstron on 13 May again clarifying that Heathrow did not consider Mr Rawstron’s proposed attendance at the Shell AGM “*in connection with exercising your rights as a Shell Plc shareholder*” to be “*in connection with Just Stop Oil (or other environmental campaign)*”, or therefore caught by the Injunction. BCLP also confirmed that Heathrow was happy to clarify the position with anyone else who had concerns and asked that this be shared with any other shareholders who had similar concerns. A copy of this email is exhibited at **PS1/132**).
74. BCLP did not receive a response from Mr Rawstron nor am I aware that he made any application to vary the Injunction.
75. At 23:00 on 13 May 2025, BCLP received a letter from Mr Kush Naker which stated that he was making an application to vary the Injunction and raised concerns that the Injunction “*would prevent shareholders of Shell Plc who have a connection to any environmental campaign from attending the AGM in person, without specific consent being granted by Heathrow Airport Limited*” and that “*this potentially precludes any shareholder who has ever been publicly critical of the environmental impacts of one of the worlds largest fossil fuel companies from holding the companies directors to account, because another separate company in a high polluting industry has not granted them permission to do so.*” A copy of the letter is exhibited at PS1/133-134 (the covering email is at of PS1/136).
76. BCLP responded to Mr Naker on 14 May 2025, stating, on behalf of Heathrow, that “*We do not consider that lawful attendance by a shareholder at Shell’s AGM to exercise their shareholder rights is caught by the injunction. To put it another way, our understanding is that shareholders wish to attend the Shell AGM “in connection with exercising their rights as a Shell Plc shareholder”. We do not*

consider that purpose to be “in connection with Just Stop Oil (or other environmental campaign)”, which are the terms in which the injunction is drafted”.

77. Mr Naker replied on 14 May 2025 stating that he is both a Shell shareholder and associated with Just Stop Oil and various other environmental campaigns and that the *“broad scope of the wording on the injunction leaves it totally open to interpretation what role my criticism [of] Shells environmental record are “in connection with””*. The email chain between BCLP and Mr Naker is exhibited at **PS1/135-137**.
78. BCLP did not respond to the Mr Naker’s second email of 14 May in view of the clarity, already given, that Heathrow consented to anyone attending the Shell AGM in their capacity as a Shell shareholder – and so were not caught by the Injunction.
79. BCLP did not receive any further correspondence in respect of the Shell AGM, apart from the correspondence from Mr Rawstron and Mr Naker as summarised above. No application to Court was ever received from Mr Naker or any other party.
80. On 16 May 2025 Heathrow uploaded the following post to the Heathrow website (<https://www.heathrow.com/injunction>), which remained on the website until 21 May 2025 (the day after the Shell AGM):

“Shell PLC Annual General Meeting on 20 May 2025 (Shell AGM):

Heathrow Airport Limited has become aware that some shareholders were concerned that they may not be able to attend the Shell AGM given the terms of the Injunction. For the avoidance of doubt Heathrow Airport Limited does not consider that the terms of the Injunction have the effect of prohibiting or restricting the lawful attendance of any shareholder at the Shell AGM”

81. I am informed by the Claimant that its understanding is that the Shell AGM went ahead on 20 May 2025 as planned with no disruptive activity occurring at the Sofitel Hotel. I am also aware from press reports that people associated with

Amnesty International UK, FFL and Justice 4 Nigeria staged a protest outside of Shell's global headquarters in central London. A news article in respect of this protest it exhibited at **PS1/138-140**.

82. These events in connection with the Shell AGM, Heathrow considers, shows that the Injunction is operating reasonably and effectively:

82.1. It is apparent that the existence and Injunction is widely known to those who apprehend that they might be affected by it.

82.2. Such people are also aware of: (i) the means of contacting BCLP in order to raise queries about the injunction; and (ii) their right to apply to vary it (which right, in the event, has not been exercised).

82.3. Heathrow, in connection with this event, acted reasonably and proportionately. It promptly, when asked, made clear that it consented to the attendance by any shareholder at the Shell AGM so that they could exercise their rights as shareholder.

82.4. The Injunction has not, in any case, served to have any unwarranted 'chilling' effect on rights of protest. Protest activity took place outside Shell's global headquarters in central London.

VI. PROCEDURAL AND OTHER MATTERS

Notice of the Review Hearing

83. On 6 March 2025, the KB Judges Listing Office emailed BCLP informing BCLP that the review hearing had been listed for 23 July 2025 for 1.5 hours, before a High Court Judge, in person (the "**Notice of Review Hearing**") – a copy of the Court's email is at **PS1/141**.

84. Pursuant to paragraph 11 of the Injunction (in respect of the First, "Persons Unknown" Defendants), paragraph 9 of the First Joinder Order (in respect of the Named Defendants (excluding the Third Named Defendant (Adam Beard))) and paragraph 6 of the Beard Joinder Order (in respect the Third Named Defendant),

Heathrow undertook the following steps to give notice and effect service of the Notice of Review Hearing:

- 84.1. On 18 March 2025, BCLP sent letters by first class post to each of the Named Defendants at their last known addresses (as previously provided to Heathrow by the Police) providing the details of the review hearing;
 - 84.2. On 18 March 2025, BCLP also sent letters providing details of the review hearing to the relevant prisons for any of the Named Defendants who were in prison at such time (which at the time was Adam Beard, Luke Elson, Luke Watson, Phoebe Plummer and Rory Wilson);
 - 84.3. On 18 March 2025, BCLP emailed the JSO email addresses ('juststopoil@protonmail.com'; 'juststopoilpress@protonmail.com'; 'info@juststopoil.org') providing the details of the review hearing; and
 - 84.4. On 19 March 2025, Heathrow updated its website to provide details of the review hearing.
85. An example letter of those sent at paragraphs 84.1 and 84.2 as well as the email sent at paragraph 84.4 above are exhibited at **PS1/142-143**.

Evidence for the Review Hearing

86. On 25 June 2025, BCLP sent a further letter by First Class Post and Special Delivery to each of the Named Defendants and by email on 26 June 2025 to JSO (at the addresses listed at paragraph 84.3 above). This followed, on 24 June 2025, the government's Find a Prisoner service confirming to BCLP that none of the Named Defendants was in prison, and so letters in respect of the Named Defendants were only sent to the Named Defendants' last known addresses (as previously provided to Heathrow by the Police). A sample letter is exhibited at **PS1/53-54**. The email to JSO is exhibited at **PS1/144-145**.
87. These letters and the email reminded the Named Defendants of the review hearing details and explained that the review hearing bundle would be uploaded to the Heathrow website by 8 July and the skeleton argument by 18 July, and asked that should any person require hardcopy documents to notify BCLP by 4 July 2025.

This approach was taken by BCLP to avoid the cost and waste of unnecessary printing and posting, but still allow time to comply with service deadlines.

88. As of today's date, BCLP has only received two responses to the letters and email issued on 25 June 2025. The first response was from Ms Pauline Hazel, who telephoned Robert Hodgson of this firm on 1 July asking for hardcopy documents and confirmed her address. Those are being provided as requested. The second was an email from Rhiannon Wood, who simply acknowledged receipt (email exhibited at **PS1/146**).
89. BCLP's letters of 25 June, as already noted, also confirmed that Heathrow is not pursuing committal proceedings in respect of previous breaches, but reserves any and all rights and remedies available to it in respect of any further breaches.

Cross-Undertaking in Damages

90. I am authorised to confirm on behalf of Heathrow that it continues to offer the cross-undertaking in damages recorded in paragraph 2 of Schedule 1 to the Injunction.

Full and Frank Disclosure

91. I confirm that Heathrow is aware of its ongoing duty of full and frank disclosure, and I consider that I have complied with that duty in setting out above all relevant factual matters – including those which might be relied upon as tending against the continuation of the Injunction.

VII. CONCLUSION

92. Heathrow obtained the Injunction following a high-profile campaign of threatened action against Airports by JSO.
93. Since this time there have been four incidents whereby 26 people in connection with JSO have carried out direct action at the Airport in breach of the Injunction.
94. Although JSO's announcement on 27 March 2025 stated that they are discontinuing any action, it is clear from press reports (which have been confirmed by JSO as correct) that JSO are 'plotting a very big comeback'.

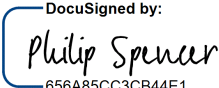
Heathrow can also not rule out that JSO's announcement was not simply a publicity stunt, or misdirection or that JSO did so tactically ahead of Heathrow's and the other airports' review hearings.

95. What is also clear, and set out above, is that there are other environmental groups taking similar action to the action previously carried out by JSO, including Youth Demand (which has been described as "JSO 2.0"), FFL, Extinction Rebellion and Shut the System.
96. FFL and Extinction Rebellion have previously taken action at UK Airports, and Extinction Rebellion publicised on 19 June 2025 that they are planning further action at a UK Airport as part of their 'Summer of Action'. It is also of concern that other groups have also sought to take action at airports, such as the incident at the RAF base on 27 June 2025 (albeit that this was in connection with events in the Middle East rather than environmental issues).
97. It also appears, from the recent activity and statements of Shut the System, that there may be a shift in the mindset of certain direct action activists from mere disruption to the physical sabotaging of operations. If so, the consequences of potential action at UK airports are likely to be more severe. Heathrow is also very aware, as explained in Fielding 1, that Heathrow will remain in the spotlight and will become potentially more of a target to environmental groups because of Heathrow's expansion plans.

98. It is for these reasons that Heathrow's position is that the Court should continue the Injunction in its current form, subject to further review in 12 months' time.

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.

DocuSigned by:

.....656A85CQ3CB44E1.....

Philip Keith Spencer

7 July 2025

IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KINGS BENCH DIVISION

Before The Honourable Mr Justice Julian Knowles

BETWEEN:

HEATHROW AIRPORT LIMITED

-and-

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



Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

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

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

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

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

AND UPON HEARING Leading Counsel and Junior Counsel for the Claimant

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

IT IS ORDERED THAT:

INJUNCTION

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

VARIATION

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

SERVICE AND NOTIFICATION

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

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

12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8.3, 9.3 and 10.3, effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

14. Liberty to apply.

COSTS

15. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

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

- (1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

- (2) Phil Spencer

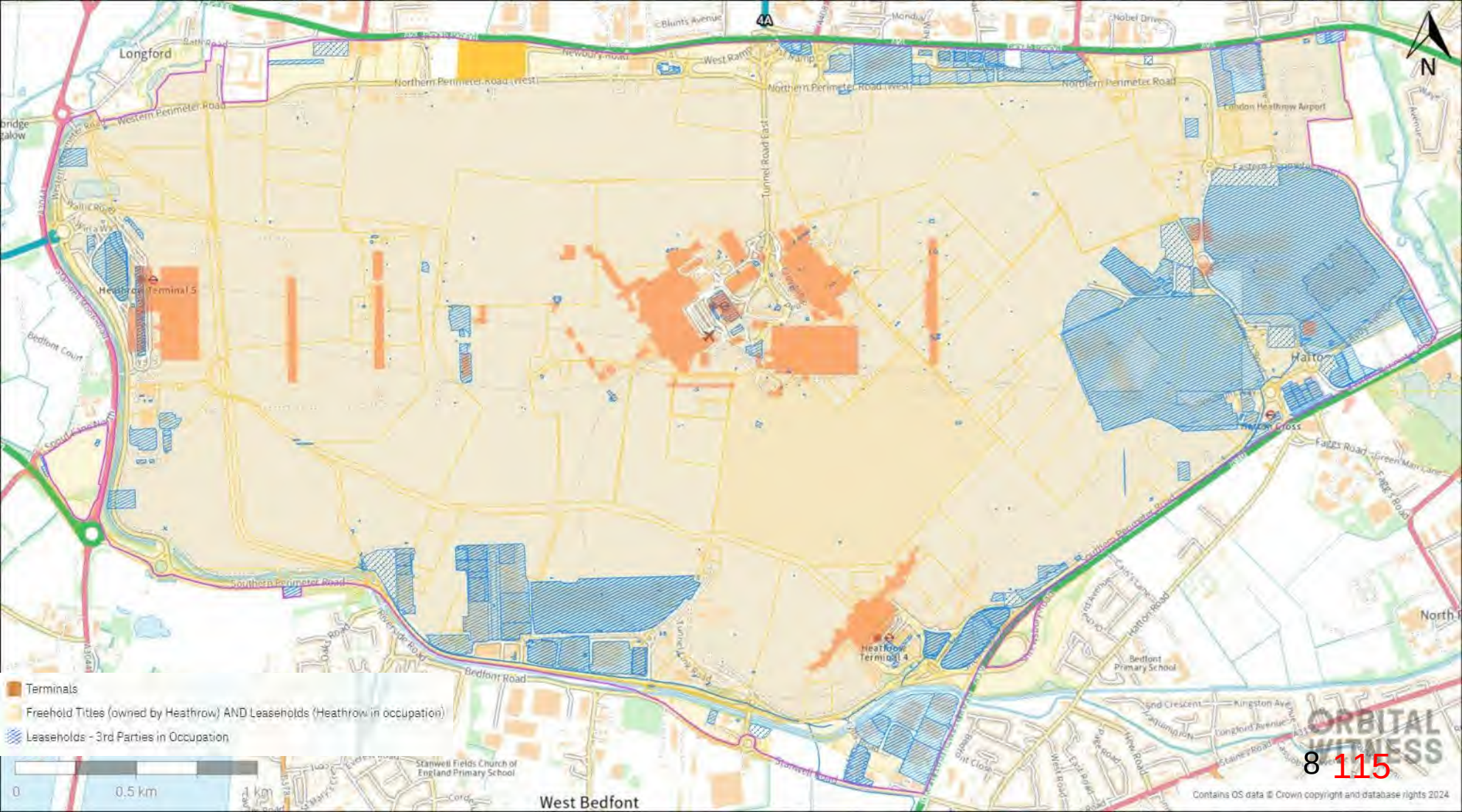
Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

Dated: 9 July 2024

SCHEDULE 1 – UNDERTAKINGS

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

SCHEDULE 2 – PLAN A



- Terminals
- Freehold Titles (owned by Heathrow) AND Leaseholds (Heathrow in occupation)
- Leaseholds - 3rd Parties in Occupation

0 0.5 km

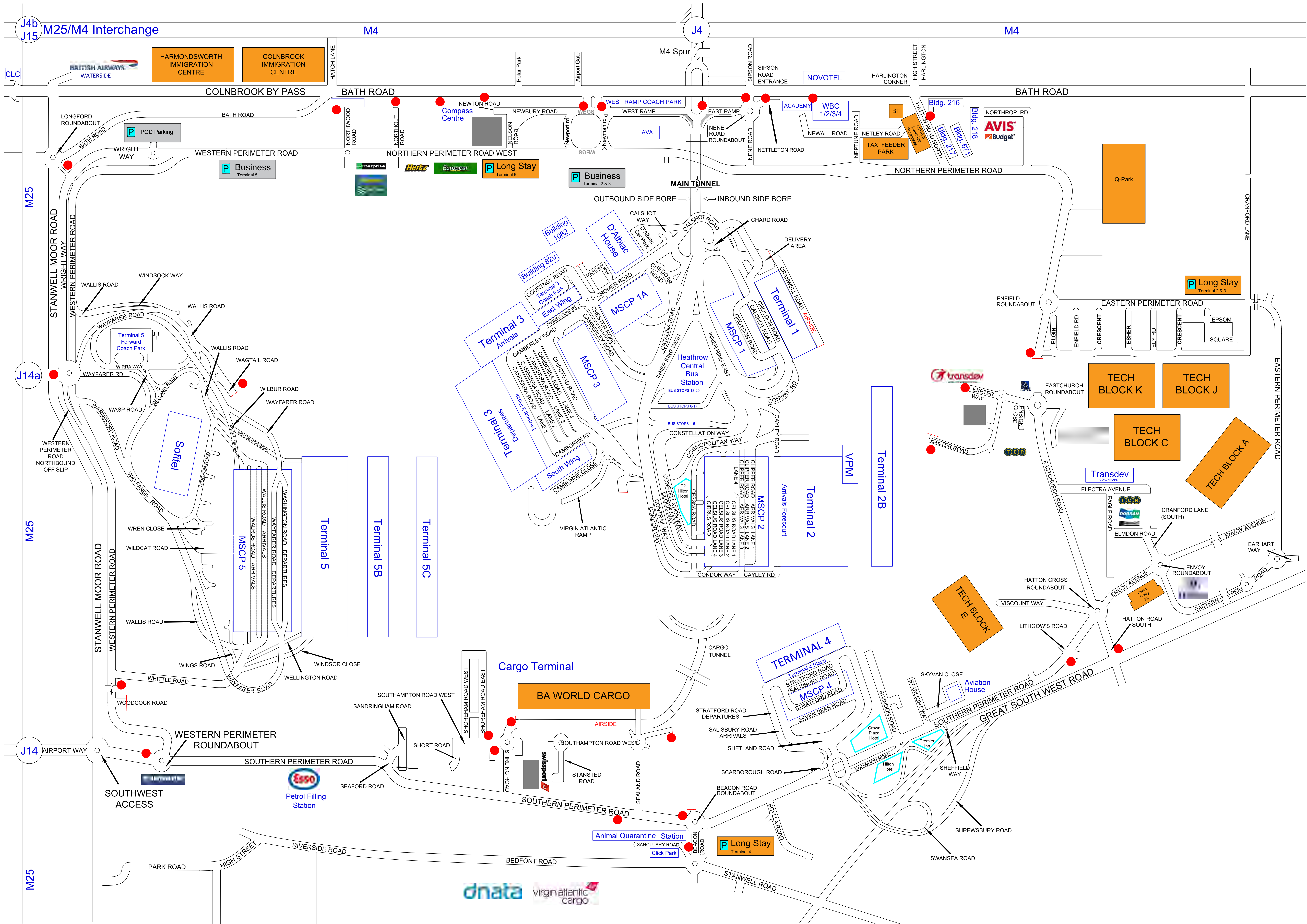
West Bedfont

Stamwell Fields Church of England Primary School

SCHEDULE 3 – EMAIL ADDRESSES

1. juststopoil@protonmail.com
2. juststopoilpress@protonmail.com
3. info@juststopoil.org

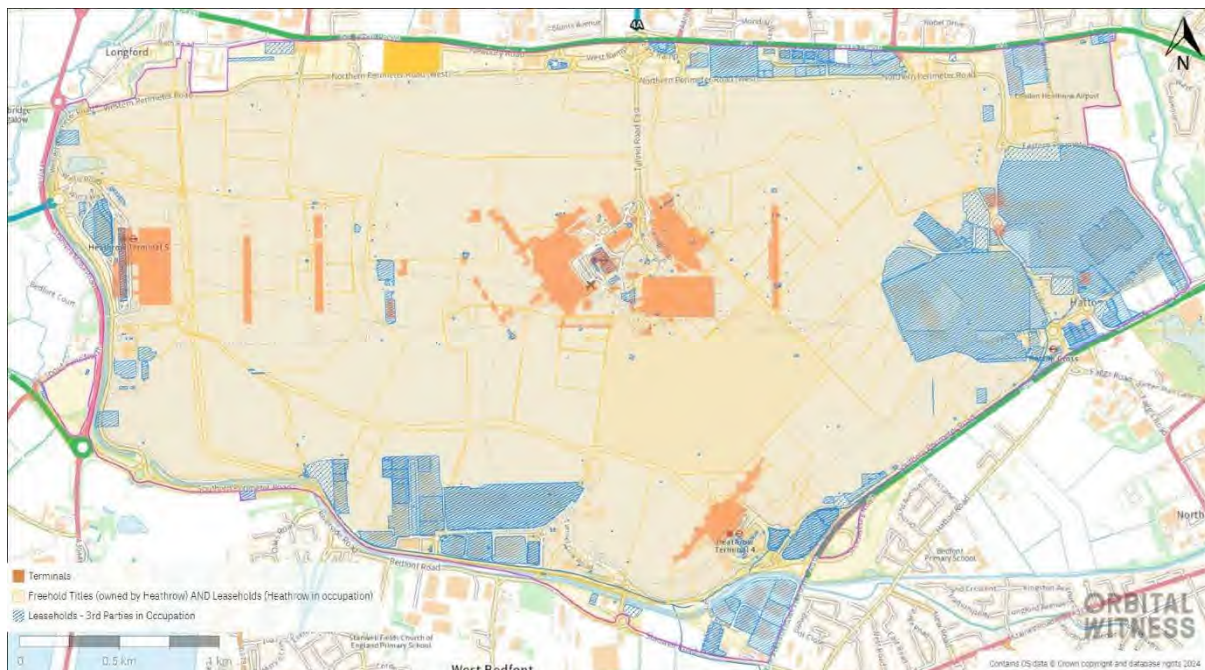
SCHEDULE 4 – PLAN B



SCHEDULE 5 – NOTICE
WARNING – NOTICE OF COURT INJUNCTION

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

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



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

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

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

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

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BEFORE: THE HONOURABLE MR JUSTICE BOURNE

ON: 24 June 2025

B E T W E E N : -

(1) LONDON CITY AIRPORT LIMITED
(2) DOCKLANDS AVIATION GROUP LIMITED

-and-

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



Defendants

ORDER

PENAL NOTICE

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

**ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING
WHICH HELPS OR PERMITS THE DEFENDANTS OR 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 DEFENDANTS

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

UPON the injunction made by Order dated 20 June 2024 by Mr Justice Julian Knowles (“**the Knowles J Order**”)

AND UPON the Claimants’ application dated 2 June 2025

AND UPON the Claimants’ application dated 17 June 2025 to amend the claim form

AND UPON the review hearings in each of the following claims having been listed on 24 June 2025 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (“**the Claims**”)

AND UPON reading the application and the witness evidence in support

AND UPON hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Knowles J Order

IT IS ORDERED that:

1. The Knowles J Order shall remain in full force and effect, subject to the variations thereto set out in the schedule to this order (and subject to review, as provided for in paragraph 3 of the Knowles J Order).
2. The Claimants have permission to amend the claim form to substitute the plan annexed to the Claimants’ application dated 17 June 2025 for Plan 1 to the claim form.
3. The court will provide sealed copies of this order to the Claimants’ solicitors for service or notification in accordance with paragraph 9 of the Knowles J Order.

Varied pursuant to the order of Bourne J dated 27 June 2025

**IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION**

CLAIM NO: KB-2024-001765

**Before Mr Justice Julian Knowles
On 20 June 2024**

BETWEEN:-

- (1) LONDON CITY AIRPORT LIMITED
(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

- v -

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

Defendant

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

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

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

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

AND UPON hearing Counsel for the Claimants

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

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

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

IT IS ORDERED THAT: INJUNCTION

1. Until 20 June 2029 or final determination of the claim or further order in the meantime, whichever shall be the earlier, Persons Unknown must not, without the consent of the Claimants, enter, occupy or remain upon the Land.
2. In respect of paragraph 1, Persons Unknown must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
3. The injunction contained at paragraph 1 of this Order shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list) ~~with a time estimate of 1.5 hours.~~ Such hearing shall be listed to be heard with the review of any injunctions made in all or any of the claims with case numbers KB-2024-002132, KB-2024-002317, and KB-2024-002473, with a time estimate of 1 day. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the review hearing.

VARIATION

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must

first give the Claimants' solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimants have liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

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

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

FURTHER DIRECTIONS

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

COMMUNICATIONS WITH THE CLAIMANT

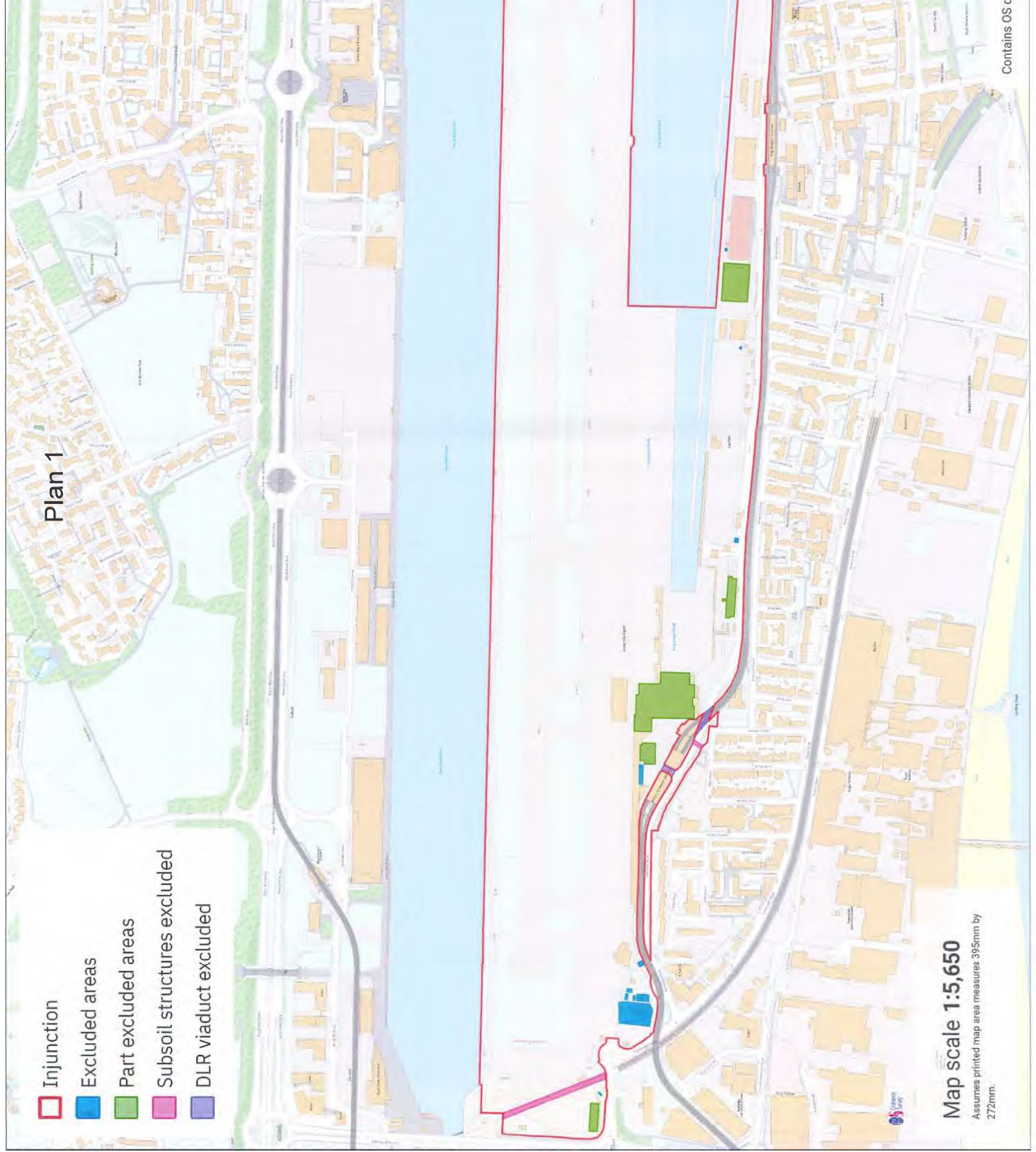
16. The Claimants' solicitors and their contact details are:

(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

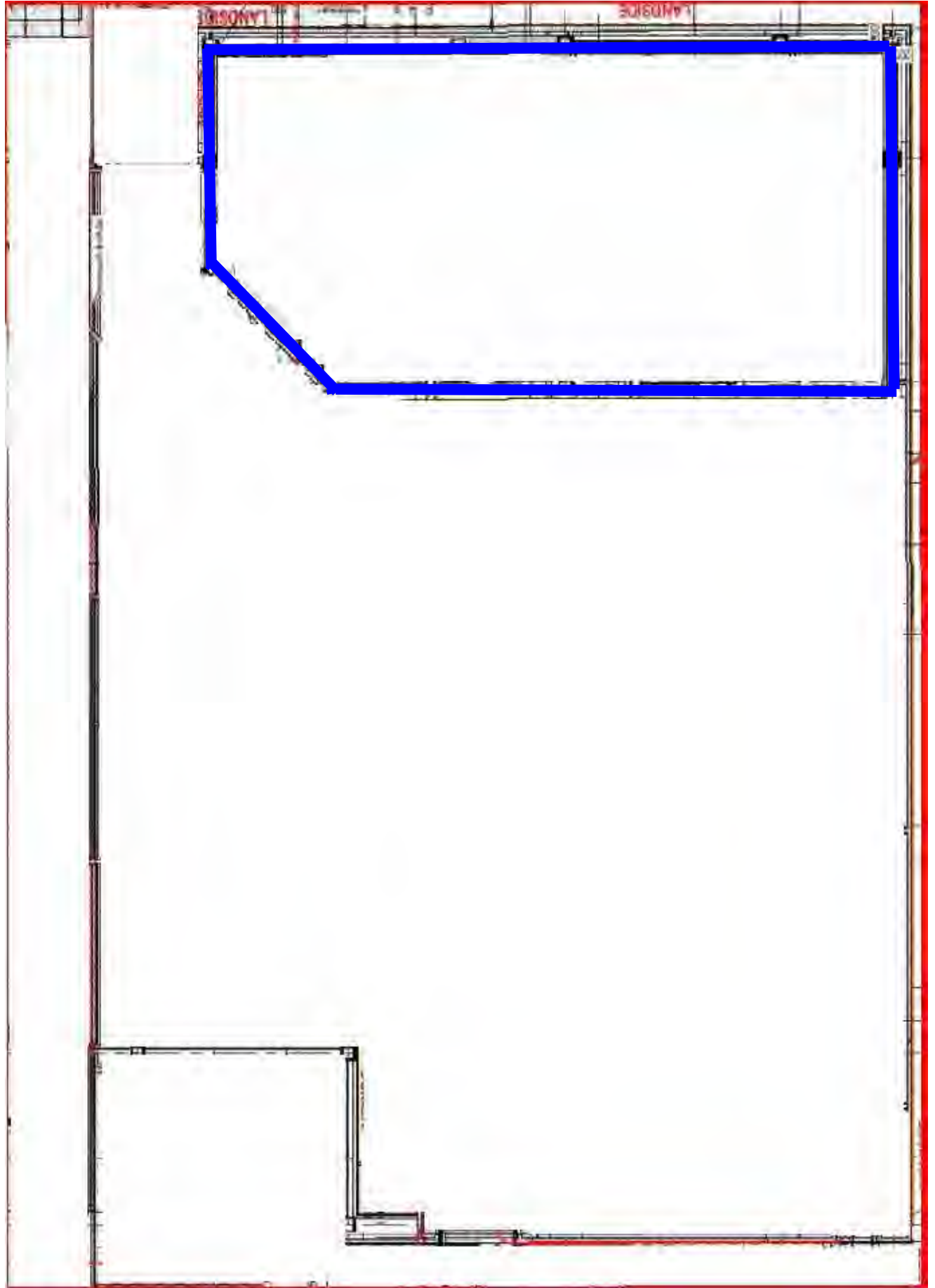
(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

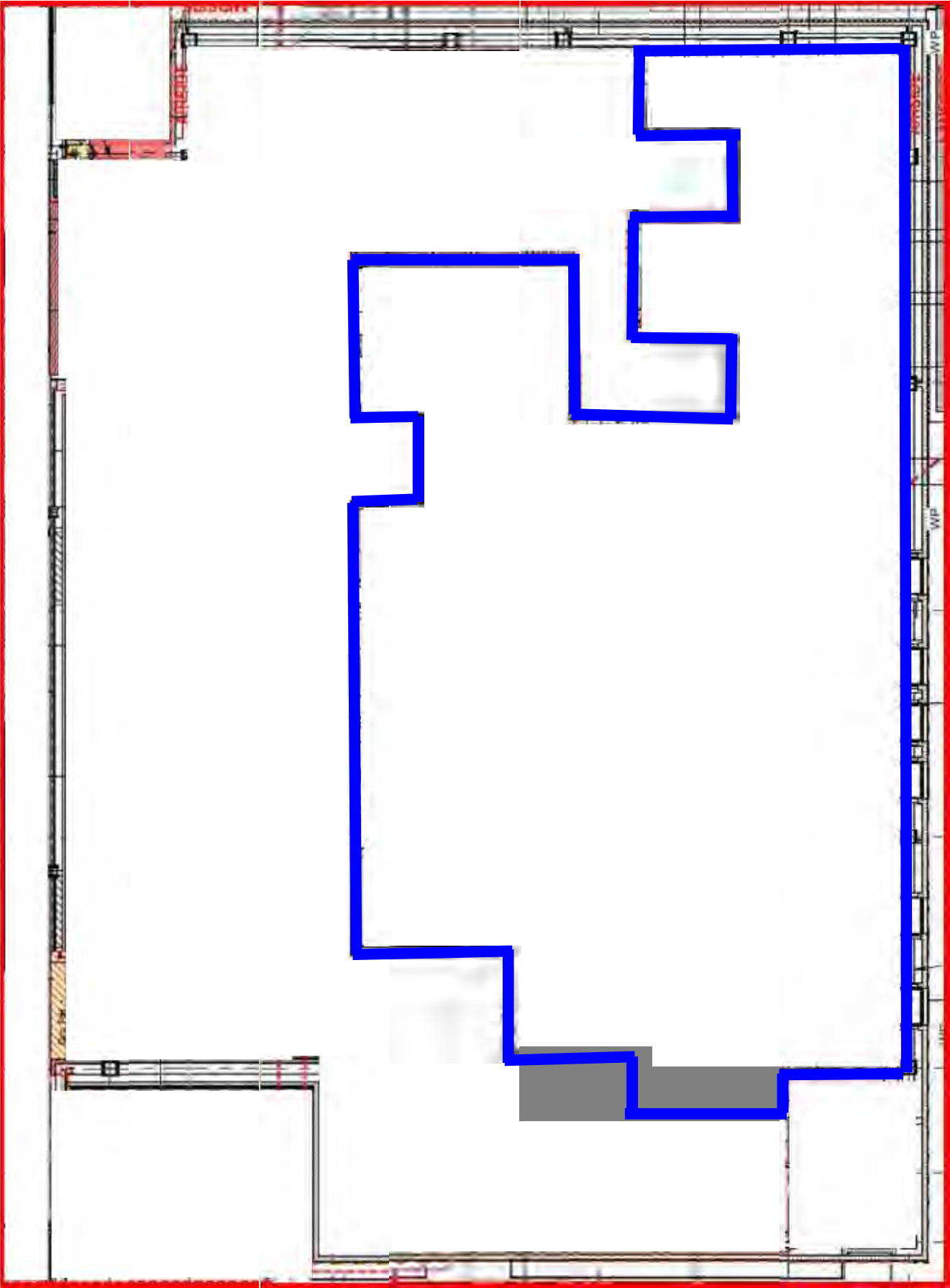
Dated: 20 June 2024

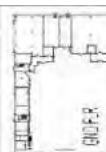
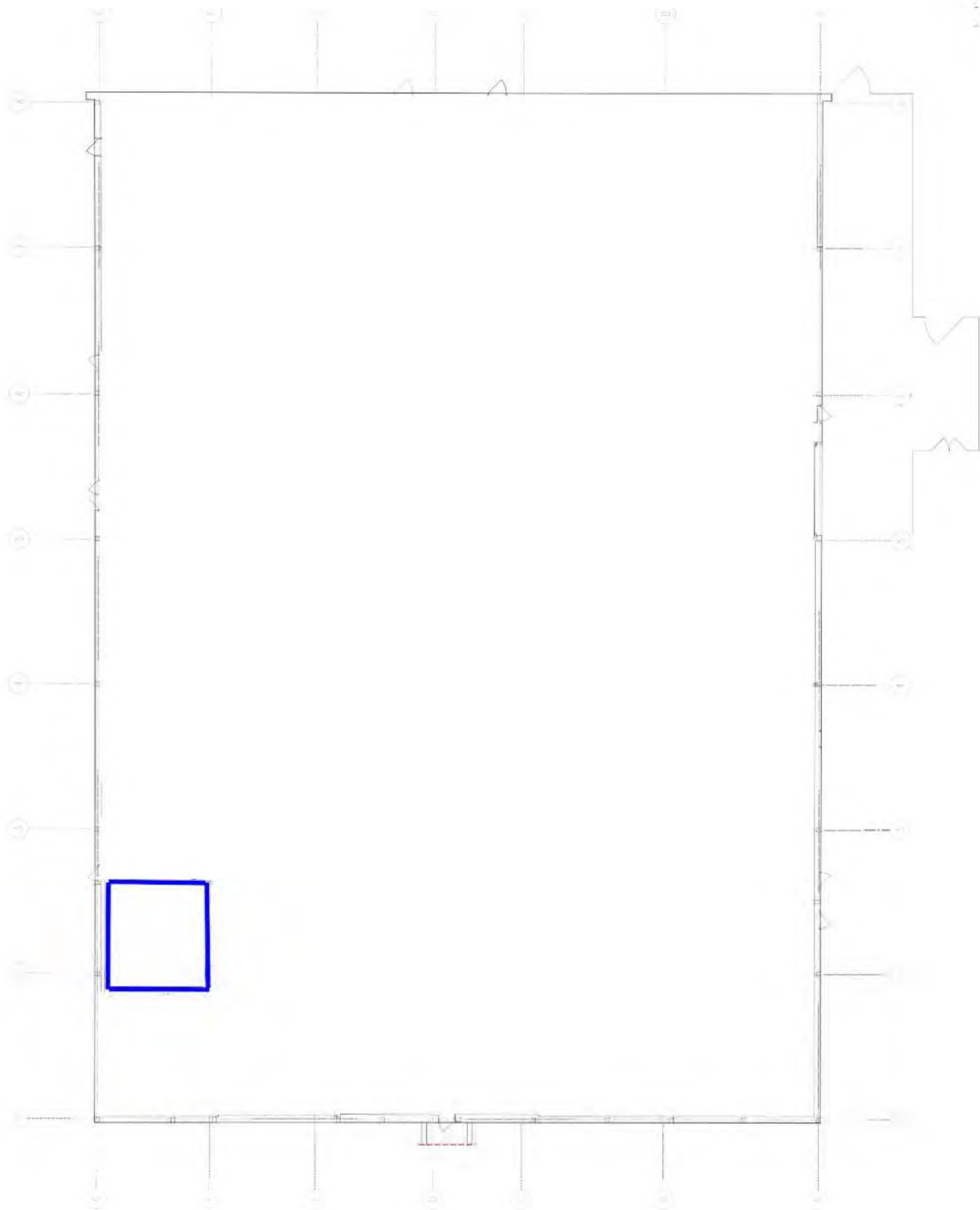
SCHEDULE 1 - PLANS





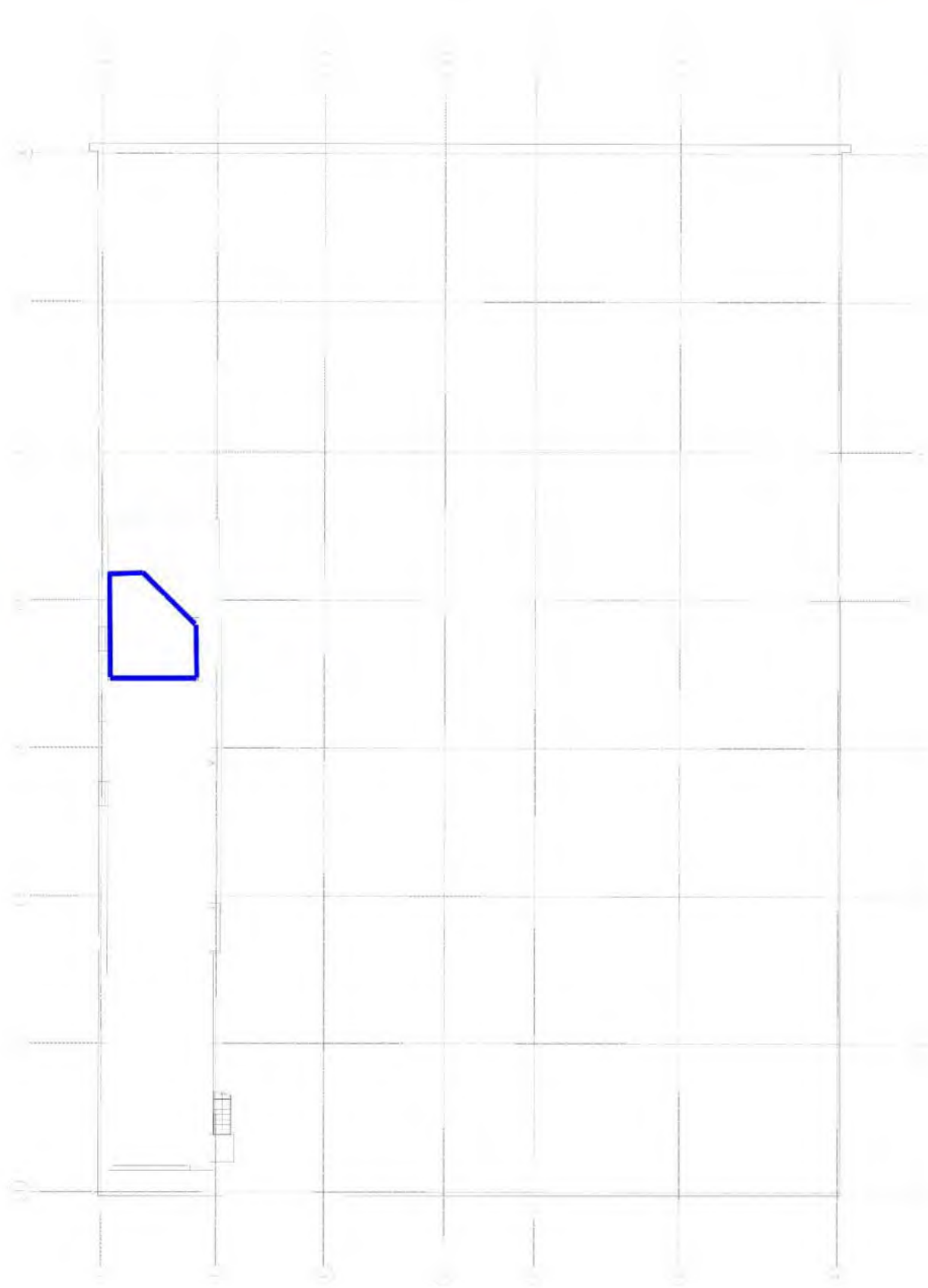






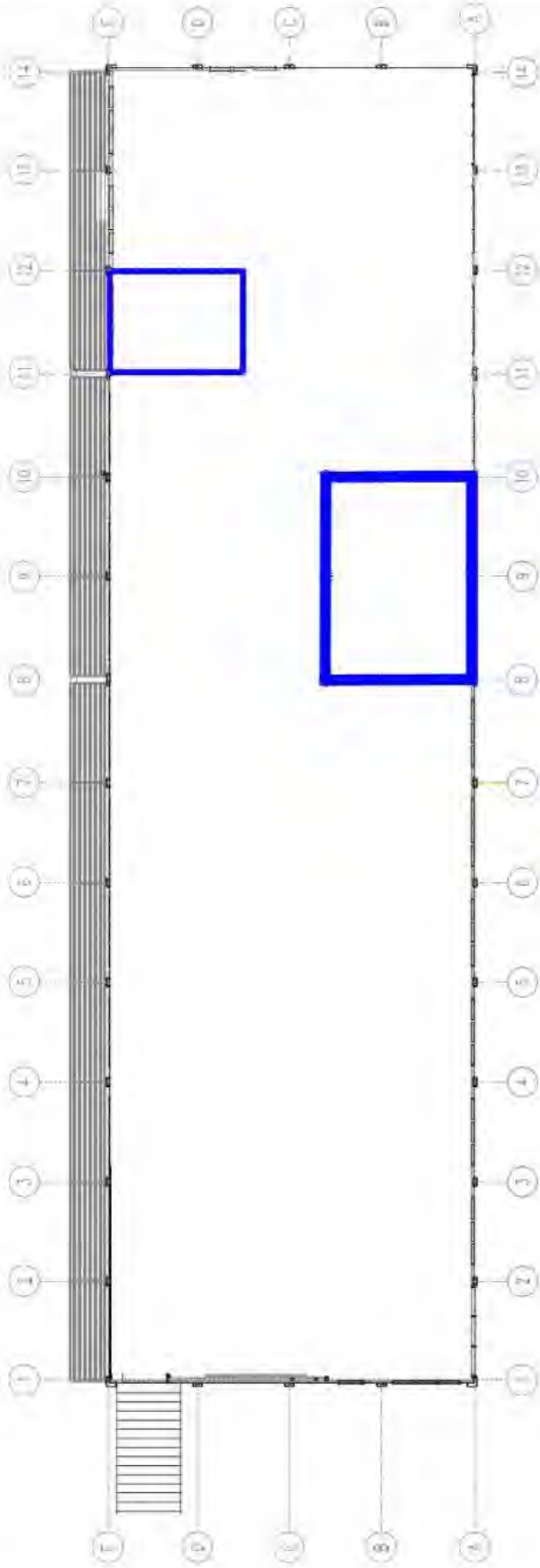
Blue Shed - First Floor

Plan 6

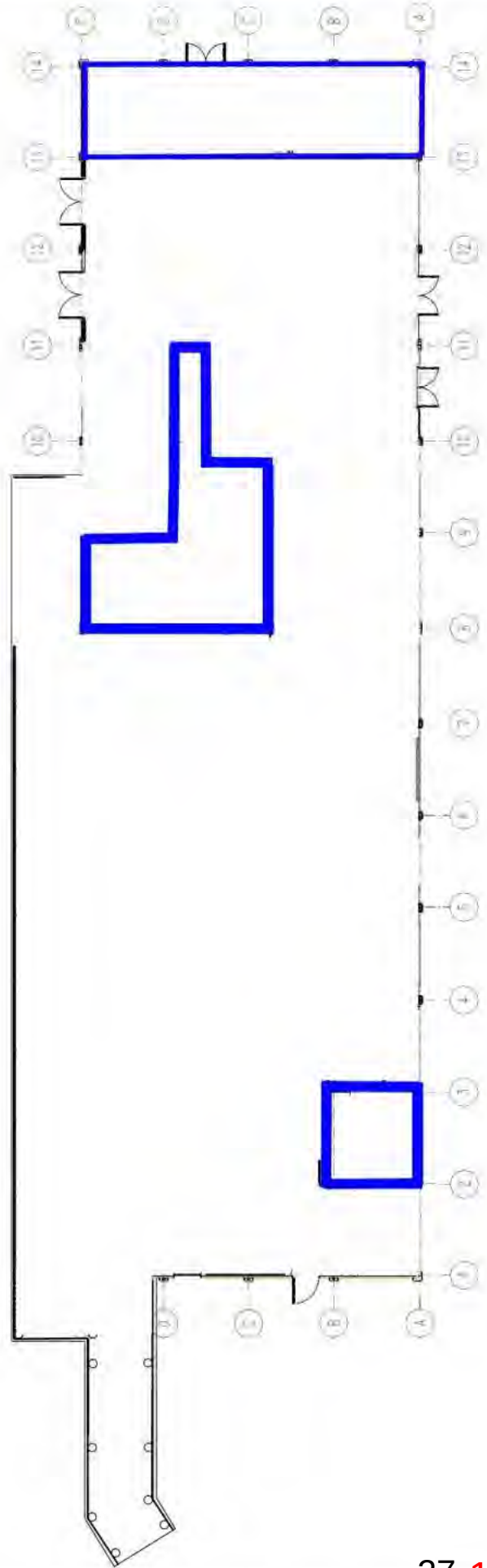


Plan 7

Jet Centre - Ground Floor



Jet Centre - First Floor



LEGEND

0.000m Sea Level
0.000m Ground Level
0.000m Structural Level

1. Plot Name	Jet Centre
2. Plot Number	1000000
3. Plot Area	1000000
4. Plot to Plot	1000000
5. Plot to Plot	1000000

0.000

LONDON CIVIL ENGINEERING

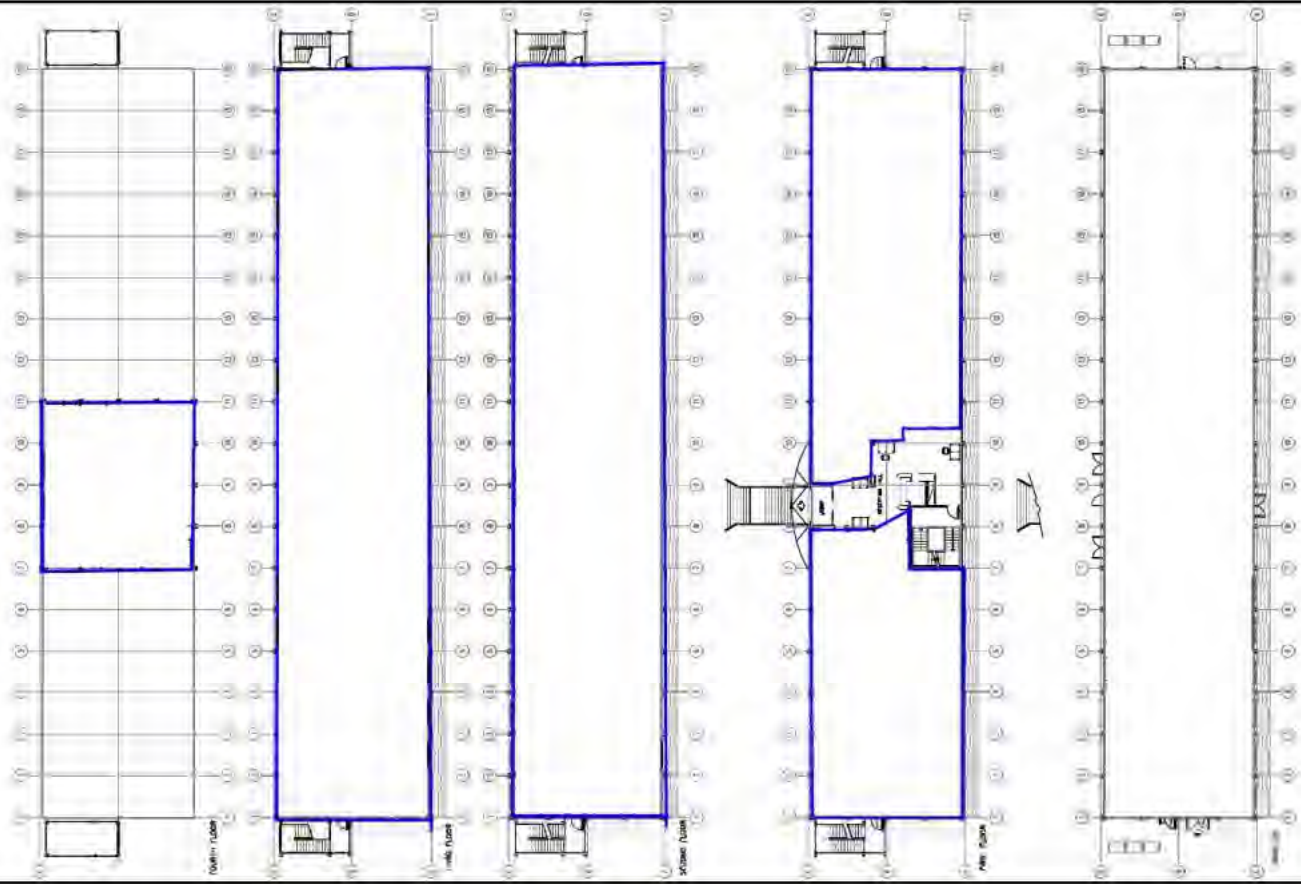
RECORD DRAWING

JET CENTRE

PLC/AV/001



City Aviation House



SCALE BAR 1:150 (9.8')

1. PLAN NUMBER: 100-100
2. PLAN NUMBER: 100-100
3. PLAN NUMBER: 100-100
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SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS

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

SCHEDULE 3 – EMAIL ADDRESSES

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

London City Airport Ltd v Persons Unknown



No Substantial Judicial Treatment

Court

King's Bench Division

Judgment Date

24 June 2025

Where Reported

[2025] 6 WLUK 499

Subject

Civil procedure

Keywords

Airports; Injunctions; Protests; Renewal; Unknown persons

Judge

[Bourne J](#)

Counsel

For the applicants: Timothy Morshead KC, Evie Barden.

For the defendants: No appearance or representation.

Case Digest

Summary

(EXTEMPORE) Injunctions granted against persons unknown, preventing direct action by protestors at four airports, were continued for another year. Nothing material had changed since the injunctions had been first granted a year earlier.

Abstract

The applicant airports applied to continue injunctions made against persons unknown.

The relevant airports were London City, Manchester, Leeds Bradford, and Birmingham. Injunctions had originally been granted in 2024 preventing environmental campaigners, particularly by the group Just Stop Oil (JSO), from protesting at the sites, with a review to take place every year. The instant hearing was the first annual review. In each case, the judge had been satisfied that an injunction against persons unknown was necessary to restrain tortious conduct, and that it was just and convenient to make the order due to the risk to health and safety to the public, airport staff and the protestors, and the delay and disruption to the public.

Held

Applications granted.

Nature of review hearing - The airports had been granted injunctive relief invoking the "newcomer" jurisdiction, *Wolverhampton City Council v London Gypsies and Travellers* [2023] UKSC 47, [2024] A.C. 983, [2023] 11 WLUK 487 followed. Newcomer injunctions had to be reviewed periodically and should come to an end after no more than a year unless an application had been made for their renewal. That was to give all parties an opportunity to make full disclosure to the court, supported by appropriate evidence, as to how effective the order had been; whether there were any grounds for discharge;

whether there was any proper justification for its continuance; and whether a further order should be made, *Wolverhampton* followed. At the review hearing, the court was not starting de novo. However, it was vital to understand why the original injunctions had been made. The court had to determine whether anything material had changed. If the risk still existed as before, the extension could be granted. However, if material matters had changed, the court was required to analyse the changes, and determine whether the injunction should be altered, *High Speed Two (HS2) Ltd v Persons Unknown* [2024] EWHC 1277 (KB), [2024] 5 WLUK 403 applied.

Application to the facts-The court therefore had to consider whether there had been any material change since the previous year's injunctions. The evidence was that, since 2024, protests had been relocated to other locations to avoid the penalties of breaching the injunctions, some members of JSO had been arrested and imprisoned, and JSO had announced that it was withdrawing from disruptive protest, although there was also evidence that they were "plotting a comeback". A statement from the police explained that new protest groups had formed and recommended maintaining the injunction. Even if JSO left the scene, there were other protest groups emerging. It was not possible to conclude that the risk had been materially removed by imprisoning members of JSO. Meanwhile, the much-reduced direct action at the airports showed that the injunctions had worked. There was no material change to the rationale for the injunctions.

Form of injunctions - The court would not depart from the original wording of the injunctions. Any potential defendants might already be aware of original wording, which militated against change. There was no need to require permission to be granted for a contempt application if the injunctions were breached. Claimants who chose to commence committal application for frivolous reasons did so at their own risk, *Sectorguard Plc v Dienne Plc* [2009] EWHC 2693 (Ch), [2009] 11 WLUK 21 considered. In the instant case, there was no reason to expect that such an issue would arise. The steps taken to publicise the injunctions last year remained appropriate and sufficient. The next review would take place in a year. The injunctions granted in 2024 were to remain in force. That was preferable to granting entirely new injunctions.

IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KINGS BENCH DIVISION

Before: Mr Justice Dexter Dias

On: 11 December 2024



KB-2024-002210

B E T W E E N:

HEATHROW AIRPORT LIMITED

Claimant

-and-

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

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the Claimant having issued this Claim by a Claim Form dated 7 July 2024 (“the **Claim**”)

AND UPON the Court granting, on the Claimant’s application dated 7 July 2024, a without notice injunction dated 9 July 2024 (“the **Injunction**”) prohibiting the Defendants from trespassing at Heathrow Airport (as defined in the Injunction; “the **Airport**”)

AND UPON the Claimant’s application dated 16 September 2024 for the joinder of additional Defendants to the Claim and further case management directions (“the **Joinder Application**”)

AND UPON READING the Second Witness Statement of Akhil Markanday dated 16 September 2024, the Second Witness Statement of Jonathan Coen dated 29 November 2024 and the First Witness Statement of Robert Hodgson dated 2 December 2024

AND UPON HEARING Tom Roscoe, Counsel for the Claimant and Mr Elliot Bannister, a solicitor at the firm of Deighton Pierce Glynn, for the proposed 27th Defendant, Mr Joe Magowan

AND UPON reading a letter to the Court from the proposed 3rd Defendant, Mr Adam Beard

AND UPON Mr Joe Magowan offering via his solicitor to provide a written undertaking to the Court not to carry out acts prohibited by the Injunction, and the Court accepting such undertaking on the condition that the form of undertaking records that Mr Magowan has had explained to him by his solicitor, and understands, the meaning of the undertaking and the consequences of failing to breach his promises.

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

AND UPON THE COURT noting, and recording in these recitals for the benefit of the Named Defendants (defined in paragraph 1 below) that:

- (i) The Claimant intends to bring committal proceedings against some of the Named Defendants for alleged contempt of court by their alleged breaches of the Injunction.
- (ii) Nothing in this Order amounts to any finding as to whether any such allegations are or would be well founded.
- (iii) The Named Defendants, in response to any such application (if made), have rights:
 - (a) to be legally represented in any contempt proceedings;
 - (b) to a reasonable opportunity to obtain legal representation and to apply for legal aid which may be available without any means test;
 - (c) to the services of an interpreter if required;
 - (d) to a reasonable time to prepare for the hearing of any such contempt application;
 - (e) to give written and oral evidence in their defence (but with no obligation to do so); a right to remain silent and to decline to answer any question which may incriminate them.
- (iv) The Named Defendants should also be aware that:
 - (a) the Court may proceed in a defendant's absence if they do not attend but (whether or not they attend) will only find the defendant in contempt if satisfied beyond reasonable doubt of the facts constituting contempt and that they do constitute contempt;
 - (b) if the Court is satisfied that a defendant has committed a contempt, the court may punish the defendant by a fine, imprisonment, confiscation of assets or other punishment under the law;
 - (c) if a defendant admits the contempt and wishes to apologise to the court, that is likely to reduce the seriousness of any punishment by the Court;
 - (d) the Court's findings will be provided in writing as soon as practicable after the hearing;
 - (e) the Court will sit in public, unless and to the extent that the court orders otherwise, and that its findings will be made public

IT IS ORDERED THAT:

- The following 24 individuals be joined as the Second to 25th Defendants to these proceedings, with the corresponding Defendant number (“the **Named Defendants**”):

Def #	Name	Address
Alleged to have been involved in activities at the Airport on 24 July 2024		
2	Rory Wilson	
3	Adam Beard	
4	Sean O’Callaghan	
5	Sally Davidson	
6	Hannah Schafer	
7	Luke Elson	
8	Luke Watson	
Alleged to have been involved in activities at the Airport on 27 July 2024		
9	Monday Rosenfeld	
Alleged to have been involved in activities at the Airport on 30 July 2024		
10	Phoebe Plummer	
11	Jane Touil	
Alleged to have been involved in activities at the Airport on 1 August 2024		
Groups 1 & 2		
12	Barbara Lund	
13	Rhiannon Wood	
14	Diane Bligh	
15	Ruth Cook	
16	Malcolm Allister	
17	Susanne Brown	
18	Christina Jenkins	

19	Jack Williams	
20	Paul Raithby	
Group 3		
21	Melanie Griffith	
22	Virginia Barrett	
23	Pauline Hazel Smith	
24	Rosemary Robinson	
25	Irfan Mamun	
26	Callum Cronin	

2. The Joinder Application, as relates to the proposed 3rd Defendant (Mr Adam Beard), be adjourned to a further hearing to be listed on the first available date after 13 January 2025 with a time estimate of 1 hour. The Claimant's solicitors are to liaise with the Court's Listing Office to arrange the listing of that hearing.

3. The Claimant, as soon as reasonably practicable, is to attempt to re-send to Mr Beard at HMP Wormwood Scrubs all relevant documents in relation to the Joinder Application, and is to inform him (by covering letter): (a) of the further hearing to be listed in accordance with paragraph 2 above; (b) that if he does not respond to the following queries as directed that the Court may proceed in his absence at the hearing without regard to any submissions he may wish to make; and (c) that the Court requires him, if so advised, to inform the Court in writing or by a representative in person or at the further hearing to be listed in accordance with paragraph 2 above, to explain:
 - 3.1 What documents he has received from the Claimant;
 - 3.2 When he received them; and
 - 3.3 What his position is on the Joinder Application, including whether he opposes it and, if so, the grounds of such opposition.

4. Save as expressly provided for herein, the terms of the Injunction shall continue to apply to each of the Named Defendants as if each was expressly named as a person to whom the Injunction applied. Accordingly:
 - 4.1 Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Named Defendants must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 (“Plan A”).
 - 4.2 In respect of paragraph 4.1, the Named Defendants must not (a) do it himself/herself/themselves in any other way (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
 - 4.3 The injunction set out at paragraph 4.1 of this Order shall be reviewed annually on each anniversary of the Injunction (or as close to this date as is convenient having regard to the Court’s list) in accordance with the directions at paragraph 3 of the Injunction.
5. The Claimant has permission to amend the Claim Form to reflect (by way of a schedule, or in other convenient manner) the joinder of the Named Defendants.
6. The Claimant has permission to amend the Particulars of Claim in the form contained at Tab 6 of the Hearing Bundle, with such further amendments as are required to reflect: (a) the adjournment of the Joinder Application against Mr Beard; and (b) the fact that Mr Magowan has not been joined as D27. The Claimant shall file such Amended Claim Form and Particulars of Claim by 4pm on 20 December 2024, and serve them as soon as reasonably practicable following receipt from the Court of a sealed copy of the Amended Claim Form.

Service

7. The Claimant shall not be required to re-serve the Amended Claim Form, Amended Points of Claim or this Order on the First Defendant (i.e. persons unknown) in the manner provided for in paragraph 8 of the Injunction or otherwise.

8. Pursuant to CPR r.6.15 & 6.27 (and to the extent that the addresses listed in respect of each Named Defendant in the table under paragraph 1 above do not represent their usual or last known residences), the steps taken by the Claimant to draw the Claim and the Joinder Application to the attention of the Named Defendants amount to good service of the Claim and the Application. The deemed date of service in each case is 8 November 2024.
9. Pursuant to CPR r.6.15, 6.27 and 81.4(2)(c), it is directed that service of this Order and any further document(s) to be served in these proceedings (including any contempt application in respect of alleged breaches of the Injunction, and any notice of further hearing) shall be effected on the Named Defendants as follows:
 - 9.1 by first class post to the addresses listed in the table under paragraph 1 above;
 - 9.2 in respect of any Named Defendant who the Claimant has reasonable cause to believe (after due enquiry) is in prison (whether on remand or otherwise), the Claimant shall (in addition) seek to establish the prison that they are in (via the Government's 'find a prisoner' service or otherwise) and effect service by first class post to that prison;
 - 9.3 in either case, by email to juststopoil@protonmail.com; juststopoilpress@protonmail.com; and info@juststopoil.org; and
 - 9.4 by posting copies on to the following website: www.heathrow.com/injunction.
10. Copies of the documents emailed or posted in accordance with paragraphs 9.3 and 9.4 above shall be redacted to remove the addresses of the Named Defendants.
11. The steps taken pursuant to paragraph 9 above shall be verified by a certificate of service and/or witness statement, and deemed service shall occur (in respect of each Named Defendant) seven working days after the taking of the last relevant step in respect of such Defendant.
12. In the event that any Named Defendant provides in writing to the Claimant's solicitors (whose details are set out below) a postal or an email address for service, service of all documents shall be by first class post or email to such address (as appropriate) and the

ordinary provisions as to in the Civil Procedure Rules (including as to the deemed date) shall apply.

13. In accordance with paragraph 9 above, the requirement for personal service of any contempt application in respect of alleged breaches of the Injunction before the date of this Order is dispensed with.
14. Notwithstanding paragraphs 7 to 13 above, the Court will review at any further hearing the adequacy of the steps taken by the Claimant to draw the Claim, this Order, any contempt application and any other relevant document upon the Named Defendant and, if they do not attend, whether or the extent to which it is in all of the circumstances appropriate to make further orders against them in their absence. The Claimant has liberty to seek orders for alternative service pursuant to CPR r.6.15, 6.27 and 81.4(2)(c) at any future hearing without having to file further or separate application notice.

Responses by the Named Defendants

15. Any Named Defendant who wishes: (i) to oppose their being named as a defendant to these proceedings; or (ii) defend the claim against them set out in the Amended Particulars of Claim served upon them pursuant to paragraph 6 above, shall:
 - 15.1 file an Acknowledgment of Service within 21 days of being served with the Amended Particulars of Claim, including a postal or email address for service; and
 - 15.2 file any points of Defence to the Amended Particulars of Claim and/or any witness statement upon which they wish to rely (in either case verified by a statement of truth) within 56 days of being served with the Amended Particulars of Claim.
16. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.
17. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

18. Liberty to apply.

COSTS

19. There be no order as to costs of the Joinder Application as against Mr Joe Magowan.

20. Costs otherwise reserved.

COMMUNICATIONS WITH THE CLAIMANT

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

(1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

(2) Phil Spencer

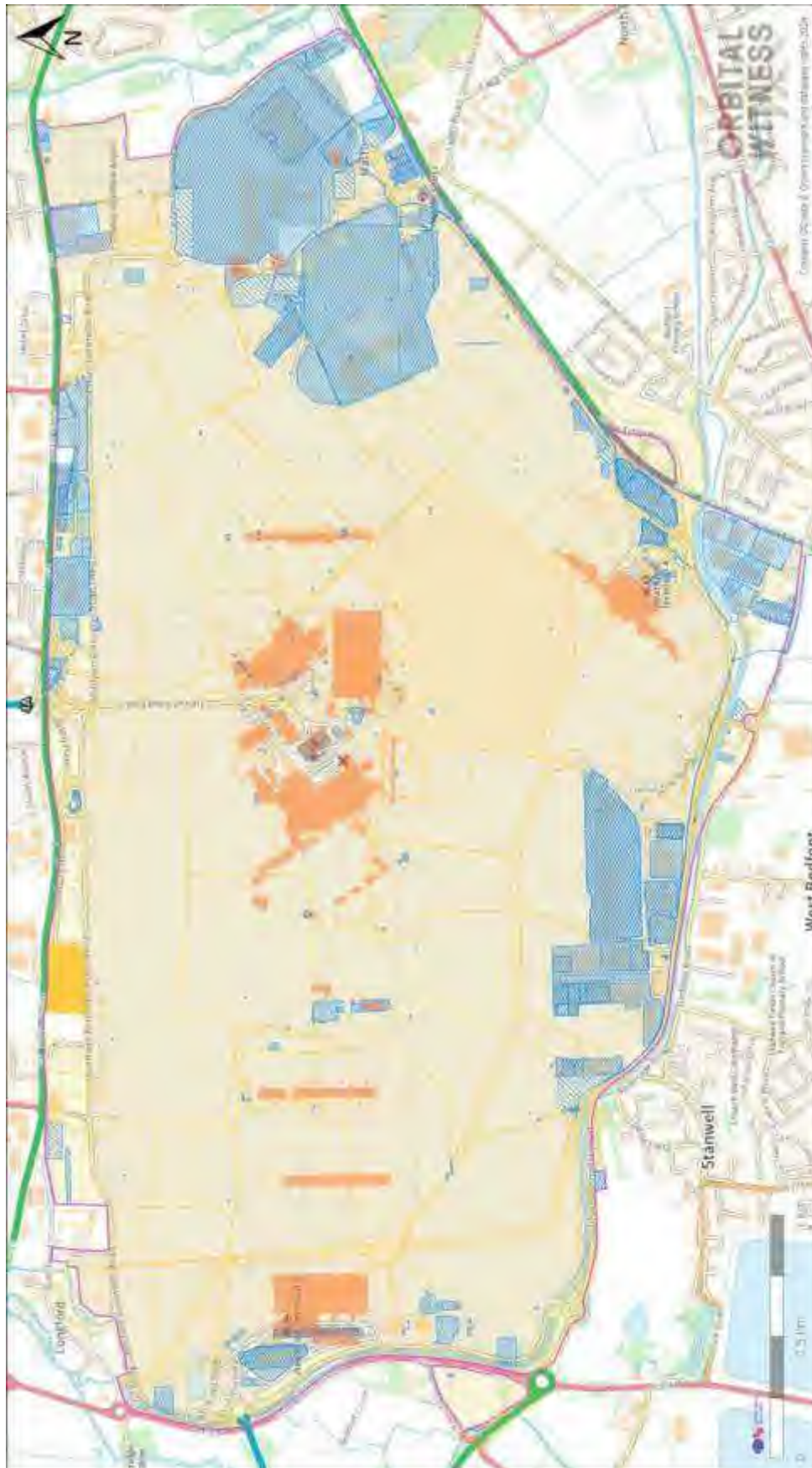
Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

Dated: 11 December 2024

SCHEDULE 1 – UNDERTAKINGS

1. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 4 of this Order has caused loss to a Named Defendant and the Court finds that the Named Defendant ought to be compensated for that loss.

SCHEDULE 2 – PLAN A



IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KINGS BENCH DIVISION

B E T W E E N:

HEATHROW AIRPORT LIMITED

-and-

- (1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE PARTICULARS OF CLAIM**
- (2) – (25) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE AMENDED PARTICULARS OF CLAIM DATED 13 DECEMBER 2024**



Defendants

ADAM BEARD

Proposed third Defendant

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

BEFORE the Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, London on 13 February 2025.

UPON the Claimant having issued this Claim by a Claim Form dated 7 July 2024 (“the **Claim**”).

AND UPON the Court granting, on the Claimant’s application dated 7 July 2024, a without notice injunction dated 9 July 2024 (“the **Injunction**”) prohibiting the Defendants from trespassing at Heathrow Airport (as defined in the Injunction; “the **Airport**”).

AND UPON the Claimant’s application dated 16 September 2024 for the joinder of additional Defendants to the Claim and further case management directions (“the **Joinder Application**”).

AND UPON READING the Second Witness Statement of Akhil Markanday dated 16 September 2024, the Second Witness Statement of Jonathan Coen dated 29 November 2024 and the First Witness Statement of Robert Hodgson dated 2 December 2024.

AND UPON the Court having granted the Joinder Application as against the Proposed Second Defendant and the Proposed Fourth to 26th Defendants (the “**Named Defendants**”) by the Order dated 11 December 2024 and adjourning the Joinder Application as against the Proposed Third Defendant, Adam Beard.

AND UPON the Court being satisfied that the Claimant has complied with paragraph 3 of the Order dated 11 December 2024.

AND UPON HEARING Daniel Scott, Counsel for the Claimant and no one appearing for Adam Beard.

AND UPON the Claimant re-affirming and the Court accepting the undertakings set out in Schedule 1 to this Order.

AND UPON THE COURT noting, and recording in these recitals for the benefit of Adam Beard that:

- (i) The Claimant intends to bring committal proceedings against some of the Named Defendants for alleged contempt of court by their alleged breaches of the Injunction.

- (ii) Nothing in this Order amounts to any finding as to whether any such allegations are or would be well founded.
- (iii) Adam Beard, in response to any such application (if made), has rights:
 - (a) to be legally represented in any contempt proceedings;
 - (b) to a reasonable opportunity to obtain legal representation and to apply for legal aid which may be available without any means test;
 - (c) to the services of an interpreter if required;
 - (d) to a reasonable time to prepare for the hearing of any such contempt application;
 - (e) to give written and oral evidence in his defence (but with no obligation to do so); a right to remain silent and to decline to answer any question which may incriminate them.
- (iv) Adam Beard should also be aware that:
 - (a) the Court may proceed in a defendant's absence if they do not attend but (whether or not they attend) will only find the defendant in contempt if satisfied beyond reasonable doubt of the facts constituting contempt and that they do constitute contempt;
 - (b) if the Court is satisfied that a defendant has committed a contempt, the court may punish the defendant by a fine, imprisonment, confiscation of assets or other punishment under the law;
 - (c) if a defendant admits the contempt and wishes to apologise to the court, that is likely to reduce the seriousness of any punishment by the Court;
 - (d) the Court's findings will be provided in writing as soon as practicable after the hearing;
 - (e) the Court will sit in public, unless and to the extent that the court orders otherwise, and that its findings will be made public.

NOW IT IS ORDERED THAT:

1. Adam Beard (whose provided address was [REDACTED]) shall be joined as the Third Defendant to these proceedings.

2. Save as expressly provided for herein, the terms of the Injunction shall continue to apply henceforth to the Third Defendant as a named person and it applied previously to him as an unknown person if he came within the scope of the prohibitions. Accordingly:
 - 2.1 Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Third Defendant must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 (“Plan A”).
 - 2.2 In respect of paragraph 2.1, the Third Defendant must not (a) do it himself in any other way (b) do it by means of another person acting on his behalf, or acting on his instructions.
 - 2.3 The injunction set out at paragraph 2.1 of this Order shall be reviewed annually on each anniversary of the Injunction (or as close to this date as is convenient having regard to the Court’s list) in accordance with the directions at paragraph 3 of the Injunction.
3. The Claimant has permission to amend the Amended Claim Form and Amended Particulars of Claim to reflect (by way of a schedule, or in other convenient manner) the joinder of the Third Defendant. The Claimant shall file such Re-Amended Claim Form and Re-Amended Particulars of Claim by 4pm on 27 February 2025, and serve them as soon as reasonably practicable on the Third Defendant following receipt from the Court of a sealed copy of the Re-Amended Claim Form.

Service

4. The Claimant shall not by this Order be required to re-serve the Re-Amended Claim Form, Re-Amended Particulars of Claim or this Order on the First Defendant or on the other Named Defendants.
5. Pursuant to CPR r.6.15 & 6.27 (and to the extent that the address listed in paragraph 1 does not represent the Third Defendant’s usual or last known residence), the steps taken by the Claimant to draw the Claim and the Joinder Application to the attention of the

Third Defendant amount to good service of the Claim and the Application. The deemed date of service is 8 November 2024.

6. Pursuant to CPR r.6.15, 6.27 and 81.4(2)(c), it is directed that service of this Order and any further document(s) to be served in these proceedings shall be effected on the Third Defendant as follows:
 - 6.1 by first class post to the address listed in paragraph 1 above;
 - 6.2 if the Third Defendant is in prison (whether on remand or otherwise), the Claimant shall (in addition) seek to establish the prison that he is in (via the Government's 'find a prisoner' service or otherwise) and effect service by first class post to that prison;
 - 6.3 in either case, by email to juststopoil@protonmail.com; juststopoilpress@protonmail.com; and info@juststopoil.org; and
 - 6.4 by posting copies on to the following website: www.heathrow.com/injunction.
7. Copies of the documents emailed or posted in accordance with paragraphs 6.3 and 6.4 above shall be redacted to remove the address of the Third Defendant.
8. The steps taken pursuant to paragraph 6 above shall be verified by a certificate of service and/or witness statement, and deemed service shall occur seven working days after the taking of the last relevant step in respect of such Defendant.

Responses by the Third Defendant

9. If the Third Defendant wishes to defend the claim against him set out in the Re-Amended Particulars of Claim served upon him pursuant to paragraph 3 above, then he shall:
 - 9.1 file an Acknowledgment of Service within 21 days of being served with the Re-Amended Particulars of Claim, including a postal or email address for service; and
 - 9.2 file any points of Defence to the Re-Amended Particulars of Claim and/or any witness statement upon which he wishes to rely (in either case verified by a statement of truth) within 56 days of being served with the Re-Amended Particulars of Claim.

10. The Third Defendant may apply to the Court at any time to vary or discharge this Order or so much of it as affects him but he must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.

COSTS

11. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

The Claimant's solicitors and their contact details are:

- (1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

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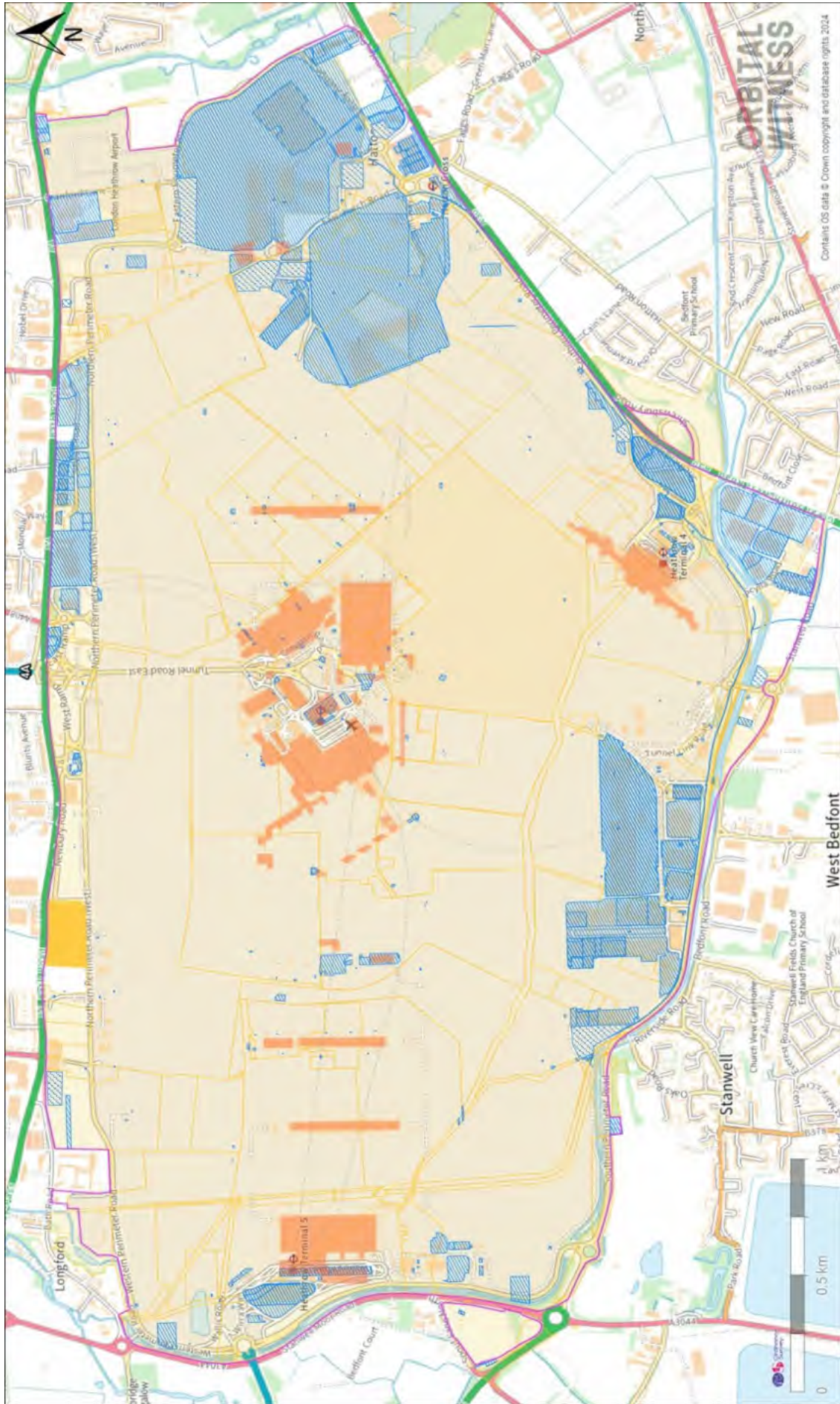
Signed: Ritchie J

Dated: 13 February 2025

SCHEDULE 1 – UNDERTAKINGS

1. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 2 of this Order has caused loss to a Named Defendant and the Court finds that the Named Defendant ought to be compensated for that loss.

SCHEDULE 2 – PLAN A



Date: 25 June 2025
Our Ref.: AMRK/PSPE/RHOD/20H0904.000140
Direct Dial: +44 20 3400 3711
Email: Robert.Hodgson@bclplaw.com

BRYAN CAVE LEIGHTON PAISNER LLP
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T: +44 (0)20 3400 1000
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DX92 London
bclplaw.com

Phoebe Plummer
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

By Special Delivery and First Class Post

Dear Phoebe Plummer

Claim Number: KB-2024-002210

HEATHROW AIRPORT LIMITED v (1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM AND (2) – (26) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND BY THE ORDER OF MR JUSTICE RITCHIE DATED 14 FEBRUARY 2025, AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS

- 1 We continue to act for and on behalf of Heathrow Airport Limited, the Claimant in connection with the above proceedings and in respect of the injunction order dated 9 July 2024 (the "**Injunction Order**").

REVIEW HEARING

- 2 As we informed you by way of our letter dated 18 March 2025, the first annual review hearing of the Injunction Order has now been listed for **Wednesday 23 July 2025**. The hearing will be in person and will take place before the King's Bench Division at The Royal Courts of Justice, Strand, London WC2A 2LL.
- 3 The High Court Judge and time of the relevant hearing will be confirmed the working day before via the Daily Cause List.¹
- 4 You are free to attend the review hearing should you wish to do so.
- 5 If you plan to be represented at the hearing, please provide us with the contact details of your representative in advance to facilitate exchange of relevant documents.

EVIDENCE

¹ At the time of writing, the relevant webpage to view the Daily Cause List is <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list>.

6 In accordance with paragraph 11 of the Injunction Order, a copy of the skeleton argument and any additional evidence to be relied upon at the review hearing by the Claimant will be uploaded to the Heathrow Website (www.heathrow.com/injunction) in accordance with the following timeframes:

(a) Bundle of Evidence: by **Tuesday 8 July 2025**; and

(b) Skeleton Argument: by **Friday 18 July 2025**.

7 All relevant documents will be made available for electronic download. If you wish to receive a physical copy of the bundle or skeleton argument, please contact Robert Hodgson (as above) by **4pm on Friday 4 July 2025** so that any applicable service deadlines can be complied with. Should we not hear from you, and in order to avoid the cost and waste of unnecessary printing, we do not intend to produce additional printed copies of these materials.

COMMITTAL PROCEEDINGS

8 As noted in the Order of Mr Justice Dexter Dias dated 11 December 2024 and the Order of Mr Justice Ritchie dated 13 February 2025 (copies of which are available on the Heathrow Website), the Claimant was considering bringing committal proceedings against you as a result of you breaching the Injunction Order.

9 The Claimant is no longer minded to pursue committal proceedings in respect of previous breaches, but reserves any and all rights and remedies available to it in respect of any further breaches.

10 Please kindly acknowledge safe receipt of this letter by email to Robert Hodgson at Robert.Hodgson@bclplaw.com.

11 We are also happy to answer any questions you may have in respect of the contents of this letter, but would suggest that you seek independent legal advice in relation to any additional queries.

Yours faithfully



Bryan Cave Leighton Paisner LLP

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Farnborough airport and its super-rich clients like Boris Johnson just got the Extinction Rebellion treatment

by [The Canary](#) — 3 June 2024 in [News](#) Reading Time: 4 mins read

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An outer London airport – Farnborough – frequently used by the super-rich and politicians, [including Boris Johnson](#), has been the target of [Extinction Rebellion](#) and other groups. They highlighted how the flying habits of the super rich are effectively helping to kill us all via their contribution to the [climate crisis](#).

Farnborough: you're killing us all!

On Sunday 2 June, a group of activists blocked all the main gates of Farnborough airport, the biggest private jet airport in the UK, which has [plans to greatly expand](#). This was part of an international week of action targeting private jets and the injustice of aviation, with protests happening in Denmark, Germany, Mexico, Norway, Sweden, Switzerland, and the US.

At Farnborough, protesters barricaded the airport's Gulfstream Gate with the Extinction Rebellion pink boat:

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Ively Gate had four protesters locked on to oil drums:



At the airport's departure gate activists mounted two tripods blockading the entrance:





A fourth group of protesters moved between the airport's other gates to block them:





Dr Jessica Upton, a veterinary surgeon and foster carer from Oxford, said:

I'm here today because private airports are an abomination. Expanding Farnborough would be putting the indulgent wants of the rich minority over the needs of the majority. Local people need cleaner air and less noise pollution, and the world's population urgently needs rapid reductions in greenhouse gas emissions to survive.

Private airports disproportionately contribute to climate breakdown and closing them would boost our chances of sticking to the Paris Climate Accords, the supposedly legally binding international treaty agreed to and signed by our government.

More than 100 people took part in the protests and several were arrested.

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Farnborough airport: private jets should be banned

Inês Teles, campaigner at Stay Grounded, said:

It's utterly obscene that, during a climate and cost of living crisis, while people are burning under scorching heat in India and Mexico or being displaced by catastrophic flooding in Brazil, the super-rich keep flying on their private jets and pouring gas in a world on fire.

✓ *These are the worst form of bullshit flights, and need to be banned, as well as short-haul flights or night flights. We need to stop this madness and hold the super-rich and institutions accountable*

1. Ban Private Jets
2. Tax Frequent Flyers
3. Make Polluters Pay

Gianluca Grimalda, university researcher and climate activist, said:

Private jets are the single most polluting form of transport, causing about 10 times more CO2 emissions per passenger than a regular flight, and up to 100 times more than trains. About two thirds of such flights are done for leisure over short stretches on which a lower-emitting alternative exists.

The 'collateral damage' of such flights is to cause about 20.000 deaths every year, as we know that every 4.000 ton of CO2 will kills one person and private jets produce about 80 million tons of CO2 every year. This is unacceptable, inhumane, and abhorrent.

Aviation is the pinnacle of climate injustice

Share 160

Tweet 100



But private jets are not the only problem: aviation as a whole is the pinnacle of climate injustice, with 1% of the population being responsible for 50% of its emissions and 80% of the world population never having set foot on a plane.

Previous Post

...esses the announced death of the 1.5° C barrier, ... and people worldwide call for a full shift in terms of how society relates to aviation and other high emission sectors, to be able to avert the worst effects of climate breakdown which, without effective action, will be even more deadly for the poorest and most vulnerable parts of society.

Next Post

Palestine Action hit two Barclays branches – annihilating one and redecorating the other

The rich need to step up and cut superfluous habits such as using private jets, if the entire society is to support a move towards the necessary change.

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...richest 1% grabbed nearly two-thirds of all new wealth created since 2020, totaling \$42 ... the bottom 99% of the world's population.

...ampaign seek to pave the road towards a fairer wealth distribution: an annual wealth tax ... could raise \$1.7 trillion a year, enough to deliver a 10-year plan to end hunger, support ... ate impacts, and deliver universal healthcare and social protection for everyone living in

...most pressing problems, and questions of social and economic justice must be at the ... apse.

Featured image and additional images via Extinction Rebellion



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Dozens of campaigners held over alleged airport plans



PA

Police said the Just Stop Oil members had been arrested under the Public Order Act

27 June 2024

Updated 28 June 2024

Dozens of Just Stop Oil supporters suspected of planning to disrupt airports this summer have been arrested across England.

The Metropolitan Police said 27 people were taken into custody, including some believed to be "key organisers" for the climate group.

Six arrests were made in east London, four at Gatwick airport, and the rest from forces across the country.

The force added the six who were arrested on Thursday evening at a community centre in London were there "as part of a publicly-advertised event promoting airport disruption".

The operation took place in Gloucestershire, Oxfordshire, Devon, Essex, Manchester, Surrey, Sussex, Norfolk and West Yorkshire, a Met spokesperson said.

The 27 were detained under the Public Order Act which makes it illegal to conspire to disrupt national infrastructure.

Four people arrested on Tuesday after being identified at Gatwick Airport and have since been released on bail.

Ch Supt Ian Howells added: "We know Just Stop Oil are planning to disrupt airports across the country this summer which is why we have taken swift and robust action now.

"Our stance is very clear that anyone who compromises the safety and security of airports in London can expect a strong response from officers or security staff.

"Airports are complex operating environments which is why we are working closely with them, agencies and other partners on this operation."

Suspects released on bail are subject to conditions which include not travelling within one kilometre of any UK airport unless passing by while on a mode of transport.

In response to the wave of arrests, a Just Stop Oil spokesman said: "It isn't a massive surprise."

He added that disruption is necessary because people are "dropping dead around the world" from extreme heat, and "tipping points" are being passed.

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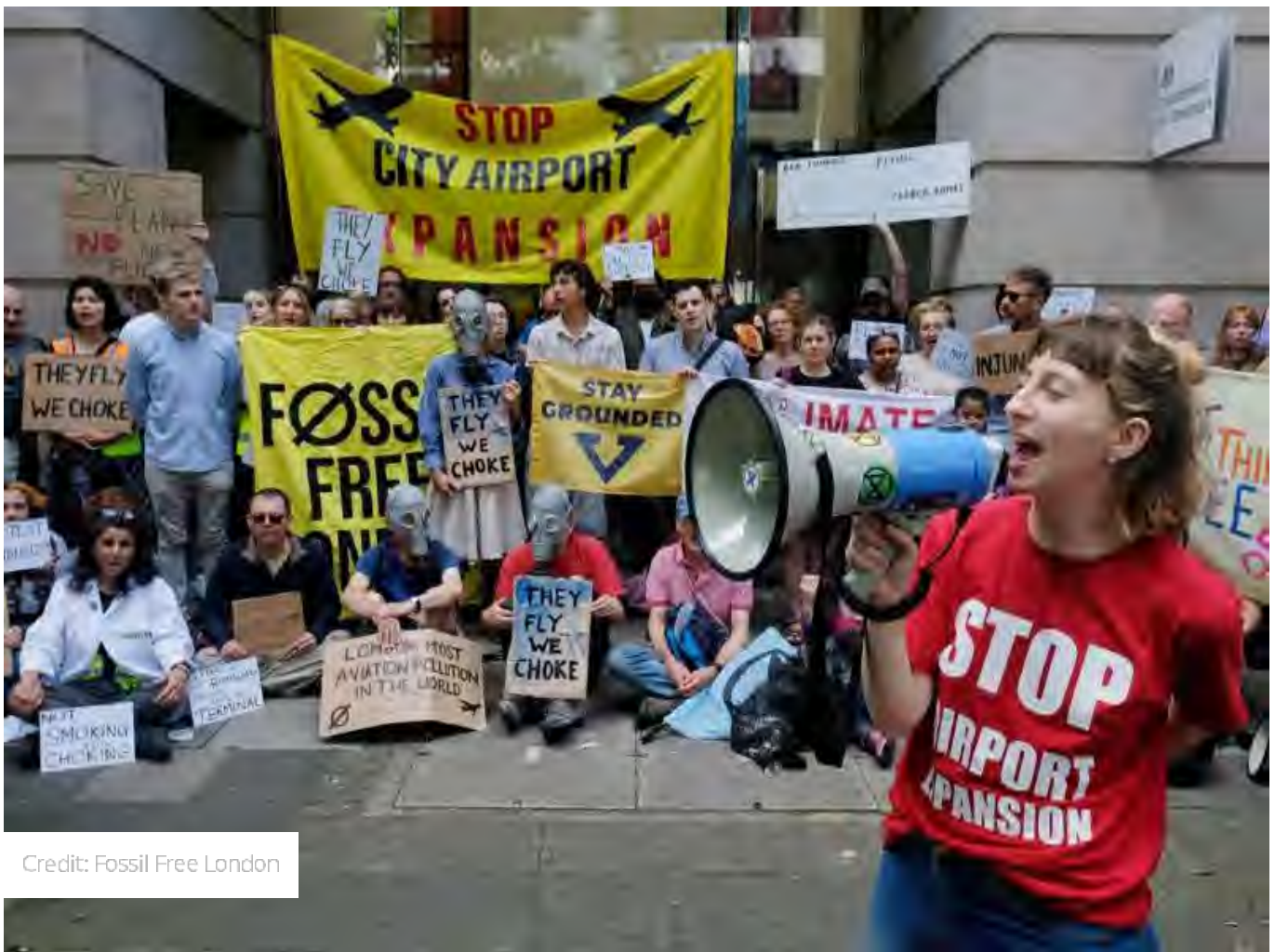
Just Stop Oil

More on this story

Almost 200 protest London City Airport's expansion plans

© 28 July, 2024 5:26 pm 3 Min Read

Activists chanted 'they fly, we choke', outside the Department of Transport yesterday. The government is shortly expected to make a decision on the airport's expansion, reports Marco Marcelline



Credit: Fossil Free London

Close to 200 air pollution and climate campaigners gathered outside the Department for Transport yesterday (27th July) to protest against the proposed expansion of a London airport with a flight path over Leytonstone.

Chanting 'they fly, we choke', protesters were calling on the Department of Transport to reject London City Airport's expansion bid.

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The penalty for breaching the injunction could have been as much as two years in prison, activists said.

< f X 6 p 5 in 3 >

but airport bosses appealed it, meaning a final decision will now be taken by the government.

The airport, based in the docklands, wants to extend its cut-off time for flights from 1pm on Saturdays to 6.30pm all year round and 7.30pm during the summer months, as well increasing its daily limit of flights from six to nine between 6.30am and 7am.

Speaking previously, the airport's CEO Robert Sinclair said the proposals were part of a wider plan to increase the number of annual passengers from 6.5million to nine million by 2031.

Sinclair has argued that if approved, more jobs would be made available for local residents, while there would be more affordable flights to different destinations. In terms of its environmental commitment, City Airport has pledged to use a "cleaner, quieter new generation aircraft".

But, environmental activists and local residents have long-argued that the airport causes significant pollution. Protesters have also stressed that it does not serve the communities living around it who cannot afford a plane ticket due to high levels of poverty in Newham.



Credit: Fossil Free London

The airport is popular with bankers flying in business class and in 2023, one in four flights leaving the airport were more than half empty.

Joanna Warrington, spokesperson for Fossil Free London, said: “As businessmen fly off over one of London’s poorest boroughs, we’re left choking on their excess fumes that fuel climate collapse.



locals who are already sick of all the noise and air pollution over their homes. And worse still, after appealing a unanimous decision by the local council to stop an increase in flights, they’ve gagged local dissent through expensive and threatening anti-protest injunctions.

Joanna added: “Our government needs to listen to Londoners, reject these plans and act for our health and futures.”

Toni Cottee from South West Essex Fight the Flights said: “Flights have been growing and growing in number with bigger and bigger jets, more and more disturbance and emissions. Local people can’t have a conversation in their own front gardens when the planes are going over. Now the airport wants to increase this and abandon the only respite residents get at the weekend.

“We need this airport closed. It’s in the wrong place and we’re living in a climate emergency – we need to reduce flights, not increase them.”



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Just Stop Oil protesters ‘arrested and removed’ after blocking Gatwick Airport

MERIDIAN | GATWICK AIRPORT | SUSSEX POLICE | ⌚ Monday 29 July 2024 at 10:23am



Seven people entered the South Terminal at around 8am and “used suitcases with lock-on devices to block the departure gates”, Just Stop Oil claimed.

Credit: Just Stop Oil

Just Stop Oil supporters who blocked departure gates at Gatwick Airport have been arrested and are being removed, the airport has said.

Seven people entered the South Terminal at around 8am and “used suitcases with lock-on devices to block the departure gates”, Just Stop Oil claimed.

A video shared by the group showed the protesters sitting on the floor inside the airport, blocking an entrance.

Passengers with suitcases appeared to step over the activists and continue with their journeys.



Just Stop Oil

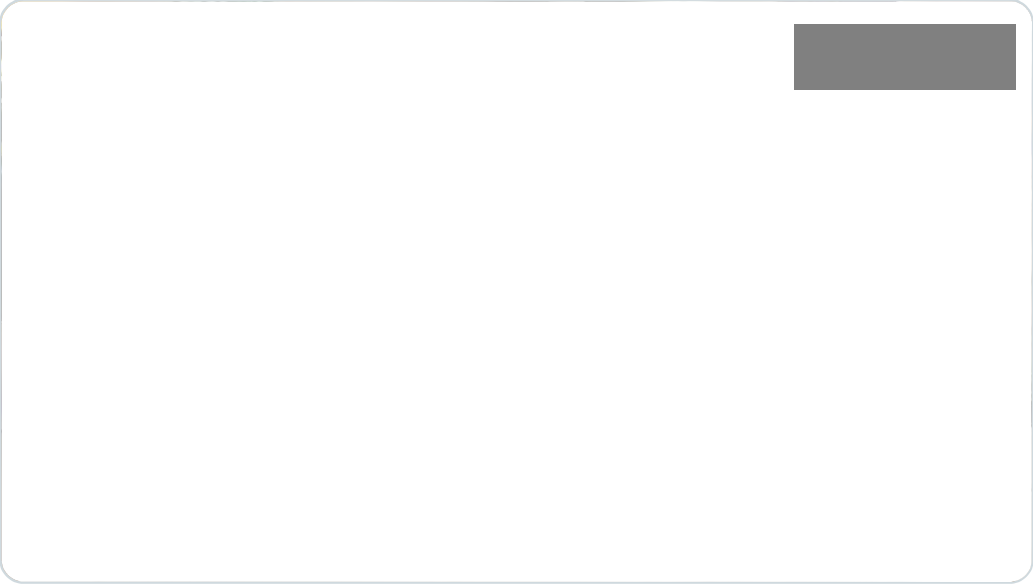
@JustStop_Oil · Follow



 **BREAKING: GATWICK DEPARTURE GATES BLOCKED**

 7 Just Stop Oil supporters have disrupted the southern terminal at Gatwick airport, joining 21 other groups in the [@_oilkills](#) international uprising.

 Demand our government Just Stop Oil by 2030 — actionnetwork.org/petitions/sign...



8:40 AM · Jul 29, 2024



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A London Gatwick spokesman said: “London Gatwick is open and operating normally today.

“There are a small number of protesters at the airport who have now been arrested and are being removed from the airport.”

In central London, environmental protesters have caused criminal damage and blocked access to an office building on Old Queen Street in Westminster, the Metropolitan Police said.

One person has been arrested for criminal damage, and the incident is ongoing, the force added.

Last week, 10 Just Stop Oil activists suspected of planning to disrupt Heathrow Airport were arrested.

The latest action is part of the “Oil Kills international uprising”, the group said, taking place at airports around the world.

Earlier this month, the airport became the latest major airport to secure a High Court injunction in an attempt to stop would-be environmental activists trespassing on its land after receiving police intelligence over protest plans.

Timothy Morshead KC, representing Gatwick at the hearing, said such action could cause “severe disruption and financial loss” and “significant delays for passengers”.

A spokesperson for Sussex Police said: "Police responded to a report that protesters were demonstrating near the security entrance at the South Terminal in Gatwick Airport at around 8am today (July 29).

"Eight people have been arrested on suspicion of interfering with public infrastructure, and a heightened police presence should be expected at this time.

"The airport is functioning as usual, and no disruption has been caused by protest activity."

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Five Just Stop Oil activists remanded in prison in connection with plot to disrupt passengers at Manchester Airport

By [DAN WOODLAND](#)
PUBLISHED: 22:09, 6 August 2024 | UPDATED: 03:51, 7 August 2024

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Five **Just Stop Oil** supporters have been remanded to prison after being arrested near **Manchester Airport** earlier this week.

Daniel Knorr, 22, Margaret Reid, 53, Ella Ward, 21, Noah Crane, 19, and Indigo Rumbelow, 30, were arrested on Monday in connection with a plot to disrupt passengers at Manchester Airport.

They were found to be in possession of items that Greater **Manchester Police** believed would have been used to 'cause damage and significant disruption to the airport and its operations', the force said.



The quintet today appeared at Manchester Magistrates' Court charged with intentionally or recklessly causing public nuisance.

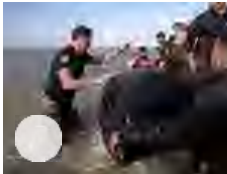


The five protesters were all remanded until at least their next appearance on September 10.



(Left to right) Indigo Rumbelow, 30, Margaret Reid, 53, Ella Ward, 21, Noah Crane, 19, and Daniel Knorr, 22, were arrested on Monday near Manchester Airport

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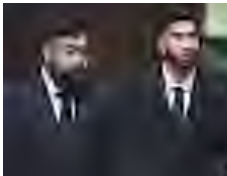


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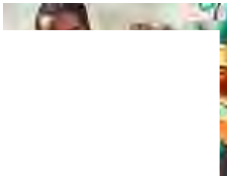


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Two brothers used 'high level of violence' to assault police officers at Manchester Airport, court hears



School uniforms that





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Noah Crane, 18, was also arrested later in the day from an address in Birmingham

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© PA Archive/PA Images
Four Just Stop Oil protesters have been arrested near Manchester Airport (pictured) in a police swoop

Ella, Daniel, Indigo and Margaret were all arrested in the early hours of yesterday morning near Manchester Airport, Just Stop Oil said.

Noah was arrested later in the day from an address in Birmingham, after police seized a phone he allegedly purchased on August 3, the group added.

Activists from the environmental group have seen their attempts in recent weeks to unleash a 'summer of chaos' at airports across Europe foiled by officers.

They have been targeting airports in recent weeks in the campaign named 'Oil Kills'. Just Stop Oil said 21 groups across 12 countries have taken action at 21 airports so far.

Speaking before her imprisonment Indigo Rumbelow, 30, from Swansea, said: 'Just Stop Oil supporters have been taking part in an International Uprising for a Fossil Fuel Treaty, because we live in an international crisis and we need an international solution. We're in a world and our leaders are hell-bent on making it worse.'

'The climate crisis threatens everything we know and love, yet our scientists are continuing to make the problem worse, the courts are protecting it and imprisoning those who stand-up to make change, whilst the media is grappling to tell the truth.'

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Pictured: Grinning JSO protesters arrested near Manchester Airport as police slam eco-idiot



▶ many abortions she has had'



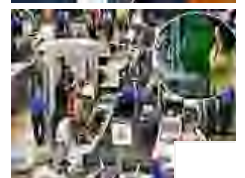
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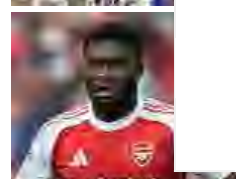
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AUGUST 1: Just Stop Oil protesters block the security screening area at Heathrow Terminal Five



AUGUST 1: Just Stop Oil protesters block the security screening area at Heathrow Terminal Five

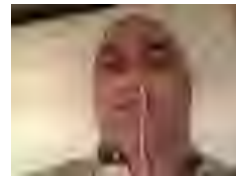


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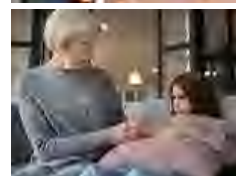
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AUGUST 1: Just Stop Oil protesters hold 'Oil Kills' signs as they block the security gates



AUGUST 1: Police officers remove a Just Stop Oil protester at London Heathrow Airport

'Many of my friends have been sent to prison, but we will not be deterred. Nothing will stop us trying to protect our families and our communities from the danger imposed on all of us through continued oil, gas and coal burning.'

Daniel Knorr, 22, from Oxford said: 'We were not born to stand-by and do nothing whilst hundreds of millions of lives are thrown into the furnace.'

'To be human is to care. This is terrifying but we need to be brave. Courage is not the absence of fear, it is to drive forwards towards what's right, despite your fear.'

'We stand to lose everything if our government continues to fuel the climate crisis. It would be completely self-defeating to not be in resistance at this time in history.'

'Our leaders must enact a Fossil Fuel Treaty to phase down oil and gas if we are to stand any hope.'

Noah Crane, 19, from Norwich said: 'When I think about the situation we're in,

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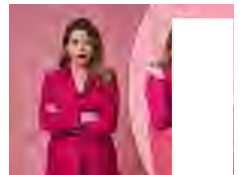
Just Stop Oil eco zealots are dragged away by police after trying to block Heathrow depart

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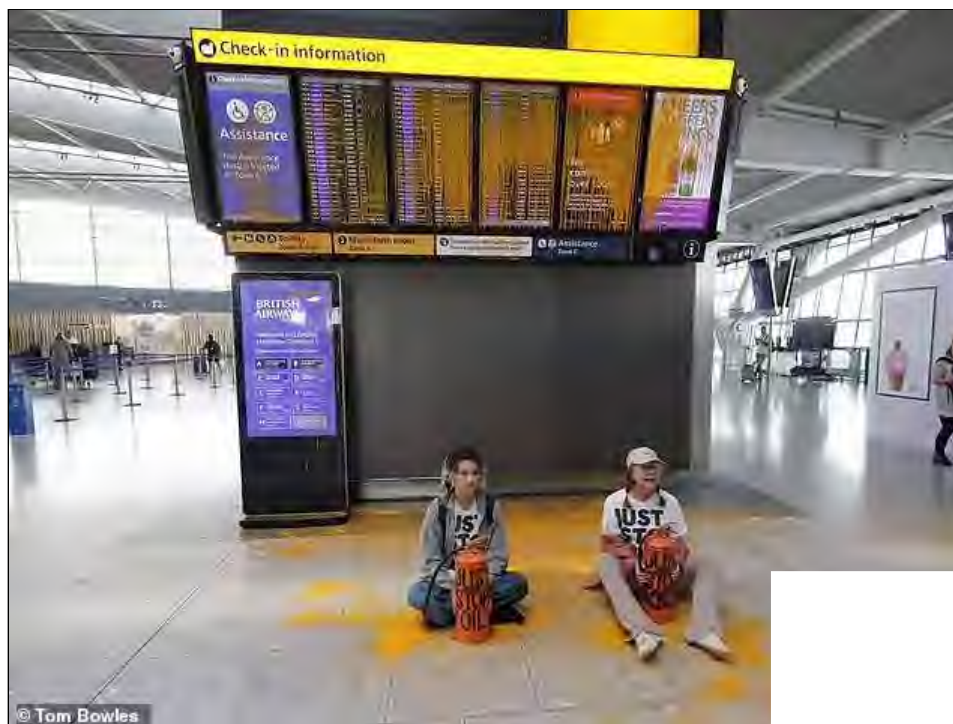
I realise we are faced with a choice; we can either sit back and watch as governments allow the deaths of hundreds of millions of people to protect profit, or we can do everything in our power to prevent that. When I think about it that way, it's really a no-brainer.'

'I'm not scared of going to prison. What I am scared of is what will happen if we don't act on this crisis. The world is in a position where there is no threat they can make towards me, that outweighs the consequences of inaction.'

JSO eco-morons strike Heathrow as part of 'summer chaos crusade'



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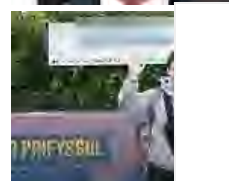
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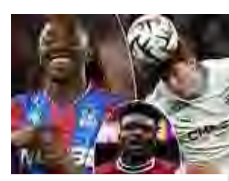
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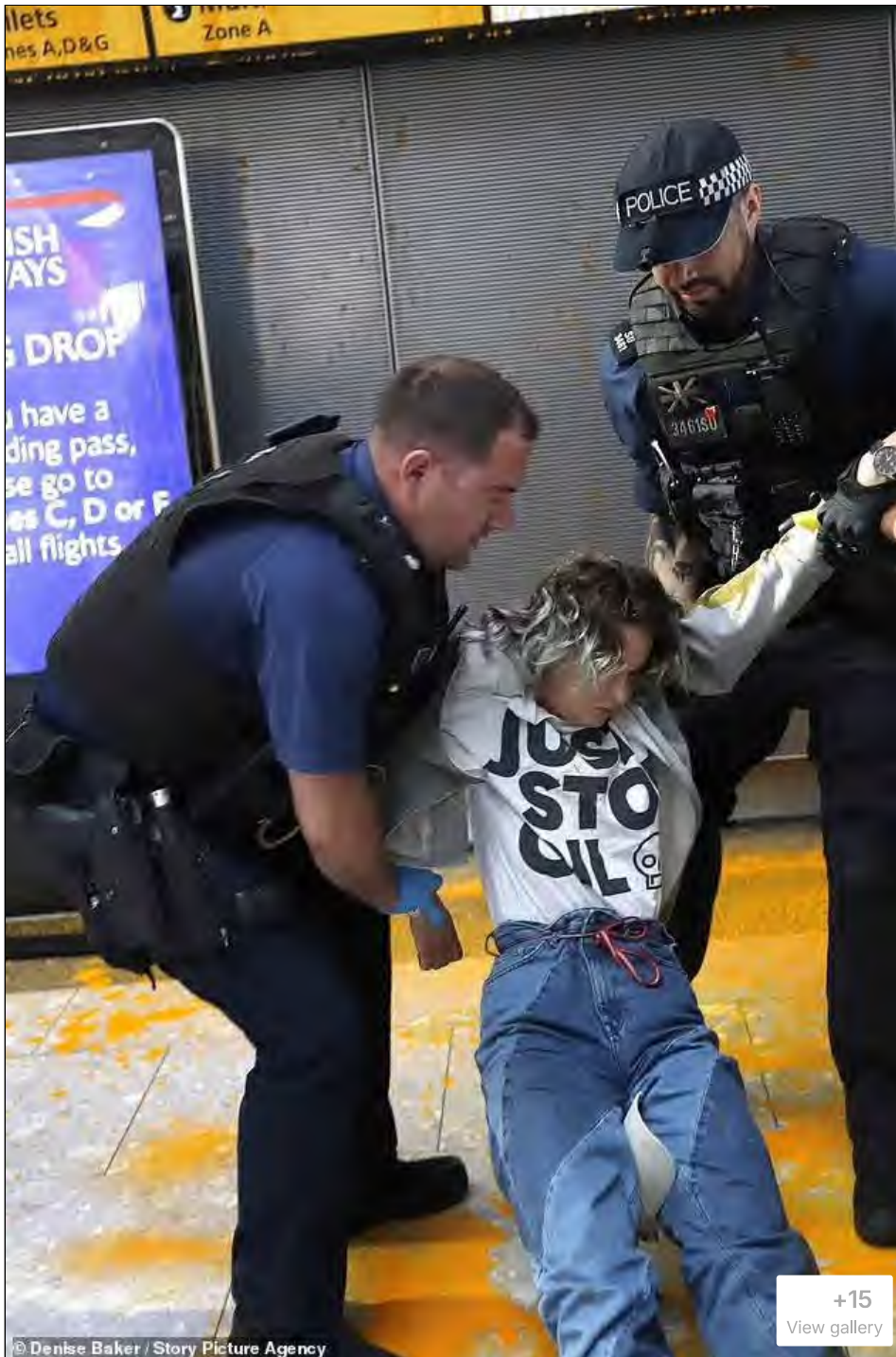


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JULY 30: Phoebe Plummer is arrested on suspicion of criminal damage at Heathrow Airport

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JULY 30: Phoebe Plummer is removed by police at Heathrow after the group's latest stunt



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JULY 29: Just Stop Oil supporters block departure gates at Gatwick Airport in another protest



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JULY 29: The seven Just Stop Oil protesters at Gatwick earlier this week were

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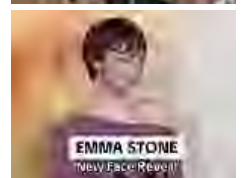


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'F*** off!': Passengers step over eco-mob blocking Gatwick departures

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A Just Stop Oil spokesperson said: 'In the wake of the four hottest days in recorded history during the past two weeks, governments are still failing to take action that is commensurate with the scale of the crisis humanity faces.

'Meanwhile, those demanding our leaders take necessary action, are being given increasingly draconian sentences by those in the judiciary who are complicit with the crimes against humanity, being perpetrated by governments and corporations.

'It's time world leaders stood up to fossil capital and enact a fossil fuel treaty to Just Stop Oil by 2030.'

Last week, a group of six demonstrators tried to block the security screening zone at London Heathrow's Terminal Five.

They sat or stood holding signs saying 'oil kills' and 'sign the treaty' in front of the barriers to enter the area for departing passengers - but they were dragged away by police officers.

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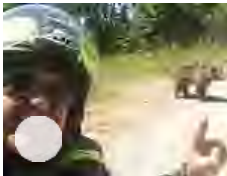
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Protestors blockade Farnborough airport over private jet expansion plans

MERIDIAN

FARNBOROUGH

🕒 Sunday 2 February 2025 at 2:12pm



Local residents joined climate activists to block the airport's main entrance

Credit: Extinction Rebellion

Local residents and climate activists have blocked access to Farnborough Airport to protest against the proposed expansion of the airport which they say will almost double the number of private jet flights to 70,000 a year.

Scores of campaigners from Extinction Rebellion, Farnborough Noise campaign group, Blackwater Valley Friends of the Earth and Alton Climate Action Network joined local councillors and local residents, to voice their opposition to the plans, which they say blatantly ignore the climate crisis.

The protest follows a consultation period on Farnborough Airport's expansion plans which ended in October 2024 drawing fierce opposition from local residents and environmental campaigners.

[Greta Thunberg joins protest against airport expansion plans](#) >

The proposals include doubling the airport's annual weekend flight limit from 8,900 to 18,900 flights and upping its annual flight limit from 50,000 to 70,000 flights.

Rushmoor Borough Council has yet to make a decision on the proposed increase.



Credit: Extinction Rebellion

In a statement, Extinction Rebellion said that the 33,120 private jet flights to and from the airport in 2024 carried an average of 2.5 passengers, with each passenger responsible for the emission of nine times as much carbon as an economy flight to the US and 20 times that to Spain.

"For the limited benefit it provides to a small number of people, private aviation has a disproportionately large impact on climate change due to its high carbon emissions," it said.

"Per passenger mile, flying in a private jet is the most inefficient and most carbon-intensive mode of transport. It

epitomises the worst of climate injustice, where a few people emit large amounts of carbon for the sake of a journey that can be taken by a scheduled flight or, in many cases, by train.



*Waverley Borough councillors joined protestors outside the airport
Credit: Extinction Rebellion*

Steve Williams, Environment Portfolio Holder for Waverley Borough Council, says “aviation has no realistic prospect of becoming sustainable in the near future, so any form of airport expansion is unacceptable, given the climate crisis.

Expansion at Farnborough is particularly iniquitous because of the impact on the locality nearby and the massive carbon footprint of the privileged few who choose to travel by private jet.”

The protest comes after the Government announced plans to boost UK economic growth through airport expansion and the use of sustainable air fuel.

Campaigners fear the potential use of the 2nd runway at Gatwick will adversely affect the locality, as will the building of a third runway at Heathrow airport.

A spokesman for Farnborough Airport has previously addressed the concerns : “Farnborough Airport is an important gateway for business aviation connectivity with the majority of flights being operated for business and corporate travel purposes.

“The airport’s environmental footprint is a fraction that of a traditional commercial airport, yet it serves as one of the largest employment sites in the region.

Activists hold demonstration at Scots airport over private jet company

Billionaire Anders Povlsen's firm targeted over environmental hypocrisy

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By **Ryan McDougall** & **Peter A Walker** Content Editor 08:15, 17 FEB 2025

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 **Activists at Inverness Airport on Saturday** (Image: XR Scotland)

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Extinction Rebellion Scotland held a demonstration at Inverness Airport on Saturday, calling out Blackbird Air's chief executive Anders Povlsen, who protesters say uses private jets frequently, while making commitments to nature conservation.

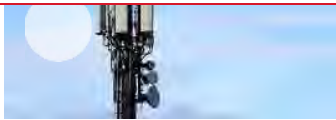
Protesters waved banners emblazoned with "Ban Private Jets", "Blackbird Nae mAir" and "We're in a climate emergency, we need to step up and take action".

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They called upon Povlsen to shut down Blackbird Air and instead invest in environmentally-friendly transportation.

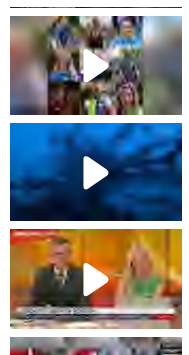
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The protesters joined fellow activists from Scientist Rebellion in Denmark, who staged a similar demonstration at Blackbird headquarters at Billund Airport.



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Povlsen - [Scotland's richest person](#) - owns a vast amount of land in Scotland and also operates Wildland, a private enterprise which aims to act upon the climate crisis.

Sarah Birkby, from Extinction Rebellion Highlands and Islands and Moray, said: "It is completely contradictory to state the importance of acting on the climate emergency and at the same time run a private jet company.

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Years Old ship found frozen in arctic ice, scientists found this inside.

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"The time when people, no matter how rich, could say one thing and do the exact opposite is over.

"As Wildland itself declares, we need people to step up and take action."

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Anthony Graham, from Scientists for Extinction Rebellion, added: "The evidence is clear: our current emissions pathway is incompatible with a safe planet.

"Every tonne of CO2 fuels climate change, yet private jets - used by the wealthiest 0.003% - emit disproportionate amounts, worsening both the climate crisis and inequality.

"Scientists for Extinction Rebellion urge action on luxury emissions, stressing that those with the most power must lead by example."

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Blackbird Air was approached for comment.

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Four arrested after RAF Brize Norton break-in



Ewan Somerville

BBC News

27 June 2025

Counter-terror police have arrested four people after military planes were sprayed with paint during a break-in at RAF Brize Norton that was claimed by a pro-Palestinian group.

Footage posted online last Friday by Palestine Action showed two people inside the Oxfordshire airbase in darkness, with one riding on a scooter up to an Airbus Voyager and spraying paint into its jet engine.

South East counter terrorism police have now arrested a 29-year-old woman of no fixed abode and two men, aged 36 and 24, both from London, on terror charges.

A 41-year-old woman, of no fixed abode, was arrested on suspicion of assisting an offender.

The suspects aged 24, 29 and 36 are suspected of "the commission, preparation or instigation of acts of terrorism, contrary to Section 41 of the Terrorism Act 2000", police said.

The arrests took place in Newbury, Berkshire, and all suspects remain in custody.

South East counter-terror police gave no further details about the individuals arrested, nor their suspected link to the incident.

The government has said it will proscribe Palestine Action following the incident at Brize Norton, making it illegal to be a member or invite support for the group.

Home Secretary Yvette Cooper said a draft proscription order would be laid before Parliament on 30 June.

Palestine Action said its activists were able to evade security and claimed they had put two air-to-air refuelling tankers "out of service".

The group said activists used repurposed fire extinguishers to spray the paint and caused "further damage" using crowbars.

However, Downing Street said the incident had not blocked any planned aircraft movements or stopped any operations.

The base is encircled by a large perimeter fence, with security cameras and sensors in the area in addition to manned security checkpoints. Patrols around the base are also carried out from time to time.

But a defence source said these measures would not have been able to provide complete cover around the large airbase.

Defence Secretary John Healey said he was "really disturbed" by the incident and ordered a wider security review of all UK military bases.

Prime Minister Sir Keir Starmer condemned the break-in as "disgraceful", characterising it as an "act of vandalism".

RAF Brize Norton serves as the hub for UK strategic air transport and refuelling, including flights to RAF Akrotiri in Cyprus.

The air force has conducted reconnaissance flights over Gaza out of the Cyprus base, though the Ministry of Defence told the BBC that RAF Voyager aircraft had not been involved in refuelling or supporting Israeli Air Force jets.

A Palestine Action spokesperson said in a statement shortly after the break-in: "Despite publicly condemning the Israeli government, Britain continues to send military cargo, fly spy planes over Gaza and refuel US and Israeli fighter jets."

Police said the incident took place in the early hours of 20 June and that "damage was caused to two aircraft".

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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/>

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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.

Support
Just Stop Oil

Donate

This action is not currently available.



Follow us on social media.

About us

Just Stop Oil is 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 our resistance in the courts and prisons.

A new revolutionary direct action campaign is coming. Help us build what's next.

'The police must crack down on Just Stop Oil's plans to make a comeback,' says Ben Leo



OPINION: Ben Leo revealed that Just Stop Oil are making a comeback

Now, I was getting pretty bored of the juvenile antics at the altar of climate change.

We've seen it all vandals throwing soup over priceless artworks in galleries, defacing Stonehenge, ambushing theatre productions in the West End, blocking traffic, scaling motorway gantries, dousing private jets in paint, and even disrupting sports events all just to spoil the fun for everyone else.

Remember them? They said they were disbanding after the government appeared to adopt their demand to end new oil and gas licences in Britain. Their actions, of course, cost the public tens of millions in police and court time.

But despite Ed Miliband bowing to their demands, I can exclusively reveal that Just Stop Oil is plotting a very big comeback.

TRENDING

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Ben Leo said: "I can exclusively reveal that Just Stop Oil is plotting a very big comeback."

GB NEWS

On Ben Leo Tonight, we have gained access to secret Just Stop Oil meetings, where members are discussing a dramatic U-turn—planning to cause chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and even carrying out “citizens’ arrests” on so-called climate criminals.

Speaking during an online meeting on Thursday night, one coordinator—known only as “Dave”—said protests should remain "action-based" and warned against becoming more peaceful, like Greenpeace.

LATEST DEVELOPMENTS

- **Just Stop Oil poster girl avoids prison despite causing 'large-scale disruption' on M25 which cost the Met Police more than £1m**
- **Net zero rubbishers are starting to sound a lot like Just Stop Oil without the superglue - Nigel Nelson**
- **Just Stop Oil activist declares ‘we WILL be back’ as tense row breaks out on GB News**

The meeting continued with Dave insisting that it was essential to keep doing what he called the “spicy and naughty stuff” to generate media attention.

The group also discussed how to feed new protest ideas back to what they referred to as a "core team". There was frustration over communication with this mysterious leadership group, with some suggesting using 50-word briefs to make it easier for them to process ideas.

It raises serious questions: Who exactly is this core team? Who are these professional protesters reporting to—and who’s funding them?

Chillingly, the group also spoke about carrying out citizen’s arrests on so-called climate deniers. There was some introspection as well, with members questioning whether their public image was doing more harm than good.

Just Stop Oil protesters targeting Stonehenge
JUST STOP OIL

But ultimately, the overwhelming feeling in the group was that direct action must continue. The meeting wrapped up with plans to proceed with Just Stop Oil's revival, including talk of keeping protesters in safe houses to maintain morale.

Let's be clear: what we're dealing with here is a group of climate zealots plotting to commit criminal acts, backed by who knows what kind of funding, and being housed like some kind of eco-mafia.

And speaking of coordination—let's not pretend the climate agenda is a spontaneous grassroots movement. It's organised. It's funded. It's political.

So, who's paying to bus these protesters from London to Stonehenge, to airports, to art galleries and sports stadiums? Who's funding the Just Stop Oil safe houses where these scruffy, self-righteous agitators meticulously plan how to make Britain colder and poorer?

Just Stop Oil protest in LondonJust Stop Oil

The police and the government must crack down on Just Stop Oil's plans for criminality before they gain traction again.

The last thing Britain needs is more disruption, more vandalism, and more self-indulgent eco-activism especially when a Labour government is already happily marching to the drumbeat of Net Zero extremism.

We'll be passing our findings to the police.

GB News has approached Just Stop Oil for a comment.

Payne, Emma

From: Payne, Emma
Sent: 02 June 2025 14:08
To: Payne, Emma
Subject: FW: Exposed by GB News

Importance: High

From: Just Stop Oil <info@juststopoil.org>
Sent: 21 May 2025 19:29
To: Wortley, Stuart <StuartWortley@eversheds-sutherland.com>
Subject: Exposed by GB News



Dear Stuart,

GB News was right for once. We are ["plotting a very big comeback"](#).

While we have stopped taking action as Just Stop Oil after winning our initial demand, we also know that revolutionary change is needed now more than ever. In the three years since Just Stop Oil began in 2022, the necessity to resist has become impossible to ignore.

We've seen the world's billionaires accumulate \$3.7 trillion in wealth, making them now richer than almost every country in the world. Over 50,000 Palestinians have been killed in the ongoing genocide in Gaza, a genocide that is still bankrolled and armed by our own government. At least 166,000 people are being killed due to government inaction on the climate crisis every year with a recent report estimating 4 billion total deaths if we don't take urgent action. The UK is facing a cost of living crisis that doesn't seem to have an end in sight. We've passed the 1.5 C global heating threshold that was internationally agreed upon to limit heating to in the 2015 Paris Agreement. And as the cherry on top of this pile of shit, our rights to dissent to this, to protest in this country are being steadily infringed upon with new laws and powers being introduced to criminalise protest and unprecedented prison sentences being handed out to nonviolent protestors.

It's clear that our government could not care less about ordinary people. Corrupt politicians are serving the interests of billionaires while the media is shifting blame from their mates on mega yachts to the people in small boats all while the world gets hotter and hotter.

Nothing short of a political and economic revolution is going to get us out of this mess. 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. You're here at ground zero of the revolution and we need your support to get it off the ground. Can you donate to make it happen?**



We run entirely off of donations and while the street campaign is over, there's still a lot of work to be done. Donations go towards building the next campaign and ensuring it's up to the task of challenging the system AND to supporting the hundreds of brave people who are still being dragged through the courts with fines, prison time, electronic tags, and isolating curfews.



Do you also want to get involved in a more practical way in building the revolution? Interested in learning the skills needed to organize and build resilient communities and movements? Curious about theories of change and nonviolent resistance? Join us on Saturday 14th and Sunday 15th of June in London as we join forces with Youth Demand for the launch of the Seeds of Revolution training programme. Everyone is welcome, old and young, seasoned veterans and fresh faces. We want to meet you!



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How 'Just Stop Oil 2.0' will ruin your summer: Now Youth Demand plot to bring London to a standstill as orange-clad eco zealots end reign of terror on hard-working Brits

By [EMILY JANE DAVIES](#)
PUBLISHED: 10:39, 7 April 2025 | UPDATED: 10:46, 7 April 2025

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Last month, Brits rejoiced when [Just Stop Oil](#) announced it was hanging up the orange hi-vis after three years of stunts - but a new kid on the block is bringing fresh misery in its place.

JSO's goal was to wean Britain off [fossil fuels](#) – a policy which is now being implemented by Ed Miliband's Department for Net Zero.

And so the group - which has tormented people around the country with waves of controversial, and often illegal, protests causing havoc for people trying to go about their daily lives - announced it was stopping direct action.



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Long-suffering Brits have missed funerals, **cancer** appointments and seen tens of thousands of journeys disrupted by the activists as part of their campaign.

But the void left by the neon-orange clad eco-zealots is already being filled by a determined group called Youth Demand, which has snappily branded itself 'JSO 2.0'.

Many of those in Youth Demand, whose members have also opted to wear JSO's trademark colour, have come from the notorious original campaign group which caused many members of the public headaches.

The bright website boasts 'young people are resisting' and they have organised a list of activities - including 'action training' and 'legal briefing' as they rally the troops.

The group is planning daily co-ordinated actions to 'shut down **London** with swarming road-blocks day after day' this month.



Campaigners from Youth Demand hold a banner as they block Tower Bridge Road on Saturday



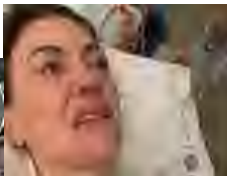
Supporters of Youth Demand block the Tower Hill Junction as part of its April

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Supporters of Youth Demand block the Tower Hill Junction on April 5

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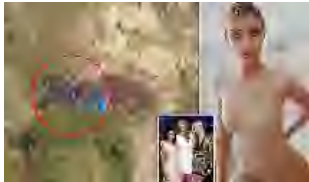
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Its website reads: 'In 2024, we built a national youth resistance organisation. We mobilised over a thousand people to pull off 60 actions, from blockading central London during the summer, plastering a picture from the Gaza genocide on a Picasso painting and shutting down five UK cities in November.

'In April we are bringing things to a whole new level. We will shut down genocidal 'business as usual' in London for a month straight. It's time for every single person to be in resistance.'

This forecasts a nightmarish summer for many. MailOnline previously revealed the new group is **planning to target the British Museum and other London landmarks this month.**

They hope to overwhelm the justice system by clogging the courts and costing the police 'millions of pounds' in shifts.

Plans to 'swarm' London were announced at a strategy launch event in the City.

An undercover reporter who attended the meeting was told by a leading activist that the British Museum was one of a number of landmarks protesters planned to target.

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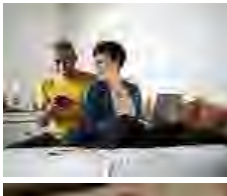
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Boasting to around 100 young people at Limehouse Town Hall, Youth Demand leader Sam Holland, 22, said: 'Just one swarm team last summer cost the Met police £25,000.

'If we do 10 actions a day for a month straight it will cost the city millions of pounds.

'We're disrupting until they meet our demands.



Youth Demand stage a rally outside the University of London, in Bloomsbury on April 1



A campaigner from Youth Demand group with the word shouts slogans as they block Tower Bridge Road as part of their April protests

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Youth Demand, Palestine Pulse and other groups at the pro Palestine rally organised by Youth Demand on April 1



© Anadolu via Getty Images
Supporters of Youth Demand activist group cover the Picasso painting 'Motherhood' with a photo of a Gazan mother and child in October 2024

'We're not [just] protesting, we're resisting and forcing change from the government.'

Teams from across the country will travel to London on rotation in a nationally co-ordinated effort to flood the capital's streets.

In a post on Telegram - an encrypted messaging site - shared to more than 1,100 Youth Demand supporters across Britain, it stated: 'With your help, we will shut it down for Palestine and those suffering across the world.'

'Let's make history together.'

To fund the month-long protest Youth Demand were hoping to raise around £75,000 from big ticket donors and individuals to cover costs such as living expenses for full-time activists, accommodation for protesters, legal support and posters.

And they kicked this off on Saturday, when 40 Youth Demand protesters were

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told to move on by the police during a pro-Palestinian rally after they blocked traffic in central London.

They met at Lincoln's Inn Fields in the morning and made their way to King's Cross station.

Some held banners which read 'Stop arming Israel' while others let off green flares.

This is the beginning of the plans to protest every single Tuesday and Saturday in April.

Inspired by Just Stop Oil's protests, hundreds of their supporters will block roads and traffic.

But instead of sticking to one location, they will continuously disperse to different spots when police arrive - a tactic known as swarming - as they look to create maximum disruption.



© Credit: Twitter@youth_demand
One Youth Demand activist wearing an 'Eat s*** Rishi' shirt staged a vile 'dirty protest' at the former Prime Minister's £2million mansion in Yorkshire in a major security breach last June



Police officers observe as Youth Demand stage a rally outside Senate House London, in Bloomsbury following the arrests of six activists at Quaker Meetir Westminster

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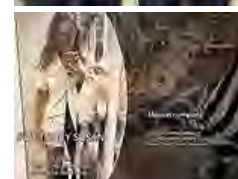
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 Youth Demand block the A501 in protest at UK arms sales to Israel and Palestinian casualties at Kings Cross on April 5



© Martin Pope/SOPA Images/Shutters
 Supporters of Youth Demand gather in Tower Hill during the protest on Saturday



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 Members of Youth Demand as they take part in a 'swarming action' in London

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The Met Police **issued the protesters with a warning under section seven of the Public Order Act**, Youth Demand said.

The group moved on after just 10 minutes.

A Met spokesperson previously said: 'Youth Demand have stated an intention to 'shut down' London over the month of April using tactics including 'swarming' and road blocks.

'While we absolutely recognise the importance of the right to protest, we have a responsibility to intervene to prevent activity that crosses the line from protest into serious disruption and other criminality.'

Last month, dozens of police battered down a door to **arrest six women, who were plotting their April action, at a Quaker meeting group**.

More than 30 police officers made the arrests at a welcome talk held at the Westminster Meeting House at around 7.30pm, Youth Demand claimed.

Youth Demand said the meeting was 'an opportunity to share plans for non-violent civil resistance actions' due to take place in April.

The group claimed a number of houses were also raided on the same night and into Friday, March 28, as part of the operation.

In a statement, Quakers in Britain said: 'Quakers support the right to nonviolent public protest, acting themselves from a deep moral imperative to stand up against injustice and for our planet.

'Many have taken nonviolent direct action over the centuries from the abolition of slavery to women's suffrage and prison reform.'

The Met Police said at the time: 'Youth Demand have stated an intention to 'shut down' London over the month of April using tactics including 'swarming' and road blocks.



Police officers at the Ministry of Defence in London, after members of Youth paint over the outside of the building last year

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Members of Youth Demand threw red paint at the Ministry of Defence last year



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Members of Youth Demand take part in a 'swarming action' in central London on Saturday



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Police officers intervene as an argument erupts between pro-Israel counter-protesters and Youth Demand over the weekend

'While we absolutely recognise the importance of the right to protest, we have a responsibility to intervene to prevent activity that crosses the line from protest into serious disruption and other criminality.

'On Thursday, 29 March officers raided a Youth Demand planning meeting at an address in Westminster where those in attendance were plotting their April action.

'Six people were arrested on suspicion of conspiracy to cause a public nuisance. Five of those arrested on Thursday have been released on bail and one will face no further action.

'A further five arrests for the same offence were made on Friday, 28 March. Four of the arrests were at addresses in London and one in Exeter.

'All five of those arrested on Friday have been released on bail.'

Previous demonstrations by Youth Demand included three people hanging a banner and laying rows of children's shoes outside Sir Keir Starmer's home in April last year, following which three people in their 20s were handed suspended prison sentences.

One Youth Demand activist **wearing an 'Eat s*** Rishi' shirt** staged a vile 'dirty protest' at the former Prime Minister's £2million mansion in Yorkshire in a major security breach last June.

And many members from JSO have now flocked to the new group.

These include Chiara Sarti, who sprayed the gatehouse of King's College Cambridge with orange paint in 2023.

There is also Eddie Whittingham, who covered a pool table in orange powder in Sheffield the same year, and many others.

The group is calling for the British Government to impose a complete trade embargo on Israel and make the 'super rich' pay £1 trillion in climate damages to the Global South.

Just Stop Oil London

Share or comment on this article: How 'Just Stop Oil 2.0' will ruin your summer: Now Youth Demand plot to bring London to a standstill as orange-clad eco zealots end reign of terror on hard-working Brits

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SUMMER OF ACTION

A Summer of Action

June 19, 2025 by Extinction Rebellion

While politicians supported airport expansions, degraded our environmental laws and parliament tightened its chokehold on climate activists, global average temperatures in 2024 blew past 1.5°C. Now the UK has recorded its warmest spring on record and its driest in over **50 years**.

Rebels are refusing to be silenced. XR local and community groups all over the nations and regions of the UK are getting ready for a summer filled with defiant action. Creative, colourful, bold actions are being planned everywhere – join them, raise your voice in protest this summer.

Join in joy or join in despair, but let it be in unity, community, and curiosity. The sun will be a totem that we rally together around, never forgetting that it is a death sentence for millions on the frontlines of climate and ecological collapse.

There has never been a more vital time to act. It will be a rebellious summer.

Check out the [movement calendar](#) and [map](#) to find actions near you this summer, and see below for some highlights!

Insure Our Survival – Without insurance, fossil fuel companies can't extract more oil, coal and gas. A [Week of Action](#) from **5th-12th July** – targeting insurers takes place with local groups across the UK planning actions.

Stop Private Jets – Join XR **Oxford on Saturday July 5th** in a march to Oxford Airport and say No to Private Jets. [Find out more](#).

Heat Strike – A week of action **14th-20th July** to highlight rising temperatures' impact on workers, as we pressure government and employers to take action. [Learn more and get involved](#).

Funeral for Nature – Dress in black for a [solemn march](#) through **Bournemouth** on **Sunday July 27th**. This visual action mourning the destruction of nature will be silent apart from a drumbeat.

Don't Pay for Dirty Water – Last year, sewage was discharged into UK waterways over 1,000 times a day. We are withholding payment of the sewerage charge portion of our bills until the UK government and water companies stop poisoning and start cleaning up coasts and waterways across the UK. [Join the boycott now!](#)

World Water Wedding – Water is sacred in many cultures. Water is fundamental to life. Wherever clean water flows, life grows. Water represents emotions, renewal and life, which all ebb and flow. Constantly evolving, ebbing and flowing, it reminds us that we can too. [Commit to water for life on August 24th](#).

For advice on the latest safety, legal and action support information, please join one of our online [Prepare for Action workshops](#), upcoming on **26th June and 1st July**.

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UK news

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Man arrested after climate activists cut UK insurance firms' fibre optic cables

Protest group says it targeted insurers 'due to their critical role underpinning the fossil fuel economy'

Damien Gayle

Fri 24 Jan 2025 17:36 GMT

A man has been arrested after environmental activists claimed responsibility for sabotage attacks on fibre optic cables outside major insurance companies.

The 29-year-old was arrested by City of London police after activists said they had cut the cables to insurance company offices in London, Leeds, Birmingham and Sheffield on Monday.

In a press release, the group, which calls itself Shut the System, said it had targeted insurers "due to their critical role underpinning the fossil fuel economy through underwriting contracts and investments".

It circulated a photo it said showed an activist dressed as an electrical engineer reaching into a maintenance hole to cut cables next to 52 Lime Street, in the City of London financial district, where the insurance firms W/R/B Underwriting and Chaucer have offices.

Fibre optics were also targeted, according to the press release, at the insurance market at Lloyd's of London, the Walkie Talkie building at 20 Fenchurch Street, which is the London base of seven big insurers, as well as the offices of Talbot AIG at 60 Threadneedle Street, Chubb at 100 Leadenhall Street, and AIG on Fenchurch Street. The offices of AIG in Birmingham, Markel in Sheffield and Axa in Leeds were also targeted, Shut the System said.

"If these powerful companies don't make public statements that they will stop driving fossil fuel expansion and destroying life on Earth, then we have no choice but to stop them ourselves," the group's statement said. "We will not give up until insurance companies take responsible action."

Lloyd's of London did not respond to a request for comment, and the City of London police were understood to still be investigating which companies in its area had been affected.

Matthew Geyman, the managing director of Intersys, a cybersecurity company with offices in the City, said there had been "significant slowdown of internet speed" in the area around the time the action took place, but the network continued to function.

"There doesn't seem to have been as much impact as I suspect the protesters hoped," Geyman said. "This is likely because robust communication systems are designed to be resilient to these attacks."

“We noticed a significant slowdown of internet speed in the City of London at the time it happened, which suggested high contention (ie some communications links were becoming saturated or stretched as they took excess load from the damaged lines) but, beyond this, I’ve heard of very little disruption from contacts.”

Resilience to such incidents was built into the system, with redundant lines able to be used and automatic switching to backup routes, including radio and cellular links, which “happen almost instantaneously”, Geyman said. Roadworks taking place outside Lloyd’s on Thursday were “presumably to remedy the physical damage”, he added.

Shut the System emerged last year with a series of actions smashing and hurling red paint across windows at City-based insurers and more than 20 branches of Barclays Bank. At the beginning of this year it announced it had sabotaged fibre optic cables outside 55 Tufton Street, the centre of a network of rightwing lobby groups and thinktanks.

Unlike groups such as Extinction Rebellion and Just Stop Oil, whose activists commit civil disobedience and wait to be arrested, the group’s supporters act clandestinely, leaving before police arrive. On a WordPress website set up in the group’s name, a statement says the group believes it has “kickstarted a new phase of the climate activist movement” with a “campaign of sabotage targeting the tools, property and machinery of those most responsible for global warming”.

DCI Kevin Ives, head of the criminal investigation department and volume crime unit at City of London police, said: “A 29-year-old man has been arrested on suspicion of criminal damage, following reports of external cabling being damaged under the City of London on Monday 20 January.

“The man has been bailed with conditions, pending further police investigations.”

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NOTICE OF 2025 ANNUAL GENERAL MEETING

April 16, 2025 at 2:36 PM BST

NOTICE OF 2025 ANNUAL GENERAL MEETING

- **Shell plc's 2025 Annual General Meeting ("AGM") scheduled to be a hybrid meeting, facilitating both physical and virtual attendance**
- **Shareholders encouraged to vote in advance of the AGM, but voting enabled during the meeting for those formally in attendance**

Today, Shell plc (the "Company") posted its Notice of 2025 Annual General Meeting (the "Notice"), which can be viewed and downloaded from shell.com/agm. The AGM is scheduled to be held at the Sofitel London Heathrow Hotel – Terminal 5, London Heathrow Airport, London TW6 2GD at 10:00 (UK time) on Tuesday May 20, 2025. Further details on how to join or watch the AGM can be found within the Notice.

National Storage Mechanism

In accordance with the UK Listing Rules, a copy of each of the documents below is being submitted to the National Storage Mechanism ("NSM") and will be available for inspection at data.fca.org.uk/#/nsm/nationalstoragemechanism:

- Notice of the 2025 AGM;
- Notice of Availability of Shareholder Documents; and
- Proxy Form relating to the 2025 AGM.

Printed copies of the Notice and associated documents are being despatched to those shareholders who have elected to receive paper communications.

Shareholders are encouraged to register for email alerts at shell.com/news-and-insights/newsroom/email-alerts to receive the latest AGM news.

Sean Ashley
Company Secretary

ENQUIRIES

Shell Media Relations
International: +44 20 7934 5550

LEI number of Shell plc: 21380068P1DRH MJ8KU70

Classification: Additional regulated information required to be disclosed under the laws of the United Kingdom.

News > Business

Shell suffers investor revolt over gas production impact on climate plans

Just over a fifth of shareholder votes backed proposals for more disclosure on how increasing LNG production meets Shell's environmental commitments.

Rebecca Speare-Cole • Tuesday 20 May 2025 17:17 BST



Shell suffered a bloody nose at its annual general meeting (Yui Mok/PA) (PA Wire)



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Shell was dealt a bloody nose by shareholders calling for more transparency over how increasing gas production aligns with its climate commitments.

The oil major saw 20.56% of votes supporting a resolution put forward by shareholders at its annual general meeting (AGM) held near Heathrow Airport on Tuesday.

The proposal called for the board to disclose whether and how its liquified natural gas (LNG) demand forecast, production and sales targets are consistent with its climate targets.

While not legally binding, support for shareholder resolutions can put pressure on business leaders to respond to the matters raised, and more than 20% of dissent against the board can be considered a rebellion.

Previous shareholder resolutions focused on climate received similar levels of

RECOMMENDED



Gary Lineker holds back tears as he says BBC should 'hang its head in shame'

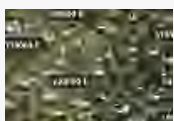


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Responding to the results, Shell said the board will meet its obligation to explain what actions it will take to consult with shareholders to understand the reasons why just over a fifth supported the resolution.

In his opening address, chair Sir **Andrew Mackenzie** defended Shell's recent shift of focus back towards fossil fuels.

“Shell believes the world needs more liquified natural gas to replace coal in Asia for energy security, and to complement and enable renewables,” he said.

“So we expect LNG will play a critical role in the transition.”

Sir Andrew also argued that Shell expects all demand to stay strong for the “foreseeable future”, meaning continued investment in fossil fuels will be needed.

“Let’s be clear, no business can operate outside the rules of supply and demand.

“So for the energy transition to succeed, there must also be demand for low carbon options from customers who are willing and able to pay for it.”

During the nearly three-hour meeting, the board was repeatedly challenged about its impact on the planet and commitment to cutting emissions to zero overall by 2050 – known as net zero.

Asked whether Shell would meet the demands of the shareholder resolution, chief executive Wael Sawan said: “There is not a company that discloses more or better information on LNG than Shell.”

Mr Sawan then made a plea to shareholders not to support “these sorts of resolutions”.

“What they are undermining is the ability of the board that you have elected to be able to drive the strategy of the company to do their job,” he said. “Challenging and providing input is very welcome but let’s have those engagements and not do it through the resolutions.”

The resolution was co-filed by Brunel Pension Partnership, Greater Manchester Pension Fund, Merseyside Pension Fund and the Australasian Centre for Corporate Responsibility (ACCR) with the support of activist group **ShareAction** and more than 100 individual investors.

Responding to the voting results, Jackie Garton, senior corporate climate campaign manager at ShareAction, said: “Today’s vote sends a strong message that shareholders will not sit back as Shell doubles down on growing its liquified natural gas production despite its own stated climate commitments.”

“It’s worrying that instead of addressing their concerns, Shell repeatedly shifted the blame for their oil and gas production growth plans onto consumers during its annual general meeting.”

Mark van Baal, from activist group Follow This, which did not file its usual climate resolution this year, said: “Today’s **AGM** demonstrates that more and more shareholders do not accept that the board puts the future of the company at risk by stubbornly sticking to a century old business model that risks being disrupted within five years.”

In a statement, Mr Sawan said: “Shell’s shareholders have strongly backed our strategy to deliver more value with less emissions as outlined at Shell’s Capital Markets Day 2025.

“Our focus on performance, discipline and simplification enables us to invest in providing the energy the world needs today, and in helping to build the low-carbon energy system of the future.”

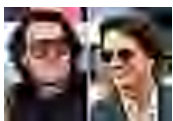
As the meeting was taking place at a hotel near Heathrow, protesters believed they were unable to stage an action outside because of a High Court injunction prohibiting environmental demonstrations at the airport.

Activists from campaign groups **Amnesty International UK**, Fossil Free London, and the Justice 4 Nigeria coalition instead held a protest outside Shell's global headquarters in central London.

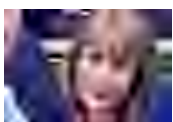
Sacha Deshmukh, chief executive of Amnesty International UK, called the effect of such injunctions in protecting firms such as Shell from protests as "chilling".

Areeba Hamid, co-executive director of Greenpeace UK, which supported the protest, accused the firm of "hiding" behind the injunction to "shut down legitimate questions about its operations".

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A spokesperson for Shell denied that the location had been chosen due to the injunction and that it chose the location “purely based on availability”.



In a statement on its website, Heathrow Airport also said: “For the avoidance of doubt, Heathrow Airport Limited does not consider that the terms of the injunction have the effect of prohibiting or restricting the lawful attendance of any shareholder at the Shell AGM.”

More about: [Shell](#) [Andrew Mackenzie](#) [AGM](#) [ShareAction](#) [Amnesty International UK](#) [Greenpeace UK](#)

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Campaigners just disrupted a Heathrow panel appearance – to expose protest injunctions protecting fossil fuel major Shell's AGM



by [The Canary](#) — 1 May 2025 in [News](#) Reading Time: 2 mins read

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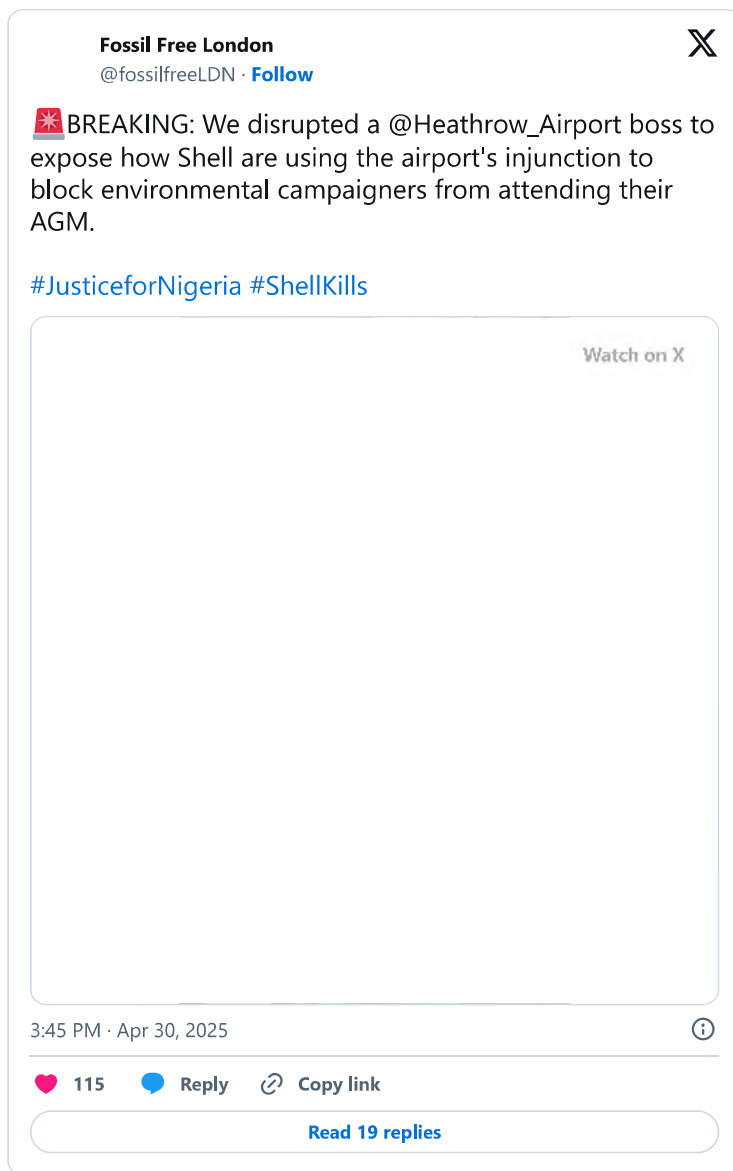
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Climate campaigners from Fossil Free London have disrupted Heathrow Airport's panel appearance at the Innovation Zero conference at Olympia London. It was to call out the airport's injunctions. These are set to prevent campaigners from protesting at fossil fuel major Shell's upcoming AGM.

Heathrow protest injunction to stop campaigners at upcoming Shell AGM

On Wednesday 30 April, Activists turned up to challenge Heathrow's director of carbon strategy Matthew Gorman:



In particular, they railed against the airport's anti-protest injunction. It currently prevents them from attending Shell's annual general meeting. This is because the fossil fuel major will be holding on airport grounds in May.

Heathrow airport took out a court injunction covering the premises last year. Notably, it did so in response to Just Stop Oil's plan to 'disrupt' airports that summer. This bans any person associated with any environmental group from entering the airport's grounds. In doing so, it means that they would risk up to two years in prison, fines and/or seizure of assets.

Legal experts and human rights organisations have expressed concern over the increasing private use of sweeping protest injunctions to suppress peaceful climate demonstrations.

Big polluter bedfellows

Fossil Free London has consistently held Shell's feet to the fire. In recent years, it has crashed Shell AGM over its role in environmental damage and human rights violations in the Niger Delta, as well as their fossil fuel expansion.

Director of Fossil Free London Robin Wells said:

Heathrow's not only locking in devastation for all British people by expanding the airport, they're now getting into bed with the climate criminals at Shell, letting them hide behind this anti-protest

injunction.

Corporate polluters are scratching each other’s backs and laughing all the way to the bank while our rights to survive and advocate for our survival are being washed away by the rising tide of repression they’re funding.

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Andrew Rawstron

To:

Heathrow Airports Limited (Heathrow Airports)

c/o

(1) Akhil Markanday
Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

(2) Phil Spencer
Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

cc

Shell plc (Shell)

c/o

- (1) Alison Oldfield, Eversheds Sutherland (International)@ shell.service@eversheds-sutherland.com
(2) Yvonne Hurley ([REDACTED]): Legal Services, Shell Centre, York Road, Waterloo, LONDON, SE1 7NA, England

Dear Akhil/Phil/Alison/Yvonne

Re: SHELL PLC AGM: TUESDAY 20 May 2025

I am a shareholder in Shell, holding certificate number 00452360, shareholder reference 11465910222. I have been a shareholder since 12 May 2022.

I have received notice of Shell's 2025 Annual General Meeting (AGM) and been invited to attend the AGM. The notice I have received states that the AGM is due to take place at 10.00am on Tuesday 20 May 2025, at the Sofitel London Heathrow Hotel Terminal 5, London.

I wish to attend the meeting, as a shareholder, since I am concerned about Shell's current environmental policies in the context of the on-going climate crisis. However, I have recently been informed that, on application by Heathrow, the Court has previously granted an interim injunction in relation to proposed protests by Just Stop Oil, or other environmental campaigners, that might take place at the airport. My specific concern is in relation to the breadth of the injunction that has been granted and its potential impact on shareholders, like me, who wish to attend the AGM and voice concerns. On its face, the interim injunction would appear to prevent "any person connected with an environmental campaign" from entering or remaining within a defined part of the airport, which includes the Sofitel Hotel, unless they have Heathrow's consent.

As a shareholder I believe that I have a right to attend the AGM: indeed, I have been invited by Shell to do so. However, the injunction is so widely drawn that I am concerned that it may make it unlawful for me to attend the meeting and that attendance would put me at risk of being found in contempt of court. The sanctions available to the Court in those circumstances are frankly chilling and I struggle to see how the Court, when granting the injunction, could have considered the circumstances currently arising.

I should make clear that I have no intention of participating in any activity in the designated area which is contrary to the rules which govern the meeting, or which are in conflict with either domestic civil or criminal law. I do however, wish to speak at the AGM about my concerns and would apply (on the day) to do so.

It is not clear to me why Shell has decided to hold the meeting at this location. I cannot imagine that Shell wish to exclude shareholders with a legitimate interest in attending and the fact that I have been invited would seem to suggest that these unfortunate circumstances have arisen without proper consideration of the effect of the injunction. Again, the injunction seems to be drawn too widely and with unforeseen consequences.

In the circumstances, and to enable me (and other Shell shareholders in a similar position) to attend the AGM, it seems to me that the position is best resolved by asking Heathrow to confirm that it consents to the presence of any Shell shareholders, within the area identified in the interim injunction, for the purposes of traveling to/from (and attending) the Shell AGM at the Sofitel Hotel on 20 May 2025.

Given that the AGM is due to take place on Tuesday week I would therefore be grateful for confirmation, as a matter of urgency, that Heathrow consent to the attendance of Shell shareholders properly entitled to attend the AGM on the day concerned.

I apologise that this is now a matter of some urgency, but I have only just been made aware of the injunction and the potential implications of it. I would have preferred to write during normal working hours on a weekday, but I am also concerned that time is short and that you need as much notice as possible of the issues arising.

I understand that the Court has made provision for anyone affected by the injunction to apply to the Court on 48 hours' notice for the interim injunction to be varied or discharged. I very much hope that it will not be necessary to apply to the Court for a variation and that we can reach a sensible understanding in this respect. However, should it not be possible to reach agreement I reserve the right to apply to the Court and you should therefore treat this letter as formal notice in that respect.

In order to allow sufficient time for any formal application, I would ask you for a response by close of business on Tuesday 13 May 2025. My contact details are found above.

I look forward to hearing from you.

Yours sincerely

Andrew Rawstron

Date: 12 May 2025
Our Ref.: AMRK/PSPE/20H0904.000140
Your Ref.:
Direct Dial: +44 20 3400 3119
Email: phil.spencer@bclplaw.com

BRYAN CAVE LEIGHTON PAISNER LLP
Governor's House
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DX92 London
bclplaw.com


By email only to: @

Dear Mr Rawstron

We refer to your letter of 10 May 2025. We continue to act for Heathrow Airport Limited.

We confirm that our client has no issue with any Shell shareholder lawfully attending the Shell AGM on 20 May 2025, nor do we consider that the terms of our client's injunction prohibit such lawful attendance.

For the avoidance of doubt, please note that we do not act for either Shell or the Sofitel Terminal 5 so cannot comment on any additional rules or requirements either of them may place on shareholder activities. We suggest you liaise with them separately and, given you have copied your correspondence to Shell and its advisors, we have done the same.

Yours faithfully



Bryan Cave Leighton Paisner LLP

CC: By email only to: shell.service@eversheds-sutherland.com and 

From: Andrew Rawstron <[REDACTED]@[REDACTED]>
Sent: 12 May 2025 16:27
To: Phil Spencer
Subject: Re: Shell AGM. Injunction. [_BCLP-LEGAL.20H0904.000140]

Phil- with apologies, just to correct a typo. My email should of course have asked why you client considers that the injunction does not apply. A missing “not”.

Andrew

On Mon, 12 May 2025 at 15:58, Andrew Rawstron <[REDACTED]@[REDACTED]> wrote:
Dear Phil- thank you for such a quick response.

Whilst I take some comfort from what you say I remain concerned that the injunction is so widely drawn.

I'd like to reflect overnight but for now I note that your letter is noticeably silent on why, given the current wording, your client considers that activist shareholders would not risk being found to be in breach of the injunction and thus risk being in contempt of court? Plainly the sanctions, which include potential imprisonment, are serious and I would have thought that clear wording is required so that those affected can properly be informed.

At the very least it seems to me that the wording can reasonably be read this way and that the absence of clarity (coupled with the seriousness of the sanctions) has the obvious potential to discourage those with a legitimate right to attend (and speak). That point also gives rise to further questions around the validity of the notice of the AGM to be held at this location, in these circumstances.

If you have anything to add by way of further explanation for why your client considers that the injunction does apply to Shell shareholders then I will of course be happy to take it into account. Otherwise I will confirm tomorrow whether I intend to apply to the Court for a variation of the current wording of the injunction for these reasons.

If I do apply to the Court I note that you continue to be instructed and I will assume that any papers can be served on you in this respect. Please let me know if that is incorrect.

Yours sincerely

Andrew Rawstron

On Mon, 12 May 2025 at 14:47, Phil Spencer <Phil.Spencer@bclplaw.com> wrote:
Dear Mr Rawstron

Please see the attached correspondence.

Yours faithfully

Bryan Cave Leighton Paisner LLP

Phil Spencer
Senior Associate
Bryan Cave Leighton Paisner LLP - London, UK
T: +44 20 3400 3119
M: +44 7738 037271
phil.spencer@bclplaw.com

-----Original Message-----

From: Andrew Rawstron <[REDACTED]@[REDACTED]>

Sent: 10 May 2025 15:58

To: Akhil Markanday <Akhil.Markanday@bclplaw.com>; Phil Spencer
<Phil.Spencer@bclplaw.com>; shell.service@eversheds-sutherland.com;

[REDACTED]
Subject: Shell AGM. Injunction.

Dear Akhil, Phil and Yvonne

Please see the attached letter to Heathrow Airports Limited, copied for information to Shell plc, for your kind attention in due course.

Your attention is drawn to the urgency of the issues arising.

Yours sincerely

Andrew Rawstron

Bryan Cave Leighton Paisner LLP

Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, UK
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From: Andrew Rawstron <[REDACTED]@[REDACTED]>
Sent: 13 May 2025 09:53
To: Phil Spencer
Subject: Re: Shell AGM. Injunction. [_BCLP-LEGAL.20H0904.000140]

Dear Phil

I write further to my email (@15:58) yesterday.

I am conscious that the Shell AGM is due to take place next Tuesday and that time is therefore pressing. I am not around much today so I thought it best to write to you now to set out my thoughts and put forward a proposal on how we might resolve the issue.

I am grateful for the speed on your initial response and for your client's confirmation that they have no objection to the attendance of any Shell shareholders at the Sofitel Terminal 5 for the purposes of the AGM. I think that is of some help. I note what you say about Shell's position and that of the hotel itself. I have not heard from either of them but that is a separate matter.

The point on which I still have considerable difficulty, and which I consider to be a serious problem, concerns the scope of the injunction obtained by your clients. You say you do not consider that the terms of your client's injunction prohibit lawful attendance at the AGM. I can see nothing on the face of the injunction that says this explicitly. What it does say, clearly, is that any person connected with an environmental campaign is prohibited from entering, occupying or remaining in the designated area unless your clients consent.

It is not clear to me whether your client's position is predicated on the need for their consent. Is that the case? If it is, then this seems to me to be unworkable in circumstances where hundreds of shareholders are expected to attend the meeting. Have your clients stated publicly that they take this view? If not, how are people expected to know? Are shareholders expected to seek your client's consent, individually? I find it difficult to image that your client's would wish to manage that process when it relates to a third party event.

If, alternatively, your understanding is based on the wording of the Order generally (and not based on consent) then it seems to require the reader to consider (1) the reasons why a person might wish to attend and (2) the activity in question. The reader is then left to trying to second guess the position that a Court is likely to take in that regard.

In the case of a person seeking to use Heathrow as a gateway for airplane travel, it would seem bizarre for the injunction to apply to them even if they were in some way connected to an environmental campaign. Those circumstances seem clear cut, based on the purpose of travel and the activity in question.

However, the circumstances here are quite different. Without seeking to address the merits, it is plainly the case that an array of environmental concerns about the activities of Shell plc have been and continue to be raised. Previous Shell AGM's have been contentious, Activist shareholders have and continue to challenge Shell's environmental policies. Some of these issues are the subject of litigation before the domestic and international courts. I anticipate that there will, once again, be

resolutions tabled at the AGM arising from environmental concerns. Shareholders will wish to address these points.

It follows that Shell shareholders who wish to raise environmental concerns at the AGM find themselves in an invidious position. There is nothing on the face of the injunction that provides for an exception in this regard. The opposite is true: the injunction appears to prohibit such activity (absent your client's consent).

Whilst I have no great familiarity with the basis on which your client's sought the interim injunction, so far as I can tell points of this kind do not seem to have been considered by the Court. It seems understandable why that is the case. The injunction presumably seeks to prohibit unlawful disruption to the activities of Heathrow as a transport hub. It does not appear to have been envisaged that a hotel within the designated area might host a third party corporate AGM at which there would be the presence of shareholders who might wish to attend in order to raise environmental concerns.

It follows that, at least in my view, the current wording of the injunction is highly problematic. Put at its lowest, , there is considerable room for doubt. I cannot see how the Court would have wanted to generate that ambiguity had it been asked to consider the circumstances now arising. The sanctions for being held in contempt of court are serious: they nclude potential imprisonment or seizure of assets. The likely chilling effect of the current ambiguity seems to me to be both obvious and of serious concern since activist Shell shareholders have been invited (by Shell, not by Heathrow) to attend the meeting and of course have a legal right to attend.

My view is therefore that the injunction should be amended to specifically allow for the attendance of Shell shareholders at the AGM. Whilst your response has offered some comfort, it does nothing to clarify the position for shareholders generally. I do not think that is sufficient to remedy what appears to be a gap in then information that has, to date, been available before the Court.

Overall, it seems to me clear that your clients do not wish to obstruct attendance. This therefore seems to be matter simply for clarification. I hope that this can be dealt with by agreement? My suggestion is that we seek to ask the Court to amend the injunction to provide for the necessary clarity. To that end, I suggest that the Order is amended by adding a further statement, as follows:

“Nothing in this Order shall have the effect of prohibiting or restricting the attendance of any shareholder at the Shell plc AGM on 20 May 2025.”

I would be grateful if you would ask your clients to consider this proposal. I am conscious that any application for a variation must be made, in accordance with the Court's Order, on 72 hours' notice. Whilst I very much hope that it will be possible to reach agreement in this respect and proceed by way of consent, please treat this email as notice of a potential application. I also understand that any evidence to be relied upon must be provided to you at lease 48 hours before any hearing. Given the urgency, the evidence upon which I would rely in making an application is that set out in the correspondence to date. This assurance should enable your clients to have sufficient time to respond.

Finally, I received bounce back to my first email which sought to cc Shell plc. I have not been able to locate another email address for their legal team on the. I did send my first letter to them by post but perhaps you could assist me by forwarding this email to them, again for information.

I look forward to hearing from you.

Yours sincerely

Andrew Rawstron

From: Phil Spencer
Sent: 13 May 2025 15:31
To: Andrew Rawstron
Cc: Akhil Markanday
Subject: RE: Shell AGM. Injunction. [_BCLP-LEGAL.20H0904.000140]
Attachments: SEALED Order of Judge Julian Knowles 9 July (Sealed 10 July) 2024.pdf

Dear Mr Rawstron

We refer to your emails timed at 16:27 yesterday and 09:53 today. We note the latter covers similar questions as the former, but set out in greater detail.

To further clarify, you have made it clear to us that you wish to lawfully attend Shell's AGM and exercise your rights as a shareholder. To put it another way, our understanding is that you wish to attend the Shell AGM "in connection with exercising your rights as a Shell Plc shareholder". We do not consider that purpose to be "in connection with Just Stop Oil (or other environmental campaign)", which are the terms in which the injunction is drafted.

We have not been contacted by any other shareholder since the AGM was announced on (we understand) 25 March 2025, but having been contacted by you our client hopes you appreciate it has now sought to clarify the position promptly and unequivocally. We would be happy to clarify the position to anyone else who has similar questions to you, if they wish to contact us. You may share our explanation with other shareholders, if you know of anyone who has a similar concern. Our client would also be happy to add a clarification to this effect on the main injunction website (<https://www.heathrow.com/injunction>).

Accordingly, given the confirmation and explanation our client has now provided, we do not consider that an application to Court is either necessary or a proportionate way to deal with the question posed (and now answered) about this one-off event.

Regardless, for the avoidance of doubt and to address your last question of yesterday, we confirm we are authorised to accept service on behalf of our client. In relation to any application, please see paragraph 4 of the injunction order (attached for reference).

Yours faithfully

Bryan Cave Leighton Paisner LLP



Phil Spencer
Senior Associate
Bryan Cave Leighton Paisner LLP - London, UK
phil.spencer@bcplaw.com
T: +44 20 3400 3119

1. I am making an application to vary the Injunction order granted on 9th July 2024 under Claim No: KB-2024-002210 in the HIGH COURT OF JUSTICE KINGS BENCH DIVISION before The Honorable Mr Justice Julian Knowles.
2. The original application for the Injunction order centred on apprehended actions by the "Just Stop Oil" campaign group over the summer of 2024.
3. On 27th March 2025 Just Stop Oil announced in a press release that it would be "hanging up the hi vis" now that it's initial demand to end new oil and gas is now government policy.
4. Just Stop Oil then held its last action on 26th April 2025, a march from St James Park to Jubilee Gardens.
5. As it stands the order prohibits all persons who have connections with any environmental campaign from entering, occupying or remaining upon "London Heathrow Airport" without the consent of Heathrow Airport Limited.
6. On 20th May 2025, Shell plc, one of the worlds largest fossil fuel companies, will be hosting their Annual General Meeting (AGM) at Sofitel London Heathrow Hotel – Terminal 5, London Heathrow Airport, London TW6 2GD, United Kingdom
7. Notice of the 2025 AGM was sent to shareholders on 16th April 2025, including the address of AGM venue.
8. This AGM venue falls within the area covered by the Injunction Order referenced above.
9. Neither the Notice of the AGM, nor the Notice of availability of shareholder documents & 2025 AGM information mentioned that the venue hosting the AGM falls within the scope of the High Court injunction graented to Heathrow Airport Limited on 9th July 2024
10. As a publicly listed company, it's AGM is the key opportunity shareholders get to hold the companies directors to account. Primarily through voting on resolutions to receive and approve directors reports and accounts, as well as providing an important opportunity for shareholders to engage in dialogue with the Board to engage in a question and answer session.
11. The wording of the Injunction as it currently stands would prevent shareholders of Shell Plc who have a connection to any environmental campaign from attending the AGM in person, without specific consent being granted by Heathrow Airport Limited.
12. This potentially precludes any shareholder who has ever been publicly critical of the environmental impacts of one of the worlds largest fossil fuel companies from holding the companies directors to account, because another separate company in a high polluting industry has not granted them permission to do so.
13. It also precludes any public demonstration from taking place within sight and sound of the AGM venue, even if such were to otherwise comply with Heathrow bye-laws.
14. I therefore ask the court to vary the Injunction order so that it terminates no later than 19th May 2025.

15. If the court does not see fit to terminate the order ahead of the planned date for the Shell AGM, I ask that the order is varied such that “persons unknown” be removed from the defendants on the day of the meeting, 20th May 2025.

Statement of Truth

I believe that the facts state within 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.

Kush Naker

Dated: 13th May 2025

[Redacted Signature]

From: Kush Naker <[REDACTED]@[REDACTED]>
Sent: 14 May 2025 13:40
To: Phil Spencer
Cc: Akhil Markanday; customer@equiniti.com; generalpublicenquiries-uk@shell.com
Subject: Re: RE: KB-2024-002210: Notification of application to vary Judge's order [BCLP-LEGAL.20H0904.000140]

Thanks for the timely response

The problem with your assurance is that it fails to deal with the overlapping roles many individuals can hold.

I am both a shell shareholder, and am associated with Just Stop Oil, and various other environmental campaigns

My attendance at Shells AGM is to criticise their record and actions on both environmental grounds as well as human rights.

The broad scope of the wording on the injunction leaves it totally open to interpretation what role my criticism Shells environmental record are "in connection with"

What if I attend and asked Shell to "Just Stop Oil production" in the Q&A?

My concern is that in fact any criticism of shells environmental record could also be interpreted as acting in connection with an environmental campaign

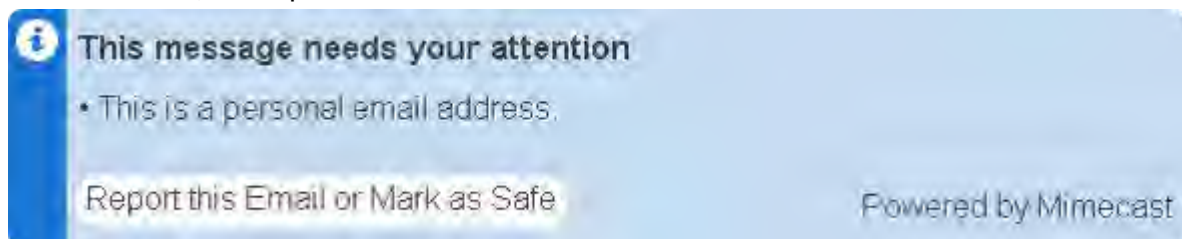
Whilst this event is only currently a one off, I do not think the location was chosen by accident, and the effect of the injunction has a chilling effect therefore on properly holding such companies & directors to account. This would therefore open the door to other companies wanting to avoid proper scrutiny following suit when it comes to choosing meeting venues.

Kind regards
Kush

Sent from Proton Mail Android

----- Original Message -----

On 14/05/2025 11:20, Phil Spencer wrote:



Dear Mr Naker

We continue to act for Heathrow Airport Limited. Although your correspondence does not specifically say so, we are assuming from the concerns raised that you are a shareholder of Shell Plc. We have been contacted by one other shareholder since the Shell AGM was announced and we are happy to clarify the position for you in the same terms.

We do not consider that lawful attendance by a shareholder at Shell's AGM to exercise their shareholder rights is caught by the injunction. To put it another way, our understanding is that shareholders wish to attend the Shell AGM "in connection with exercising their rights as a Shell Plc shareholder". We do not consider that purpose to be "in connection with Just Stop Oil (or other environmental campaign)", which are the terms in which the injunction is drafted.

Accordingly, we do not consider that an application to Court is either necessary or a proportionate way to deal with the shareholder questions posed (and now answered) about this one-off event.

Regardless, to the extent necessary, we confirm we are authorised to accept service on behalf of our client. In relation to any application, please see paragraph 4 of the injunction order you refer to in your correspondence.

For the avoidance of doubt, please note that we do not act for either Shell or the Sofitel Terminal 5 so cannot comment on any additional rules or requirements either of them may place on shareholder activities. We suggest you liaise with them separately.

Please feel free to share this clarification with any shareholders who have similar concerns, or invite them to contact us and we will be happy to set out the same explanation to them.

Yours faithfully

Bryan Cave Leighton Paisner LLP



Phil Spencer
Senior Associate
Bryan Cave Leighton Paisner LLP - London, UK
phil.spencer@bclplaw.com
T: +44 20 3400 3119 M: +44 7738 037271

From: Kush Naker <[REDACTED]@[REDACTED]>
Sent: 13 May 2025 23:00
To: Akhil Markanday <Akhil.Markanday@bclplaw.com>; Phil Spencer <Phil.Spencer@bclplaw.com>
Cc: customer@equiniti.com; generalpublicenquiries-uk@shell.com
Subject: KB-2024-002210: Notification of application to vary Judge's order

Dear Akhil Markanday & Phil Spencer,

Re: Claim no: KB-2024-002210

[High court injunction on behalf of Heathrow Airport Limited](#)

I am writing to notify you that I shall be applying to the court to vary the Injunction order granted on 9th July 2024.

Shell plc has decided to hold its 2025 AGM within the area prohibiting entry to "persons unknown" in connection with any environmental campaign.

I intend to rely on the attached statement

Kind regards

Bryan Cave Leighton Paisner LLP

Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, UK
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Amnesty International UK

PRESS RELEASES

Campaigners stage 'oil spill' at Shell HQ to mark AGM and demand justice

20 May 2025, 01:12pm



Striking visual protest staged by Amnesty UK, Fossil Free London, and Justice 4 Nigeria coalition coincides with Shell's AGM

This morning, activists from Amnesty International UK, Fossil Free London, and the Justice 4 Nigeria coalition staged a powerful protest outside Shell's global headquarters in central London, demanding accountability for decades of oil pollution in Nigeria's Niger Delta.

Timed to coincide with Shell's AGM - held in a Heathrow hotel protected by a court injunction against environmental protesters - the stunt featured dramatic visuals symbolising the ongoing environmental devastation Shell has caused.

Campaigners in suits emblazoned with a flaming Shell logo poured fake oil onto a giant map of the Niger Delta. Seated protesters, wearing T-shirts reading

“Decades of Oil Spills”, “Polluted Waters”, and “Devastated Communities”, represented those whose lives have been severely impacted by Shell’s operations. A striking red location pin declared: *“It’s Hell in the Niger Delta”,* while banners demanded: *“Shell: Own up, Clean up, Pay up.”*

The protest drew strong media interest and public attention during the busy morning commute as Shell staff arrived for work.

Shell’s operations in the Niger Delta have led to severe pollution of water, soil, and air, affecting the health and livelihoods of millions. Despite billions in profits and repeated court rulings, Shell has failed to adequately clean up the region or compensate those affected. Just this year, over 13,500 residents from Ogale and Bille filed claims against Shell in the UK High Court.

Peter Frankental, Amnesty International UK’s Business and Human Rights Director, said:

“Today’s protest was a stark reminder that Shell cannot simply wash its hands of decades of environmental devastation. Communities in the Niger Delta have suffered catastrophic harm - contaminated water, poisoned land, and shattered livelihoods - while Shell continues to make billions in profit.

“The frustration and anger on display this morning reflect a wider truth: Shell must be held to account. It cannot walk away. The company must clean up its toxic legacy and provide full compensation to those whose lives it has wrecked.”

Lazarus Tamana, Justice 4 Nigeria coalition co-founder, said:

“Shell still refuses to clean up and pay up after so many years of Niger Delta people highlighting the damage Shell has caused. How is it still necessary for us to be here and call on Shell to clean up its mess? They have devastated our water, land, health and livelihoods and we continue to fight for justice.

Shell admitted liability for their oil pollution in 2014, yet the Bodo community has had to drag Shell back to the courts here in London, just to get them to clean up. They must be held to account and compensate all affected communities.”

Robin Wells, Director of Fossil Free London, said:

“Year after year we have hit the front pages or millions of social media views holding Shell to account at their AGM, and we are sick to the back teeth. We’re not only sick of the devastation they cause, but we are sick of a system which rewards them handsomely for tearing down these fragile ecosystems that keep us all alive.

Communities in the Niger Delta were some of the first to bear the brunt and we stand in solidarity with them as they fight for justice, but, make no mistake, like a

Mexican wave of disaster, soon this climate meltdown will impact every single one of us.”

Shell must not be allowed to walk away from its liabilities for the environmental destruction it has caused. Niger Delta communities will continue to demand full clean-up and compensation for the decades of harm that Shell has inflicted.

For images contact the press office

[View latest press releases](#)

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Sent: 06 March 2025 10:28

To: Leire Bardaji <Leire.Bardaji@bclplaw.com>

Subject: KB-2024-002210 Heathrow Airport Limited v Persons Unknown Who (in connection with Just Stop Oil or other environ...

Importance: High

Dear Sirs,

Further to your email, the annually reviewed injunction is listed for 23rd July 2025 for 1.5 hours, before a High Court Judge, in person.

Please notify all parties.

The Judge and start time will be confirmed on the cause list the working day before.

Kind Regards,

Aysha Begum

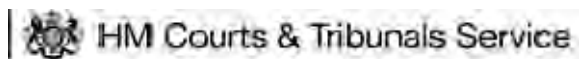
Administrative Officer

King's Bench Judges Listing Office, Room E03

King's Bench Division | HMCTS | Royal Courts of Justice | Strand, London | WC2A 2LL

Phone: 020 3936 8957

Web: www.gov.uk/hmcts



For information on how HMCTS uses personal data about you please see:

<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Date: 18 March 2025
Our ref: AMRK/PSPE/RHOD/HF4/20H0904.000140
DDI: +44 20 3400 3711
e-mail: robert.hodgson@bclplaw.com

BRYAN CAVE LEIGHTON PAISNER LLP
Governor's House
5 Laurence Pountney Hill
London EC4R 0BR
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T: +44 (0)20 3400 1000
F: +44 (0)20 3400 1111
DX92 London
bclplaw.com

FAO: Jane Touil


By First Class Post

Dear Jane Touil

Claim Number: KB-2024-002210

HEATHROW AIRPORT LIMITED v (1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM AND (2) – (26) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND BY THE ORDER OF MR JUSTICE RITCHIE DATED 14 FEBRUARY 2025, AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS

As you are aware, by an Order of Mr Justice Julian Knowles dated 9 July 2024, the Claimant was granted an injunction against the Defendants (the "**Injunction**"). For the avoidance of doubt, you are a Defendant. We continue to act for the Claimant.

We have now been informed by the Judges Listing Office that, in accordance with paragraph 3 of the Injunction, the first annual review hearing has been listed for:

23rd July 2025, for 1.5 hours before a High Court Judge, in person.

The Judge and time of the hearing will be confirmed the working day before on the Daily Cause List¹.

Further documents in relation to the hearing will be made available on www.heathrow.com/injunction in due course.

Yours faithfully



Bryan Cave Leighton Paisner LLP

¹ At the time of writing, the relevant web page to view this is <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list>

Sent: 18 March 2025 15:48

To: 'juststopoil@protonmail.com' <juststopoil@protonmail.com>; 'juststopoilpress@protonmail.com' <juststopoilpress@protonmail.com>; 'info@juststopoil.org' <info@juststopoil.org>

Cc: Phil Spencer <Phil.Spencer@bclplaw.com>; 'Leire Bardaji' <Leire.Bardaji@bclplaw.com>

Subject: RE: NOTICE AND SERVICE OF HIGH COURT INJUNCTION AT LONDON HEATHROW AIRPORT (Claim Number KB-2024-002210) [_BCLP-LEGAL.20H0904.000140]

HIGH COURT CLAIM NUMBER: KB-2024-002210

HEATHROW AIRPORT LIMITED v (1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM AND (2) – (26) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND BY THE ORDER OF MR JUSTICE RITCHIE DATED 14 FEBRUARY 2025, AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS

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We have now been informed by the Judges Listing Office that, in accordance with paragraph 3 of the Injunction, the first annual review hearing has been listed for:

23rd July 2025, for 1.5 hours before a High Court Judge, in person.

The Judge and time of the hearing will be confirmed the working day before on the Daily Cause List.

Further documents in relation to the hearing will be made available on www.heathrow.com/injunction in due course.

At the time of writing, the relevant web page to view this is <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list>.

Yours faithfully

Bryan Cave Leighton Paisner LLP



Robert Hodgson
Associate
Bryan Cave Leighton Paisner LLP - London, UK
robert.hodgson@bclplaw.com
T: +44 20 3400 3711 M: +44 7568 129029

Sent: 26 June 2025 17:14

To: juststopoil@protonmail.com; juststopoilpress@protonmail.com; info@juststopoil.org

Cc: Phil Spencer <Phil.Spencer@bclplaw.com>; Madeline Thompson <Madeline.Thompson@bclplaw.com>

Subject: RE: NOTICE AND SERVICE OF HIGH COURT INJUNCTION AT LONDON HEATHROW AIRPORT (Claim Number KB-2024-002210) [_BCLP-LEGAL.20H0904.000140]

Claim Number: KB-2024-002210

HEATHROW AIRPORT LIMITED v (1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE RE-AMENDED PARTICULARS OF CLAIM AND (2) – (26) THE NAMED DEFENDANTS JOINED BY THE ORDER OF MR JUSTICE DEXTER DIAS DATED 11 DECEMBER 2024 AND BY THE ORDER OF MR JUSTICE RITCHIE DATED 14 FEBRUARY 2025, AND WHOSE NAMES ARE SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS

We continue to act for and on behalf of Heathrow Airport Limited, the Claimant in connection with the above proceedings and in respect of the injunction order dated 9 July 2024 (the "**Injunction Order**").

REVIEW HEARING

As we informed you by way of our email below dated 18 March 2025, the first annual review hearing of the Injunction Order has now been listed for **Wednesday 23 July 2025**. The hearing will be in person and will take place before the King's Bench Division at The Royal Courts of Justice, Strand, London WC2A 2LL.

The High Court Judge and time of the relevant hearing will be confirmed the working day before via the Daily Cause List.

At the time of writing, the relevant webpage to view the Daily Cause List is

<https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list>.

You are free to attend the review hearing should you wish to do so.

If you plan to be represented at the hearing, please provide us with the contact details of your representative in advance to facilitate exchange of relevant documents.

EVIDENCE

In accordance with paragraph 11 of the Injunction Order, a copy of the skeleton argument and any additional evidence to be relied upon at the review hearing by the Claimant will be uploaded to the Heathrow Website (www.heathrow.com/injunction) in accordance with the following timeframes:

1. Bundle of Evidence: by **Tuesday 8 July 2025**; and
2. Skeleton Argument: by **Friday 18 July 2025**

All relevant documents will be made available for electronic download.

If you wish to receive a physical copy of the bundle or skeleton argument, please contact Robert Hodgson (as above) by **4pm** on **Friday 4 July 2025** so that any applicable service deadlines can be complied with. Should we not hear

from you, and in order to avoid the cost and waste of unnecessary printing, we do not intend to produce additional printed copies of these materials.

Please kindly acknowledge safe receipt of this email by email to Robert Hodgson at Robert.Hodgson@bclplaw.com.

We are also happy to answer any questions you may have in respect of the contents of this email, but would suggest that you seek independent legal advice in relation to any additional queries.

Yours faithfully

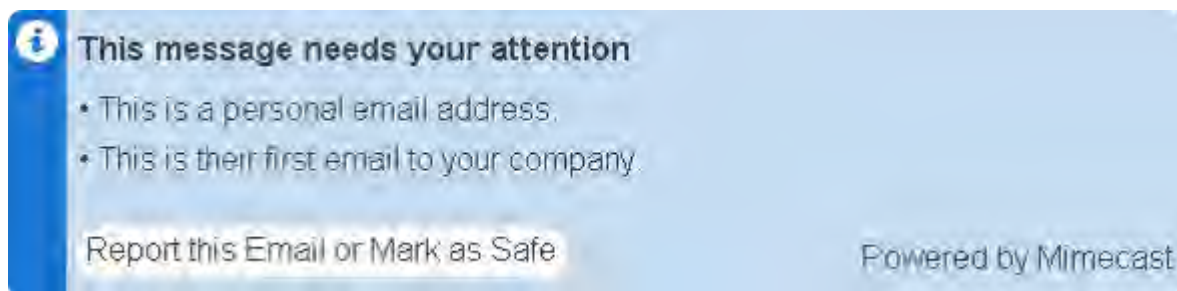
Bryan Cave Leighton Paisner LLP



Robert Hodgson
Associate
Bryan Cave Leighton Paisner LLP - London, UK
robert.hodgson@bclplaw.com
T: +44 20 3400 3711 M: +44 7568 129029

From: Helen Wood <[REDACTED]@[REDACTED]>
Sent: 01 July 2025 19:28
To: Robert Hodgson
Subject: Claim number KB-2024-002210

Follow Up Flag: Follow up
Flag Status: Flagged



To whom it may concern,

I hereby acknowledge safe receipt of the above referenced document via Royal Mail.

Many thanks,

Rhiannon Wood

Made on behalf of the Claimant
Witness: Akhil Markanday
Number of Statement: First
Exhibit: AM1
Dated: 6 July 2024

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

- and -

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

Defendants

FIRST WITNESS STATEMENT OF AKHIL MARKANDAY

I, **AKHIL MARKANDAY**, of Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, **will say as follows:**

- 1 I am a partner in the firm of Bryan Cave Leighton Paisner ("**BCLP**"). BCLP act for the Claimant in this matter, under my supervision. I am duly authorised to make this witness statement on behalf of the Claimant.
- 2 I make this witness statement in support of an application by the Claimant for

injunctive relief.

3 Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge.

4 Where facts and matters referred to in this statement are not within my own knowledge they are based on instructions, documents and information supplied to me in my capacity as solicitor for the Claimant and are true to the best of my knowledge and belief.

5 I refer to a paginated bundle of documents, attached as Exhibit “AM1”. Where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit “AM1”.

BACKGROUND

6 The Just Stop Oil environmental campaign (“**JSO**”) has made well publicised threats to disrupt airports during the summer of 2024 [**AM1/1-2**]. JSO has taken unlawful direct action on numerous occasions in recent years. As well as taking direct action against airports in the UK and in Europe, JSO has targeted key transport infrastructure such as motorways and private organisations such as oil companies.

7 The Metropolitan Police have also had cause to act on the immediate and serious risk of disruption posed by JSO. During the last week of June 2024, a number of JSO members were arrested in relation to public order offences arising from the group’s threat to airports [**AM1/3-9**].

8 JSO themselves say 27 arrests were made but, despite these arrests, JSO have publicly stated that “they will not be intimidated” and that they “are joining an international uprising” [**AM1/10-11**]. The threat to airports, in particular Heathrow Airport (“**Heathrow**”), remains real and imminent.

9 As explained below and in the first witness statement of Jonathan Daniel Coen, the Claimant considers that the impact of direct action at Heathrow by JSO would be of severe concern from a safety and security perspective.

Furthermore, there would be significant disruption in the form of delays, diversions and cancellations to travellers as well as significant impact on businesses and the wider economy.

HEATHROW LAND OWNERSHIP

- 10 A plan [AM1/12] demonstrates the Claimant's ownership of the land composing Heathrow - shaded in yellow are titles at HM Land Registry ("HMLR") for which the Claimant is the registered proprietor (the "**Yellow Plan**"). A complete list of these titles is annexed to the Particulars of Claim and the available HMLR Official Copies are exhibited at [AM1/250-1330]. Although the Registered Proprietor and land description are accessible via HMLR's database, it is not uncommon for some Official Copies to be unavailable online immediately, in which case HMLR send them later in printed form via post. That is the case here. Some Official Copies could not be provided to us by HMLR in time to be exhibited for this claim and remain on order.
- 11 In order to bring this claim, my Firm has undertaken an extensive amount of work to present to the Court the title and ownership structure at Heathrow. Heathrow is a very large and complex site comprised of hundreds of titles at HMLR.
- 12 In addition to the Yellow Plan, we have produced Plan A [AM1/13] which also shows the land within Heathrow to which the Claimant does not have a right to immediate possession, due to various occupational leases. That is the blue hatched land on Plan A. The areas shown shaded orange on Plan A are the terminal buildings. There are a number of floors in each of the terminal buildings and different parts are leased to or otherwise occupied by third parties, such as the retail units. In light of the complexity of seeking to show which parts of the terminal buildings are ones to which the Claimant is entitled to immediate possession and those parts which are subject to leases (etc), for the purposes of this claim the terminal buildings have been excluded from those parts of Heathrow to which the Claimant asserts an entitlement to immediate possession by reason of its freehold or leasehold ownership.

- 13 The purple edging around Plan A sets out the clear boundary of Heathrow and it is in respect of the entirety of the area which the Claimant seeks an injunction to restrain trespass and/or nuisance as explained in the Particulars of Claim.

THE THREAT TO HEATHROW

- 14 On 9 March 2024, the Daily Mail published an article online which reported, as a result of an undercover investigation by the Mail on Sunday, it had discovered that JSO were planning to undertake a campaign of “wreaking havoc” (the journalist’s words) at airports during the summer, with activists planning to “storm terminal buildings to hold sit-ins, glue themselves to runways and even climb on jets to paralyse the travel industry” (the journalist’s words).
- 15 The homepage of JSO’s website [AM1/15-20] emphasises that the group plans to target action on airports during the summer of 2024. As at today’s date, the page states (emphasis original):

“Our Government doesn’t give a f about its responsibilities. The country is in ruins. You know it, I know, they know it. That means it’s up to us to come together and be the change we need.***

We need bold, un-ignorable action that confronts the fossil fuel elites. We refuse to comply with a system which is killing millions around the world, and that’s why we have declared airports a site of nonviolent civil resistance.

We can’t do this alone, we have a plan for this Summer, are you willing help make this happen?”

- 16 Directly below this statement, is a video published on 5 May 2024. This video is available at: <https://www.youtube.com/watch?v=tbvYQFGAY48>.
- 17 The audio of this video combined with the visual imagery presents three obvious concerns. First, an intention to focus on disrupting airports in the UK.

Second, that the timing of this disruption will be the summer months of 2024. Third, the video specifically highlights Heathrow as a target of disruption: the video accompanying the speech includes a screen shot of a road sign on the highway immediately adjacent to the perimeter of Heathrow showing directions to Terminal 5 and Terminals 2, 3 and 4. The video states (our emphasis):

*“What are we going to do in the face of this repression? [clips of JSO members being arrested] **We are going to continue to resist.** We are passing over 1.5 degrees of warming. It is absolutely catastrophic. Seeing as there is no meaningful action that’s come from our Government, **we are going to ratchet it up.** We are going to take our nonviolent, peaceful, demonstrations to the centre of the carbon economy. **We are going to be gathering at airports** [video shows a road sign leading to **Heathrow, Terminal 5**] across the UK.*

In the heat of the summer months, when the grass is scorched here, when the hose-pipe ban kicks in; when the wildfires take off in Canada, as they potentially begin to dig this EACOP pipeline, we’re going to be saying to the Government, if you’re not going to stop the oil, we’re going to do it for you.”

THE CURRENT THREAT TO AIRPORTS IN GENERAL

18 In support of their aim to disrupt airports in the summer months, JSO has set up at least two fundraising pages:

- (a) Fund Radical Climate Action — Just Stop Oil | Chuffed | Non-profit charity and social enterprise fundraising [AM1/21]
- (b) Cat’s out the bag. Just Stop Oil will take action at airports ✈️ | Chuffed | Non-profit charity and social enterprise fundraising [AM1/22]

19 Fundraising page (a), which has raised £149,000 as of 1 July 2024, states the following (original bold emphasis, underlining added by me):

We're escalating our campaign this summer to take action at airports.

...

*To make this action phase happen, we have a costed plan...**During June and July, we expect to spend around £180,000**, some of which we have already secured, and the rest we must raise now.*

- 20 Fundraising page (b), which has raised £24,000 as of 1 July 2024, states (original bold emphasis, underlining added by me):

***"Cat's out the bag. Just Stop Oil will take action at airports**
The secret is out — and our new actions are going to be big.*

*We're going so big that we can't even tell you the full plan, but know this — Just Stop Oil will be taking our most radical action yet this summer. We'll be taking action at sites of key importance to the fossil fuel industry; **super-polluting airports**.*

- 21 On JSO's website, within the section entitled 'Get Involved' and a sub-section entitled 'Events', there is a calendar on reflecting upcoming events. For 6 July 2024, the calendar states "Resistance Starts Here" [AM1/23].
- 22 There has been extensive media coverage of the JSO plans and the danger they pose. A Daily Mail online article I have referred to at paragraph 14 above entitled 'Exclusive Revealed: The eco mob plot to ruin the summer holidays with activists planning to disrupt flights by gluing themselves to major airport runways' [AM1/24-32] states that JSO have advocated the following unlawful activities:

- "Cutting through fences and gluing themselves to runway tarmac;
- Cycling in circles on runways;
- Climbing on to planes to prevent them from taking off;

- *Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports."*

- 23 Since that article, several other publications have reported on JSO’s campaign to disrupt and focus on airports, a selection of examples is at **[AM1/33-49]**.
- 24 Multiple messages sent from the official Instagram account of JSO demonstrate how JSO intends to target airports. Text examples are as follows, with screenshots at **[AM1/50-61]**

Date of Instagram Post	Caption referring to direct action at airports
[Instagram does not give actual dates, references here are to dates of posted when viewed from the perspective of 1 July 2024]	
Two days ago (i.e. subsequent to the Police arrests referred to in paragraph 8).	“help us replace tech seized by the police by donating via the link in our bio”
1 week ago	“Just Stop Oil is going global! JSO, along with many other campaigns around the world, are part of an International Uprising against oil, gas, and coal. We are part of the global movement rising up against genocide, demanding change by causing maximum disruption at airports. So, if you want to hear about why we’re taking action at airports, from the numerous countries taking action with us, come to Soup Night this week, where we’ll also be joining a call and listening to their stories! We’ll also be sharing some free vegan food! It’s a really nice time, so we hope that you can make it! Link in bio! (link to JSO website)”

4 weeks ago	“Zoom: taking action at airports with Lezte Generation’. Last Saturday, 8 people from @letztegeneration, a German campaign within the A22 Network alongside JSO, blocked flights from Much Airport by sitting on the runway. Join a call tonight, 7pm, to hear from those who took action. Register via link in bio -@juststopoil”
5 weeks ago	“Walney wants to ban us. We won’t be silenced. Take action with us at airports this summer – juststopoil.org”
5 weeks ago	“who do you sue when the climate collapses? What do you do when our democracy has been brought by oil companies? Airports will be declared sites of civil resistance this summer. Take action with us – juststopoil.org”
6 weeks ago	“this summer, airports will be declared sites of civil resistance. Sign up for action via the link in our bio”. <i>[This link takes you to a page with links to different areas of JSO’s website.]</i>

RECENT UNLAWFUL ACTION AT AIRPORTS

- 25 On 20 June 2024, two JSO supporters breached the fence at Stansted Airport and sprayed orange paint over private jets. In a post on social media site X (formerly Twitter), JSO posted a video showing one of the activists cutting a hole in the perimeter fence leading to the runway, before spraying the paint over the jets. Alongside this video, JSO stated that the two activists had “cut the fence into the private airfield at Stansted where taylorswift13’s jet is

parked, demanding an emergency treaty to end fossil fuels by 2030” [AM1/62-72].

- 26 On 2 June 2024, Extinction Rebellion (who are related to JSO, as explained in paragraph 32 below) activists blocked access to Farnborough Airport [AM1/73-84]. This involved different sets of activists carrying out co-ordinated disruptive activities. Some barricaded one of the airport’s gates, another four activists locked on to oil drums, one individual mounted on a tripod blockaded the airport’s departure gate and another fourth group of activists distracted airport authorities, moving between the airport’s other gates to block them.
- 27 As mentioned in paragraph 40 below, a group affiliated with JSO called Last Generation caused disruption at Munich airport on 18 May 2024. This involved people actually gluing themselves to the runway, a dangerous and highly disruptive approach [AM1/85-89]. Due to the these actions, around 60 flights were cancelled and 11 flights were diverted to other airports.
- 28 I understand from reviewing the London City Airport (“**LCY**”) injunction materials as further described below, that one of the activists who was closely involved in the Munich airport events joined a JSO call on Tuesday 28 May 2024 to encourage others to undertake activities to similar effect in the United Kingdom.

OTHER AIRPORT INJUNCTIONS

- 29 In response to the tangible and impending risk of harm posed by JSO’s airports campaign, LCY sought and has already been granted a High Court injunction on 20 June 2024..
- 30 The Order granted is at [AM1/90-105]. It prohibits anyone from entering, occupying or remaining on London City Airport in connection with the JSO campaign (or any other environmental campaign) without the permission of the entity owning and managing City, London City Airport Limited. I have also very recently learned that Manchester, East Midlands and Stansted Airports secured injunction against JSO on Friday 5 July 2024. I consider this

heightens the risk to Heathrow since activists are now less likely to target these airports and will turn their attention to other airports, with Heathrow being a particularly likely target.

BACKGROUND TO JUST STOP OIL

- 31 My understanding of JSO is based on public statements and communications, as well as having had the benefit of reading the background set out in the LCY injunction application.
- 32 JSO is said to have been “masterminded” by Roger Hallam who was involved in both other disruptive action groups, including Extinction Rebellion and Insulate Britain [AM1/106-108]. As mentioned below at paragraph 42, Extinction Rebellion has previously threatened direct action against Heathrow.
- 33 On its website and in press releases, JSO refers to itself as a:
- (a) “civil resistance group demanding the UK Government stop licensing all new oil, gas and coal projects.” [AM1/70]
 - (b) “coalition of groups working together to demand the British government work with other nations to establish a legally binding treaty to stop extraction and burning of oil, gas and coal by 2030, whilst supporting and financing other countries to make a fair and just transition.” [AM1/67]
- 34 JSO have a ‘Frequently Asked Questions’ page (“FAQ”) on their website [AM1/109]. From this, it is clear JSO is committed to civil disobedience. For example (my emphasis added):

“Extinction Rebellion and Insulate Britain have demonstrated that Civil Disobedience works. They also show that we need to do significantly more to stop the greatest crime against humanity. That’s why we are moving into Civil Resistance — it’s no longer about a single project or campaign, it’s about resisting a Government that is

harming us, our freedoms, rights and future, and making them work for us.”

35 The FAQ further clarifies how JSO intend to behave, including using:

“tactics such as strikes, boycotts, mass protests and disruption to withdraw their cooperation from the state.”

36 In response to the question of “Will there be arrests?”, the following FAQ reply is given:

“probably, however there is a long established tradition in the UK of citizens, when they recognise that the state is acting immorally, taking action to prevent further harm.”

37 The JSO website also includes a section entitled ‘Law’, which includes a sub-section detailing support offered for individuals facing criminal charges for taking the actions JSO are encouraging **[AM1/110-115]**. This section also displays statistics of JSO’s relationship with the Police and criminal justice system, stating that since the group’s inception there have been:

- (a) 2970 arrests;
- (b) 1889 charges;
- (c) 475 convictions;
- (d) 100 acquittals;
- (e) 129 cases dismissed; and
- (f) 1086 trials to come.

38 On 20 June 2024, JSO put out a press release **[AM1/63-72]** after 2 JSO supporters breached part of the perimeter fence at Stansted Airport to attack some private planes. I will return to this further below but for present purposes note that the footnotes confirm JSO is “a member of the A22 Network of civil resistance projects”.

- 39 A22’s website homepage states that:

 “We are an international network racing to save humanity. We have a recipe for effective civil resistance. Support us. Join us. You are needed”. **[AM1/116]**

A22’s declaratory statement underlines A22’s desire to use disruptive tactics; stating that, amongst other tactics, “we commit to mass civil disobedience” **[AM1/117]**. The fact that JSO is a part of the A22 network emphasises its commitment to civil disobedience.
- 40 Other organisations within JSO’s wider group can be seen on JSO’s website **[AM1/118]**. This includes ‘Last Generation’ who are mostly active in Germany, France, Italy and Poland. On 18 May 2024, Last Generation caused disruption at Munich Airport, Germany **[AM1/85-89]**.
- 41 It therefore seems clear to me that JSO accepts and acknowledges it will engage in unlawful acts as part of their civil resistance/disobedience.

JUST STOP OIL’S HISTORY OF DISRUPTION

- 42 JSO has been very active over the past three years. I have collated a history below which focuses mainly on direct action in relation to infrastructure assets, but there has also been a significant history of activity directed at sporting activities or cultural events/venues, such as the throwing orange paint/powder at paintings in the National Gallery, at the World Snooker Championships, and, most recently, Stonehenge and invading the pitch during the Rugby Premiership Final and during an Ashes test last year. Evidence is exhibited at **[AM1/119-238]**

Date	Disruptive Action taken by JSO
1 April 2022	Commencement of a blockade of 10 critical oil facilities multiple at multiple locations across England, intending to cut off the supply of petrol in South East England [AM1/119-121]

14 April 2022	JSO activists stopped and surrounded an oil tanker in London, causing congestion on the motorway [AM1/122-129]
15 April 2022	JSO supporters targeted oil terminals at Kingsbury, Navigator and Grays, blockading roads and climbing onto oil tankers [AM1/130-134]
28 April 2022	Circa 35 JSO supporters sabotaged petrol pumps at two M25 motorway service stations, Cobham Service stations in Surrey and Clacket Lane services in Kent [AM1/135-138]
26 August 2022	JSO blocked seven petrol stations in Central London and vandalised fuel pumps [AM1/139-144]
October 2022	32 days of disruption from end of September throughout October, which the Metropolitan Police said resulted in 667 arrests with 111 people charged. Specifically, in Islington, Abbey Road, High Holborn/Kingsway, four bridges across Thames, Westminster and the M25 motorway [AM1/145-169]
17 October 2022	Two supporters scaled this bridge which connects the M25 between Essex and Kent, causing its closure. Closure resulted in six miles of congestion on both directions of the bridge [AM1/170-174] . After 36 hours, the activists agreed with Police to leave the bridge, and were arrested. The bridge remained closed for another 6 hours [AM1/175-177]
26 October 2022	13 activists targeted Piccadilly and spray painted luxury car show rooms [AM1/178-183]
31 October 2022	Activists targeted buildings used by the Home Office, MI5, the Bank of England News Corps, spraying paint on each and demanding an end to new oil and gas licenses. The targets were chosen because they represent ‘the four pillars that support and

	maintain the power of the fossil fuel economy' JSO stated [AM1/184-186]
7 November 2022	Multiple junctions on M25 closed due to JSO action [AM1/187-195]
1 July 2023	Disruption of the annual Pride March, sitting on the road [AM1/196-198]
21 July 2023	Traffic disruption in Acton, London organised by JSO during rush hour, infamous for preventing a mother with a newborn child from driving to the hospital [AM1/199-207]
9/10 October 2023	Activists sprayed paint on buildings across these three universities (Bristol, Exeter, Oxford), to highlight the links between universities and fossil fuel groups [AM1/208-219]
30 October 2023	Demonstrations near Parliament Square [AM1/220-225]
8 November 2023	At least 40 activists disrupted traffic on Waterloo Bridge. The Police claimed that there had been blockage of an ambulance flashing blue lights [AM1/226-231]
20 June 2024	Private jets sprayed at a private airfield at Stansted Airport [AM1/232-238]

REACTION OF METROPOLITAN POLICE

43 I am informed by Jonathan Daniel Coen of the Claimant that, during recent meetings with senior officers of the Metropolitan Police, the Claimant was advised to consider applying for a civil injunction. BCLP were instructed soon after.

44 As referred to in paragraph 8, in the week commencing 24 June 2024, around 27 JSO supporters suspected of planning to disrupt airports this summer were arrested under the Public Order Act 2023. Chief Superintendent Ian Howells, who led the operation, said **[AM1/239-246]**:

“We know Just Stop Oil are planning to disrupt airports across the country this summer which is why we have taken swift and robust action now.

‘Our stance is very clear that anyone who compromises the safety and security of airports in London can expect a strong response from officers or security staff.

‘Airports are complex operating environments which is why we are working closely with them, agencies and other partners on this operation.’

Suspects released on bail are subject to conditions which include not travelling within one kilometre of any UK airport unless passing by while on a mode of transport.”

- 45 Despite the proactive Police action so far, the threat of severely disruptive action occurring remains, as JSO themselves have made clear **[AM1/247-248]**.

THE IMPACT AT HEATHROW

- 46 I have had sight of the first witness statement of Jonathan Daniel Coen on behalf of the Claimant and refer to the facts and figures set out therein.
- 47 It is clear to me that the primary cause for concern from the unlawful activity the Claimant seeks to restrain is one of safety (for both the wider innocent members of staff and public, but also the participants) and security. Heathrow is a crucial piece of UK infrastructure and any unlawful disruption will have multiple ‘knock-on’ effects.
- 48 Whilst it cannot be denied those effects will have financial ramifications that run into many millions of pounds, regard should also be had to the various other effects disruption would cause, particularly in relation to cargo and passengers or airline crew left diverted or delayed around the world.

49 In relation to cargo, not only are supply shortages a risk, it strikes me there will be a major risk of spoilage to any sort of fresh produce. This would be extremely wasteful and have quite the opposite effect of protecting the environment.

50 The feared unlawful disruption at Heathrow would clearly have numerous serious consequences, many of which I am not sure the wider public, let alone JSO activities, appreciate.

PROCEEDING AGAINST PERSONS UNKNOWN

51 I am informed by Jonathan Daniel Coen that the Claimant does not know the names of any individual activists who intend to disrupt operations Heathrow.

52 Though specific individuals within JSO have been charged by the Police in connection with the planned disruption to airports, neither I nor the Claimant have seen any clear evidence to be confident enough to name anyone as a named Defendant in this claim at this stage.

53 I am instructed enquiries continue and, should specific individuals be identified, named Defendants will be joined to proceedings in future in the usual way.

BRINGING THE CLAIM WITHOUT NOTICE

54 The Claimant believes there is a compelling reason to bring this claim 'without notice' based on the fact that notice to the Defendants may cause them to accelerate their unlawful actions, which the injunction sought seeks to restrain.

SERVICE AND NOTICE OF THE PROCEEDINGS

55 In the present case, the Claimant does not know the names of any individuals who may seek to carry out the activities which the injunction sought is intended to restrain. This is a case in which the identity of such persons can only be described in the manner set out in the descriptions of the Defendants. As such, the injunction sought is analogous to the 'newcomer' injunctions

discussed in the *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45 decision. There is no person upon whom the proceedings could currently be served. In accordance with the Court's approach in that case, the Claimant is therefore seeking an order to dispense with service and is intending to notify any individuals potentially affected by the application and any order made by taking steps to bring it to their attention, as set out below.

56 The Claimant intends to provide copies of the following documents ("the Documents") to the Defendants:

- (a) Sealed copy of the Claim Form;
- (b) Copy Particulars of Claim;
- (c) Response Pack;
- (d) Copy Application;
- (e) Order;
- (f) Copy of the supporting evidence (Witness Statement of Akhil Markanday and Witness Statement of Jonathan Daniel Coen); and
- (g) Copy of a note of the hearing.

57 The Claimant intends to notify them in the following way:

- (a) uploading copies of all court documents onto the following website:
www.heathrow.com/injunction;
- (b) attaching a copy of the Court order in each of the locations shown with a red dot on Plan B [AM1/249]. These locations are where signage is already placed warning people they are entering a "Critical Part of the Security Restricted Area under Section 11A of the Aviation Security Act 1982", i.e. where analysis and thinking has already been done on how to communicate to persons unknown they are about to be 'caught' by a specific legal construct if they proceed;

- (c) attaching copies of the approved warning notice (a draft form of which will be made available for the Court's approval at the first hearing) at each of the locations shown with a red dot on Plan B referring to:
 - (i) these proceedings;
 - (ii) the fact that an injunction is now actively covering Heathrow; and
 - (iii) stating that the court documents may be viewed on the Claimant's website (and providing the relevant web page address) or may be obtained from the Claimant's solicitors and providing the relevant contact details;
- (d) sending an email message to info@juststopoil.org (the email address on the JSO website for general enquiries), juststopoil@protonmail.com and juststopoilpress@protonmail.com providing the same information as that contained in the warning notice.

58 I believe that these would be reasonable steps to draw the Documents to the attention of the persons likely to be affected by the injunctions sought. I consider the above methods would be effective in achieving this. The email addresses are JSO email addresses so there is good reason to believe that the Documents would come to their attention if sent to this email address service will be effective there. The proposed notices and other steps give any potential newcomer ample opportunity to be aware of the injunction and underlying materials before engaging in prohibited conduct.

59 The steps proposed also take into account the fact that the Claimant is in the position of operating a high-profile and highly sensitive piece of critical national infrastructure. Heathrow's nature, scale and importance present concerns which differ from other airfields. Anything to be done in or around the airfield must be extremely carefully considered and balanced against the risks of (a) terrorism (for example, allowing people to exploit packages of documents to conceal dangerous items) and (b) impacting airfield operations

(for example, that objects may be detached, accidentally or deliberately, and ingested into aircraft engines, especially at critical phases of landing or taking off).

CONCLUSION

- 60 There is a serious and imminent risk of disruption at Heathrow if the injunction sought is not granted.
- 61 Heathrow is an extremely likely target for direct action in relation to airports, especially given the disincentive to target LCY, Stansted, Manchester and East Midlands airports given their existing injunctions.
- 62 Damages would not be an adequate remedy for the Claimant with reference to the impact of disruption when viewed as a whole. Beyond financial losses, this must factor in, *inter alia*, (i) health and safety risks, (ii) disruption inconvenience to passengers and staff, and (iii) dangers associated with the risk, and wasted fuel, of extended aircraft holding or diversions. In addition, there is no credible reason to believe any of the Persons Unknown could or would meet any award of damages.

Statement of Truth

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.

DocuSigned by:

CÉE6F743862149D...

Akhil Markanday

6 July 2024

Made on behalf of the Claimant
Witness: Jonathan Daniel Coen
Number of Statement: First
Exhibit: JDC1
Dated: 7 July 2024

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

- and -

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

Defendants

FIRST WITNESS STATEMENT OF JONATHAN DANIEL COEN

I, **JONATHAN DANIEL COEN**, of The Compass Centre, Nelson Road, Hounslow, Middlesex, TW6 2GW, **will say as follows:**

1. I am making this statement in connection with the proceedings for injunctive relief being issued by the Claimant against the Defendants in relation to threatened unlawful direct action at Heathrow Airport ("**Heathrow**"). As detailed below, the actions threatened by the Defendants involve, and have the primary aim of, severely disrupting operations at British airports, in particular during the summer of 2024.

2. I am employed by the Claimant as the Director of Security at Heathrow. I am responsible for all aspects of airport security. I have a staff of approximately 4,500 people reporting to me and a multimillion pound annual operational budget. I report to the Claimant's Chief Operating Officer.
3. My remit includes the development and implementation of the airport's security policies, the security of the airport terminals, airside areas, cargo facilities and the airport perimeter. Part of my role relates to security intelligence and I am the principal manager of our relationships with law enforcement agencies, including the Metropolitan Police.
4. I have worked in the aviation industry for over twenty years, starting at Gatwick Airport in 1998, working at Stansted Airport from 2001, in Group BAA from 2003 and finally starting work at Heathrow in January 2008. I have held a number of roles at Heathrow, including Commercial Director, Development Programme Director and Customer Relations and Service Director. In this latter role I was responsible for leading the day-to-day airline terminal relations and operations of the airport, ensuring the end to end passenger journey and so I am also well-placed to speak to the impact of disruption on passengers. I took up my current role as Director of Security on 15 March 2019.
5. The facts and matters set out in this witness statement are within my own knowledge, unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, I identify the source of the information. Facts and matters derived from other sources are true to the best of my knowledge and belief.
6. I refer to a paginated bundle of documents, attached as Exhibit "**JDC1**"; where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit "**JDC1**".
7. I am duly authorised to make this statement on behalf of the Claimant.
8. More generally, in preparing this witness statement, I have had sight of both the First Witness Statement of Akhil Markanday given by Bryan Cave Leighton Paisner LLP (**BCLP**), the Claimant's solicitors (**BCLP's Statement**), and the papers relating to the grant of an injunction over London City Airport on 20 June 2024. The former sets out more detail on Just Stop Oil () and the general threat they pose. It will be no surprise

some of the points arising in the latter are equally relevant here and overlap the concerns the Claimant has, as I set out below.

Heathrow Airport

9. Heathrow is Europe's busiest airport and the world's fourth busiest airport.
10. 89 airlines operate regular scheduled flights from the airport to 214 destinations in 84 countries. In 2024, we are forecasting that 82.8 million passengers will travel through the airport, an average of nearly 227,000 passengers daily. The average number of flights daily is just over 1,300.
11. In the 12 months up until June 2024, around three quarters of all passengers were flying for holiday and other leisure purposes with around one quarter flying for business purposes.
12. From a cargo transport perspective, the total value of UK imports and exports that travelled through Heathrow in 2023 was £198.5 billion. That is more than the combined value of goods that went through Felixstowe and Southampton, the UK's biggest container ports. 45% of all of the UK's non-EU export goods (by value) travelled through Heathrow in 2023. In total, 1.43 million tonnes of cargo travelled through the airport that year, equating to 62% of the total volume of UK air cargo.
13. The cargo transported through Heathrow includes a wide range of materials essential to daily life, from pharmaceutical products and human blood, to critical machinery and aviation parts, to foodstuffs. Heathrow is also the UK's only airport capable of safely caring for all animal species.
14. The airport operates two runways during normal operation. Under a local planning cap, it is permitted to schedule up to 480,000 aircraft movements per year and we anticipate operating very close to this limit in 2024. Across the summer 2023 and winter 2023 operating seasons Heathrow operated at approximately 96% of the cap.

The importance of Heathrow

15. The Claimant commissioned a report from the Centre for Economics and Business Research in July 2021 [JDC1/1-27]. This highlighted the significant contribution that Heathrow makes to the wider economy. The key findings were:

- (a) a forecast of total trade through Heathrow of £204 billion by 2025;
- (b) based on figures from 2019, that visitors to the UK arriving at Heathrow spent a further amount of approximately £16.5 billion in the UK during their visits; and
- (c) with respect to jobs, Heathrow's combined direct and indirect impact is equivalent to over 140,000 jobs.

16. Highlighting its importance to the UK, Heathrow was designated as a Critical National Infrastructure (**CNI**) site by the Centre for the Protection of National Infrastructure (**CPNI**), now succeeded by the National Protective Security Authority (**NPSA**). The NPSA is the Government authority for physical and protective security advice to UK national infrastructure. It describes its role as helping “*organisations understand the range of threats they and the UK face, for example from terrorism, espionage, and state actors, and importantly what they can do to minimise their risk through how they operate day to day*” [JDC1/28-31]. The NPSA states [JDC1/32-36] that:

“The UK government’s official definition of CNI is: ‘Those critical elements of infrastructure (namely assets, facilities, systems, networks or processes and the essential workers that operate and facilitate them), the loss or compromise of which could result in:

(a) Major detrimental impact on the availability, integrity or delivery of essential services – including those services whose integrity, if compromised, could result in significant loss of life or casualties – taking into account significant economic or social impacts; and/or

(b) Significant impact on national security, national defence, or the functioning of the state.’”.

Heathrow Airport Limited

17. The Claimant is an indirect subsidiary of Heathrow Airport Holdings Limited (“**HAHL**”). HAHL is the intermediary holding company of a group of companies connected with Heathrow, including the Claimant and Heathrow Express Operating Company Limited which owns the Heathrow Express rail service.
18. The Claimant is the owner and operator of Heathrow. The Claimant’s licence to operate Heathrow is through an aerodrome certification (the **Certificate**) [**JDC1/37**] which is granted by the CAA in accordance with UK Reg (EU) No 139/2014 (the UK Aerodromes Regulation). The Certificate entitles Heathrow to operate the aerodrome and requires compliance with various safety and operational standards. The certification includes the aerodrome manual for Heathrow which is required to contain or refer to all necessary information for the safe use, operation and maintenance of the aerodrome, its equipment, as well as its obstacle limitation and protection surfaces and other areas associated with the aerodrome [**JDC1/38-103**]. In addition, Heathrow holds an Economic Licence granted by the CAA in accordance with the Civil Aviation Act 2012 (the **Licence**) [**JDC1/104-207**]. The Licence enables Heathrow to charge for use of and access to the airport land and infrastructure and sets out certain price control conditions.

The Land at Heathrow

19. I refer to the First Witness Statement of Akhil Markanday which sets out the details of the land at Heathrow and the unique challenges the structure presents.
20. The nature of Heathrow is such that large areas are broadly open to the public, with the Claimant’s permission and consent, for legitimate short-term purposes connected with Heathrow’s status as an airport – for example, to travel themselves or to drop-off/collect other travellers. As described below, various other activities are expressly prohibited. This includes, very obviously, anything that will interfere with or endanger airport operations.

Heathrow’s Byelaws

21. Everyone who lawfully visits Heathrow is subject to ‘The Heathrow Airport – London Byelaws, 2014’ (the **Byelaws**), which regulate the use and operation of the airport and the conduct of all persons while within the airport [JDC1/208-224]. These came into force on 13 April 2014. The Byelaws were made under s.63 of the Airports Act 1986. Section 64 of the Airports Act 1986 provides that any person contravening any byelaws made under s.63 commits a criminal offence in doing so and is liable on summary conviction to a fine. There is a plan of Heathrow attached to these Byelaws [JDC1/223] (“**Byelaws Plan**”).
22. Whilst application of the Byelaws (by our own security staff and often in close cooperation with the Metropolitan Police) can help us manage unlawful or undesirable behaviour, the response is, necessarily, usually reactive in nature and subject to the availability of Police officers.

The imminent and serious threat to Heathrow

23. JSO is an environmental activist group and, as explained further at paragraph 31 onwards of BCLP’s Statement, JSO are threatening to disrupt operations at British airports, in particular during the summer of 2024. The Claimant has therefore taken the carefully considered decision to apply for an injunction to restrain unlawful activity by such groups at Heathrow. As I explain below, Heathrow is at high risk of unlawful action from environmental groups. If the threatened disruption occurs, it will present many serious risks and cause significant damage.
24. As per paragraph 17 (for example) of BCLP’s Statement, JSO have made numerous public statements around their intent to disrupt airports. Even after 27 of their group were arrested in late June 2024, JSO publicly signalled their intent to continue to defy the law. I note in the letter sent to MPs on 13 June 2024, JSO imposed a deadline before further action of 12 July 2024.
25. In light of all the circumstances, in both my personal and professional view, it is abundantly clear to me that, despite recent arrests, the threat from JSO is not going away and they present a genuine, serious and imminent threat to Heathrow. For completeness, the wider history of which I have been made aware which leads me to this conclusion is:

- (a) in the Evening Standard on 21 April 2024, JSO threatened airports with “disruption on a scale which has never been seen before”;
- (b) there was unannounced disruption at Munich Airport on 18 May 2024 in which (according to media reports) several individuals claiming to be from a group affiliated to JSO glued themselves to the runway resulting in the cancellation of 50 flights and the diversion of another 11 flights;
- (c) there was unannounced direct action by Extinction Rebellion (who I understand are related to JSO in at least sharing a co-founder) at Farnborough Airport on Sunday 2 June 2024;
- (d) on 13 June 2024, the letter from JSO to MPs referred to above was sent. It threatened *“if you do not provide such assurance by 12 July 2024, we will be forced to take action to protect our communities by engaging in a campaign of non-cooperation against fossil fuel use at airports across the country.”*;
- (e) on 20 June 2024, there was an unannounced disruption where JSO members unlawfully broke in to Stansted airport and painted parked aircraft orange;
- (f) that following the reported arrest of 27 members of JSO the group reaffirmed its commitment to unlawful direct action;
- (g) JSO’s general track record of disruption (including against the major oil companies in 2022) but, in any event, JSO’s video content (see paragraph 16 in BCLP’s Statement) specifically references Heathrow; and
- (h) the fact that JSO (as shown in the examples above too) is very unlikely to make any public announcement in advance of the location and date/time of plans to target any airport.

Previous incidents at Heathrow

- 26. Heathrow is a high profile and highly probable target for disruptive action, largely (but not only) due to its position as the UK’s hub airport. This point is demonstrated by previous, intentionally disruptive and harmful incidents directed at Heathrow. Some

examples given below highlight the Claimant's need to take action and obtain the injunction sought.

27. For example, there have been past incidents directly at Heathrow:-

- (a) From 12 September 2019, the climate change campaign group, Heathrow Pause attempted to disrupt flights into and out of Heathrow by flying drones in the airport's exclusion zone. The action was unsuccessful in disrupting flights and nineteen people were arrested;
- (b) On 8 January 2019 a drone, spotted close to the northern runway (in breach of the Byelaws and other laws), meant flights had to be suspended for just under an hour, during which period the southern runway remained open, but the northern runway had to be closed. Given the heightened threat environment, a significant Metropolitan Police-wide response was deployed, in addition to specialist military support. Operationally, this resulted in a 60-minute stoppage on aircraft departing the airport during which time 42 flights would have ordinarily departed and subsequent delays; and
- (c) On 13 July 2015, thirteen members of the climate change group 'Plane Stupid' broke through the perimeter fence and onto the northern runway. They chained themselves together, severely disrupting flight operations.

28. There have also been other incidents in the vicinity of the Airport:

- (a) On 27 September 2021, climate change activists defied a court order and blocked part of the M25 at Heathrow. A total of 53 people were arrested as Insulate Britain blocked the slip road at junction 14 just after 08:00 BST;
- (b) On 21 April 2019, 20 climate change activists launched a gathering outside Heathrow, amid a plan to "shut down" the transport hub. They gathered next to a roundabout between terminals two and three with a banner reading "are we the last generation?";
- (c) On 19 November 2016 activist group 'Rising Up' caused disruption after it was announced that the Government would be backing the £16 billion plan to expand Europe's busiest airport with a third runway. 15 supporters were

arrested after a so-called 'die-in' event at Heathrow over airport expansion during which they attempted to block the M4 spur road and successfully blocked the east ramp by 'locking-on'; and

- (d) On 21 February 2017, 'Rising Up' members caused tailbacks on the M4 heading towards Heathrow in an action against plans to build a third runway. A video posted by the group shortly before 0830 shows a car blocking the Heathrow Tunnel draped in a sign reading 'No new runways'. An activist is seen lying next to the vehicle on the road.

Health and safety concerns

29. Heathrow is a complex operational environment. Health and Safety is naturally taken very seriously and we consider there to be a real risk that any unlawful direct action at the Airport may endanger our staff, other companies' staff, our passengers, other legitimate visitors and the participants themselves.
30. There are obvious severe risks associated with any activity on a taxiway or runway are, but it is worth highlighting additional risks as well:
 - (a) those people who are not trained or being supervised will be oblivious to the numerous hazards associated with airports and the precise nature of the dangers - for example, how being too close to a jet engine carries a risk of ingestion. Our ground-staff are trained in airport health and safety issues so they can operate properly and safely, but even they have to remain vigilant . For example, in May 2024 someone was tragically killed when ingested into a passenger jet engine at Amsterdam's Schiphol Airport;
 - (b) airline pilots as well as authorised vehicle drivers on access roads between terminals and aircraft stands will not be expecting trespassers on or near the taxiway/runway. Any sudden need by pilots or drivers to take evasive action could put people at risk;
 - (c) as with all airports, movements on the taxiway/runway are carefully managed by air traffic control. However, air traffic control have no ability to

communicate with trespassers to ensure their own safety around aircraft and ground traffic movements; and

- (d) the emergency services and our own rescue and fire-fighting team may have to put themselves at risk in order to remove and/or rescue trespassers, and in the event of an airfield emergency their response may be hampered with serious potentially fatal consequences.

31. Also, Heathrow is a Code F compliant airport. This means Heathrow can receive the largest aircraft, which many other UK airports cannot. The ability to receive larger aircraft means Heathrow has a higher proportion of long-haul aircraft landing than other UK airports. These aircraft will, by the nature of their operations, be running lower on fuel reserves. In the event that Heathrow is forced to unexpectedly close due to the Defendants' actions, it may not be possible for such aircraft to be easily re-routed. These effects will be amplified if JSO attempt to block multiple airports (which is their stated aim (as per paragraph 8 of BCLP's statement) and could pose a serious threat to life, endangering the passengers, airline staff and operating personnel on that flight and also those on the ground.
32. Given the nature of Heathrow's business, it is also a potential target for terrorist activity. Heathrow has specialist Police in operation who carry firearms and can respond to any such threat with potentially lethal force. Aviation Police enforce any prohibitions to a 'severe' threat level, as standard procedure, due to the unique threats to which Heathrow is exposed.
33. The general risk to health and safety is also easily illustrated by examples of similar action in the past:
 - (a) I am aware that the Extinction Rebellion group targeted London's City Airport in 2019. This involved members climbing on top of the roof of the main terminal building and one person even glued himself to an aircraft **[JDC1/225-237]**. These activities are self-evidently a danger to those involved and innocent bystanders.
 - (b) As mentioned above already, on 20 June 2024, two JSO supporters breached the fence at Stansted Airport and sprayed orange paint over private jets. These

incursions could have had dire consequences depending on the response from airport Police focused on dealing with terror threats, not to mention the usual obvious risks from aircraft ground movements.

Severe impact of disruption

34. I consider that the potential impacts of the disruption at Heathrow would be extremely severe. In addition to the safety and security risks that I have discussed above, any direct action campaign, if it were allowed to go ahead, would likely have the following impacts on Heathrow and those who use it:
- (a) Firstly, direct action could cause significant disruption to innocent travellers, in the form of delays, diversions and cancellations, as a result of planes not being able to land or take-off from Heathrow. Flights in summer operate at a very high load factor (i.e. aircraft are at or near full capacity). The effect of this is that: (1) a very high number of travellers could be affected by the disruption; and (2) there would be very few spare places on alternative flights on which passengers could be re-booked;
 - (b) Secondly, the disruption caused by direct action may have a significant impact on businesses and the wider economy. It is perhaps obvious that business travel would be disrupted by flights not being able to take off and land at Heathrow. It is, however, less obvious, but equally important, that key supply chains, upon which businesses rely, would also be severely disrupted. Problems like this could be seen in the early days of the COVID-19 pandemic when supply chains were disrupted. In this regard, I point to the statistics I set out at paragraph 12 above with regard to the scale of Heathrow's cargo operations, and the critical nature of some of the cargo which is carried;
 - (c) Thirdly, passengers intending to transfer at Heathrow will experience diversions, delays or cancellations as a result of the disruption (in 2024 approximately 18 million passengers are forecast to transfer at Heathrow);
 - (d) Fourthly, if, as a result of JSO's direct action, the airport becomes extremely busy with people waiting in the terminals for delayed flights, the car parks and subsequently the roads around Heathrow, including the M25 motorway, are

likely to become congested. This would, in my opinion, very quickly become a national infrastructure issue;

- (e) Fifthly, there may be significant disruption to airlines which will persist even after the runways are able to re-open as a result of aircraft, cabin crew, and baggage being in the wrong place;
 - (f) Sixthly, to the extent the airport has to close as a result of any direct action, a further important aspect to consider from a safety perspective is the extremely limited additional airport capacity that exists in the South East outside of Heathrow. Heathrow typically averages 40 – 45 aircraft landings per hour. The excess capacity of nearby airports such as Gatwick, Stansted and Luton is such that if landings at Heathrow had to be completely stopped due to disruption, these other airports could only absorb re-directed aircraft bound for Heathrow for around an hour. Other inbound aircraft would have to be diverted to other airports, including airports outside the UK. The attendant disruption this would cause would be enormous. This is in addition to the point I make at paragraph 31 above about some other airports being unable to handle certain large aircraft types;
 - (g) Seventhly, significant Police resources will likely be deployed to Heathrow, not only from the Metropolitan Police, but from other neighbouring Police forces as well. The impact of this is twofold: (1) vital Police resources are diverted away from other areas with the result that such other areas become more vulnerable to crime; and (2) the considerable additional costs of this policing.
35. Further, to the extent additional safeguards by way of the injunctions sought cannot be obtained, all of the above problems could be compounded if JSO took simultaneous action (for example, closing London Gatwick at the same time as London Heathrow) with potentially catastrophic consequences for the safe landing of inbound aircraft.

Likely financial impact

36. As well as earning revenue from services to airlines, Heathrow also generates revenue from a variety of other sources, including concession fees from retail operators, income

from car parks, advertising revenue, the rental of airport premises, the provision of facilities and services and the Heathrow Express rail service.

37. To the extent the direct action suspends activity at Heathrow, it would also cause a significant economic loss to the Claimant. Based on information supplied to me by the Head of Finance - Operation at Heathrow, we estimate that closure of a single runway for half a day (0600-1200) would result in a loss of approximately £5.4 million. We would also expect to incur many millions in additional operating costs resulting from assisting disrupted passengers (such as providing passengers with spending vouchers for meals and hotel accommodation).

Metropolitan Police advice

38. Due to the threat posed by Just Stop Oil, their publicly stated intent to disrupt airports and the numerous previous examples of their unlawful behaviour, on 8 and 20 May 2024, Heathrow was advised by Chief Superintendent Ian Howell of Aviation Policing to consider seeking an injunction to enhance the protective security & safety response of the airport.

The balance of convenience/compelling justification

39. Given the foregoing, I believe that:-
- (a) although JSO refer to planned airport disruption in broad terms, Heathrow is the obvious and highest profile target for disruption given that it is the UK's only hub airport;
 - (b) unless an injunction is granted, there are numerous very serious consequences of that threatened disruption at Heathrow, in particular during this summer;
 - (c) as noted above, it is very unlikely that JSO will make a public announcement concerning the location, time/date of its action so an urgent injunction is appropriate in such circumstances;
 - (d) having discussed matters further with BCLP, I can see how damages would not be an adequate remedy for the Claimant with reference to the impact of disruption when viewed as a whole. In addition to the large financial losses I

refer to above, we must also consider (i) health and safety risks, (ii) disruption inconvenience to passengers and staff, and (iii) dangers associated with the risk of extended plane holding or diversions. Furthermore, there is no credible reason to believe any of the Persons Unknown could or would meet any award of damages;

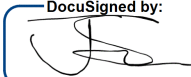
- (e) since the Claimant seeks only to prevent unlawful activity, there is no obvious way the Defendants will suffer any actionable loss; and
- (f) the grant of the injunction sought would be a genuinely appropriate and effective deterrent to prevent unlawful behaviour.

Cross-undertaking in damages

- 40. As noted above, I am not aware of any loss or damage the Defendants could bring an action for. Nevertheless, as is expected, I am authorised on behalf of the Claimant to provide the necessary cross-undertaking to pay any sum which the Court considers appropriate to compensate anyone affected by the proposed injunction if it is subsequently determined that the Claimant is not entitled to the order which they seek.
- 41. The audited accounts for the Claimant's year ending 31 December 2023 show revenue of £3,602 million and adjusted profit before tax of £485 million.

Statement of Truth

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.

DocuSigned by:

 6D31F8AE8D94EA.....

Jonathan Daniel Coen

7 July 2024

Made on behalf of the Claimant
Witness: Akhil Markanday
Number of Statement: Second
Exhibit: AM2
Dated: 16 September 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No: KB-2024-002210

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

- and -

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

Defendants

SECOND WITNESS STATEMENT OF AKHIL MARKANDAY

I, **AKHIL MARKANDAY**, of Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, will say as follows:

1. I am a partner in the firm of Bryan Cave Leighton Paisner ("**BCLP**"). BCLP act for the Claimant ("**Heathrow**") in this matter, under my supervision. I am duly authorised to make this witness statement on behalf of the Claimant. This is my second witness statement in these proceedings.

2. I make this witness statement in support of an application by Heathrow to join 26 named defendants as defendants to these proceedings, and for associated case management directions.
3. Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge.
4. Where facts and matters referred to in this statement are not within my own knowledge they are based on instructions, documents and information supplied to me in my capacity as solicitor for Heathrow and are true to the best of my knowledge and belief.
5. I refer to a paginated bundle of documents, attached as Exhibit “AM2”. Where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit “AM2”.

Background

6. By a without notice injunction dated 9 July 2024 (“the **Injunction**”), the Court prohibited “Persons Unknown” (as defined as the Defendants to the Claim) from trespassing on Heathrow Airport (“the **Airport**”) in connection with the “Just Stop Oil” (“**JSO**”) campaign (or other environmental campaign). That application was sought by Heathrow in connection with a high-profile campaign of ‘direct action’ disruption threatened (and in some instances, carried out) by JSO. Most other major UK airports have now obtained similar injunctions. I refer to my first witness statement for the background to those matters, and do not repeat it here.
7. At the time the Injunction was sought, Heathrow did not know the names of any individuals who presented a distinct threat of committing acts of direct action at the Airport. That is why the claim was brought only against “Persons Unknown”.
8. Whilst a matter for legal submissions, I understand (and, without waiving privilege, Heathrow also understands) that a party in the position of Heathrow is under an obligation to apply promptly to join as named defendants any individual

who they identify as presenting such threat, or therefore being an appropriate named defendant.

9. As I detail below, there have regrettably been several actual or attempted instances of ‘direct action’ by individuals at the Airport since the Injunction was granted. All such persons have been arrested and identified (with the exception of Monday Rosenfeld who was involved in the incident on 27 July 2024 but was not arrested).
10. In view of their actions, Heathrow believes that each of those individuals should appropriately be a named defendant to these proceedings (the “**Named Defendants**”) and, moreover, that it is now obliged to apply for their joinder as such.
11. I should also emphasise at the outset that Heathrow is minded to bring committal applications for contempt of court against at least some of the Named Defendants. A final decision as to precisely which of the Named Defendants will be subject to such applications has not been reached. Again without waiving privilege, it is necessary for Heathrow, with the assistance of its legal team, to review the evidence against each of the Named Defendants before reaching that final decision.
12. Heathrow, however, is mindful of (what it understands to be) the need to apply to join named defendants promptly and therefore does so at this stage, with a view to bringing contempt applications subsequently.
13. Heathrow also seeks, by the present application, case management directions intended to facilitate the efficient conduct of these proceedings and the intended contempt applications hereafter. In particular, it seeks directions (as set out in detail in the accompanying draft Order) to address:

13.1. Joinder of the Named Defendants, and accompanying amendment of the Claim Form.

- 13.2. Making absolutely plain that the Injunction continues to apply to the Named Defendants. To that end, Heathrow offers the same cross-undertaking in damages as applied to the Injunction to the Named Defendants.
- 13.3. The provision of Supplemental Points of Claim in respect of those Named Defendants (in preference to amending the Particulars of Claim, which were prepared at a time when there were no named defendants, and which have previously been served in accordance with the detailed service provision in the Injunction).
- 13.4. Service of this application, and future documents in these proceedings (including the contempt application) on those Named Defendants. As discussed below, this is somewhat complicated by the fact that many of the Named Defendants are presently on remand in prison, having been arrested and charged with a variety of crimes by reason of the same activities which found this application.
- 13.5. How and by when the Named Defendants should respond to these proceedings.
- 13.6. The time-table for the future contempt applications.
- 13.7. Provision for a further directions hearing thereafter, at which point further directions are likely to be appropriate for the ongoing case management of the substantive proceedings against each of the Named Defendants, as well as the anticipated contempt applications.
14. As regards the last of those points, Heathrow is cognisant of the fact that the Named Defendants are facing criminal charges for the same actions which found the anticipated contempt proceedings. Whilst again a matter for legal submissions, it is not considered that the existence of parallel criminal proceedings prevents the pursuit of contempt proceedings. However, it is recognised that the outcome of the criminal proceedings may impact any appropriate sanction for contempt of court (or *vice versa*), and that the imprisonment of Named Defendants will no doubt impact their ability to take part in these proceedings or any contempt application. The suggestion of a further

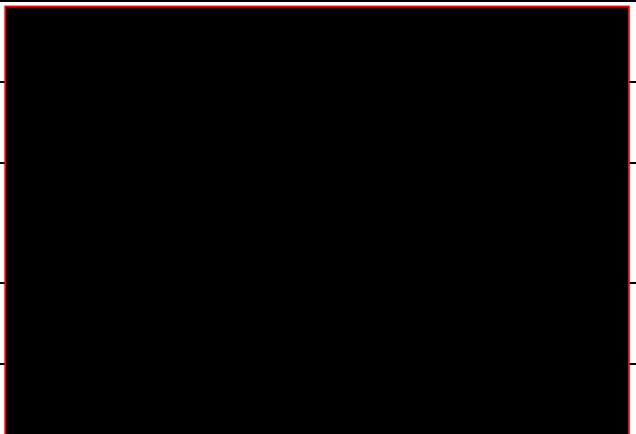
directions hearing is made, in part, to allow those considerations to be addressed at a suitable juncture and appropriate directions to be given for further case management with them in mind.

The Named Defendants

15. With the exception of the 27th proposed named defendant Monday Rosenfeld (whose position is addressed at paragraphs 24-27 below), each of the Named Defendants has been arrested by the Police in respect of their actions at or in the vicinity of the Airport on 24 July, 27 July, 30 July or 1 August. It is convenient to group my evidence in respect of the Named Defendants by reference to the events on each of those dates.
16. I wish to make clear that the following evidence is intended only by way of high level overview of the individuals' alleged involvement in those alleged incidents, solely for the purposes of explaining why Heathrow now seeks their joinder as named defendants. Heathrow would seek to adduce further evidence of their involvement at trial, or in connection with any contempt application (as the case may be).

24 July 2024

17. The Named Defendants involved in the incident on 24 July 2024 are set out in the following table. Each individual was arrested in connection with that incident, their names and the following addresses are those that they provided to the Police upon their arrest:

Def #	Name	Address
2	Rory Wilson	
3	Adam Beard	
4	Sean O'Callaghan	
5	Sally Davidson	
6	Hannah Schafer	

7	Luke Elson	
8	Luke Watson	

18. Each of the above Named Defendants was arrested at the Airport at about 0900 on 24 July 2024, at one of two locations at the perimeter fence to the Airport (along the Northern Perimeter Road) [AM2/4-18], within the ‘purple outlined’ area covered by the Injunction (as shown in Plan A to the Injunction).
19. Heathrow has been informed by the Police that each person was arrested in possession of items which indicate an intention to breach the perimeter fence to the Airport and commit acts of disruption.
20. They have each been charged with conspiracy to interfere with key national infrastructure under s.7 of the Public Order Act 2003. Press reports indicate that each was remanded in custody, having appeared before Westminster Magistrates’ Court later that day [AM2/19-20].
21. It is, further, clear that each of these individuals was undertaking intentional ‘direct action’ in the name of JSO. A JSO press release on its website from 24 July 2024 refers to those arrested as “*Just Stop Oil supporters*”. The press release continues to refer to (and impliedly therefore draws a connection with) other environmental activists’ activities at other European Airports [AM2/21-22] :

“This comes after German supporters of Last Generation blocked air traffic at Cologne Bonn Airport, causing international delays. Meanwhile, supporters of Folk Mot Fossilmakta (People against Fossil Power) cut through a chain-link fence and sat next to a runway stopping flights departing from Oslo Gardermoen airport.

Also this morning, supporters of Extinction Rebellion in Finland have blocked security gates at Helsinki Vantaa Airport. Meanwhile in Spain, five supporters of Futuro Vegetal accessed the taxiway at Barcelona airport, however were intercepted before taking action. In Switzerland, eleven supporters of Drop Fossil Subsidies blocked main roads around both Zurich and Geneva airports.”
22. Heathrow is aware, from publications from the official Instagram account of JSO [AM2/23-24], that at a case management hearing in Isleworth Crown Court on 22 August 2024 that Hannah Schaffer, Sally Davidson and Sean O’Callaghan were granted bail and that Adam Beard, Rosa Hicks, Luke Elson, Luke Watson and Rory Wilson have been remanded in custody. From the information released

by JSO it appears that a plea hearing has been listed for 27 September 2024 and a trial date has been set for 20 January 2025, and is expected to last for 6 weeks.

23. For completeness, I record also that Heathrow is aware (from press reports, and information supplied by the Police) that three additional individuals (Rosa Hicks, Julia Mercer and Willaim Goldring) were arrested by the Police in connection with the same incident. They were, however, not within the ‘purple outlined’ area covered by the Injunction (as shown in Plan A to the Injunction). In the circumstances, Heathrow is not presently proposing that Ms Hicks, Ms Mercer or Mr Goldring be joined as Named Defendants.

27 July 2024

24. I am informed by the Airport Operations Manager for the Airport on duty that day that at about 1043 on 27 July 2024 he received a report of a female demonstrator holding an “Oil Kills” sign within the Terminal 5 departures area [AM2/25-28]. It is again clear therefore that this action was in connection with an environmental campaign.
25. Police in attendance verified her identity as the proposed 9th Defendant, Monday Rosenfeld, and she gave an address of [REDACTED]. Those details have been provided to Heathrow by the Police.
26. Ms Rosenfeld was accompanied by two other individuals, who were recording her actions. Heathrow does not know their identities.
27. Ms Rosenfeld ceased her protest, and left the Airport (under Police supervision), when requested to do so by the said Airport Operations Manager and the Police officers in attendance.

30 July 2024

28. At about 0830 on 30 July 2024, I have been informed by the Airport Operations Manager on duty at the time that the following two proposed Named Defendants entered the Terminal 5 departures hall at the Airport and each began spraying orange paint from fire-extinguishers over the ceiling, walls, floor and (significantly) the electronic departure board screens.

Def #	Name	Address
9	Phoebe Plummer	
10	Jane Touil	

29. I exhibit at [AM2/29-40] photographs showing the incident. It can be seen that Ms Plummer and Ms Touil were wearing JSO t-shirts, and the fire extinguishers had “Just Stop Oil” written on them. JSO has posted on its website a press release about this action [AM2/41-43]. It is therefore plain that their actions were in connection with that campaign.
30. Ms Plummer and Ms Touil were arrested for their actions, and the names and addresses recorded above were again those provided to the Police. They have been charged (as I understand it, with causing criminal damage), and have both been remanded into custody following an appearance at Westminster Magistrates Court. Heathrow is now aware that Ms Touil has been released on bail after appearing in Isleworth Crown Court on 14 August 2024 [AM2/44].
31. A Daily Mail article reporting the incident and those charges records that Ms Plummer has also been found guilty of causing criminal damage for the high-profile incident of throwing soup over a Van Gough painting in the National Gallery in October 2022 [AM2/45-53].

1 August 2024

32. The Named Defendants involved in the incident on 1 August 2024 were those individuals set out in the following table. Each was arrested in connection with that incident, and their names and the following addresses are those that they provided to the Police upon their arrest:

Def #	Name	Address
<i>Groups 1 & 2</i>		
11	Barbara Lund	

12	Rhiannon Wood	
13	Diane Bligh	
14	Ruth Cook	
15	Malcolm Allister	
16	Susanne Brown	
17	Christina Jenkins	
18	Jack Williams	
19	Paul Raithby	
Group 3		
20	Melanie Griffith	
21	Virginia Barrett	
22	Pauline Hazel Smith	
23	Rosemary Robinson	
24	Irfan Mamun	
25	Callum Cronin	
26	Joe Magowan	

33. I am informed by the Airport Operations Manager on duty at the time that he was informed by the Police on the day that:

33.8. Three individuals had been arrested in the Airport at around 0700, in the vicinity of the Terminal 5 London Underground station, on suspicion of conspiracy to interfere with the use or operation of key national infrastructure under s.7 of the Public Order Act 2003. They were found to be in possession of orange t-shirts and banners.

- 33.9. A short time later (by approx. 0740) that a further six individuals had been detailed on the central platform at the Terminal 5 London Underground Station. The said manager understood that they too were in possession of orange t-shirts and banners.
34. Those nine individuals have since been identified (again by reference to information supplied to Heathrow by the Police) as the proposed 12th to 20th Defendants (i.e. “Groups 1 & 2” in the above table). I infer, given the association between the colour orange and the events explained in the next paragraph, that the orange t-shirts and banners were in connection with the JSO campaign.
35. I have also been informed by the Airport Operations Manager on duty at the time that he received reports from colleagues informing him that at around 0850 on the same morning a further group of six individuals were blocking the entrance to the security area in Terminal 5 departures. I exhibit photographs showing that activity at [AM2/54-56]. It can be seen from those photographs, that this direct action was overtly part of the JSO campaign. Again, JSO has posted a press-release about this action on its website [AM2/57-59].
36. Each of those individuals was arrested by the Police (with the area being cleared by about 0913), and their names and addresses as provided to Heathrow are set out in the above table.

Service & Current Whereabouts of the Defendants

37. As set out above, addresses have been provided to Heathrow by the Police for each of the Defendants. Those are believed to be the usual or last known addresses of each of the Named Defendants for the purposes of service.
38. However, with the exception of Monday Rosenfeld (D9) (who was not arrested) and the following who have reportedly been released on bail; Sean O’Callaghan (D4), Sally Davidson (D5), Hannah Schafer (D6), Jane Touil (D11), Heathrow understands that all of the Named Defendants (i.e. the other 21 persons) are presently being held in prison on remand. It is recognised, therefore, that service at their usual and last known addresses is unlikely to be effective.

39. My firm is seeking to identify which prisons each of those Named Defendants is currently being held in (via the Government's 'find a prisoner' service) so that service can be effected on those Named Defendants via that channel. My colleague Robert Hodgson made a request for these details to the Find a Prisoner service on 21 August 2024. Heathrow intends, by the date of the hearing of this application, to file updated evidence on the results of those enquiries and therefore the extent to which it has been able to serve these proceedings. To the extent necessary and appropriate, Heathrow may seek orders for alternative service under CPR r.6.15 and 6.27 to validate the steps that it has by then been able to take as effective service.
40. In addition, and in the hope that it may help to draw the present application to the attention of the Named Defendants, Heathrow intends to send the application (and supporting materials) to JSO's publicised email addresses and post copies (with the Defendants' addresses redacted) on the website set up to advertise the Injunction. These steps are in accordance with the provisions for service of the original Injunction.

CONCLUSION

41. For the reasons I outline above, Heathrow considers both that: (i) it is obliged (on the current state of the law) to seek the joinder of these Named Defendants; and (ii) that, in view of the clear evidence that there is (at the very least) a serious question that each of the Named Defendants has already committed acts in breach of the Injunction, it is appropriate that each of them be joined.
42. In circumstances where the procedure on injunctions of this sort is still being developed by the Courts, Heathrow further respectfully suggests that it is appropriate that it seeks the direction from the Court (to the extent the Court considers appropriate) as to the joinder of some or all of these Defendants (or any other potential defendants).
43. Further, in view of the: (i) complexities with service caused by many of the Named Defendants being held on remand in prison; and (ii) the potential for contempt applications in respect of the conduct outlined above, Heathrow seeks

directions to regularise service and future case management (including of any such contempt applications).

Statement of Truth

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.

DocuSigned by:

.....CEE6F7438621A9D.....

Akhil Markanday

16 September 2024

Made on behalf of the Claimant
Witness: Jonathan Daniel Coen
Number of Statement: Second
Exhibit: JDC2
Dated: 29 November 2024

IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION

Claim No.: KB-2024-002210

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

- and -

**PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR
OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN
(WITHOUT THE CLAIMANT’S CONSENT) UPON ‘LONDON HEATHROW
AIRPORT’ AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE
PARTICULARS OF CLAIM**

Defendants

SECOND WITNESS STATEMENT OF JONATHAN DANIEL COEN

I, **JONATHAN DANIEL COEN**, of The Compass Centre, Nelson Road, Hounslow, Middlesex, TW6 2GW, **will say as follows:**

1. I am making this statement to provide factual evidence of the steps taken by the Claimant to notify the Defendants of the Claim Form, Application Notice, evidence in support, Note of the Hearing on 9 July 2024 and the injunction order (the “**Documents**”) related to an injunction order granted by the Court on 9 July 2024 prohibiting “Persons Unknown” from trespassing on Heathrow Airport (“**Heathrow**”)

in connection with the “Just Stop Oil” (“**JSO**”) campaign (or other environmental campaign) (the “**Order**”). This is my second witness statement in these proceedings.

2. I am currently employed as Customer Director by the Claimant. I took on this role on 1 August 2024. Prior to this and as set out in my first witness statement [**JDC2/3-16**], I was employed by the Claimant as the Director of Security at Heathrow. As Director of Security, I had overall responsibility for managing the implementation of the Order and delegated individual tasks to specialist areas within the Claimant’s organisation.
3. The facts and matters set out in this witness statement are within my own knowledge, unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, I identify the source of the information. Facts and matters derived from other sources are true to the best of my knowledge and belief.
4. I refer to a paginated bundle of documents, attached as Exhibit “**JDC2**”; where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit “**JDC2**”.
5. I am duly authorised to make this statement on behalf of the Claimant.
6. More generally, in preparing this witness statement, I have had sight of information from Bryan Cave Leighton Paisner LLP (“**BCLP**”) which confirms the actions they took to assist us in completing the steps required of the Claimant by the Order.

Background

7. Paragraph 8 of the Order [**JDC2/17-28**] requires the Claimant to take steps to notify the Defendants of the Claim Form [**JDC2/29-33**], Application Notice [**JDC2/51-55**] and evidence in support [**JDC2/56-74**] and Note of the Hearing on 9 July 2024 [**JDC2/75-83**] in connection with the Order.
8. Paragraph 9 of the Order requires the Claimant to take steps to notify the Defendants of the Order itself.

Service and notification

9. Pursuant to paragraph 8.1 of the Order, the Claimant was required to upload a copy of the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024 to www.heathrow.com/injunction.
10. Pursuant to paragraph 9.1 of the Order, the Claimant was required to upload a copy of the Order to www.heathrow.com/injunction.
11. The Claimant took the above steps together at 10:24 on 11 July 2024, as evidenced by an email from Helen Stokes of the Claimant to Phil Spencer of BCLP at 10:31 on 11 July 2024 **[JDC2/84-86]**. In this email, Helen Stokes confirms that the URL and its contents went live at 10:24 on 11 July 2024. In her email from 10 July 2024 **[JDC2/87-91]**, Helen Stokes confirms that the main injunction page <https://www.heathrow.com/company/local-community/injunction> (to which the short URL in the Order, www.heathrow.com/injunction, redirects) was published at 13:07 on 10 July 2024, but the shortened URL was live from 10:24 on 11 July 2024. The Bundle for Hearing (which contained the Claim Form, Application Notice and evidence in support), Note of Hearing and the Order were part of the published contents. This is confirmed by the PDF screenshot of the live contents of website which is attached to Helen Stokes' email. Helen Stokes was the Head of Legal, Regulation and Operations of the Claimant on 11 July 2024 and authorised to take these actions on the Claimant's behalf.
12. Pursuant to paragraph 8.2 of the Order, the Claimant was required to send an email to the email addresses listed in Schedule 3 to the Order, stating that a claim has been brought and an application made and that the documents can be found at www.heathrow.com/injunction.
13. Pursuant to paragraph 9.2 of the Order, the Claimant was required to send an email to the email addresses listed in Schedule 3 to the Order, notifying them of the Order.
14. The Claimant took the above steps at 10:57 on 11 July 2024 by way of an email from Phil Spencer of BCLP acting on behalf of the Claimants sent to 'juststopoil@protonmail.com', 'juststopoilpress@protonmail.com', and 'info@juststopoil.org' (each as set out in Schedule 3 to the Order) **[JDC2/92]**. In this

email, Phil Spencer informs the recipients that a claim (KB-2024-002210) has been brought, an application to the High Court has been made and that the documents relating to this claim (including the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024) are available at: www.heathrow.com/injunction. Phil Spencer notified the recipients of the Order by attaching it to the email and drawing the recipients' attention to the attachment.

15. Pursuant to paragraph 8.3 of the Order, the Claimant was required to affix a notice at the locations marked with a red dot in the plan of Heathrow contained at Schedule 4 of the Order (the "**Plan**") setting out where the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024 can be found and obtained in hard copy or include this information in the warning notices referred to at paragraph 9.4 of the Order.
16. Pursuant to paragraph 9.3 of the Order, the Claimant was required to affix a copy of the Order in A4 size in a clear plastic envelope at each location shown with a red dot in the Plan.
17. Pursuant to paragraph 9.4 of the Order, the Claimant must affix warning notices of A2 size, substantially in the form of the notice at Schedule 5 of the Order, at each location shown with a red dot in the Plan.
18. As Director of Security, I coordinated taking the above steps on behalf of the Claimant, delegating the notification steps to my security team. The steps were completed on 19:12 on 11 July 2024 as evidenced by an email from Helen Stokes to Akhil Markanday and Phil Spencer of BCLP at 15:15 on 12 July 2024 [**JDC2/93-95**]. The email attaches a picture of a warning notice, substantially in the form of the notice at Schedule 5 of the Order, to which a clear plastic envelope containing a copy of the Order has been stapled. The notice clearly states that the Order, Claim Form, Application Notice and evidence in support and a note of the hearing on 9 July 2024 can be viewed at <https://www.heathrow.com/company/local-community/injunction> or obtained from the Compass Centre, Heathrow Airport, Nelson Road, Hounslow TW6 2GW or from BCLP. The email also attaches a table with the 'approximate locations' at which the warning notices and the copies of the Order were affixed and the times at which they were affixed by members of my team. It is my understanding that each of these

‘approximate locations’ matches the approximate position of a red dot in the Plan. The picture Helen Stokes attached to her email is time stamped at 14:48 on 11 July 2024. Pursuant to the table, this time at which the warning notice and copy of the Order were affixed at “Longford Roundabout”, which is the approximate location of the left-most, top-most red dot on the Plan. Helen Stokes’ email to Phil Spencer at 16:42 on 11 July 2024 [JDC2/96] confirms that a hard copy folder of the relevant documents was placed at the reception of Compass Centre at 11:30 on 11 July 2024.

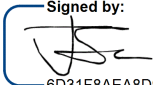
19. In addition to the steps required in the Order to bring the injunction to the notice of the Defendants, the Claimant has also voluntarily:
- (a) Placed printed copies of the original hearing bundle and the Order in Landside locations in each of the terminals available on request; and
 - (b) Affixed approximately 85 warning notices of the type referred to in paragraph 18 above at the pedestrian entrances to the train and bus stations at Heathrow and at the pedestrian entrances to each of the terminals.

Conclusion

20. Given the above, I believe the terms of the Order have been complied with and service of the Order was perfected by completing the final required step, which was posting the final warning notice as set out in paragraph 18 above. Accordingly, the injunction came into full effect from 19:12 on 11 July 2024.

Statement of Truth

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.

Signed by:

 6D31F8AE8D94EA.....

Jonathan Daniel Coen

29 November 2024

Made on behalf of the Claimant
Witness: Robert Hodgson
Number of Statement: First
Exhibit: RH1
Dated: 2 December 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No: KB-2024-002210

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

- and -

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

Defendants

FIRST WITNESS STATEMENT OF ROBERT HODGSON

I, **ROBERT HODGSON**, of Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, **will say as follows:**

1. I am an associate in the firm of Bryan Cave Leighton Paisner ("**BCLP**"). BCLP act for the Claimant ("**Heathrow**") in this matter. I am duly authorised to make this witness statement on behalf of the Claimant. This is my first witness statement in these proceedings.

2. Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge.
3. Where facts and matters referred to in this statement are not within my own knowledge they are based on instructions, documents and information supplied to me in my capacity as solicitor for Heathrow and are true to the best of my knowledge and belief.
4. I refer to a paginated bundle of documents, attached as Exhibit “RH1”. Where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit “RH1”.

Background

5. On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against Persons Unknown who (in connection with Just Stop Oil or other Environmental Campaign) enter, occupy or remain (without the Claimant’s consent) upon ‘London Heathrow Airport’ as is shown edged purple on the attached Plan A to the Particulars of Claim.
6. On 9 July 2024, the High Court granted Heathrow an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow (the “**Injunction Order**”).
7. As detailed in the Second Witness Statement of Akhil Markanday dated 16 September 2024 (“**Markanday 2**”), there have been several actual or attempted incidents of ‘direct action’ by individuals at London Heathrow Airport since the Injunction Order was granted in breach of the Injunction Order.
8. Following these incidents, the Claimant has made an application dated 16 September 2024 seeking an order to join 26 defendants as named defendants (the “**Named Defendants**”) to these proceedings, as also set out in Markanday 2 (the “**Claimant’s Joinder Application**”). As a result of their actions at those incidents

and/or other direct action incidents unconnected with Heathrow, several of those Named Defendants were arrested by police and have been charged and held on remand, or are now in prison for unrelated offences. That has led to additional service challenges for the Claimants' Joinder Application, which I return to below.

9. A hearing has now been listed for 2 hours on 11 December 2024 before a High Court Judge, to determine the Claimant's Joinder Application.
10. I make this witness statement to update the Court on the matters that have occurred since the Claimant issued the Claimant's Joinder Application, in particular on the following:
 - 10.1. the steps taken by the Claimant to notify the Named Defendants of the hearing on 11 December 2024 and to serve the Named Defendants with the relevant documents;
 - 10.2. to update the Court on any responses that have been received;
 - 10.3. to update the Court on Heathrow's intention to bring committal proceedings against a number of the Named Defendants; and
 - 10.4. to inform the Court of the steps the Claimant intends to take from the filing and serving of this statement to the hearing on 11 December 2024.

Service

11. Following the Notice of Listing, received on 1 November 2024, Heathrow has taken steps to:
 - 11.5. ascertain the location of the Named Defendants through contacting the Government's 'Find a Prisoner Service' in circumstances where, as set out above, the Claimant was aware that several were in prison;
 - 11.6. serve the Claimant's Joinder Application (with all supporting documents) and provide notice of the hearing to each of the Named Defendants, as set out below; and
 - 11.7. respond to any responses received by the Named Defendants.

Find a Prisoner Service

12. The issues facing Heathrow in regards to serving these proceedings are detailed at paragraph 37-40 of Markanday 2.
13. As explained there, addresses have been provided to Heathrow by the Police for each of the Named Defendants. Those are believed to be the usual or last known addresses of each of the Named Defendants for the purposes of service.
14. However, as per paragraph 38 of Markanday 2, the Claimant is aware that a number of the Named Defendants were arrested following the various incidents and held on remand. At least one (Phoebe Plummer) is now serving a term of imprisonment for a separate offence (for her role the well-publicised incident where soup was thrown at a Van Gough painting in the National Gallery).
15. The Claimant has therefore taken steps to ascertain the location of the Named Defendants so that any individual who is currently in prison can also be served in prison with the relevant documents and be notified of the hearing (as well as being served separately at their usual or last known address as provided by the Police).
16. I first wrote to government's Prisoner Location Service on 21 August 2024 setting out the names of the Named Defendants and requesting confirmation as to whether any of the Named Defendants were being held in prison and if so, the details of the prison **[RH1: pages 2 - 4]**. Copies of my correspondence with the Find a Prisoner service are set out in **[RH1: pages 2 - 13]**.
17. We received a response on 20 September 2024 stating that the exemption provided is not sufficient and that consent must be sought from the Named Defendants to release the requested information. I responded on 23 September 2024 explaining that the requested information can be disclosed pursuant to Schedule 2, Part 5, Paragraph 3a of The Data Protection Act 2018.
18. On 21 October 2024 we received a response from the Find a Prisoner Service confirming whether each of the Named Defendants were being held in prison or

whether they were not a match on their system (and so not in prison). The search confirmed that the following 4 individuals were in prison as at 21 October 2024:

- (i) Rory Wilson ;
- (ii) Adam Beard;
- (iii) Luke Elson;
- (iv) Luke Watson;

19. Following subsequent correspondence with the Find a Prisoner Service on 24 October 2024 in relation to a misspelling of Phoebe Plummer, the search for Phoebe Plummer was re-run and on 30 October 2024 an updated list was provided to us confirming that Phoebe Plummer was also in prison as at 30 October 2024.
20. The Find a Prisoner service therefore confirmed that as at 30 October 2024, that the following 5 individuals were being held in prison **[RH1: pages 6 - 8]**:

- (i) Rory Wilson ;
- (ii) Adam Beard;
- (iii) Luke Elson;
- (iv) Luke Watson;
- (v) Phoebe Plummer

Service of Documents

21. Following the receipt of the Notice of Listing, received on 1 November 2024, I prepared and issued letters to each of the Named Defendants on 5 November 2024. A copy of each of these letters is appended at **[RH1: pages 14-106]**. The various methods of service of these letters and enclosed documents is set out below.
22. Each letter enclosed the following documents:
- (i) Sealed Claim Form in relation to the Injunction Order
 - (ii) Particulars of Claim in relation to the Injunction Order

- (iii) Injunction Order
 - (iv) Sealed Application Notice in relation to the Claimant's Joinder Application
 - (v) Draft Joinder Order in relation to the Claimant's Joinder Application
 - (vi) Second Witness Statement of Akhil Markanday
 - (vii) Exhibit AM2
 - (viii) Notice of Listing in relation to the hearing on 11 December 2024
 - (ix) Draft Amended Particulars of Claim
23. Each letter also sought to explain the background of the proceedings, the nature of the upcoming hearing (including how to confirm the exact time of the hearing) and a recommendation that each of the Named Defendants seek independent legal advice and notifying them of the right against self-incrimination which may become material in any response to the Claimant's Joinder Application in light of the potential Contempt of Court proceedings.
24. Each letter also explained that that the Claimant will be seeking the Court's permission to amend the Particulars of Claim at the upcoming hearing to include each of the Named Defendants and offered to provide a copy of the hearing bundle on request.

Methods of Service

25. In order to bring the documents set out at paragraph 22 above to the attention of the Named Defendants, the following has been undertaken:
- 25.1. A copy of each letter as appended at **[RH1: pages 14-91]** enclosing the documents listed at paragraph 22 above was sent to each of the Named Defendants by first class post to each of the Named Defendant's usual or last known address (as provided to Heathrow by the Police).
 - 25.2. For the 5 individuals in prison (Rory Wilson, Adam Beard, Luke Elson, Luke Watson and Phoebe Plummer) a copy of the letter and the documents listed at paragraph 22 above was also sent to the relevant prison addressed to each individual in question as appended at **[RH1: pages 92-106]**.

25.3. Each of the documents listed at paragraph 22 above was uploaded to the Heathrow website (www.heathrow.com/injunction) on 7 November 2024 (to the extent the documents were not already on the website).

25.4. My colleague Phil Spencer of BCLP emailed the Just Stop Oil email addresses (info@juststopoil.org (the email address on the JSO website for general enquiries), and juststopoil@protonmail.com and juststopoilpress@protonmail.com) on 7 November 2024 (with me in copy) appending a copy of the Notice of Listing and providing a link to Heathrow's website and explaining that the documents could be accessed via the link contained in his email. A copy of this email is appended at **[RH1: page 107]**.

25.5. To note is that the documents provided pursuant to paragraphs 25.3 and 25.4 above were redacted to remove the addresses of the Named Defendants.

Responses to letter

26. I am only aware of one response to the letters and documents that have been provided to the Named Defendants.
27. I received an email from Sally Davidson (one of the Named Defendants) on 10 November 2024 asking for a copy of the documents listed at paragraph 21 above in 'digital form'. Sally's email is appended at **[RH1: page 109]**.
28. As I was on holiday at the time, my colleague Phil Spencer responded to Sally on 11 November 2024 (again with me in copy). Phil referred Sally in his response email to the Heathrow website where all the documents could be accessed in digital form. Phil Spencer's email is appended at **[RH1: page 110]**.

Committal Applications

29. To update the court in respect of the potential contempt applications as previously referred to at paragraph 11 of Markanday 2, upon review of all the circumstances, including the evidence and the disruption caused to Heathrow and the existence and likely outcome of parallel criminal proceedings (in respect of which review

and considerations no privilege whatsoever is waived) Heathrow is minded to bring committal proceedings against the following Named Defendants:

29.6. In respect of the incident on 30 July 2024 against:

- (i) Phoebe Plummer; and
- (ii) Jane Touil

29.7. In respect of the incident on 1 August 2024 against:

- (iii) Melanie Griffith
- (iv) Virginia Barrett
- (v) Pauline Hazel Smith
- (vi) Rosemary Robinson
- (vii) Irfan Mamun
- (viii) Callum Cronin

30. These committal applications are in the process of being drafted.

Further steps to be taken prior to the 11 December 2024 hearing

- 31. This witness statement, as well as the Second Witness Statement of Jonathan Coen dated 29 November 2024, will be filed, and then served by the same methods as set out at paragraph 25 above.
- 32. Both witness statements will then be added to the hearing bundle.
- 33. The hearing bundle, skeleton argument and authorities' bundle will all be uploaded to the Heathrow website.
- 34. I then intend to email the Just Stop Oil email addresses (info@juststopoil.org (the email address on the JSO website for general enquiries), and juststopoil@protonmail.com and juststopoilpress@protonmail.com) notifying them that we have uploaded the hearing bundle, skeleton argument and authorities' bundle.

35. I then intend to prepare a short further witness statement confirming that the steps above have been undertaken, to be filed shortly before the hearing.
36. To note again is that the hearing bundle uploaded to the Heathrow website and provided to the Just Stop Oil email addresses will contain redacted copies of the documents to remove the addressed of the Named Defendants. The hardcopy bundle provided to the Court will contain unredacted copies.

Statement of Truth

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.



.....

Robert Hodgson

2 December 2024

Made on behalf of the Claimant
Witness: Robert Hodgson
Number of Statement: Second
Exhibit: RH2
Dated: 10 December 2024

IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KING'S BENCH DIVISION

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

- and -

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

Defendants

SECOND WITNESS STATEMENT OF ROBERT HODGSON

I, **ROBERT HODGSON**, of Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, **will say as follows:**

1. I am an associate in the firm of Bryan Cave Leighton Paisner ("**BCLP**"). BCLP act for the Claimant ("**Heathrow**") in this matter. I am duly authorised to make this witness statement on behalf of the Claimant. This is my second witness statement in these proceedings.

2. Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge.
3. Where facts and matters referred to in this statement are not within my own knowledge they are based on instructions, documents and information supplied to me in my capacity as solicitor for Heathrow and are true to the best of my knowledge and belief.
4. I refer to a paginated bundle of documents, attached as Exhibit “RH2”. Where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit “RH2”.

Background

5. I refer to my first witness statement in this matter dated 2 December 2024 (“**Hodgson 1**”). I use the definitions as set out in Hodgson 1 in this statement unless defined otherwise.
6. As envisaged at paragraph 35 of Hodgson 1, I make this statement to confirm to the Court that the steps set out at paragraphs 31 – 34 of Hodgson 1 have been completed and to update the Court on further correspondence that has been received since my first statement.

Service of further documents

7. Hodgson 1 and the Second Witness statement of Jonathan Coen dated 29 November 2024 (“**Coen 2**”) along with exhibits RH1 and JC2 were CE filed on 2 December 2024.
8. Hodgson 1 and Coen 2 along with Exhibits RH1 and JC2 were then served by the same methods as set out at paragraph 25 of Hodgson 1, as follows:
 - 8.1. On 2 December 2024, hardcopies were sent by first class post to the each of the Named Defendants’ usual or last known address (as provided by the Police);

- 8.2. On 2 December 2024, hardcopies were sent by first class post to the relevant prison for the 5 individuals in prison (Rory Wilson, Adam Beard, Luke Elson, Luke Watson and Phoebe Plummer);
- 8.3. Both statements and exhibits were uploaded to the Heathrow website (www.heathrow.com/injunction) on 5 December 2024; and
- 8.4. On 2 December 2024, both statements and exhibits were sent by email to the (info@juststopoil.org (the email address on the JSO website for general enquiries), and juststopoil@protonmail.com and juststopoilpress@protonmail.com) (together the “**Just Stop Oil Email Addresses**”) as well as explaining in the covering email that the documents would be uploaded to the Heathrow website along with the bundle.
9. A hardcopy of the hearing bundle was filed at court by my colleague Leire Barjadi on 5 December 2024 at 10:30am (at the King’s Bench Division drop box).
10. On 5 December 2024 I CE-filed a core electronic bundle (volume 1). On the same day I emailed Aysha Begum of King’s Bench Judges Listing Office with a file transfer link to both the full hearing bundle and the core electronic bundle, and explained that the full hearing bundle was too large to CE-file.
11. On 9 December 2024 the redacted hearing bundle, Claimant’s skeleton argument and the Claimant’s authorities’ bundle were published on the Heathrow website (www.heathrow.com/injunction).
12. On 9 December 2024 I emailed the Just Stop Oil Email Addresses providing a file transfer link to the redacted hearing bundle, Claimant’s skeleton argument and the Claimant’s authorities’ bundle, again explaining that these documents would also be available on the Heathrow website (www.heathrow.com/injunction).

Further correspondence received

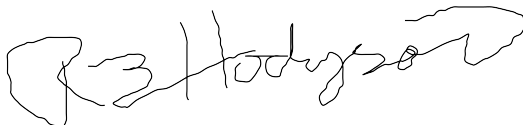
13. I received an email from Ruth Cook (D15) on 4 December 2024. This email acknowledged the joinder documents issued on 2 December 2024 and requested that further communication be sent by email in order to not waste paper.
14. On 4 December 2024 I received a call from Elliot Bannister, solicitor at Deighton Pierce Glynn. Mr Bannister said he acted for Joe Magowan (D27). He went on

to say that Mr Magowan was ‘only the photographer’ at the incident on 1 August 2024 and said he would send me a letter requesting that Mr Magowan be dropped from the joinder proceedings. I said I would take client instructions once the letter had been received.

15. Mr Bannister sent me the letter appended at **[RH2 pages 1-2]** on 9 December 2024.
16. My colleague Phil Spencer issued a letter in response on 10 December 2024 at 7:59am **[as appended at RH2 page 3]**. As set out in the letter the Claimant considers the joinder application against Mr Magowan to be right and proper, but if Mr Magowan provides a suitable undertaking to the Court (in form N117, and to the satisfaction of the Court), the Claimant is prepared to rely on that undertaking and not pursue joinder against Mr Magowan. The letter requested that Mr Bannister provide BCLP with a proposed form of undertaking in time for the hearing on 11 December 2024.
17. The letter also explains that the Court will expect Mr Magowan to appear at the hearing in person or by a solicitor or counsel to give such undertaking.
18. As at the time of filing this statement we have not had a response to our letter.

Statement of Truth

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.



.....

Robert Hodgson

10 December 2024

Made on behalf of the Claimant
Witness: Robert Hodgson
Number of Statement: Third
Exhibit: RH3
Dated: 20 January 2025

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No: KB-2024-002210

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

- and -

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

(2) THE NAMED DEFENDANTS AS SET OUT IN SCHEDULE 2 TO THE AMENDED PARTICULARS OF CLAIM DATED 13 DECEMBER 2024

Defendants

THIRD WITNESS STATEMENT OF ROBERT HODGSON

I, **ROBERT HODGSON**, of Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, **will say as follows:**

1. I am an associate in the firm of Bryan Cave Leighton Paisner ("**BCLP**"). BCLP act for the Claimant ("**Heathrow**") in this matter. I am duly authorised to make this witness statement on behalf of the Claimant. This is my third witness statement in these proceedings.

2. Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge.
3. Where facts and matters referred to in this statement are not within my own knowledge they are based on instructions, documents and information supplied to me in my capacity as solicitor for Heathrow and are true to the best of my knowledge and belief.
4. I refer to a paginated bundle of documents, attached as Exhibit “RH3”. Where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit “RH3”.

Background

5. Pursuant to the Order of Mr Justice Dexter Dias dated 11 December 2024 (the “**Joinder Order**”), the Claimant was required to serve on the Named Defendants (as defined in the Joinder Order):
 - 5.1. the Joinder Order;
 - 5.2. the sealed amended Claim Form dated 13 December 2024; and
 - 5.3. the amended Particulars of Claim dated 13 December 2024,
(together, the “**Documents**”).
6. I make this statement to confirm that the service requirements set out at paragraph 9 of the Joinder Order have been complied with, as set out in further detail below.

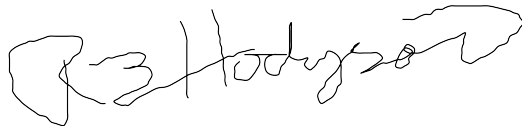
Service of the Documents

7. The Documents have been served (except in relation to Adam Beard, as explained below), by the following methods:
 - 7.1. On 2 January 2025, the Documents were sent by first class post to the each of the Named Defendants at the addresses listed in paragraph 1 of the Joinder Order;
 - 7.2. On 2 January 2025, the Documents were sent by first class post to the relevant prison for the individuals in prison (Rory Wilson, Luke Elson, Luke Watson and Phoebe Plummer);

- 7.3. On 3 January 2025, the Documents were uploaded to the Heathrow website (www.heathrow.com/injunction); and
- 7.4. On 3 January 2025, I sent the Documents by email to info@juststopoil.org (the email address on the JSO website for general enquiries), and juststopoil@protonmail.com and juststopoilpress@protonmail.com (consistent with the emails previously used in relation to the original Injunction Order (as defined in the Joinder Order)).
8. The versions of the Documents uploaded to the Heathrow website and sent by email referred to in paragraphs 6.3 and 6.4 above were redacted in accordance with paragraph 10 of the Joinder Order.
9. I am aware that my colleague Phil Spencer of this firm arranged for a letter to be sent to Mr Beard on 23 December 2025 in accordance with paragraph 3 of the Joinder Order (a copy of this letter is exhibited at **[RH3 1-3]**). The documents provided to Mr Beard enclosed with that letter included the Documents. In order to avoid unnecessary duplication, I therefore did not resend the Documents to Mr Beard.
10. As at the time of filing this statement we have not had any responses apart from a letter from Mr Beard addressed to myself dated 8 January 2025 (a copy of this letter is exhibited at **[RH3 4]**).

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.



.....

Robert Hodgson

20 January 2025

Date: 23 December 2024
Our Ref.: AMRK/PSPE/RHOD/HF4/20H0904.000140
Direct Dial: +44 20 3400 3711
Email: robert.hodgson@bclplaw.com

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London EC4R 0BR
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T: +44 (0)20 3400 1000
F: +44 (0)20 3400 1111
DX92 London
bclplaw.com

FAO: Adam Beard
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

By First Class Post

Dear Adam Beard

Claim Number: KB-2024-002210

HEATHROW AIRPORT LIMITED v PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE PARTICULARS OF CLAIM DATED 7 JULY 2024 (THE "INJUNCTION ORDER")

- 1 We refer to our previous letters of 5 November 2024, sent to you at both this address and to your last known residential address (the "**BCLP Letters**").
- 2 At paragraph 8 of the BCLP Letters, we gave you notice of a Court hearing listed for 11 December 2024 (the "**First Hearing**") to determine the Claimant's application for an order to join you and other individuals as named Defendants to the Injunction Order (the "**Joinder Application**").
- 3 During the First Hearing, an individual who had visited you in prison brought to the Court's attention a letter from you dated 27 November 2024 ("**Your Letter**"). The Court passed a copy of this letter to the Claimant.
- 4 In Your Letter, you confirmed that you had received some paperwork from this firm regarding the above claim, but requested further information. Comments made by the individual who handed up Your Letter suggested at least one concern was the fact you only received black and white documents in prison and therefore could not see the purple edging referred to in the Injunction Order.
- 5 Also at the First Hearing, one proposed named Defendant provided an undertaking to Court such that there was no longer any need to join them. Accordingly, insofar as the Joinder Application related to you, the Court adjourned the hearing. With respect to the remaining proposed named Defendants, the Court granted the Joinder Application and issued a sealed order that joined 24 named individuals to the Injunction Order (the "**Joinder Order**").
- 6 Pursuant to paragraph 3 of the Joinder Order, and in case you did not receive all documents enclosed in the BCLP Letters, we enclose with this letter all relevant documents in relation to the Joinder Application, as directed by the Court and by way of service upon you:
 - (a) Sealed Claim Form (as amended following the Joinder Order);
 - (b) Particulars of Claim (as amended following the Joinder Order);

- (c) Injunction Order;
- (d) Sealed Application Notice for the Joinder Application;
- (e) Joinder Order;
- (f) Second Witness Statement of Akhil Markanday;
- (g) Exhibit AM2; and
- (h) Clearer Black & White Plan A.

- 7 In particular, in relation to item (h) above, given our client's understanding following the First Hearing that the black and white version of the original plan presented a concern, this is a new plan to help you identify the land subject to the Injunction Order. On this plan, the shaded grey area more obviously represents in black and white the extent of the land subject to the Injunction Order (i.e. the thicker outer black line boundary on this plan corresponds to the purple edging on the colour plan, and all shaded grey land falls within the area subject to the Injunction Order).
- 8 In Your Letter, you said you "object to being the subject of a claim" because, amongst other things, you were "arrested at the perimeter fence at Heathrow airport on 24 July 2024". To be clear (and as the new plan should better illustrate by way of its hatched area), the perimeter fence falls well within the land covered by the Injunction Order. Accordingly, by being arrested at the perimeter fence as you admit, in connection with JSO, the Claimant believes you were in breach of the terms of the Injunction Order and it is therefore required to seek to join you as a named Defendant.
- 9 To give the Claimant a chance to re-send you documents and clarify the above, you will see that (pursuant to paragraph 2 of the Joinder Order), the Joinder Application as it relates to you has been adjourned to a further hearing to be listed on the first available after 13 January 2025 (the "**Further Hearing**"). Following this letter, we will write to Court on the Claimant's behalf to request such a listing. As soon as details are known of the Further Hearing, we will write to you again.
- 10 Pursuant to paragraph 3 of the Joinder Order, the Court requires you, if you are so advised, to inform the Court in writing or by a representative in person or at the Further Hearing of:
- (a) What documents you have received from the Claimant;
 - (b) When you received them; and
 - (c) What your position is on the Joinder Application, including whether you oppose it and, if so, the grounds of such opposition.
- 11 We also draw your attention to the wider contents of paragraph 3 of the Joinder Order, pursuant to which the Court has made clear that if you do not respond to the Court's queries as directed above, the Court may proceed in your absence at the Further Hearing without regard for any submissions you may wish to make.
- 12 We recommend that you seek independent legal advice and, as set out in the BCLP Letters, although this is a matter for your own legal counsel, we remind you that you do have a right

against self-incrimination, which may become material in your response to the Claimant's joinder application in light of the potential Contempt of Court proceedings against you.

- 13 A bundle for the Further Hearing will be available before the hearing by way of electronic download. If you wish to receive an electronic copy of the hearing bundle, please email Robert Hodgson (robert.hodgson@bclplaw.com). Copies of other documents relevant to these proceedings are also available at: <https://www.heathrow.com/company/local-community/injunction>.
- 14 Please acknowledge receipt of this letter. We are also happy to answer any questions you may have about the contents of this letter, although as noted above you should seek your own independent legal advice, as we cannot advise you.

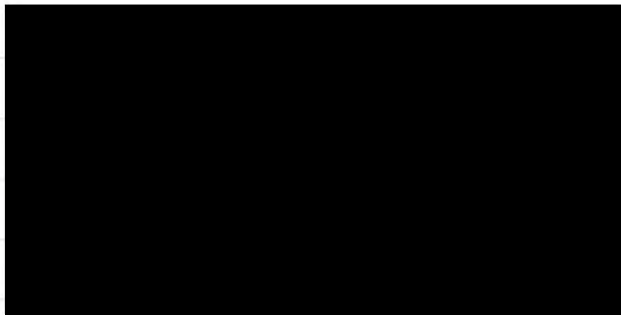
Yours faithfully



Bryan Cave Leighton Paisner LLP

Encs.:

1. Sealed Amended Claim Form
2. Amended Particulars of Claim
3. Injunction Order
4. Sealed Application Notice
5. Joinder Order
6. Second Witness Statement of Akhil Markanday
7. Exhibit AM2
8. Clearer Black & White Plan A


Robert Hodgson
BCLP
Governors House
5 Laurence Pountney Hill
London
EC4R 0BR

8th Jan 2025

Dear Mr. Hodgson

Re: claim Number: KB-2024-002210
Heathrow Airport Limited v. persons unknown

I write to acknowledge receipt of your letter dated 23rd December and the enclosed documents, for which I thank you.

I have written to the court and look forward to hearing the details of the timing of the next hearing when they are known.

Yours sincerely



ADAM BEARD

Made on behalf of the Claimant
Witness: Robert Hodgson
Number of Statement: Fourth
Dated: 21 February 2025

IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KING'S BENCH DIVISION

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

- and -

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

(2) THE NAMED DEFENDANTS AS SET OUT IN SCHEDULE 2 TO THE RE-AMENDED PARTICULARS OF CLAIM DATED 18 FEBRUARY 2025

Defendants

FOURTH WITNESS STATEMENT OF ROBERT HODGSON

I, **ROBERT HODGSON**, of Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, **will say as follows:**

1. I am an associate in the firm of Bryan Cave Leighton Paisner ("**BCLP**"). BCLP act for the Claimant ("**Heathrow**") in this matter. I am duly authorised to make this witness statement on behalf of the Claimant. This is my fourth witness statement in these proceedings.

2. Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge.
3. Where facts and matters referred to in this statement are not within my own knowledge they are based on instructions, documents and information supplied to me in my capacity as solicitor for Heathrow and are true to the best of my knowledge and belief.

Background

4. Pursuant to the Order of Mr Justice Ritchie dated 13 February 2025 (the “**Ritchie Order**”), the Claimant was required to serve on the Third Defendant (as defined in the Ritchie Order):
 - 4.1. the Ritchie Order;
 - 4.2. the sealed re-amended Claim Form dated 18 February 2025; and
 - 4.3. the re-amended Particulars of Claim dated 18 February 2025,
(together, the “**Documents**”).
5. I make this statement to confirm that the service requirements set out at paragraph 6 of the Ritchie Order have been complied with, as set out in further detail below.

Service of the Documents

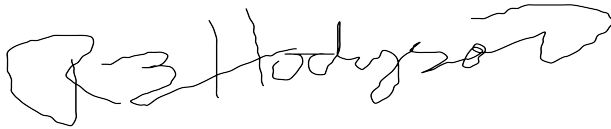
6. The Documents have been served as follows:
 - 6.1. On 20 February 2025, the Documents were sent by first class post to the Third Defendant at the addresses listed in paragraph 1 of the Ritchie Order;
 - 6.2. On 20 February 2025, the Documents were also sent by first class post to H M Prison Wormwood Scrubs (the prison where the Claimant understands the Third Defendant is being held) marked for the attention of the Third Defendant;
 - 6.3. On 21 February 2025, the Documents were uploaded to the Heathrow website (www.heathrow.com/injunction); and
 - 6.4. On 20 February 2025, I sent the Documents by email to info@juststopoil.org (the email address on the JSO website for general

enquiries), and juststopoil@protonmail.com and
juststopoilpress@protonmail.com.

7. The versions of the Documents uploaded to the Heathrow website and sent by email referred to in paragraphs 6.3 and 6.4 above were redacted in accordance with paragraph 7 of the Ritchie Order.

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.



.....

Robert Hodgson

21 February 2025



FAO: Robert Hodgson
Bryan Cave Leighton Paisner
London
EC4R 0BR

By email only: Robert.hodgson@bclplaw.com

VERY URGENT

Dear Sir

Our client: Joe Magowan
KB-2024-002210
Heathrow Airport Limited v Persons Unknown
Hearing: 11 November 2024

We write on behalf of the above-named to invite your client to immediately remove him from the joinder application made in the above proceedings.

We understand that Mr Magowan attended Heathrow Airport on 1 August 2024 in his capacity as a photographer. He did not attend as a protestor, did not participate in any protest, and did not have any protest equipment in his possession, only a point-and-shoot camera.

He was subsequently arrested under section 7 of the Public Order Act 2023 (interfering with the use or operation of key national infrastructure). He has not been charged with any offence, and his bail conditions have been removed. We are not aware of any evidence that Mr Magowan engaged in a breach of section 7. We are of the view that his arrest for the same was unlawful, and are advising him in relation to this.

We understand that the two members of the press covering the protests with Mr Magowan were not arrested and are not subject to these proceedings. We are not aware of any evidence of Mr Magowan "causing a nuisance" and thereby breaching

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A list of directors is available on our website www.dpglaw.co.uk together with a list of those persons who are designated as partners. We use the word 'partner' to refer to a director of the company, or an employee or consultant who is a lawyer with equivalent standing and qualifications.

the terms of the above injunction. It is presumed your client has named him in these proceedings on the basis of his arrest which, as explained, is thought to have been unlawful.

Your client has, by adding Mr Magowan to these proceedings in the absence of any evidence implicating him in a breach of the injunction, caused him considerable distress, not least because he did not breach the injunction and now faces the prospect of being subjected to a costs order which he cannot afford to pay.

Please confirm **as soon as possible**, and in any event by **midday on Tuesday 10 December 2024**, that you will remove Mr Magowan from the above-mentioned joinder application and will not seek to take any action against him in relation to the events of 1 August 2024.

Should your client decline to do this, please provide within the same timeframe any and all evidence your client has demonstrating a breach of the injunction by Mr Magowan.

We look forward to hearing from you.

Yours faithfully

Deighton Pierce Glynn

DEIGHTON PIERCE GLYNN

Date: 10 December 2024
Our Ref.: AMRK/PSPE/20H0904.000140
Your Ref.: Joe Magowan
Direct Dial: +44 20 3400 3119
Email: phil.spencer@bclplaw.com

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FAO: Elliot Bannister
Deighton Pierce Glynn
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EC1R 0BJ

By email only to: EBannister@dpglaw.co.uk

Dear Deighton Pierce Glynn

HIGH COURT CLAIM NUMBER KB-2024-002210

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

We write in response to your letter of 9 December 2024, the contents of which are noted.

The terms of the injunction in question (quoted above), make clear that your client could not, in connection with Just Stop Oil, enter, occupy or remain (without our client's consent – which he did not have) upon 'London Heathrow Airport' as is shown edged purple on the plan referred to.

Your letter suggests that your client admits he was within the land edged purple, without consent, in connection with Just Stop Oil. He was therefore in breach of the injunction.

Accordingly, we consider the joinder application remains right and proper.

However, if your client is willing to provide a suitable undertaking to the Court (in Form N117, and to the satisfaction of the Court) that he will henceforth comply with the injunction as if he were a named respondent to it for so long as the injunction remains in force (as renewed or extended), our client will rely on that and not pursue joinder against your client any further and/or require him to take any further part in these proceedings (unless directed or required to do so by the Court). We also confirm that, if such undertaking is provided, our client will not seek any adverse costs order against yours.

Please therefore supply us with any proposed form of undertaking in time for the hearing if your client wishes to proceed in this manner. You will note from the N117 that the Court will expect your client to appear at the hearing in person or by a solicitor or counsel in order to give such undertaking.

Yours faithfully



Bryan Cave Leighton Paisner LLP