

KINGS BENCH DIVISION

Before: The Honourable [

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

-and-

(1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHER WEALTH INEQUALITY 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-RE-AMENDED PARTICULARS OF CLAIM (AND ALSO ATTACHED TO THIS ORDER AS PLAN A)

(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-RE-AMENDED 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 the injunction made by Order dated 9 July 2024 by Mr Justice Julian Knowles ("the **Knowles J 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 extending the injunction to apply to those named defendants

AND UPON the first annual review of the injunction having taken place on 23 July 2025, and that injunction having been continued until the second review hearing by Order dated 23 July 2025 by Mr Justice Turner ("the **Turner J Order**").

AND UPON the second annual review hearing on 9 July 2026 (as listed pursuant to paragraph 3 of the Knowles J Order)

AND UPON reading the witness evidence filed by the Claimants for the second annual review hearing, in the form of the Third Witness Statement of Philip Keith Spencer dated 15 June 2026

AND UPON the Claimant's application by Application Notice dated 3 July 2026

AND UPON hearing Tom Roscoe, counsel for the Claimants and []

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 and extended to the Named Defendants by the Dias J Order and the Ritchie J Order, but subject to the revisions effected by this Order appearing below

AND UPON the Claimant continuing to give and the Court accepting the undertaking set out in Schedule 1 to this Order

IT IS ORDERED THAT:

Permission to Amend

1. The Claimant has permission to re-re-amend the Re-Amended Claim Form and re-re-amend the Re-Amended Particulars of Claim to: (i) amend the description of the First Defendant; and (ii) plead the basis of the claim against the new category of Defendant added to that description, in the forms appended to the 3 July 2026 Application Notice and approved by the Court in draft at the second review hearing on 9 July 2026.
2. The Claimant shall file the Re-Re-amended Claim Form and Re-Re-amended Particulars of Claim and serve or notify the Defendants of the Re-Re-amended Claim Form and Re-Re-amended Particulars of Claim following receipt of sealed copies from the Court in accordance with the steps identified in paragraph 10 and 16 below.
3. The Knowles J Order, paragraph 4 of the Dexter Dias J Order and paragraph 2 of the Ritchie J Order shall be replaced by this Order and, upon sealing of this Orders, those orders or parts thereof shall be discharged from further effect.

INJUNCTION

4. 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**”).
5. In respect of paragraph 4, 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.
6. The injunction set out at paragraph 4 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

7. 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.

8. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
9. The Claimant has liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Re-Re-Amended Claim Form, Re-Re-Amended Particulars of Claim and a Note of the Hearing on 9 July 2026 will be notified to the First Defendant by the Claimant carrying out each of the following steps:

10.1 Uploading a copy 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 a claim has been brought and an application made and that the documents can be found at the website referred to above.

11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to the First Defendant by the Claimant carrying out each of the following steps:

11.1 Uploading a copy of the Order on to the following website:
www.heathrow.com/injunction

11.2 Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.

11.3 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 the second plan attached to this Order at Schedule 4 ("**Plan B**").

11.4 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.

12. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to the First Defendant of any further applications shall be effected by the Claimant carrying out each of the following steps:
 - 12.1 Uploading a copy of the application on to the following website:
www.heathrow.com/injunction
 - 12.2 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.
 - 12.3 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.
13. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to the Defendant may be effected by carrying out the steps set out in paragraphs 12.1 and 12.2 only.
14. In respect of paragraphs 10 to 12 above, effective notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.
15. For the avoidance of doubt, in respect of the steps referred to at paragraphs 10.3 and 12.3, effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.
16. Pursuant to CPR r.6.15 and 6.27, it is directed that service of this Order and any further document(s) to be served in these proceedings shall be effected on Defendants 2 – 26 as follows:
 - 16.1 by first class post to the addresses listed in the Re-Amended Particulars of Claim dated 18 February 2025;
 - 16.2 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;

16.3 in either case, by email to the email addresses listed in Schedule 3 to this Order;
and

16.4 by posting copies on to the following website: www.heathrow.com/injunction.

17. Copies of the documents emailed or posted in accordance with paragraphs 16.3 and 16.4 above shall be redacted to remove the addresses of the Defendants.
18. The steps taken pursuant to paragraph 16 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.
19. 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

20. Liberty to apply.

COSTS

21. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

22. 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

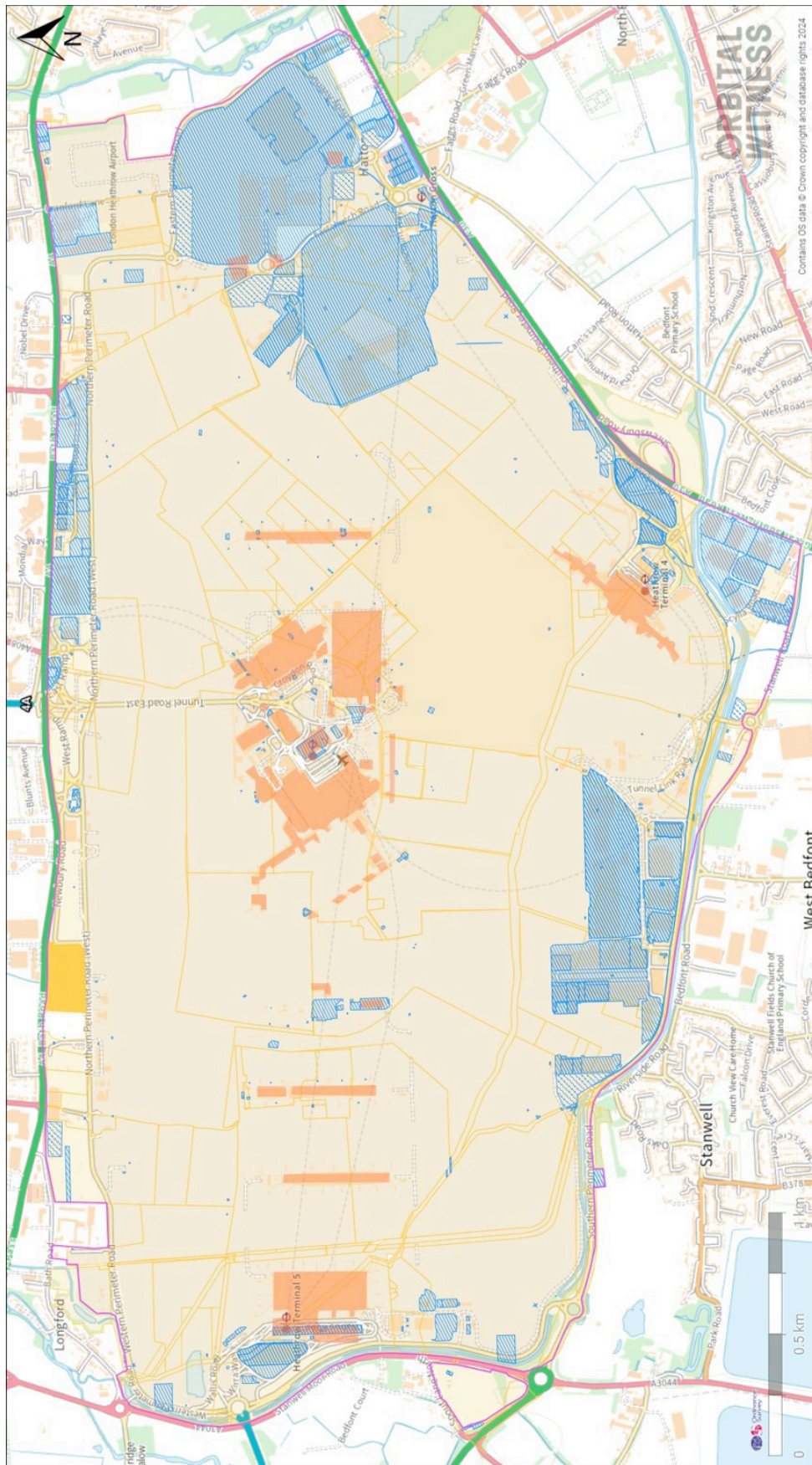
Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

Dated: 9 July 2026

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 1 of this Order has caused loss to a Defendant and the Court finds that the 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
4. press@takebackpower.net
5. info@takebackpower.net

The map provides a comprehensive overview of Heathrow Airport's layout. Key features include:

- Terminals and MSCPs:** Terminal 1, Terminal 2, Terminal 3, Terminal 4, Terminal 5, MSCP 1, MSCP 2, MSCP 3, MSCP 4, MSCP 5, MSCP 5B, MSCP 5C, and MSCP 5D.
- Cargo and Business Centers:** BA World Cargo, DHL, and various business centers like the Compass Centre and Long Stay.
- Infrastructure:** The M4 and M25 interchanges, the Main Tunnel, and various access roads like Stanwell Moor Road and Western Perimeter Road.
- Other Buildings:** Tech Block A through K, the Hilton hotel, and the Virgin Atlantic building.

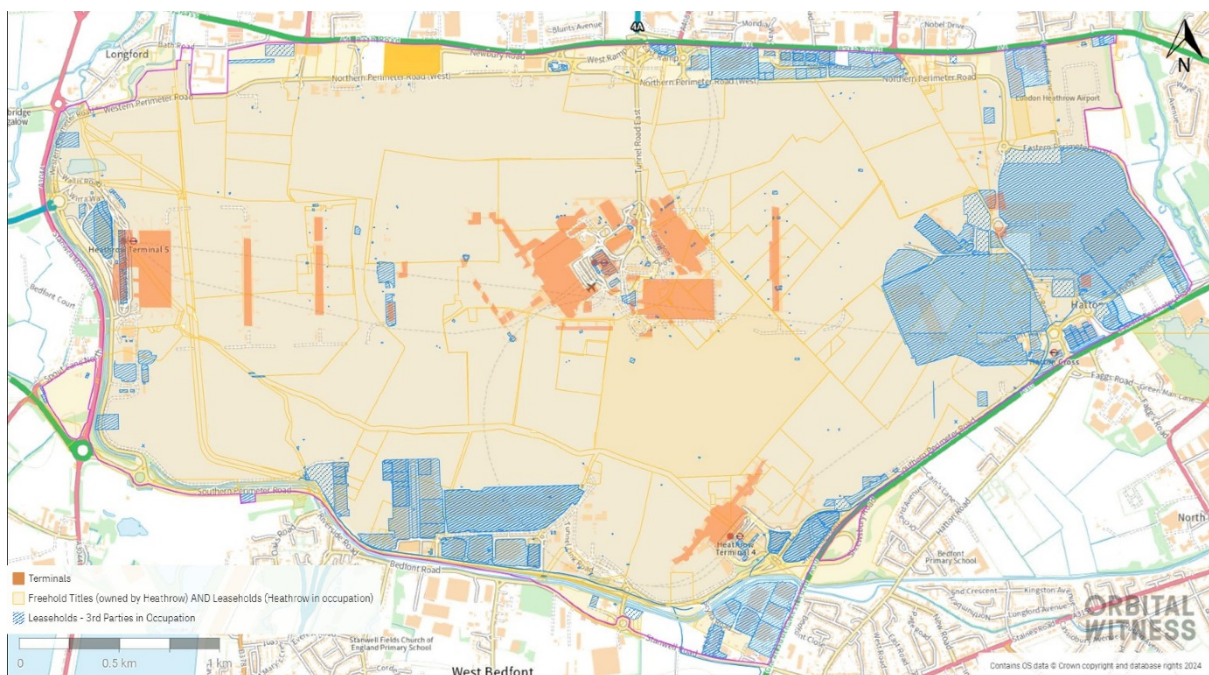
The map is a detailed site plan showing the layout of Heathrow Airport, including terminals, cargo buildings, and surrounding infrastructure. It is oriented with North at the top.

SCHEDULE 5 – NOTICE

WARNING – NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION re-granted in Claim No KB-2024-002210 on 9 July 2026 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 OR TAKE BACK POWER OR OTHER WEALTH INEQUALITY 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 Orders, Re-Re-Amended Claim Form, Re-Re-Amended Particulars of Claim, Application Notices, evidence in support and a note of the hearings in these proceedings on 9 July 2024 & 9 July 2026 a transcript of the Judgment dated 23 July 2025) 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.