

NOTICE OF AMENDED ORDERS

CLAIM NO. QB-2022-001098

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

CLAIMANTS

-and-

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

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

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON **SO45 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')**

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

- (4) PAUL BARNES
(5) DIANA HEKT

DEFENDANTS

29 January 2025

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

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

To whom it may concern

We enclose, by way of service:

- (a) the amended orders of Mrs Justice Ellenbogen DBE dated 29 January 2024 (the **first Ellenbogen Order**), Mrs Justice Tipples DBE dated 10 July 2024 (the **Tipples Order**) and Mrs Justice Farbey DBE dated 15 August 2024 (the **Farbey Order**) (together, the **Orders**); and
- (b) the Claimants' without notice application dated 13 December 2024 to correct the postcode for the Fawley site in each of the Orders (the **Application**)

in relation to the Operating Sites injunction that the Claimants have sought and been granted against various Defendants connected to the Extinction Rebellion or Just Stop Oil campaigns with claim number QB-2022-001098.

The Orders and the Application are being served in the same method as prescribed at paragraphs 12 to 15 of the first Ellenbogen Order and paragraph 5 of the Tipples Order, as varied by paragraph 2 of the Farbey Order.

Copies of the Orders and the Application may be obtained from Norton Rose Fulbright LLP at the address stated above (Ref: Holly Stebbing, tel: 020 7283 6000) or by emailing ExxonMobil.Service@nortonrosefulbright.com. This notice, the Orders and the Application can also be viewed at <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Enc.

BEFORE: THE HONOURABLE MRS JUSTICE ELLENBOGEN DBE
On 21 January 2025

B E T W E E N:



QB-2022-001098

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

Claimants

-and-

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

(A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')

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

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

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

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

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

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

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

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED ‘FAWLEY PLAN’)

(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS’ PROPERTY AND OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES (WHERE “SITES” FOR THIS PURPOSE DOES NOT INCLUDE THE AREA EDGED BROWN ON THE PURFLEET PLAN)

(4) PAUL BARNES

(5) DIANA HEKT

Defendants

ORDER

RECITALS

FOLLOWING the orders made, respectively, by:

- (a) Ellenbogen J, on 29 January 2024 (‘the first Ellenbogen Order’);
- (b) Tipples J, on 10 July 2024 (‘the Tipples Order’); and
- (c) Farbey J, on 15 August 2024 (‘the Farbey Order’)

AND UPON the Claimants’ application, without notice, by letter dated 13 December 2024, to correct the postcode in each of the above orders for the following sites, from SO45 1TH to SO45 1TX, pursuant to CPR 40.12:

- (a) The Oil Refinery And Jetty at The Petrochemical Plant, Marsh Lane, Southampton; and
- (b) The Chemical Plant, Marsh Lane, Southampton

AND UPON that application being referred to Ellenbogen J, Tipples J and Farbey J, for each judge to consider it in so far as it relates to the order which she had previously made

AND UPON it appearing that: (a) the application seeks to correct a minor error in the first Ellenbogen Order; and, accordingly, (b) a hearing would not be appropriate; and (c) the slip is obvious, such that the application need not be made on notice

IT IS ORDERED THAT:

1. The first Ellenbogen Order is amended under CPR 40.12, in the form annexed to this order, at Appendix 1.
2. A copy of this Order; of the first Ellenbogen Order, as amended under CPR 40.12; and of the Claimants' application dated 13 December 2024 is to be served on all Defendants in accordance with paragraphs 12 to 15 of the first Ellenbogen Order, and with paragraph 5 of the Tipples Order, as varied by paragraph 2 of the Farbey Order.
3. A Defendant who was not served with a copy of the Claimant's application before this Order was made may apply to have this Order set aside or varied under CPR 23.10. Any such application must be made within 7 days after the date on which this Order was served on that person, or, in the case of the First to Third Defendants, deemed to have been served (in accordance with paragraph 13 of the first Ellenbogen Order).
4. There be no order as to costs.

THE COURT

5. The Court will provide sealed copies of this Order, for service, to the Claimants' solicitors, whose details are set out in paragraphs 12.1 and 15.1 of the first Ellenbogen Order.
6. All communications to the Court about this Order should be sent to:
 - King's Bench Division, Royal Courts of Justice, Strand WC2A 2LL
 - The office is open between 10.00am and 4.30pm Monday to Friday (except Bank Holidays)
 - The telephone number is 020 7947 6000
 - The email address is kjudgeslistingoffice@justice.gov.uk

Dated this 21st day of January 2025

By the Court

Amended under the Slip Rule CPR 40.12 dated 21st January 2025 was a & approved by Mrs justice Ellenbogen.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. OB-2022-001098

BEFORE: THE HONOURABLE MRS JUSTICE ELLENBOGEN DBE
On 29 January 2024

B E T W E E N:



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

Claimants

-and-

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

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

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

**SOUTHAMPTON SO45 1TX (AS SHOWN FOR IDENTIFICATION EDGED
PURPLE ON THE ATTACHED 'FAWLEY PLAN')**

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

(4) PAUL BARNES

(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANT

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

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

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

RECITALS

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

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

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

- (1) pursuant to paragraph 9 of the Linden Order, for a review of that order in light of the above judgment of the Supreme Court; and
- (2) for a variation of the Linden Order (a) to remove the Hartland Park site from the scope of that order, and (b) to amend the area comprising the Birmingham Terminal, as shown in the ‘Birmingham Plan’ attached to that order.

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

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

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

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

AND UPON the Court further being satisfied that:

- (1) the judgment of the Supreme Court has marked no material change in the law in relation to injunctions of the nature granted by Linden J; and
- (2) the removal of the Hartland Park site from the scope of the Linden Order and the amendment of the Birmingham Plan are appropriate, for the reasons set out by the Claimants

IT IS ORDERED THAT:

NAMED DEFENDANTS

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

THE INJUNCTIONS

- 2 Until 11 July 2028, or further order in the meantime, the First Defendant must not:
 - 2.1 enter or remain upon any part of the First Claimant's properties ("the Sites") without the consent of the First Claimant at:
 - (1) the Oil Refinery and Jetty at the Petrochemical Complex, Marsh Lane, Southampton **SO45 1TX** (as shown for identification edged red and green but excluding those areas edged blue on the attached 'Fawley Plan').

- (2) Hythe Terminal, New Road, Hardley, SO45 3NR (as shown for identification edged red on the attached 'Hythe Plan').
- (3) Avonmouth Terminal, St Andrews Road, Bristol BS11 9BN (as shown for identification edged red on the attached 'Avonmouth Plan').
- (4) Birmingham Terminal, Wood Lane, Birmingham B24 8DN (as shown for identification edged red on the attached, revised 'Birmingham Plan').
- (5) Purfleet Terminal, London Road, Purfleet, Essex RM19 1RS (as shown for identification edged red and brown on the attached 'Purfleet Plan').
- (6) West London Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ (as shown for identification edged red on the attached 'West London Plan').
- (7) Alton Compound, Pumping Station, A31, Hollybourne (as shown for identification edged red on the attached 'Alton Compound Plan')

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

- 2.2 damage any part of any of the Sites;
 - 2.3 affix themselves or any person or object to any part of any of the Sites;
 - 2.4 erect any structures on any part of any of the Sites;
- 3 Until 11 July 2028, or further order in the meantime, the Second Defendant must not without the consent of the First Claimant or Second Claimant:

- 3.1 enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TX ("the Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');
 - 3.2 damage any part of the Chemical Plant;
 - 3.3 affix themselves or any person or object at the Chemical Plant;
 - 3.4 erect any structures on any part of the Chemical Plant;
- 4 Until 11 July 2028, or further order in the meantime, the Third Defendant must not enter onto the Claimants' property and obstruct any of the vehicular entrances or exits to any of the Sites (where "Sites" for this purpose does not include the area edged brown on the Purfleet Plan, or Hartland Park Logistics Hub) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

VARIATION OR DISCHARGE OF THIS ORDER

- 5 The Defendants may apply to vary or discharge this Order at any time upon giving not less than 3 clear days' notice to the Claimant's solicitors, Norton Rose Fulbright LLP, by emailing ExxonMobil.Service@nortonrosefulbright.com. Any evidence to be relied upon in support of such an application must be communicated in writing to the Claimants' solicitors at least 2 clear days before the hearing.
- 6 Any person applying to vary or discharge this Order must provide his or her full name and address, an address for service.
- 7 The Claimants have liberty to apply.

REVIEW HEARINGS

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

- 9 The Claimants shall file and serve a trial bundle not less than 7 days before the review hearing.
- 10 Skeleton arguments on behalf of any represented party shall be lodged and exchanged, with bundle of authorities, not less than 3 days before the review hearing.

INTERPRETATION OF THIS ORDER

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

SERVICE OF THIS ORDER

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

- 12.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that a copy of the Order may be obtained from the Claimants' solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email: ExxonMobil.Service@nortonrosefulbright.com; and (b) that a copy of the Order may be viewed at the website referred to in Paragraph 12.2 of this Order;

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

- 12.3 fixing a minimum of four large warning notices in the forms annexed to this Order at Schedule 2 in conspicuous places around the perimeters of the Sites. Such notices must be a minimum of A2 size; and

- 12.4 sending an email to each of the following email addresses: (i) with the information that a copy of the Order may be viewed at the website referred to in Paragraph 12.2 of this Order; and/or (ii) enclosing a copy of this Order (whether by Mimecast link or otherwise):

- (a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

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

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

SERVICE OF OTHER DOCUMENTS

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

15.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that copies of the Further Documents may be obtained from the Claimants’ solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email: ExxonMobil.Service@nortonrosefulbright.com; and (b) that copies of the Further Documents may be viewed at the website referred to in Paragraph 15.2 of this Order;

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

15.3 sending an email to each of the following email addresses: (i) with the information that copies of the Further Documents may be viewed at the website referred to in Paragraph 15.2 of this Order; and/or (ii) enclosing copies of the Further Documents (whether by Mimecast link or otherwise):

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

- 15.4 Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the Further Documents shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in Paragraph 15 above have been completed.
- 15.5 Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 15 of this Order shall stand as good service of the Further Documents on the First, Second and Third Defendants.
- 15.6 Pursuant to CPR 81.4(2)(c) and (d), the Court dispenses with the requirement for personal service in relation to the Fifth Defendant.

COSTS

16 No order as to costs.

THE COURT

17 The Court will provide sealed copies of this Order for service to the Claimants' solicitors, whose details are set out in Paragraphs 12.1 and 15.1 of this Order.

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

- King's Bench Division, Royal Courts of Justice, Strand WC2A 2LL
- The office is open between 10.00am and 4.30pm Monday to Friday (except Bank Holidays)
- The telephone number is 020 7947 6000
- The email address is kjudgeslistingoffice@justice.gov.uk

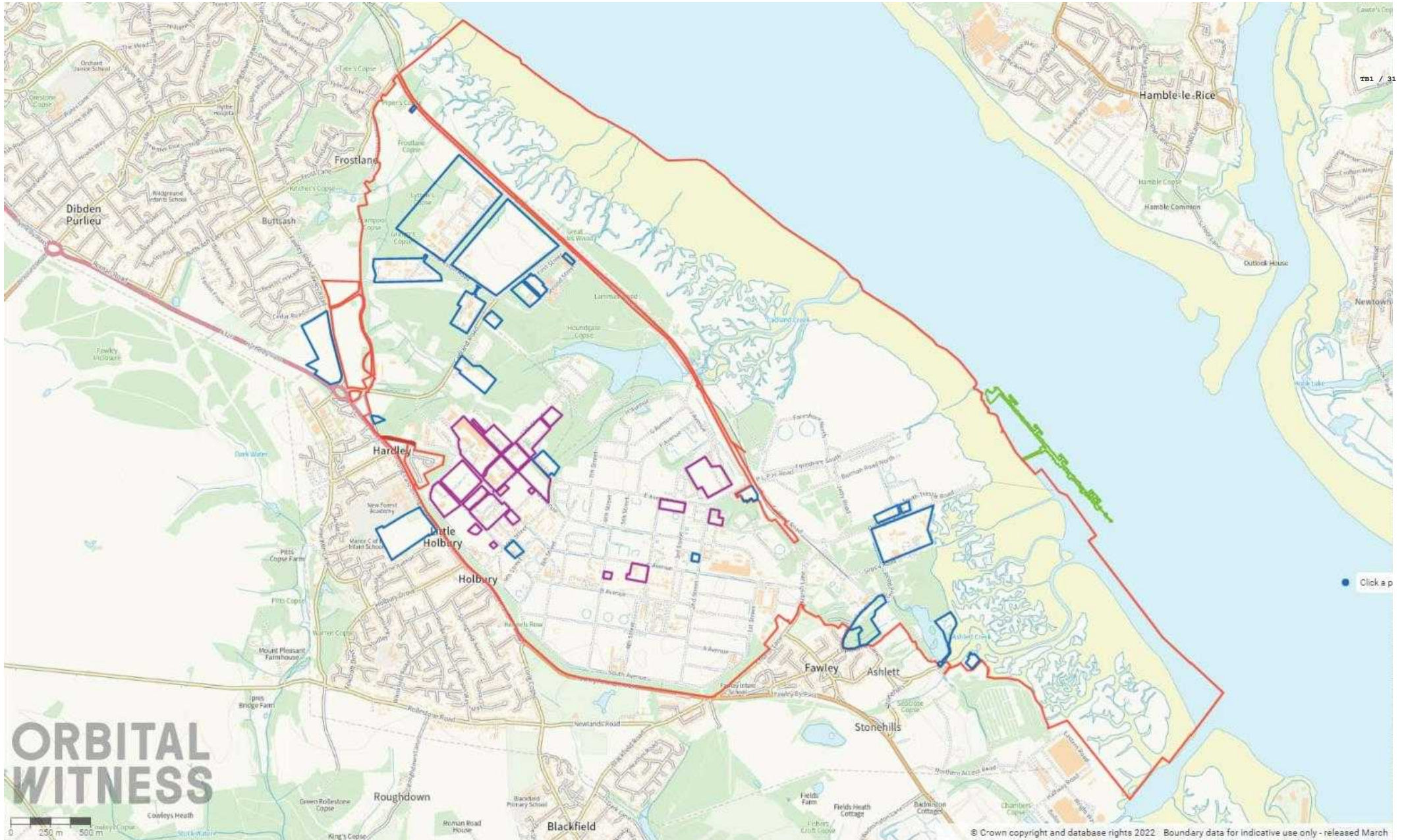
SERVICE OF THE ORDER

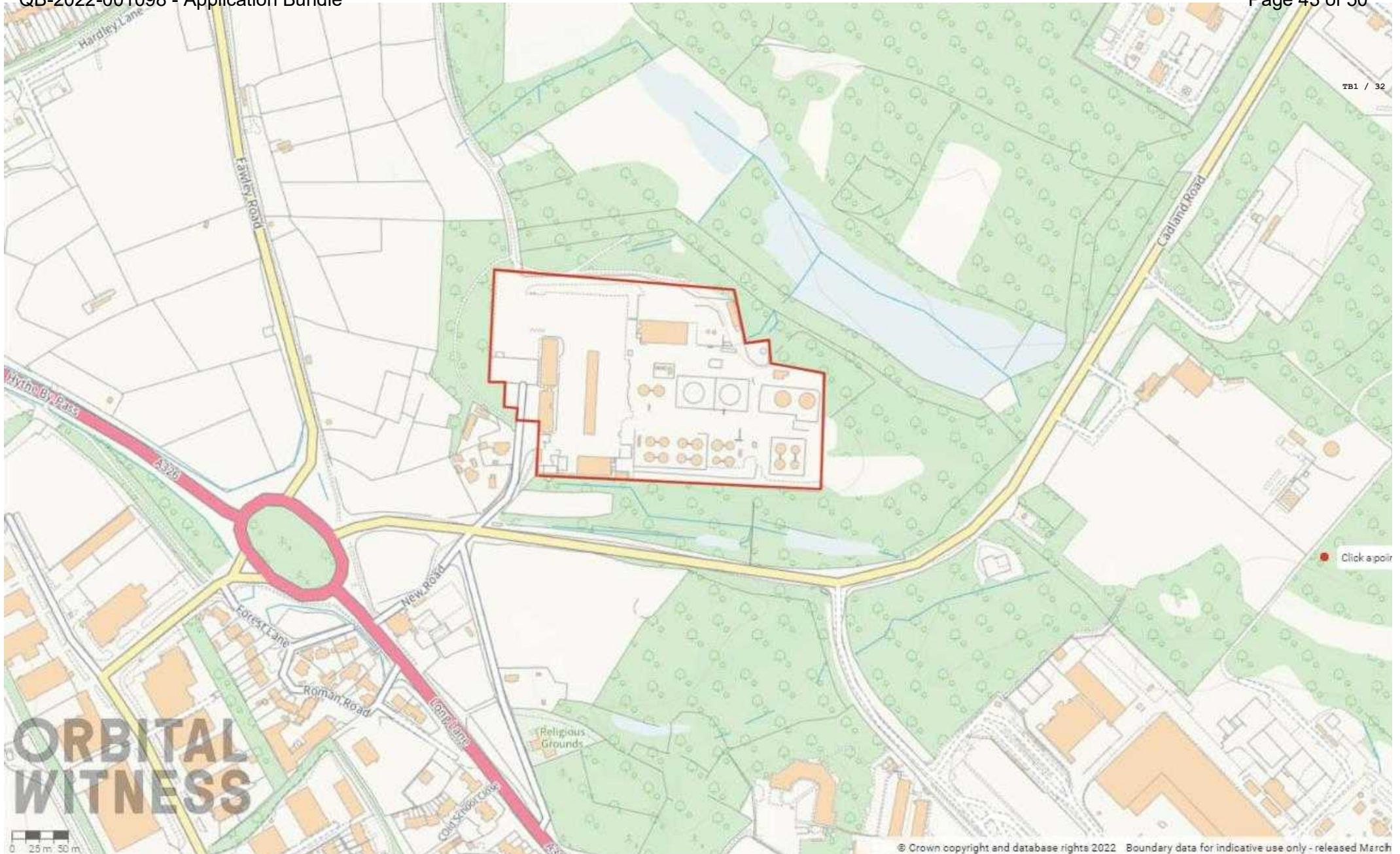
19 This Order shall be served by the Claimants on all Defendants. 29

January 2024

SCHEDULE 1 - Plans

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





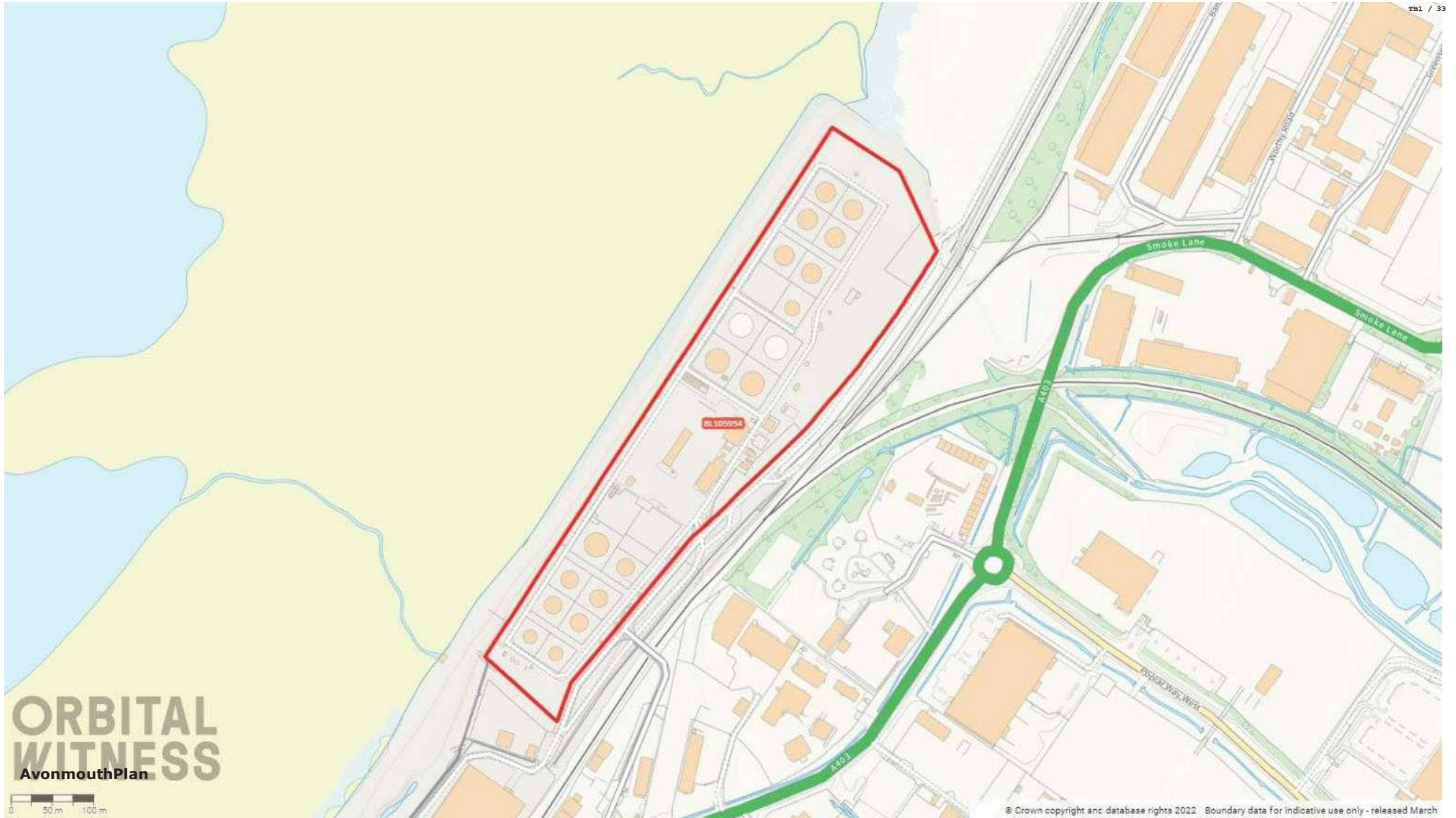
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**ORBITAL
WITNESS**

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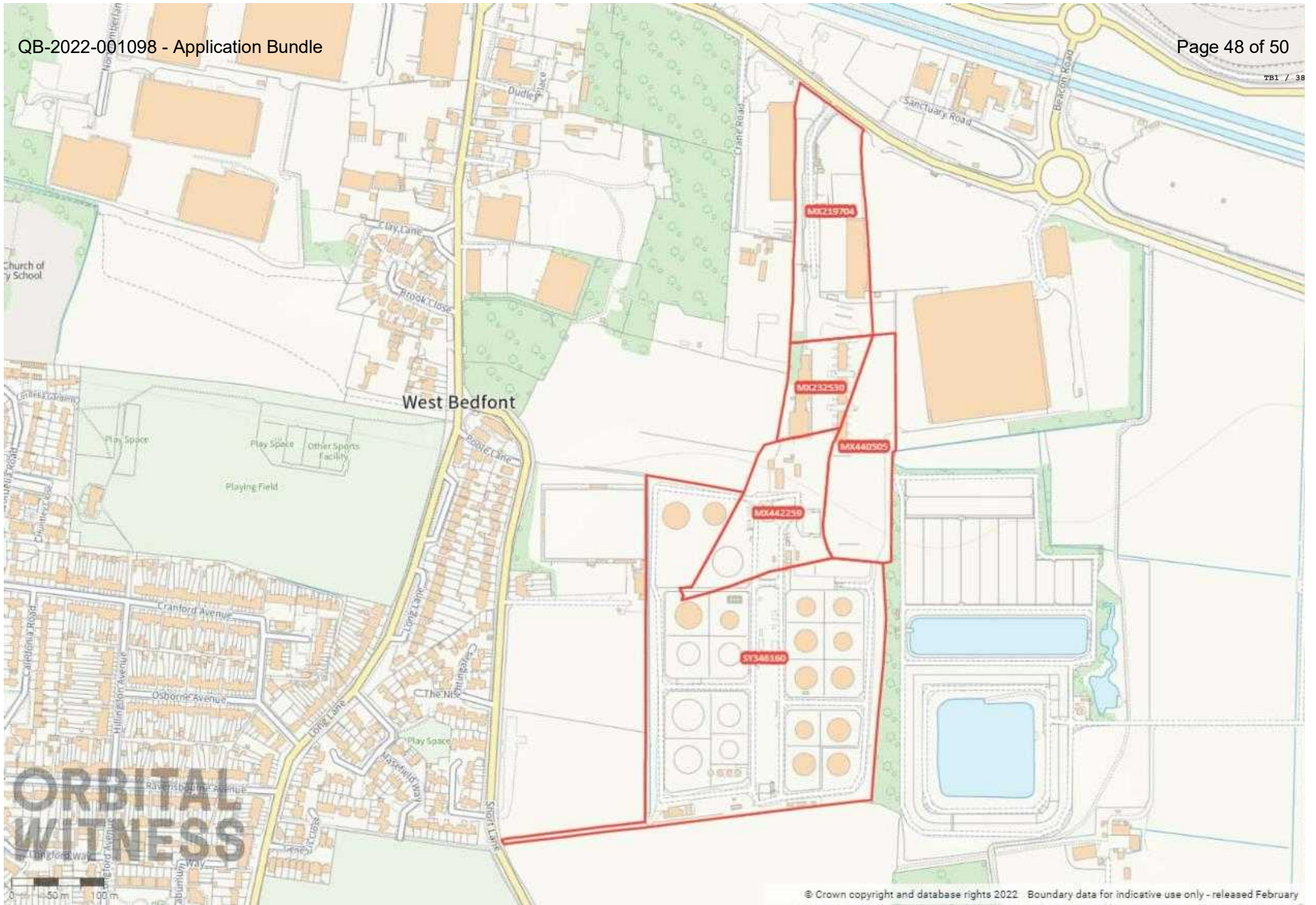
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PurfleetPlan B



**ORBITAL
WITNESS**

West London Plan



SCHEDULE 2 – Warning Notice

ESSO PETROLEUM COMPANY, LIMITED (First Claimant)
EXXONMOBIL
CHEMICAL LIMITED (Second
Claimant) Important Notice
High Court of Justice – Claim No QB-2022-001098

On 29 January 2024, an injunction was made by the High Court of Justice in the proceedings referred to above concerning this Site.

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

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

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

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

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

Copies may also be obtained from ExxonMobil.Service@nortonrosefulbright.com.

The injunction applies to the following Sites:-

- The Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Fawley, Southampton
SO45 1TX
- Hythe Oil Terminal, New Road, Hardley SO45 3NR
- Avonmouth Oil Terminal, St Andrews Road, Bristol BS11 9BN
- Birmingham Oil Terminal, Wood Lane, Birmingham B24 8DN
- Purfleet Oil Terminal, London Road, Purfleet, Essex RM19 1RS
- West London Oil Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ
- Alton Compound, Pumping Station, A31, Holybourne

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
Mrs Justice Tipples
Wednesday 10 July 2024
B E T W E E N:**

CLAIM NO. QB-2022-001098



QB-2022-001098

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

Claimants

-and-

- (1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT) UPON ANY OF THE FOLLOWING SITES ("THE SITES")**
 - (A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')**
 - (B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')**
 - (C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')**
 - (D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')**
 - (E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN')**
 - (F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED**

- (G) RED ON THE ATTACHED 'WEST LONDON PLAN')
 - (H) ~~HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
 - (I) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')
- (2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON **SO45 1TX** (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')
- (3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES (WHERE "SITES" FOR THIS PURPOSE DOES NOT INCLUDE THE AREA EDGED BROWN ON THE PURFLEET PLAN)
- (4) PAUL BARNES
 - (5) DIANA HEKT

Defendants

ORDER

RECITALS

UPON the Order of Linden J, dated 18 July 2023 (as amended on 21 July 2023 and 16 October 2023) granting the Claimants final injunctive relief until 11 July 2028 (the “**Linden Order**”)

AND UPON the Order of Ellenbogen J, dated 29 January 2024, maintaining the relief granted in the Linden Order but superseding that Order following a review in light of the Supreme Court judgment in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45 (the “**Ellenbogen Order**”)

AND UPON a review hearing being listed on 10 July 2024 for a review of the Linden Order, pursuant to paragraph 10 of Linden Order, and the Ellenbogen Order, pursuant to paragraph 8 of the Ellenbogen Order (the “**Review Hearing**”)

AND UPON reading the evidence and the Claimants’ skeleton argument

AND UPON hearing Timothy Morshead KC and Yaaser Vanderman for the Claimants and the Defendants not appearing

AND UPON the Court being satisfied that proper and effective service of the Ellenbogen Order, pursuant to paragraph 12 of the Ellenbogen Order, and the documents prepared for the Review Hearing, pursuant to the steps set out in paragraph 15 of the Ellenbogen Order, had been effected on all Defendants

AND UPON the Court reviewing the Linden and Ellenbogen Orders and being satisfied that, in respect of the First to Third Defendants, there had been no material change in circumstances warranting amendments to, or the setting aside of, the relief granted in the Linden and Ellenbogen Orders

AND UPON the Claimants having received assurances from Diana Hekt that she does not intend to breach any injunction covering the Sites (as defined in the Ellenbogen Order) but not having received any response from Paul Barnes

IT IS ORDERED THAT:

1. Subject to the below, no order be made as to the continuing effect of the Ellenbogen Order.

Amended by Mrs Justice Tipples under the slip rule (CPR 40.12) dated 10 July 2024

1. In view of the assurance given by her mentioned above, expiring on 30 June 2025, the Fifth Defendant (Diana Hekt) is not to be subject to the injunctions set out in the Linden and Ellenbogen Orders, without further order.
2. The Fourth Defendant (Paul Barnes) is not to be subject to the injunctions set out in the Linden and Ellenbogen Orders, but the Claimants have liberty to apply to make him subject to those injunctions in the absence of receiving assurances from him to like effect as those given by him in June 2023 and lasting until at least 30 June 2025.
3. This Order shall be served on the First to Third Defendants pursuant to paragraph 15 of the Ellenbogen Order.
4. This Order shall be served on the Fourth and Fifth Defendants by email, pursuant to paragraphs 2 and 3 of the Consent Order sealed on 19 July 2023.

Dated: 10 July 2024

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BEFORE: JUSTICE FARBEY

CLAIM NO. QB-2022-001098

B E T W E E N:



QB-2022-001098

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

Claimants

-and-

- (1) **PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT) UPON ANY OF THE FOLLOWING SITES ("THE SITES")**
- (A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON **SO45 1TX** (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
- (B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
- (C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
- (D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
- (E) PURFLEET OIL TERMINAL, LONDON ROAD,

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IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED
'PURFLEET PLAN')
(F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
(G) ~~HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')~~
(H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')
(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')
(3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES (WHERE "SITES" FOR THIS PURPOSE DOES NOT INCLUDE THE AREA EDGED BROWN ON THE PURFLEET PLAN)
(4) PAUL BARNES
(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

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

Any other person who knows of this order and does anything which helps or permits the Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE FOURTH DEFENDANT

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

You should read it very carefully.

UPON the **Fourth Defendant** having agreed to an order in the terms set out below

AND UPON the **Fourth Defendant** giving undertakings to the Court as set out below

AND UPON the Order of Tipples J dated 10 July 2024 making no order as to the continuing effect of the Ellenbogen Order; and

IT IS ORDERED THAT:

1. There be no order as to costs.
2. Pursuant to CPR r.6.15, r.6.27 and r.81.4(2)(c)-(d), service of this Order and any subsequent court documents in these proceedings on the Fourth Defendant may be effected by alternative means by email to PBHPXR@protonmail.com, and/or by an email to PBHPXR@protonmail.com referencing that the documents can be found at <https://www.exxonmobil.co.uk/company/overview/uk-operations>, and such service shall be deemed to be good and sufficient service on the Fourth Defendant. Any such document shall be deemed served on the date the email is sent.

UNDERTAKINGS TO THE COURT

The **Fourth Defendant** undertakes to the Court promising as follows:

3. Not to:

- (a) enter or remain on any part of the Sites (as defined above) without the Consent of the First Claimant.
 - (b) damage any part of any of the Sites;
 - (c) affix themselves or any person or object to any part of any of the Sites;
 - (d) erect any structures on any part of any of the Sites.
4. Not to:
- (a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TX (the "Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');
 - (b) damage any part of the Chemical Plant;
 - (c) affix themselves or any person or object at the Chemical Plant;
5. Not to enter onto the Claimants' property and obstruct any of the vehicular entrances or exits to any of the Sites (where "Sites" for this purpose does not include the area edged brown on the Purfleet Plan) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THESE PROMISES UNTIL 30 June 2025

STATEMENT

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

Paul Barnes Fourth Defendant
_____ July 2024

We consent to an order in these terms

Norton Rose Fulbright LLP Solicitors for the Claimants
----- July 2024

THE HON MRS JUSTICE FARBEY 15/08/2024 (NB: SIGNATURE OF PAUL BARNES AND OF NORTON ROSE FULBRIGHT VIEWED ON PDF VERSION AND ACCEPTED)

STATEMENT

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

Paul Barnes Fourth Defendant

July 2024

We consent to an order in these terms

Norton Rose Fulbright LLP Solicitors for the Claimants

July 2024

THE HON MRS JUSTICE FARBEY 15/08/2024 (NB: SIGNATURE OF PAUL BARNES AND OF NORTON ROSE FULBRIGHT VIEWED ON PDF VERSION AND ACCEPTED)

QB-2022-001098

**ORBITAL
WITNESS**

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Fawley Plan

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**Fawley
Plan**

13 December 2024

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

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

By: CE File

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

Direct line
+44 20 7444 2441

Email
Scott.Speirs@nortonrosefulbright.com

Your reference
QB-2022-001098

Our reference
HMOR/1001309345

Attention: Court Manager

Dear Court Manager

Claim Number QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited v Person Unknown & Ors

We act for the Claimants in this claim.

We refer to the Order of Mrs Justice Ellenbogen DBE dated 29 January 2024 (the **Ellenbogen Order**), the Order of Mrs Justice Tipples DBE dated 10 July 2024 (the **Tipples Order**) and the Consent Order dated 15 August 2024 (the **Consent Order**) (together the **Relevant Orders**).

The Claimants have discovered a typographical error in the description of the sites referred to as the "Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Southampton" (the **Oil Refinery and Jetty**) and the "Chemical Plant, Marsh Lane, Southampton" (the **Chemical Plant**) in the Relevant Orders. The postcode for both sites is incorrectly stated to be "SO45 1TH". The correct postcode for both sites is "SO45 1TX".

The incorrect postcode is used:

1. in the titles of the Relevant Orders when describing the First Defendant at (1)(A) and the Second Defendant at (2);
2. at paragraphs 2.1(1) and 3.1, and Schedule 2 of the Ellenbogen Order; and
3. at paragraph 4(a) of the Consent Order,

together the **Errors**.

Pursuant to Civil Procedure Rule 40.12 and paragraph 4 of Practice Direction 40B, we request that the Errors be amended under the slip rule to reflect the correct postcodes in the Relevant Orders as follows:

Reference	Error	Correction
Ellenbogen Order, title of the First Defendant at (1)(A)	"SO45 1TH"	"SO45 1TX"
Ellenbogen Order, title of the Second Defendant at (2)	"SO45 1TH"	"SO45 1TX"
Ellenbogen Order, paragraph 2.1(1)	"SO45 1TH"	"SO45 1TX"
Ellenbogen Order, paragraph 3.1	"SO45 1TH"	"SO45 1TX"
Ellenbogen Order, Schedule 2	"SO45 1TH"	"SO45 1TX"
Tipples Order, title of the First Defendant at (1)(A)	"SO45 1TH"	"SO45 1TX"
Tipples Order, title of the Second Defendant	"SO45 1TH"	"SO45 1TX"
Consent Order, title of the First Defendant at (1)(A)	"SO45 1TH"	"SO45 1TX"
Consent Order, title of the Second Defendant	"SO45 1TH"	"SO45 1TX"
Consent Order, paragraph 4(a)	"SO45 1TH"	"SO45 1TX"

We enclose a draft Ellenbogen Order, Tipples Order and Consent Order, amended to reflect the Claimants' request, for the Court's approval.

In the event that the draft orders are approved, we look forward to receiving sealed versions in due course and we will serve on the Defendants pursuant to paragraph 15 of the Ellenbogen Order and paragraphs 4 and 5 of the Tipples Order.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright

Enclosures

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. OB-2022-001098

BEFORE: THE HONOURABLE MRS JUSTICE ELLENBOGEN DBE
On 29 January 2024

B E T W E E N:

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

Claimants

-and-

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

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

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON **SO45 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')**

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

- (4) PAUL BARNES**
(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANT

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

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

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

RECITALS

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

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

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

- (1) pursuant to paragraph 9 of the Linden Order, for a review of that order in light of the above judgment of the Supreme Court; and
- (2) for a variation of the Linden Order (a) to remove the Hartland Park site from the scope of that order, and (b) to amend the area comprising the Birmingham Terminal, as shown in the ‘Birmingham Plan’ attached to that order.

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

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

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

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

AND UPON the Court further being satisfied that:

- (1) the judgment of the Supreme Court has marked no material change in the law in relation to injunctions of the nature granted by Linden J; and
- (2) the removal of the Hartland Park site from the scope of the Linden Order and the amendment of the Birmingham Plan are appropriate, for the reasons set out by the Claimants

IT IS ORDERED THAT:

NAMED DEFENDANTS

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

THE INJUNCTIONS

- 2 Until 11 July 2028, or further order in the meantime, the First Defendant must not:
 - 2.1 enter or remain upon any part of the First Claimant's properties ("the Sites") without the consent of the First Claimant at:
 - (1) the Oil Refinery and Jetty at the Petrochemical Complex, Marsh Lane, Southampton SO45 1TX (as shown for identification edged red and green but excluding those areas edged blue on the attached 'Fawley Plan').

- (2) Hythe Terminal, New Road, Hardley, SO45 3NR (as shown for identification edged red on the attached 'Hythe Plan').
- (3) Avonmouth Terminal, St Andrews Road, Bristol BS11 9BN (as shown for identification edged red on the attached 'Avonmouth Plan').
- (4) Birmingham Terminal, Wood Lane, Birmingham B24 8DN (as shown for identification edged red on the attached, revised 'Birmingham Plan').
- (5) Purfleet Terminal, London Road, Purfleet, Essex RM19 1RS (as shown for identification edged red and brown on the attached 'Purfleet Plan').
- (6) West London Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ (as shown for identification edged red on the attached 'West London Plan').
- (7) Alton Compound, Pumping Station, A31, Hollybourne (as shown for identification edged red on the attached 'Alton Compound Plan')

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

- 2.2 damage any part of any of the Sites;
- 2.3 affix themselves or any person or object to any part of any of the Sites;
- 2.4 erect any structures on any part of any of the Sites;

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

- 3.1 enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TX ("the Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');
 - 3.2 damage any part of the Chemical Plant;
 - 3.3 affix themselves or any person or object at the Chemical Plant;
 - 3.4 erect any structures on any part of the Chemical Plant;
- 4 Until 11 July 2028, or further order in the meantime, the Third Defendant must not enter onto the Claimants' property and obstruct any of the vehicular entrances or exits to any of the Sites (where "Sites" for this purpose does not include the area edged brown on the Purfleet Plan, or Hartland Park Logistics Hub) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

VARIATION OR DISCHARGE OF THIS ORDER

- 5 The Defendants may apply to vary or discharge this Order at any time upon giving not less than 3 clear days' notice to the Claimant's solicitors, Norton Rose Fulbright LLP, by emailing ExxonMobil.Service@nortonrosefulbright.com. Any evidence to be relied upon in support of such an application must be communicated in writing to the Claimants' solicitors at least 2 clear days before the hearing.
- 6 Any person applying to vary or discharge this Order must provide his or her full name and address, an address for service.
- 7 The Claimants have liberty to apply.

REVIEW HEARINGS

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

- 9 The Claimants shall file and serve a trial bundle not less than 7 days before the review hearing.
- 10 Skeleton arguments on behalf of any represented party shall be lodged and exchanged, with bundle of authorities, not less than 3 days before the review hearing.

INTERPRETATION OF THIS ORDER

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

SERVICE OF THIS ORDER

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

- 12.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that a copy of the Order may be obtained from the Claimants' solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email: ExxonMobil.Service@nortonrosefulbright.com; and (b) that a copy of the Order may be viewed at the website referred to in Paragraph 12.2 of this Order;

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

- 12.3 fixing a minimum of four large warning notices in the forms annexed to this Order at Schedule 2 in conspicuous places around the perimeters of the Sites. Such notices must be a minimum of A2 size; and

- 12.4 sending an email to each of the following email addresses: (i) with the information that a copy of the Order may be viewed at the website referred to in Paragraph 12.2 of this Order; and/or (ii) enclosing a copy of this Order (whether by Mimecast link or otherwise):

- (a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

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

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

SERVICE OF OTHER DOCUMENTS

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

15.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that copies of the Further Documents may be obtained from the Claimants’ solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email: ExxonMobil.Service@nortonrosefulbright.com; and (b) that copies of the Further Documents may be viewed at the website referred to in Paragraph 15.2 of this Order;

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

15.3 sending an email to each of the following email addresses: (i) with the information that copies of the Further Documents may be viewed at the website referred to in Paragraph 15.2 of this Order; and/or (ii) enclosing copies of the Further Documents (whether by Mimecast link or otherwise):

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

- 15.4 Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the Further Documents shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in Paragraph 15 above have been completed.
- 15.5 Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 15 of this Order shall stand as good service of the Further Documents on the First, Second and Third Defendants.
- 15.6 Pursuant to CPR 81.4(2)(c) and (d), the Court dispenses with the requirement for personal service in relation to the Fifth Defendant.

COSTS

16 No order as to costs.

THE COURT

17 The Court will provide sealed copies of this Order for service to the Claimants' solicitors, whose details are set out in Paragraphs 12.1 and 15.1 of this Order.

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

- King's Bench Division, Royal Courts of Justice, Strand WC2A 2LL
- The office is open between 10.00am and 4.30pm Monday to Friday (except Bank Holidays)
- The telephone number is 020 7947 6000
- The email address is kbjudgeslistingoffice@justice.gov.uk

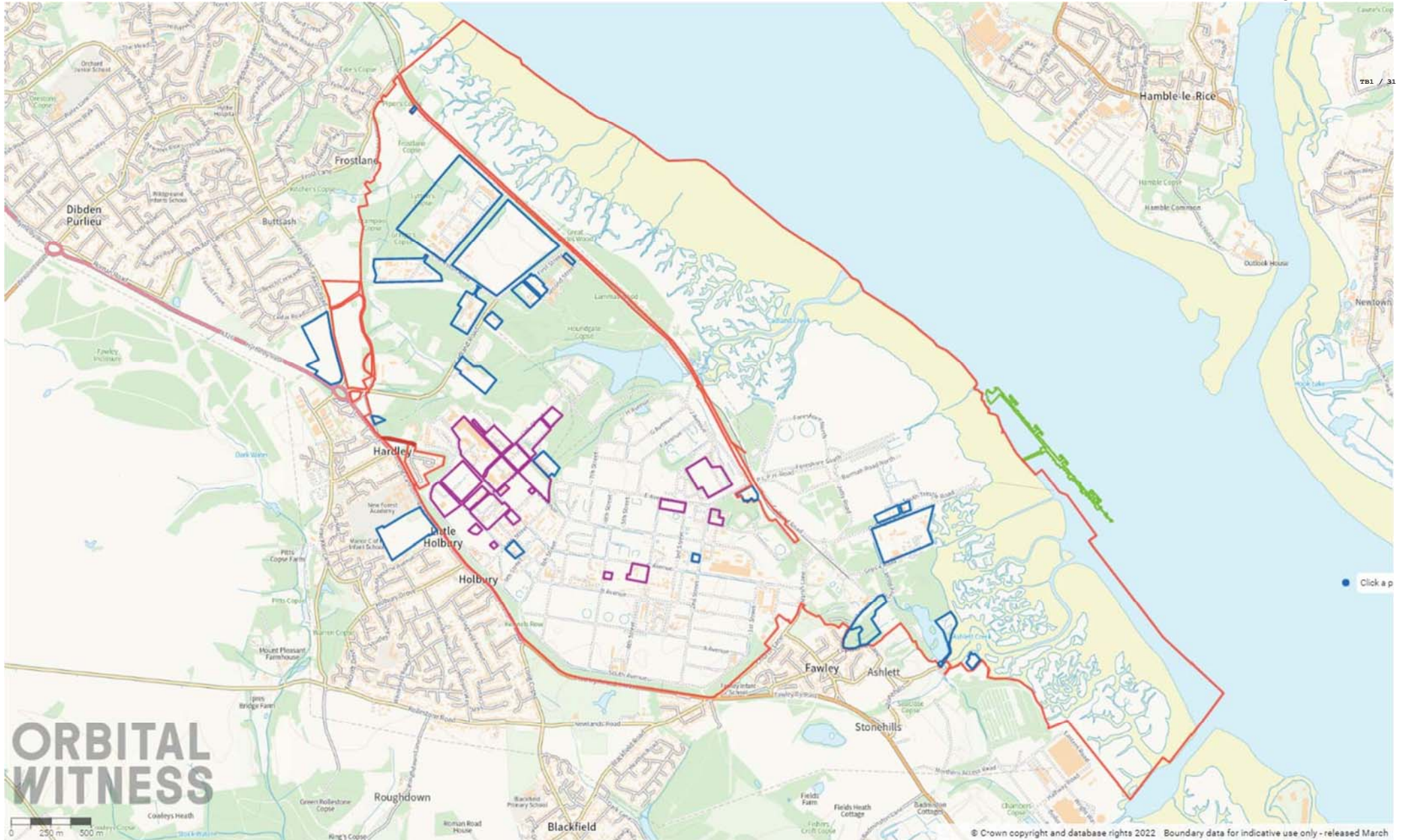
SERVICE OF THE ORDER

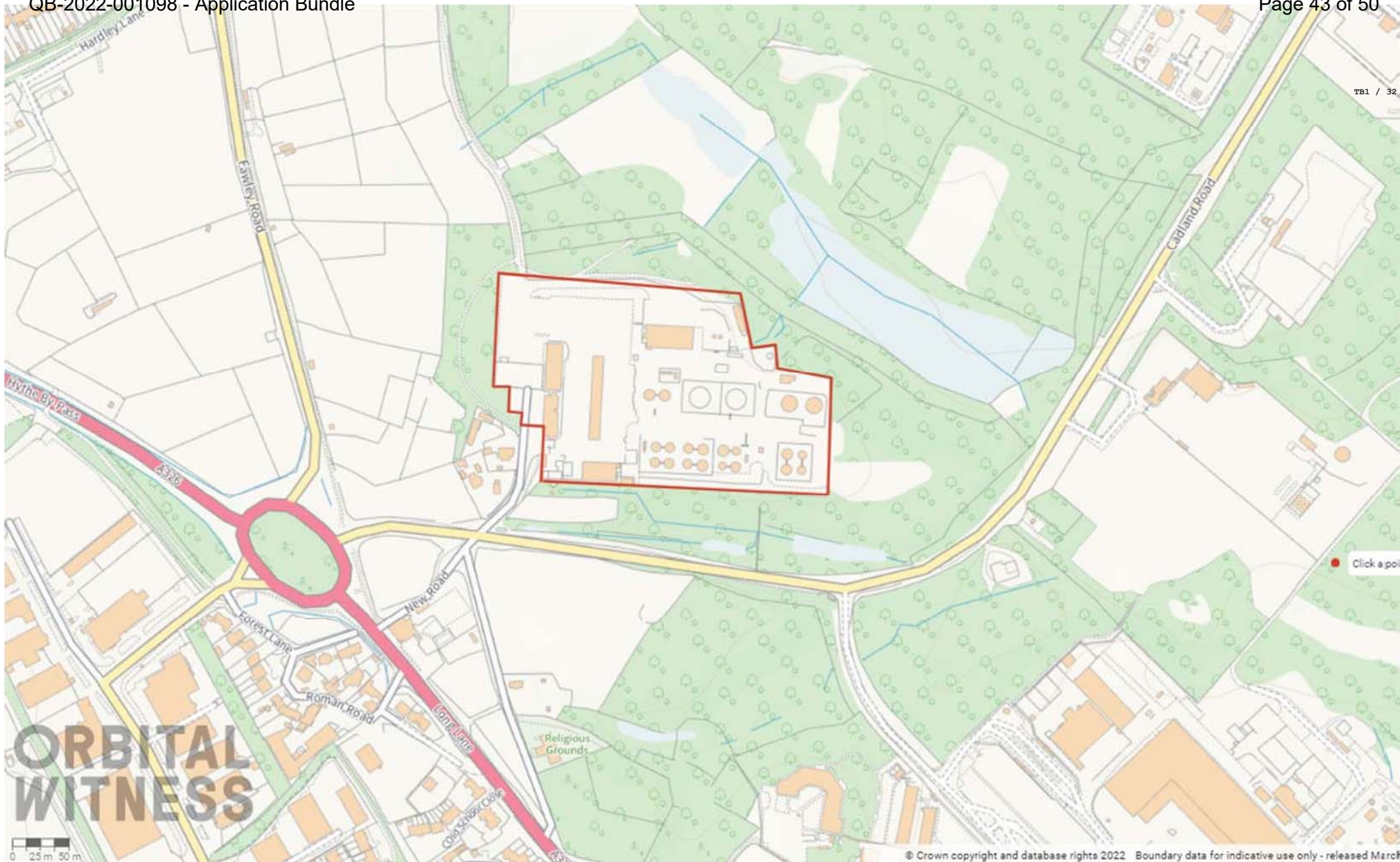
19 This Order shall be served by the Claimants on all Defendants.

29 January 2024

SCHEDULE 1 - Plans

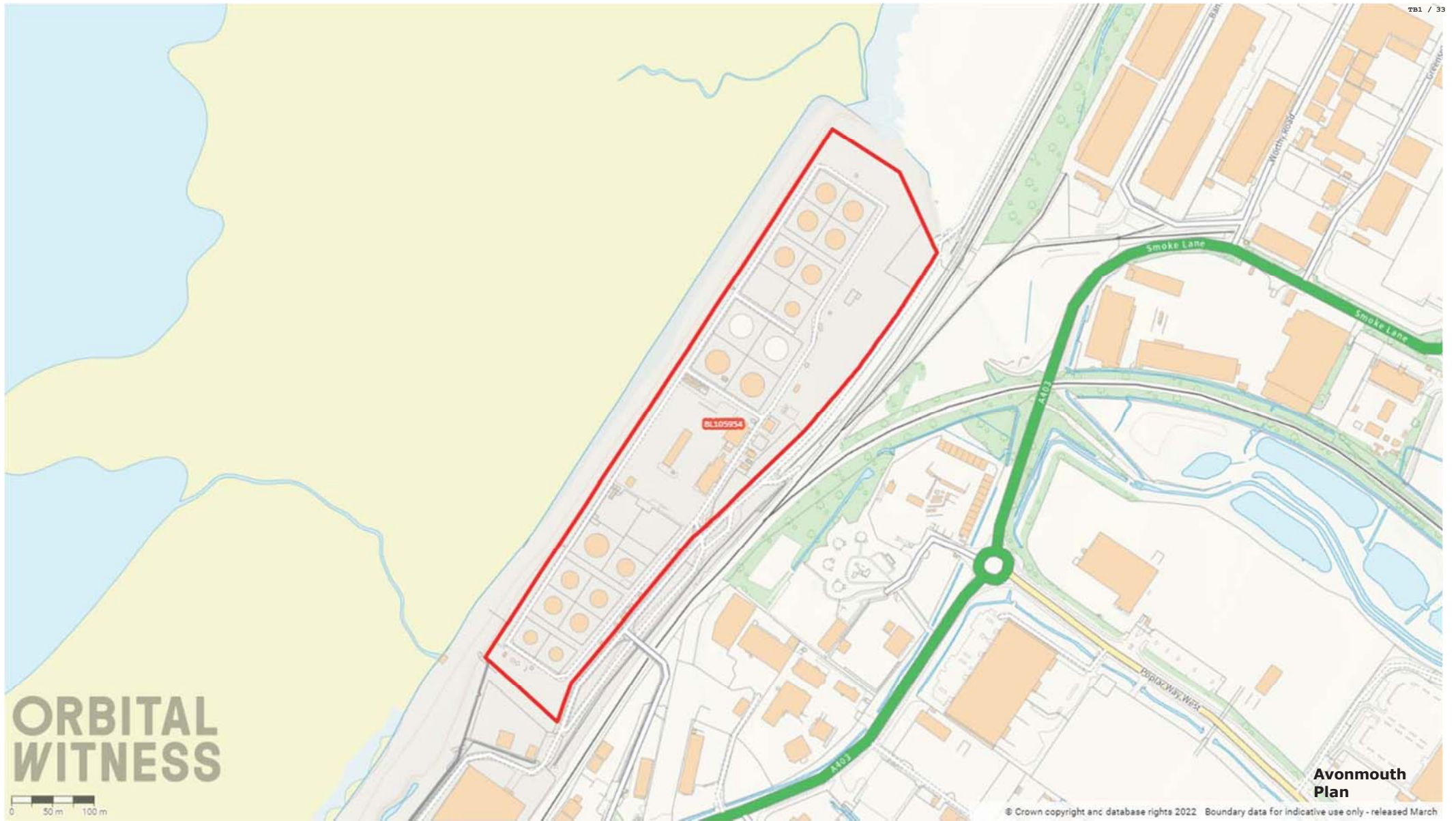
1. Fawley Plan
2. Hythe Plan
3. Avonmouth Plan
4. Birmingham Plan
5. Purfleet Plan
6. West London Plan
7. Alton Compound Plan

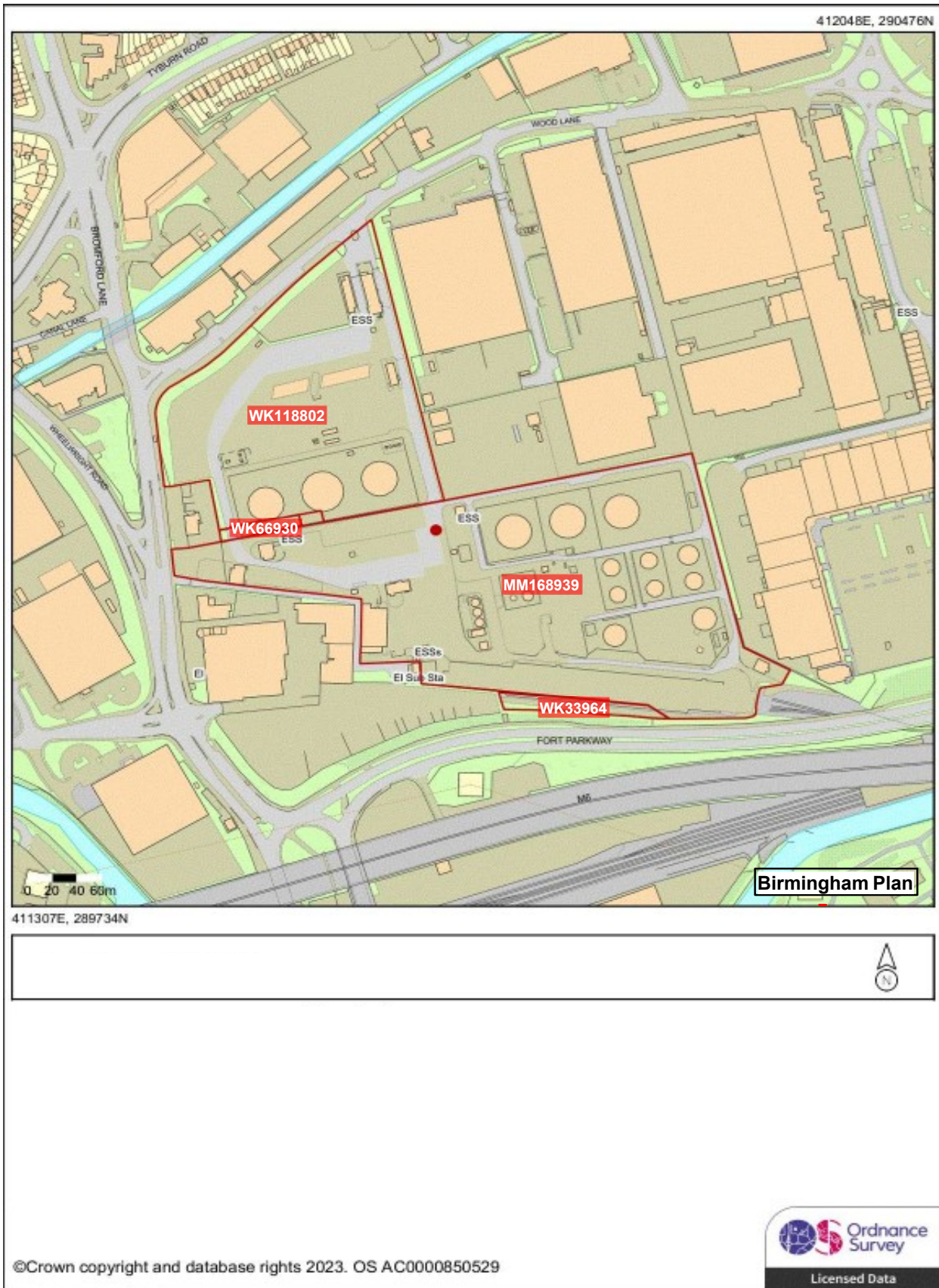




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**ORBITAL
WITNESS**







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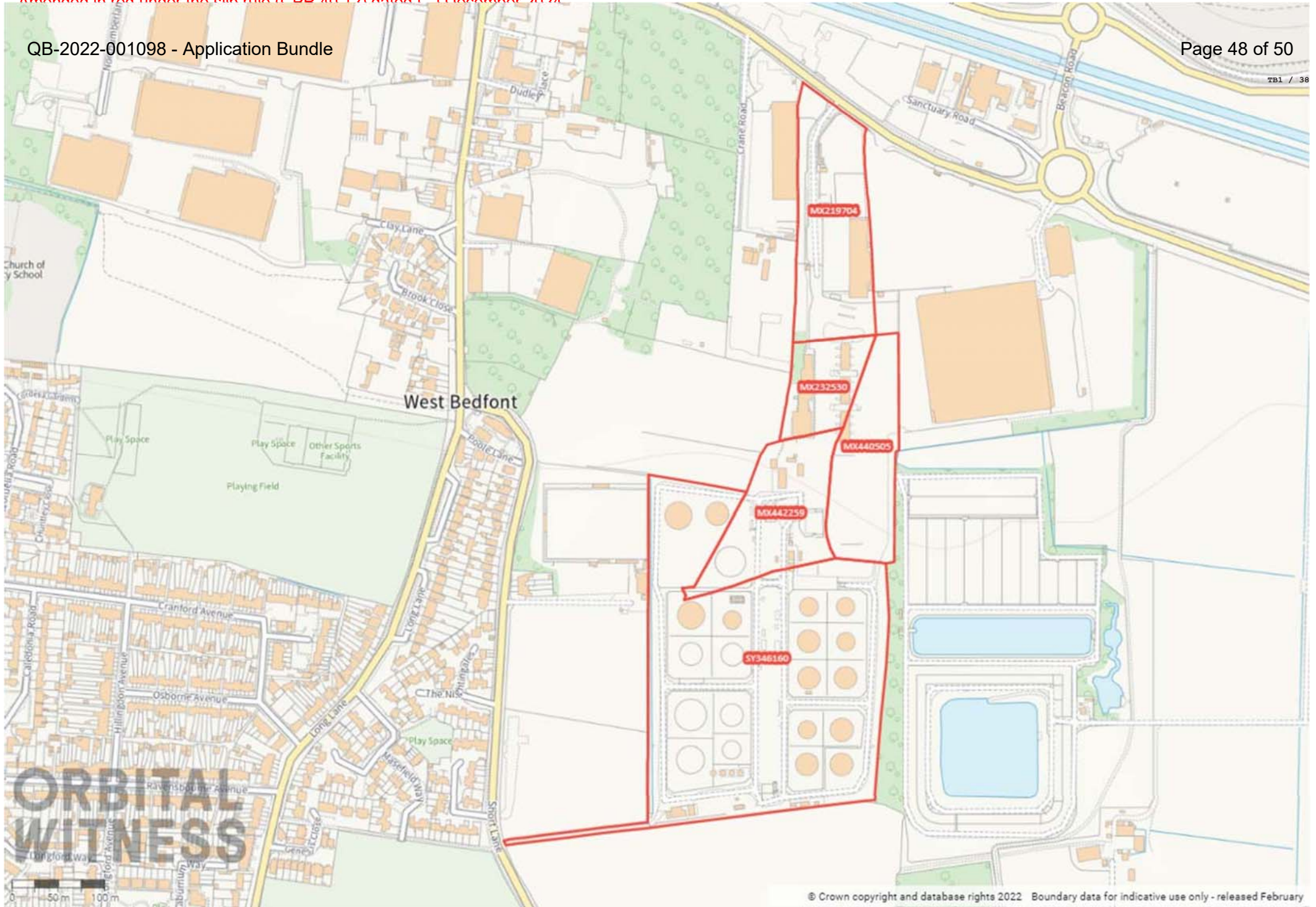


**ORBITAL
WITNESS**

0 25 m 50 m

Amended in red under the slip rule (CPR 40.12) dated [] December 2024

**Purfleet
Plan B**



Amended in red under the slip rule (CPR 40.12) dated [] December 2024

**West London
Plan**



SCHEDULE 2 – Warning Notice

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

Important Notice

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

On 29 January 2024, an injunction was made by the High Court of Justice in the proceedings referred to above concerning this Site.

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

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

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

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

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

Copies may also be obtained from ExxonMobil.Service@nortonrosefulbright.com.

The injunction applies to the following Sites:-

- The Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Fawley, Southampton **SO45 1TX**
- Hythe Oil Terminal, New Road, Hardley SO45 3NR
- Avonmouth Oil Terminal, St Andrews Road, Bristol BS11 9BN
- Birmingham Oil Terminal, Wood Lane, Birmingham B24 8DN
- Purfleet Oil Terminal, London Road, Purfleet, Essex RM19 1RS
- West London Oil Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ
- Alton Compound, Pumping Station, A31, Holybourne

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

Mrs Justice Tipples
Wednesday 10 July 2024

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

Claimants

-and-

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

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

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR

THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON **SO45 1TX** (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')

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

- (4) PAUL BARNES
- (5) DIANA HEKT

Defendants

ORDER

RECITALS

UPON the Order of Linden J, dated 18 July 2023 (as amended on 21 July 2023 and 16 October 2023) granting the Claimants final injunctive relief until 11 July 2028 (the “**Linden Order**”)

AND UPON the Order of Ellenbogen J, dated 29 January 2024, maintaining the relief granted in the Linden Order but superseding that Order following a review in light of the Supreme Court judgment in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45 (the “**Ellenbogen Order**”)

AND UPON a review hearing being listed on 10 July 2024 for a review of the Linden Order, pursuant to paragraph 10 of Linden Order, and the Ellenbogen Order, pursuant to paragraph 8 of the Ellenbogen Order (the “**Review Hearing**”)

AND UPON reading the evidence and the Claimants’ skeleton argument

AND UPON hearing Timothy Morshead KC and Yaaser Vanderman for the Claimants and the Defendants not appearing

AND UPON the Court being satisfied that proper and effective service of the Ellenbogen Order, pursuant to paragraph 12 of the Ellenbogen Order, and the documents prepared for the Review Hearing, pursuant to the steps set out in paragraph 15 of the Ellenbogen Order, had been effected on all Defendants

AND UPON the Court reviewing the Linden and Ellenbogen Orders and being satisfied that, in respect of the First to Third Defendants, there had been no material change in circumstances warranting amendments to, or the setting aside of, the relief granted in the Linden and Ellenbogen Orders

AND UPON the Claimants having received assurances from Diana Hekt that she does not intend to breach any injunction covering the Sites (as defined in the Ellenbogen Order) but not having received any response from Paul Barnes

IT IS ORDERED THAT:

1. Subject to the below, no order be made as to the continuing effect of the Ellenbogen Order.

2. In view of the assurance given by her mentioned above, expiring on 30 June 2025, the Fifth Defendant (Diana Hekt) is not to be subject to the injunctions set out in the Linden and Ellenbogen Orders, without further order.
3. The Fourth Defendant (Paul Barnes) is not to be subject to the injunctions set out in the Linden and Ellenbogen Orders, but the Claimants have liberty to apply to make him subject to those injunctions in the absence of receiving assurances from him to like effect as those given by him in June 2023 and lasting until at least 30 June 2025.
4. This Order shall be served on the First to Third Defendants pursuant to paragraph 15 of the Ellenbogen Order.
5. This Order shall be served on the Fourth and Fifth Defendants by email, pursuant to paragraphs 2 and 3 of the Consent Order sealed on 19 July 2023.

Signed: Mrs Justice Tipples DBE

Dated: 10 July 2024

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BEFORE:
JUSTICE FARBEY**

CLAIM NO. QB-2022-001098

B E T W E E N:

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

Claimants

-and-

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

- (A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON **SO45 1TX** (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
- (B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN')
- (C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')
- (D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
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- (G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN')
- (H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')

(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON **SO45 1TX (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')**

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

- (4) PAUL BARNES
(5) DIANA HEKT**

Defendants

DRAFT ORDER

PENAL NOTICE

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

Any other person who knows of this order and does anything which helps or permits the Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE FOURTH DEFENDANT

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

You should read it very carefully.

UPON the **Fourth Defendant** having agreed to an order in the terms set out below

AND UPON the **Fourth Defendant** giving undertakings to the Court as set out below

AND UPON the Order of Tipples J dated 10 July 2024 making no order as to the continuing effect of the Ellenbogen Order; and

IT IS ORDERED THAT:

1. There be no order as to costs.
2. Pursuant to CPR r.6.15, r.6.27 and r.81.4(2)(c)-(d), service of this Order and any subsequent court documents in these proceedings on the Fourth Defendant may be effected by alternative means by email to PBHPXR@protonmail.com, and/or by an email to PBHPXR@protonmail.com referencing that the documents can be found at <https://www.exxonmobil.co.uk/company/overview/uk-operations>, and such service shall be deemed to be good and sufficient service on the Fourth Defendant. Any such document shall be deemed served on the date the email is sent.

UNDERTAKINGS TO THE COURT

The **Fourth Defendant** undertakes to the Court promising as follows:

3. Not to:

- (a) enter or remain on any part of the Sites (as defined above) without the Consent of the First Claimant.
 - (b) damage any part of any of the Sites;
 - (c) affix themselves or any person or object to any part of any of the Sites;
 - (d) erect any structures on any part of any of the Sites.
4. Not to:
- (a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TX (the "Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');
 - (b) damage any part of the Chemical Plant;
 - (c) affix themselves or any person or object at the Chemical Plant;
5. Not to enter onto the Claimants' property and obstruct any of the vehicular entrances or exits to any of the Sites (where "Sites" for this purpose does not include the area edged brown on the Purfleet Plan) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THESE PROMISES UNTIL 30 June 2025

STATEMENT

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

Paul Barnes

Fourth Defendant

____ July 2024

We consent to an order in these terms

Norton Rose Fulbright LLP

Solicitors for the Claimants

____ July 2024

THE HON MRS JUSTICE FARBEY 15/08/2024 (NB: SIGNATURE OF PAUL BARNES AND OF NORTON ROSE FULBRIGHT VIEWED ON PDF VERSION AND ACCEPTED)

Amended in red under the slip rule (CPR 40.12) dated [] December 2024

QB-2022-001098

Fawley Plan

