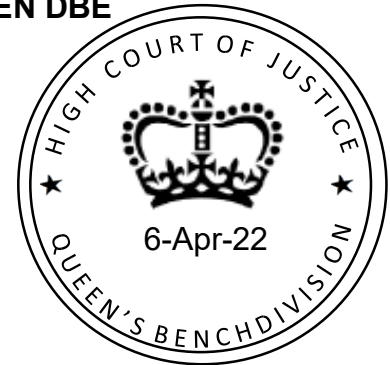


IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO. QB-2022-001098

BEFORE THE HONOURABLE MRS JUSTICE ELLENBOGEN DBE
6 April 2022



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

Claimants

-and-

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

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

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

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

(D) BIRMINGHAM OIL TERMINAL, TYBURN ROAD, BIRMINGHAM B24 8HJ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')

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

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

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

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

- (2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')
- (3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES (WHERE "SITES" FOR THIS PURPOSE DOES NOT INCLUDE THE AREA EDGED BROWN ON THE PURFLEET PLAN)

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANT

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

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

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

RECITALS

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

AND UPON HEARING Leading Counsel and Junior Counsel for the Claimants

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

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

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

IT IS ORDERED THAT:

THE INJUNCTIONS

1. Until trial or further order the First Defendants must not:
 - 1.1 enter or remain upon any part of the First Claimant's properties ("the Sites"), without the consent of the First Claimant, at:
 - (1) the Oil Refinery and Jetty at the Petrochemical Complex, Marsh Lane, Southampton SO45 1TH (as shown for identification edged red and green but excluding those areas edged blue on the attached 'Fawley Plan').
 - (2) Hythe Terminal, New Road, Handley, SO45 3NR (as shown for identification edged red on the attached 'Hythe Plan').

- (3) Avonmouth Terminal, St Andrews Road, Bristol BS11 9BN (as shown for identification edged red on the attached 'Avonmouth Plan').
- (4) Birmingham Terminal, Tyburn Road, Birmingham B24 8HJ (as shown for identification edged red on the attached 'Birmingham Plan').
- (5) Purfleet Terminal, London Road, Purfleet, Essex RM19 1RS (as shown for identification edged red and brown on the attached 'Purfleet Plan').
- (6) West London Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ (as shown for identification edged red on the attached 'West London Plan').
- (7) Hartland Park Logistics Hub, Ively Road, Farnborough (as shown for identification edged red on the attached 'Hartland Park Plan').
- (8) Alton Compound, Pumping Station, A31, Hollybourne (as shown for identification edged red on the attached 'Alton Compound Plan');

1.2 damage any part of any of the Sites;

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

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

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

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

2.2 damage any part of the Chemical Plant;

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

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

3. Until trial or further order the Third Defendants must not obstruct any of the vehicular entrances or exits to any of the Sites (where “Sites” for this purpose does not include the area edged brown on the Purfleet Plan) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

VARIATION OR DISCHARGE OF THIS ORDER

4. The Defendants may apply to vary or discharge this Order at any time upon giving not less than 4 hours’ notice to the Claimant’s solicitors, Eversheds Sutherland (International) LLP, by emailing exxonmobil.service@eversheds-sutherland.com;
5. Any person applying to vary or discharge this Order must provide their full name and address, an address for service and must also apply to be joined as a named defendant to the proceedings at the same time.
6. The Claimants have liberty to apply to extend or vary this Order or to seek further directions.

THE RETURN DATE

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

INTERPRETATION OF THIS ORDER

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

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

SERVICE OF THIS ORDER

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

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

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

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

- (a) the existence and nature of this Order
- (b) the existence of the proceedings
- (c) the potential consequences of breaching the Order

- (d) the address at which copies of the proceedings can be obtained
- (e) details of the website at which the injunction can be viewed.

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

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

- (a) xr-legal@riseup.net
- (b) juststopoil@protonmail.co.uk

- 10. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), this Order shall be deemed to be served on the latest date on which all of the methods of service referred to in Paragraph 9 above have been completed, such date to be verified by the completion of a certificate of service.
- 11. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 9 of this Order shall stand as good service of the Order and the Court documents.
- 12. The Court will provide sealed copies of this Order for service to the Claimants' solicitors, whose details are set out in Paragraph 9.1 of this Order.
- 13. Pursuant to CPR 6.15(4), the period for service of any acknowledgement of service, admission or defence shall be 56 days.

COSTS

- 14. Costs reserved.

COMMUNICATIONS WITH THE COURT

- 15. All communications to the Court about this Order should be sent to:
 - Queen's Bench Division, Room E07,
 - Royal Courts of Justice, Strand WC2A 2LL

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

SCHEDULE 1

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

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

SCHEDULE 2

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

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

SCHEDULE 3

Plans

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

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

ESSO PETROLEUM COMPANY, LIMITED
EXXONMOBIL CHEMICAL LIMITED

IMPORTANT NOTICE

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

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

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

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

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

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

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

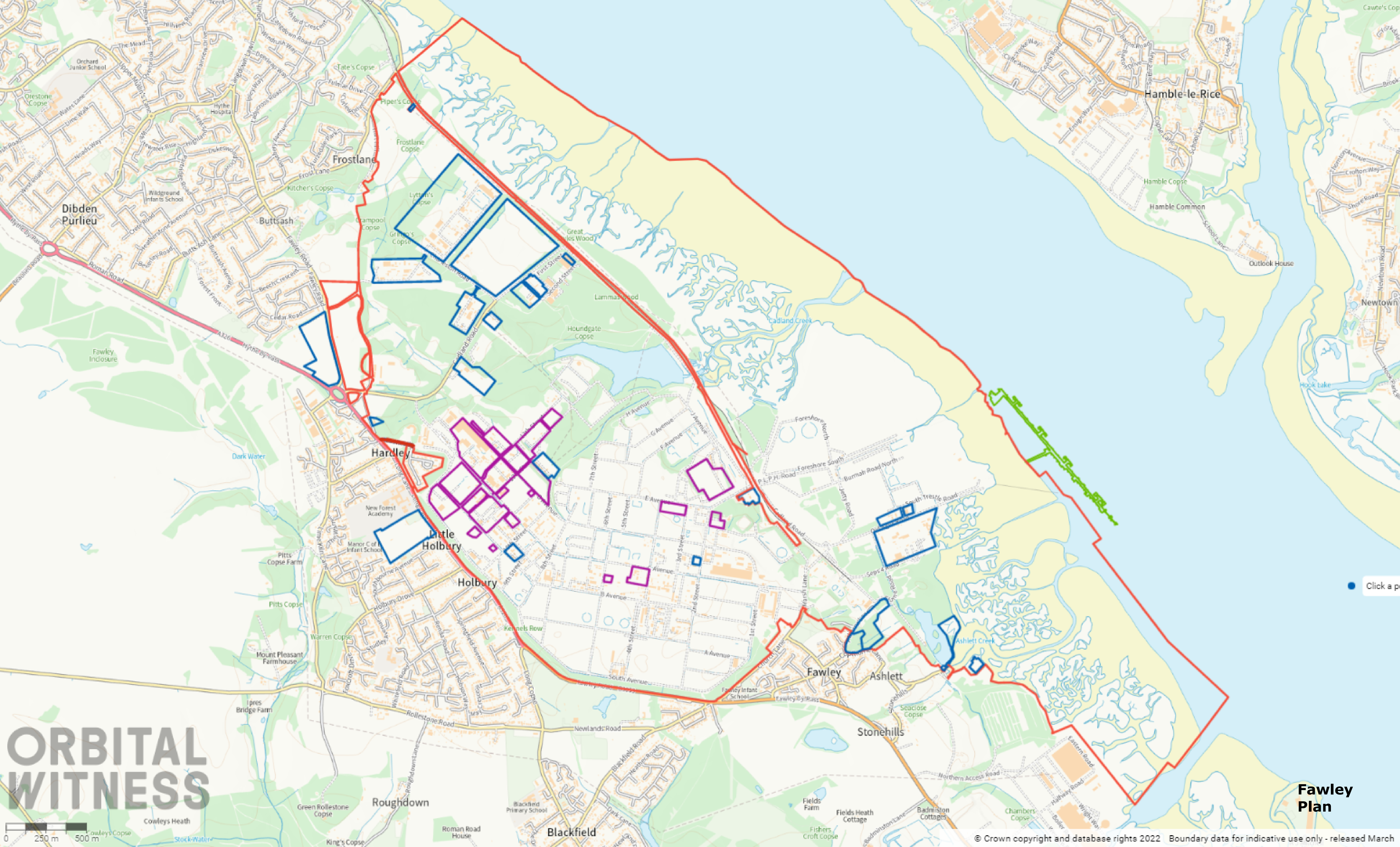
THIS MEANS THAT YOU MUST NOT GO BEYOND THIS NOTICE AND ENTER THIS SITE WITHOUT PERMISSION.

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

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

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

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

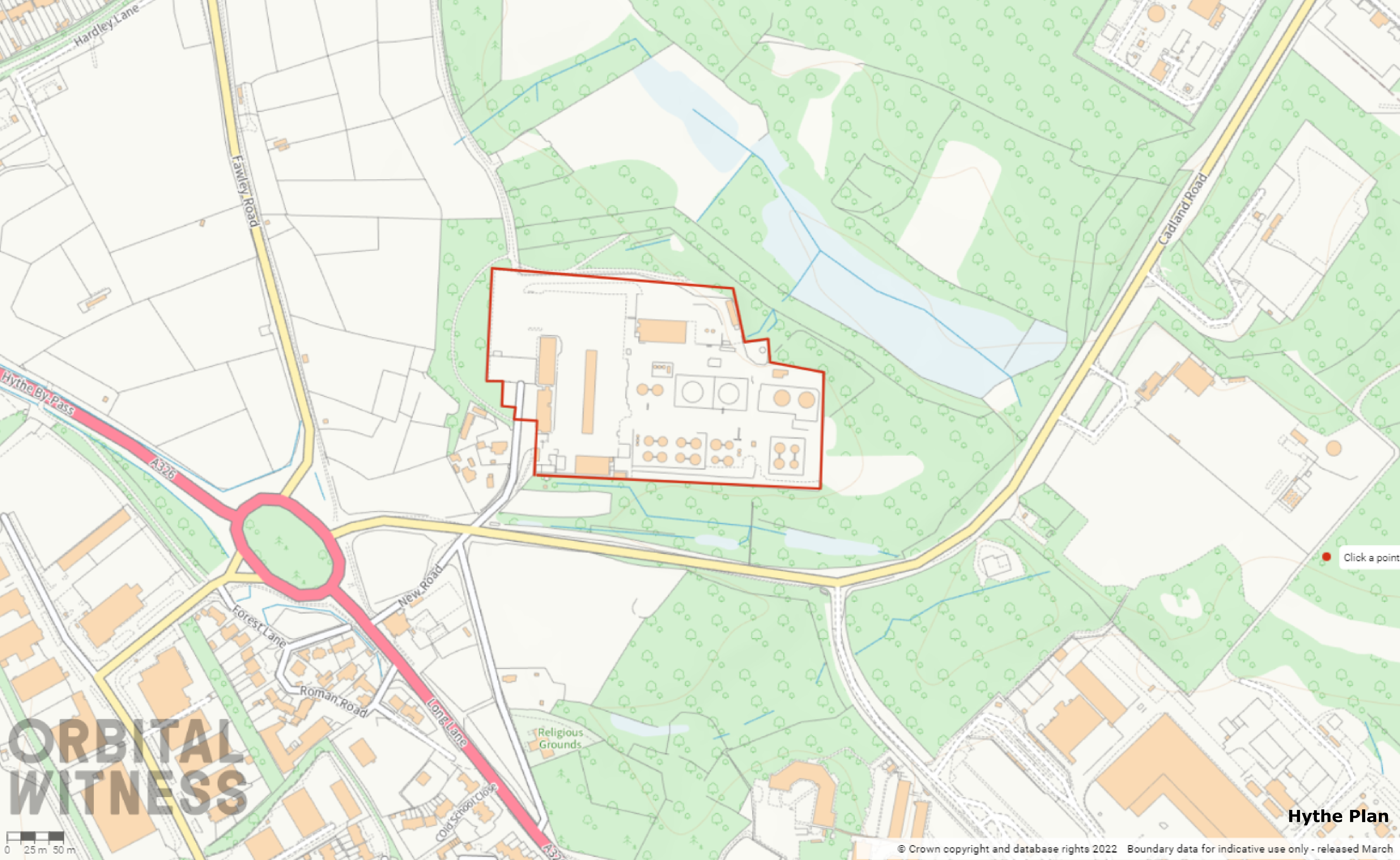


ORBITAL
WITNESS

0 250 m 500 m

Fawley
Plan

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Click a point

ORBITAL
WITNESS

Hythe Plan

0 25m 50m

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ORBITAL
WITNESS

0 50 m 100 m

BL105954

A403

Smoke Lane

Smoke Lane

Worthing Road

Green Lane

Poplar Way West

Avonmouth
Plan

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ORBITAL
WITNESS

Birmingham
Plan

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Harris Academy
Riverside

Purfleet
Baptist Church

London Road Purfleet

EX869958

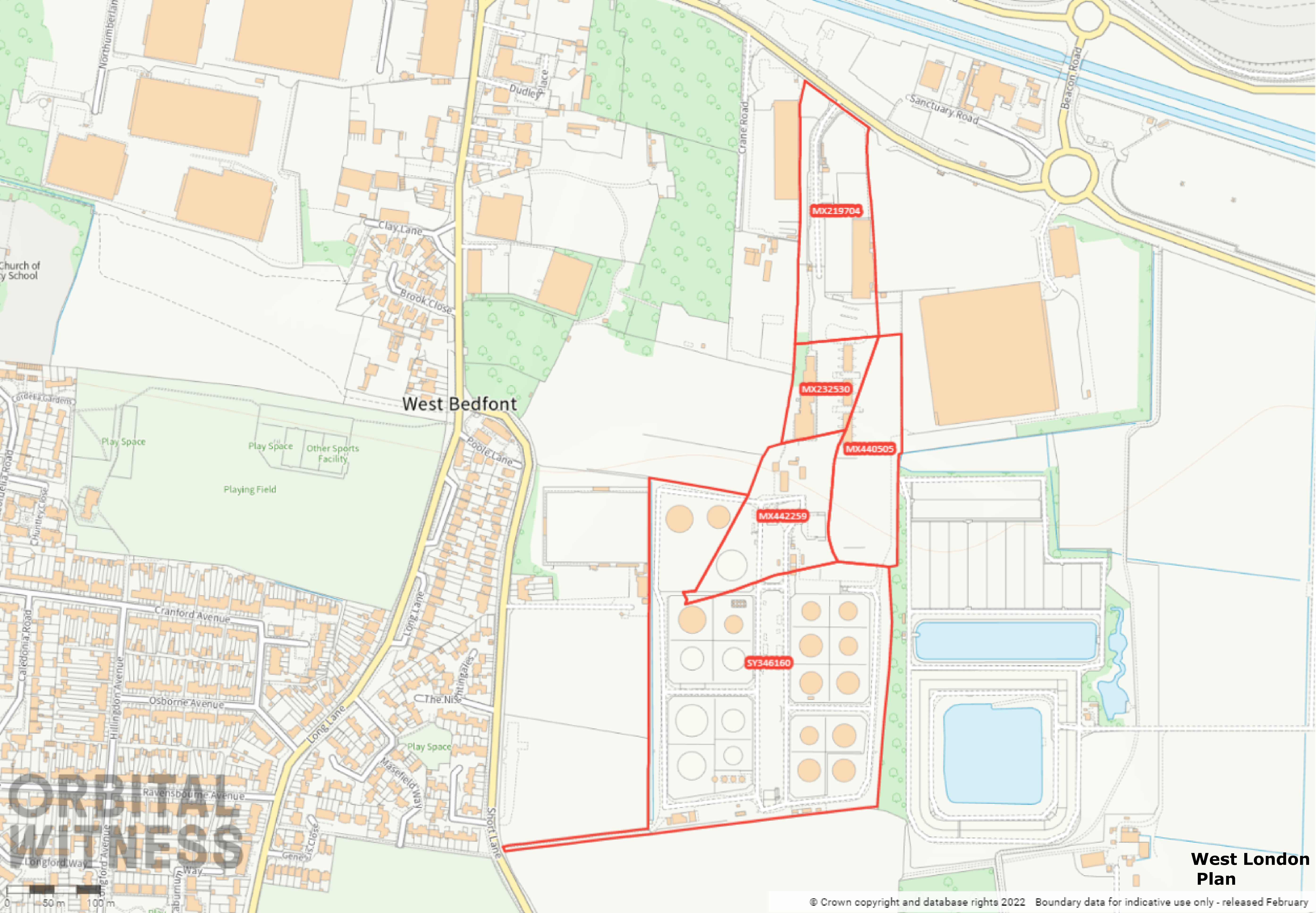
Purfleet Thames
Terminal

Purfleet
Plan

ORBITAL
WITNESS

0 25 m 50 m

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West Bedfont

MX219704

MX232530

MX440505

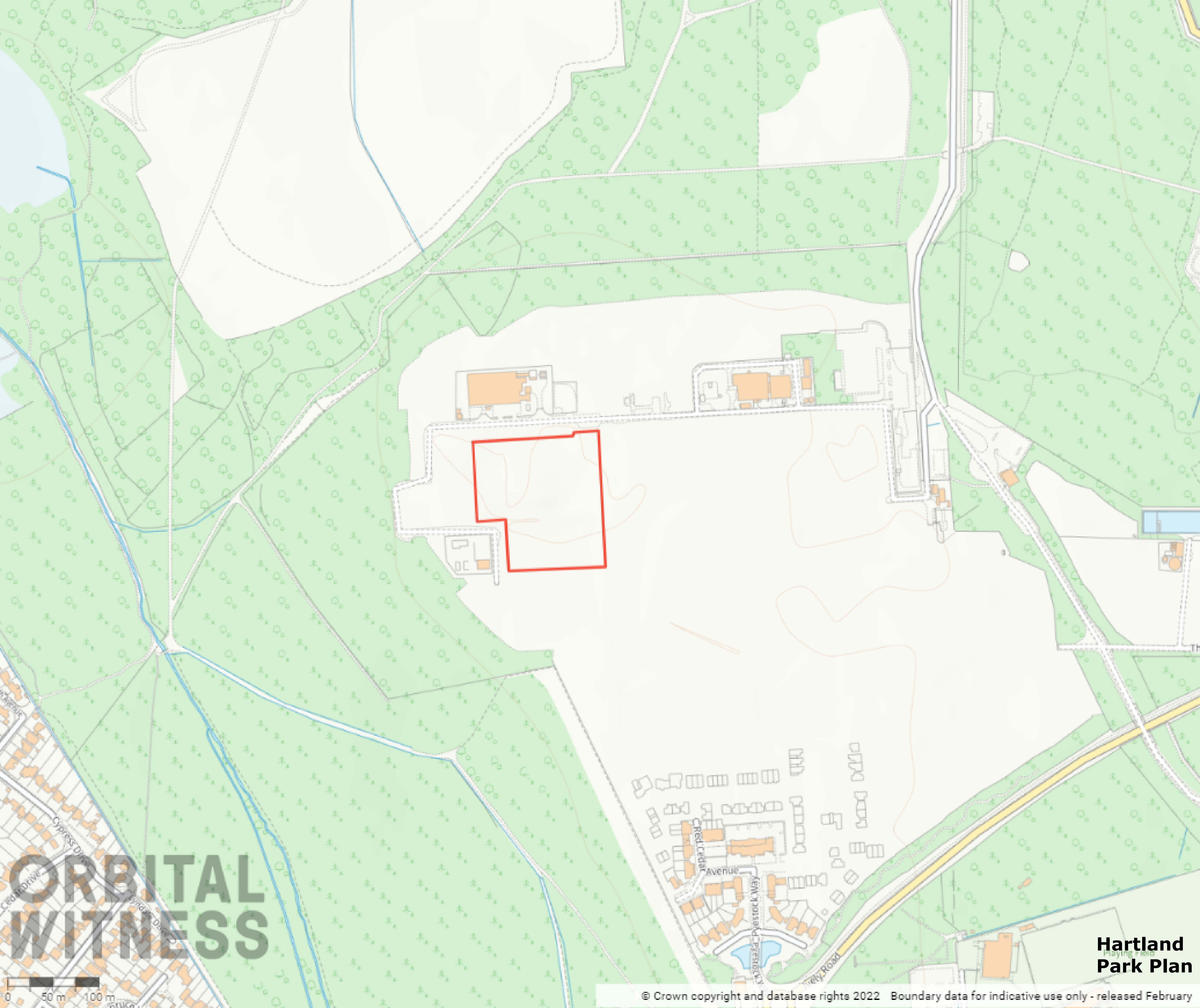
MX442259

SY346160

ORBITAL
WITNESS

West London
Plan

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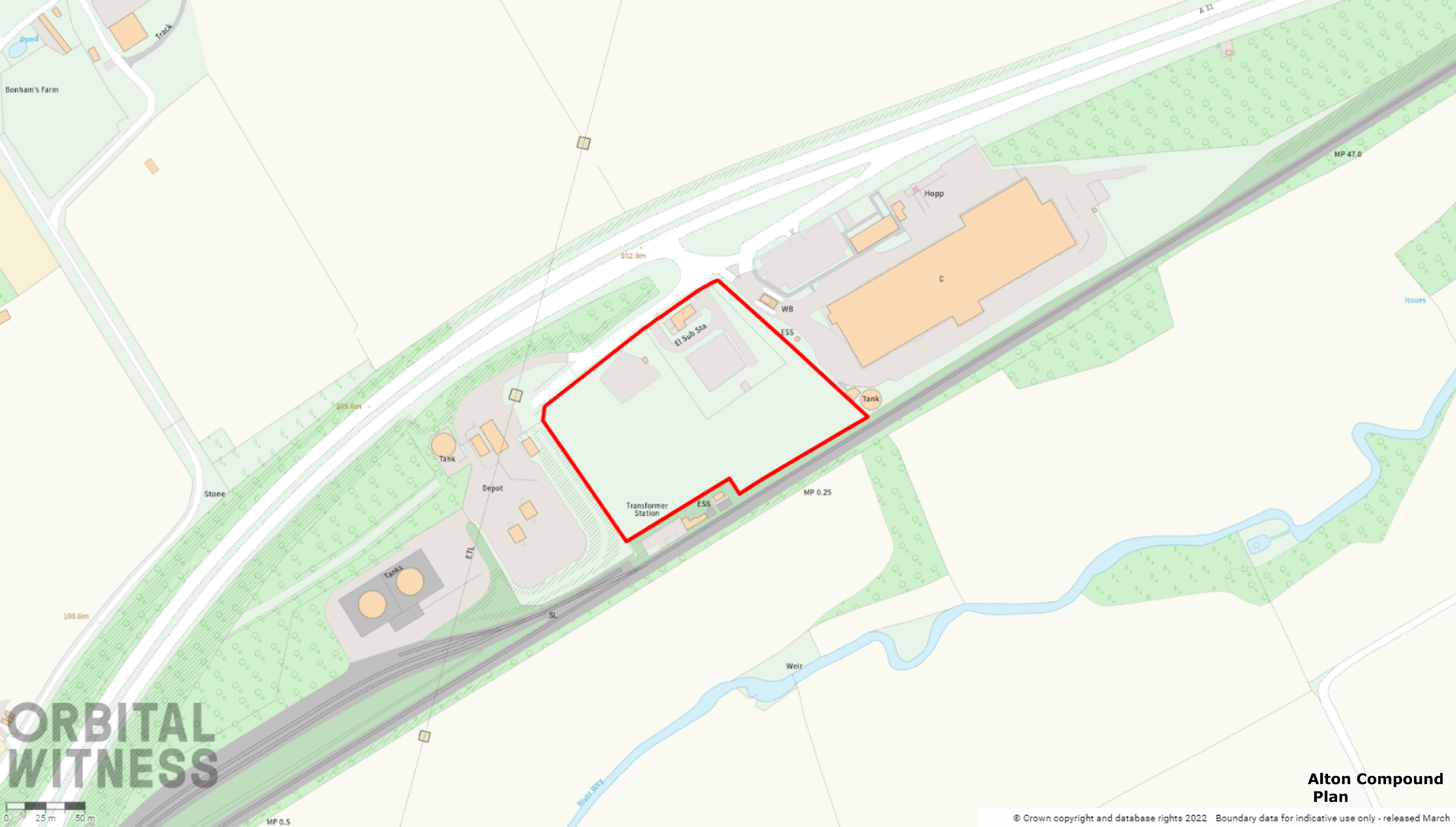


**ORBITAL
WITNESS**

0 50m 100m

**Hartland
Park Plan**

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ORBITAL
WITNESS

**Alton Compound
Plan**