

Claim No. QB-2022-001098 | Order re Notice of Change of Solicitors dated 16 October 2023

Accompanying Documents

Index

<u>Name</u>	<u>Date</u>	<u>Page(s)</u>
Application notice	13 October 2023	1-6
First Witness Statement of Holly Stebbing	13 October 2023	7-12
Exhibit HS1 to the First Witness Statement of Holly Stebbing	13 October 2023	13-58
Draft Order	13 October 2023	59-62
Order of Mr Justice Linden dated 18 July 2023 (amended on 21 July 2023)	21 July 2023	63-81

N244

Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Name of court HIGH COURT OF JUSTICE, KING'S BENCH DIVISION	Claim no. QB-2022-001098
Claimants' names (including ref.) (1) ESSO PETROLEUM COMPANY, LIMITED (2) EXXONMOBIL CHEMICAL LIMITED	
Defendants' names (including ref.) (1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT) UPON ANY OF THE FOLLOWING SITES ("THE SITES") (A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN') (B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTHE PLAN') (C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN') (D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN') (E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED 'PURFLEET PLAN') (F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN') (G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND PARK PLAN') (H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN') (2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN') (3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PROPERTY AND OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES (WHERE "SITES" FOR THIS PURPOSE DOES NOT INCLUDE THE AREA EDGED BROWN ON THE PURFLEET PLAN) (4) PAUL BARNES (5) DIANA HEKT	
Date	13-10-2023

1. What is your name or, if you are a legal representative, the name of your firm?

NORTON ROSE FULBRIGHT LLP

2. Are you a Claimant Defendant Legal Representative

Other (please specify)

If you are a legal representative whom do you represent?

CLAIMANTS (1) & (2)

3. What order are you asking the court to make and why?

(1) An order to vary the definition of Further Documents in paragraph 17 of the order dated 18 July 2023 (amended on 21 July 2023) (the **Order**) to include all documents for service (other than the Order) so that the parties have an order regarding the correct method of service for those documents;
 (2) An order that paragraphs 6 and 17 of the Order (and for good order, paragraph 14.1) shall be varied to reflect the contact details of the Claimants' new solicitors to ensure that all correspondence and documentation in connection with these proceedings is sent to the correct address; and
 (3) An order that service of the notice of change of solicitors dated 2 October 2023 (the **Notice**) by the methods of service set out in paragraph 17 of the Order was good service (in the absence of any direction regarding the correct method of service for the Notice) and granting retrospective permission to serve the Notice in such alternative manner; and
 (4) An order permitting service of any order that the Court may grant in connection with this application by the method prescribed at paragraph 17 of the Order.

4. Have you attached a draft of the order you are applying for?

Yes

No

5. How do you want to have this application dealt with?

at a hearing

without a hearing

at a remote hearing

6. How long do you think the hearing will last? Is this time estimate agreed by all parties?

Hours

Minutes

Yes

No

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

9. Who should be served with this application?

We request that the Court deal with this application without notice to any other party pursuant to CPR 6.15(3)(b), as set out in the First Witness statement of Holly Stebbing (enclosed)

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

N/A

10. What information will you be relying on, in support of your application?

- the attached witness statement
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

- No


Statement of Truth

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

I believe that the facts stated in section 10 (and any continuation sheets) are true.

The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature



Applicant

Litigation friend (where applicant is a child or a Protected Party)

Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

13

Month

10

Year

2023

Full name

HOLLY STEBBING

Name of applicant's legal representative's firm

NORTON ROSE FULBRIGHT LLP

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

PARTNER

Applicant's address to which documents should be sent.

Building and street

NORTON ROSE FULBRIGHT LLP

Second line of address

3 MORE LONDON RIVERSIDE

Town or city

LONDON

County (optional)

Postcode

S	E	1	2	A	Q
---	---	---	---	---	---

If applicable

Phone number

020 7283 6000

Fax phone number

DX number

DX 85 LONDON

Your Ref.

1001267389

Email

HOLLY.STEBBING@NORTONROSEFULBRIGHT.COM

Claimants
H Stebbing
FIRST
Exhibit HS1
13 October 2023

IN THE HIGH COURT OF JUSTICE
 KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

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

Claimants

AND

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

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

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

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

- (4) PAUL BARNES
 (5) DIANA HEKT

Defendants

FIRST WITNESS STATEMENT
 OF HOLLY STEBBING

I, Holly Stebbing of Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ, United Kingdom, state as follows:

1 Introduction

- 1.1 I am a Partner at Norton Rose Fulbright LLP. I am duly authorised to make this witness statement on behalf of the Claimants.
- 1.2 I make this witness statement in support of the Claimants' application to vary Mr Justice Linden's order dated 18 July 2023 (as amended on 21 July 2023) (the **Order**).
- 1.3 The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.
- 1.4 There is now produced and shown to me a paginated bundle of true copy documents marked ["HS1"]. All references to documents in this statement are to **Exhibit HS1** unless otherwise stated.

2 Statement in support of application

Application without notice

- 2.1 Pursuant to CPR 6.15(3)(b), this application is being made without notice.

Service of documents

- 2.2 The Claimants have instructed Norton Rose Fulbright LLP to take over as solicitors from Eversheds Sutherland (International) LLP in the abovementioned proceedings. Accordingly, on 9 October 2023, the Claimants filed a notice of change of solicitors (the **Notice**) with the Court [HS1/1-2].
- 2.3 Paragraph 17 of the Order states:

SERVICE OF OTHER DOCUMENTS

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

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

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

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

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

2.4 The definition of Further Documents in paragraph 17 of the Order appears to be limited to “*applications and evidence*” and therefore may not include the Notice (or other types of documents requiring service in these proceedings).

2.5 In the absence of any order regarding the correct service for such documents and in order to effect service of the Notice on Defendants 1 to 3, the Claimants have taken the following steps:

(a) On 6 October 2023, in accordance with paragraph 17.1 of the Order, affixed copies of the Notice at 2 locations on the perimeter of each of the Sites [HS1/3-33], together with a letter [HS1/34-35] which states that copies of the Notice may be:

- (i) obtained from the Claimants' new solicitors, Norton Rose Fulbright LLP; and
- (ii) viewed on the Claimants' website.

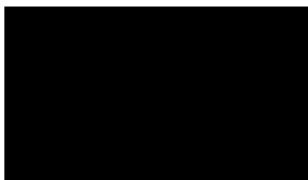
- (b) On 5 October 2023, in accordance with paragraph 17.2 of the Order, posted a copy of the Notice at <https://www.exxonmobil.co.uk/Company/Overview/UK-operations> [HS1/36-38].
- (c) On 9 October 2023, in accordance with paragraph 17.3 of the Order, sent a copy of the Notice and details of the Claimants' website referred to in paragraph 17.2 of the Order to the following email addresses:
 - (i) xr-legal@riseup.net [HS1/39-41];
 - (ii) enquiries@extinctionrebellion.uk [HS1/39-41]; and
 - (iii) juststopoilpress@protonmail.com [HS1/42-44].

2.6 On 6 October 2023, the Claimants also sent copies of the Notice to Defendants 4 and 5 by first class post to the following addresses:

- (a) **Paul Barnes**



- (b) **Diana Hekt**



2.7 Norton Rose Fulbright LLP has not received any objections to the method of service set out in paragraph 2.5 above. I have also checked with my clients (and with the Claimants' former solicitors, Eversheds Sutherland LLP) and they have confirmed to me that they have not received any objections to this method of service.

3 Variation of the Order

3.1 The Claimants are applying for the Order to be varied as follows:

- (a) A variation to the definition of "Further Documents" in paragraph 17 to include all documents (other than the original Order itself) so that the parties have an order regarding the correct method of service for such documents;
- (b) A variation to paragraphs 6 and 17 of the Order to reflect the details of the Claimants' new solicitors to ensure that all documentation in connection with these proceedings arrives at the correct address; and

- (c) Whilst I understand that the Order has been served on Defendants 1 to 3 by the methods prescribed in paragraph 14 of the Order, as the Order grants injunctions until 11 July 2028 (or further order), the Claimants also apply to vary paragraph 14 to reflect the contact details of the Claimants' new solicitors.

3.2 The Claimants also:

- (a) Apply for retrospective confirmation from the Court that the Notice was effectively served; and
- (b) Request that the Court permit service of any order that it grants in connection with this application by way of alternative method, such method prescribed in paragraph 17 of the Order.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:



HOLLY STEBBING

Date: 13 October 2023

CLAIMANTS
H STEBBING
FIRST
EXHIBIT HS1
13 OCTOBER 2023

CLAIM NO. QB-2022-001098

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

B E T W E E N:

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

Claimants

-and-

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

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

THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')

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

- (4) PAUL BARNES
(5) DIANA HEKT

Defendants

FIRST WITNESS STATEMENT OF HOLLY STEBBING

3 More London Riverside
London SE1 2AQ
United Kingdom

+44 20 7283 6000
+44 20 7283 6500
DX 85 London

Claimants
H Stebbing
FIRST
Exhibit HS1
13 October 2023

IN THE HIGH COURT OF JUSTICE
 KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

B E T W E E N:

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

Claimants

AND

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

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

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

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

(4) PAUL BARNES
 (5) DIANA HEKT

Defendants

EXHIBIT "HS1"

This is the exhibit marked "HS1" referred to in the First Witness Statement of Holly Stebbing.



Holly Stebbing

Dated: 13 October 2023

INDEX

<u>Name</u>	<u>Date</u>	<u>Page(s)</u>
Notice of change of solicitors (the Notice)	2 October 2023	1-2
Photos of the Notice at the Oil Refinery and Jetty at the Petrochemical Plant	4 October 2023	3-5
Photos of the Notice at Hythe Oil Terminal	3-4 October 2023	6-11
Photos of the Notice at Avonmouth Oil Terminal	5 October 2023	12
Photos of the Notice at Birmingham Oil Terminal	3-5 October 2023	13-20
Photos of the Notice at Purfleet Oil Terminal	5 October 2023	21-22
Photos of the Notice at West London Oil Terminal	3-4 October 2023	23-26
Photos of the Notice at Hartland Park Logistics Hub	4 October 2023	27-28
Photos of the Notice at Alton Compound	3 October 2023	29-33
Covering letter accompanying Notice at Sites	2 October 2023	34-35
Snapshot of ExxonMobil UK Operations website	5 October 2023	36-38
Email from Norton Rose Fulbright LLP to Extinction Rebellion	9 October 2023	39-41
Email from Norton Rose Fulbright LLP to Just Stop Oil	9 October 2023	42-44

Notice of change of legal representative

Note:

You should tick either box A **or** B as appropriate **and** box C. Complete details as necessary.

In the HIGH COURT OF JUSTICE, KING'S BENCH DIVISION	Claim No. QB-2022-001098
Name of Claimants (including ref.) (1) ESSO PETROLEUM COMPANY, LIMITED (2) EXXONMOBIL CHEMICAL LIMITED	
Name of Defendants (1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT) UPON ANY OF THE FOLLOWING SITES (“THE SITES”) (A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED ‘FAWLEY PLAN’) (B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘HYTHE PLAN’) (C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘AVONMOUTH PLAN’) (D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘BIRMINGHAM PLAN’) (E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED ‘PURFLEET PLAN’) (F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘WEST LONDON PLAN’) (G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘HARTLAND PARK PLAN’) (H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘ALTON COMPOUND PLAN’) (2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED ‘FAWLEY PLAN’) (3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS’ PROPERTY AND OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES (WHERE “SITES” FOR THIS PURPOSE DOES NOT INCLUDE THE AREA EDGED BROWN ON THE PURFLEET PLAN) (4) PAUL BARNES (5) DIANA HEKT	

We give notice that

A my legal representative (*insert name and address*)

--

has ceased to act for me and I shall now be acting in person.

B we (*insert name of legal representative*)

NORTON ROSE FULBRIGHT LLP

have been instructed to act on behalf of the claimants in this claim
in place of (*insert name and address of previous legal representative*).

EVERSHEDS SUTHERLAND (INTERNATIONAL) LLP
--

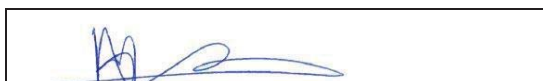
we have served notice of this change on every party to the claim (and on the former legal representative).

Address to which documents about this claim should be sent (including any reference)

NORTON ROSE FULBRIGHT LLP 3 MORE LONDON RIVERSIDE LONDON Postcode <table border="1" style="display: inline-table; vertical-align: middle;"> <tr> <td>S</td><td>E</td><td>1</td><td></td><td></td> </tr> </table> <table border="1" style="display: inline-table; vertical-align: middle;"> <tr> <td>2</td><td>A</td><td>Q</td><td></td><td></td> </tr> </table>	S	E	1			2	A	Q			If applicable	
	S	E	1									
	2	A	Q									
	Telephone no.	020 7283 6000										
	Fax no.											
DX no.	DX 85 LONDON											
Your ref.	1001267389											

Email	HOLLY.STEBBING@NORTONROSEFULBRIGHT.COM
-------	--

Signed



Claimants' legal representative

Position or
office held

PARTNER

If signing on behalf of firm or company

Date

0	2	/	1	0	/	2	0	2	3
---	---	---	---	---	---	---	---	---	---

For further details of the courts www.gov.uk/find-court-tribunal

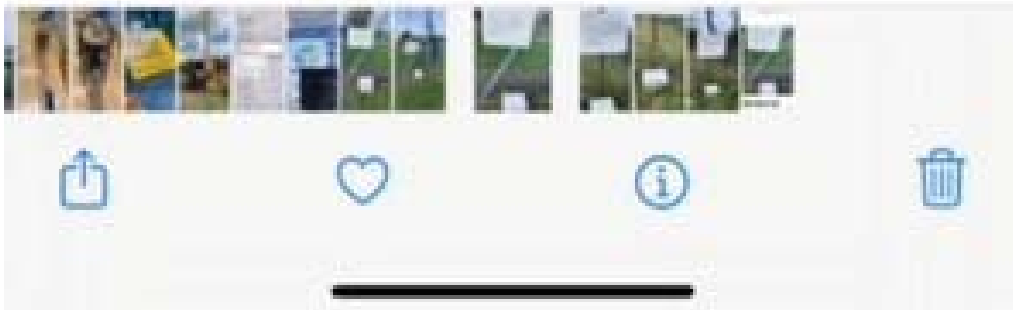
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.



Southampton - Fawley

Today 15:52

Edit





Add a Caption

Wednesday • 4 Oct 2023 • 15:52

Adjust

IMG_1027

Apple iPhone XS Max

HEIF

Wide Camera — 26 mm f/1.8

12 MP • 3024 x 4032 • 4.2 MB

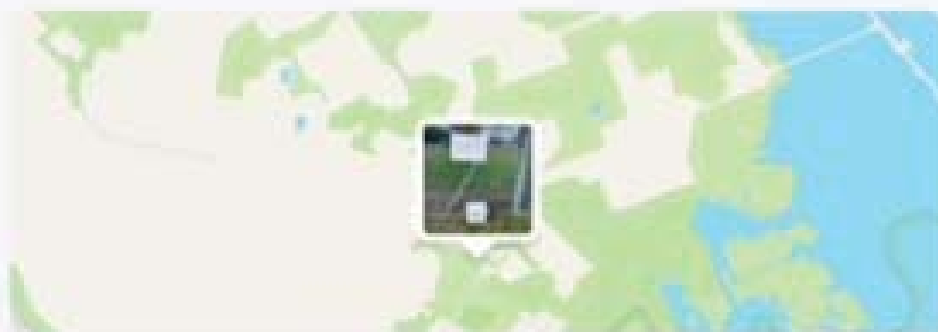
ISO 25

26 mm

0 ev

f/1.8

1/903 s





Add a Caption

Wednesday • 4 Oct 2023 • 16:02

Adjust

IMG_1030

Apple iPhone XS Max

HEIF

Wide Camera — 26 mm f1.8

12 MP • 3024 x 4032 • 3.2 MB

ISO 25

26 mm

0 ev

f1.8

1/577 s





Add a Caption

Tuesday • 3 Oct 2023 • 16:43

Adjust

IMG_4402

Apple iPhone 11

HEIF

Wide Camera — 26 mm f1.8

12 MP • 3024 × 4032 • 2,3 MB

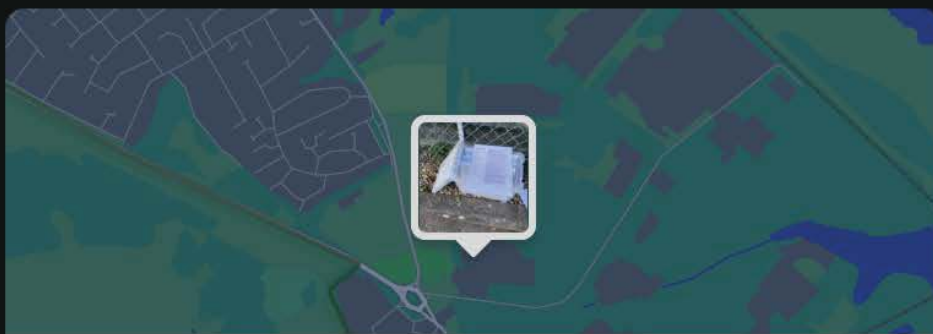
ISO 32

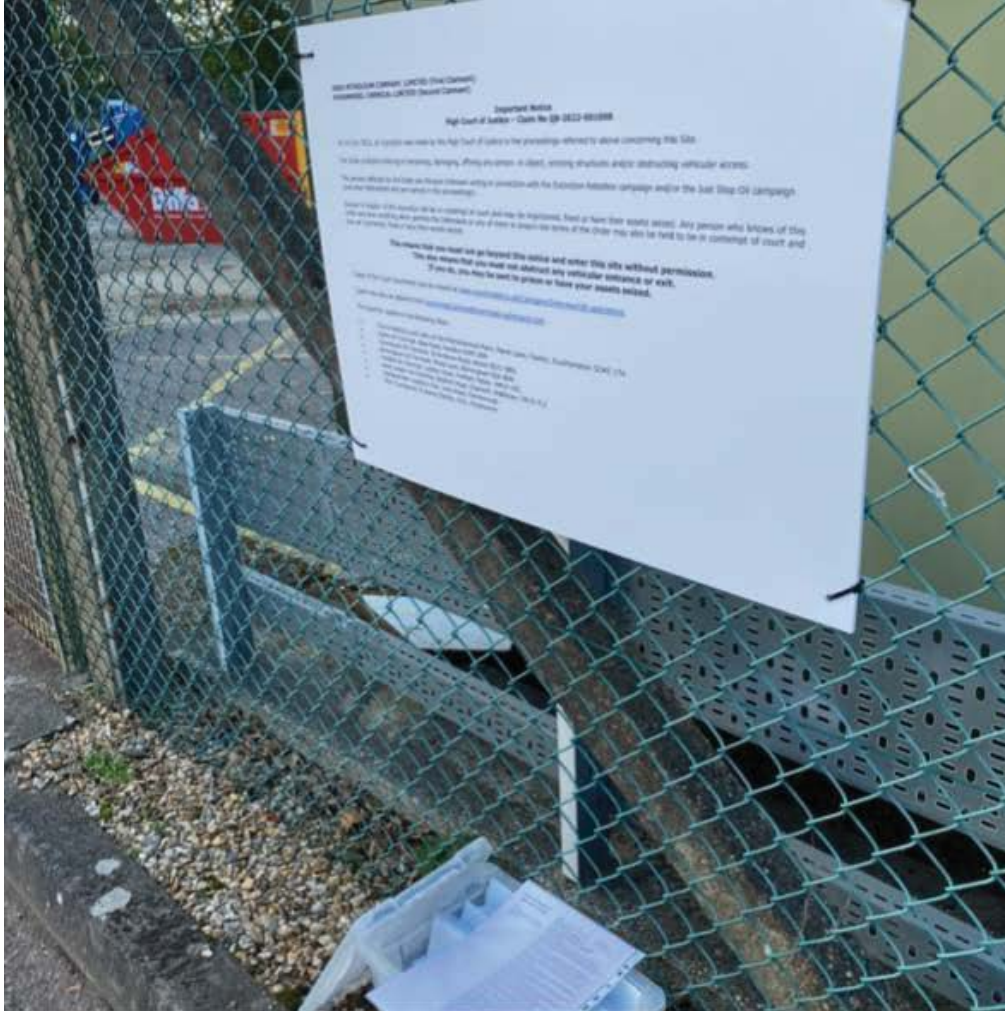
26 mm

0 ev

f1.8

1/354 s





Add a Caption

Tuesday • 3 Oct 2023 • 16:43

Adjust

IMG_4404

Apple iPhone 11

HEIF

Wide Camera — 26 mm f1.8

12 MP • 3024 × 4032 • 2,7 MB

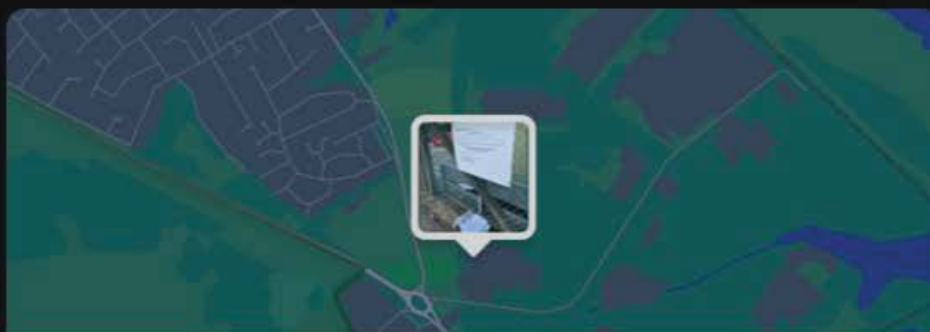
ISO 32

26 mm

0 ev

f1.8

1/418 s





Add a Caption

Tuesday • 3 Oct 2023 • 16:45

Adjust

IMG_4405

Apple iPhone 11

HEIF

Wide Camera — 26 mm f1.8

12 MP • 4032 × 3024 • 1,9 MB

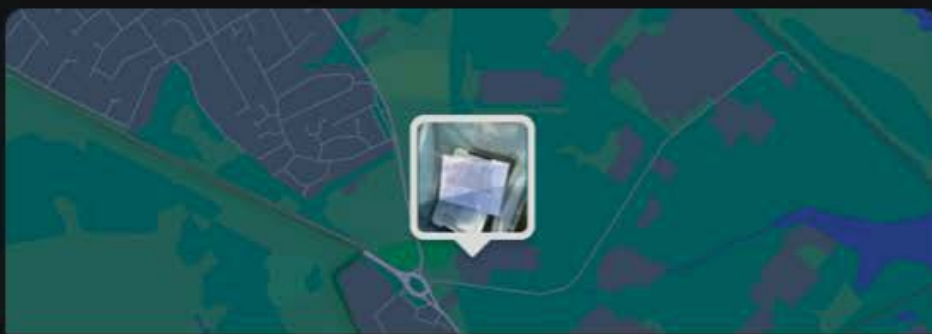
ISO 32

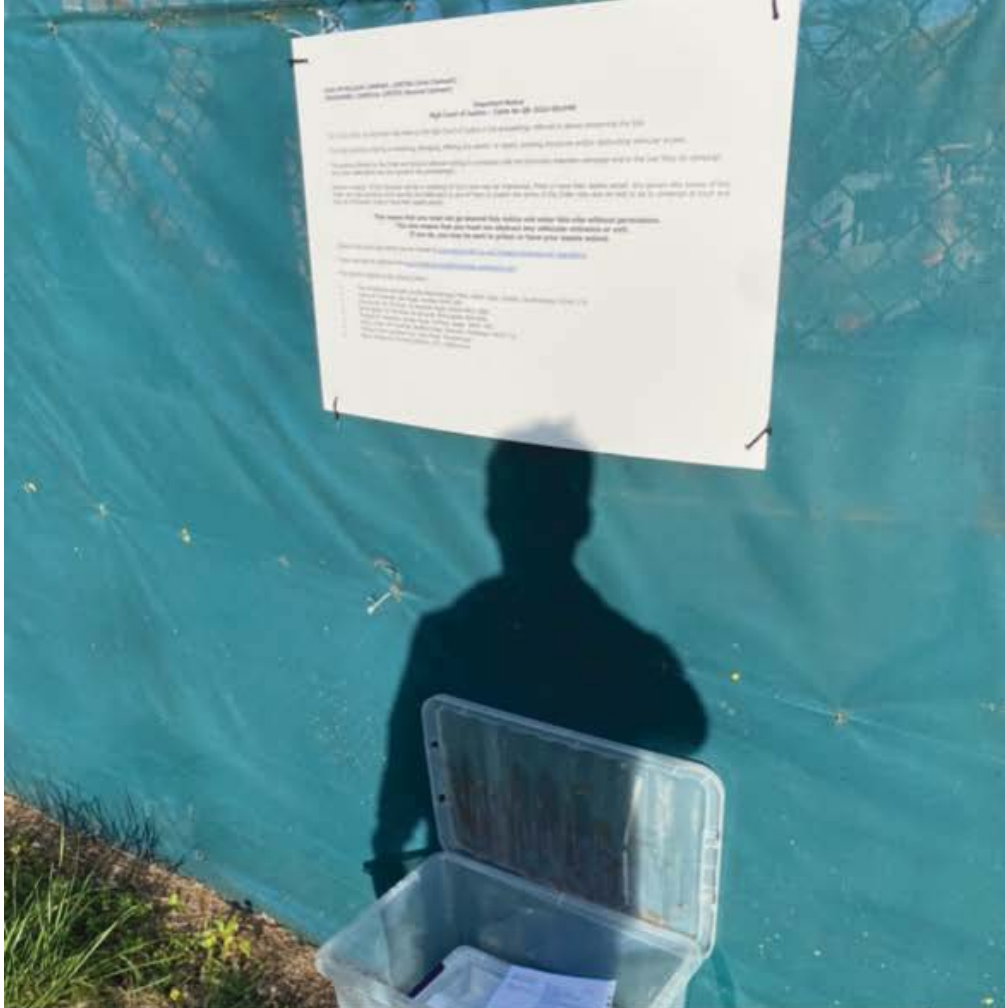
26 mm

0 ev

f1.8

1/1779 s





Add a Caption

Tuesday • 3 Oct 2023 • 16:45

Adjust

IMG_4406

Apple iPhone 11

HEIF

Wide Camera — 26 mm f1.8

12 MP • 3024 × 4032 • 2,6 MB

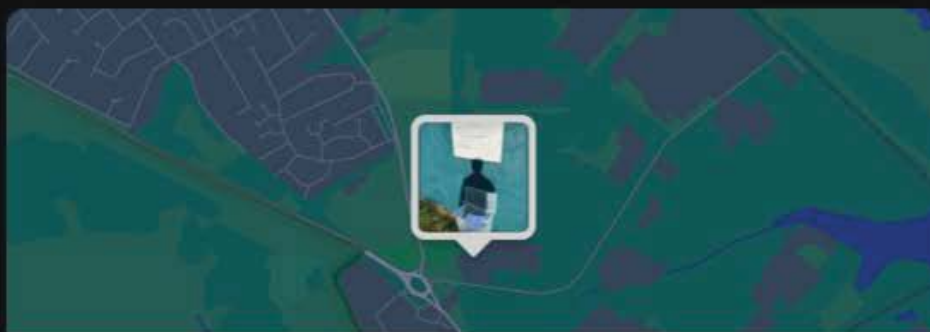
ISO 32

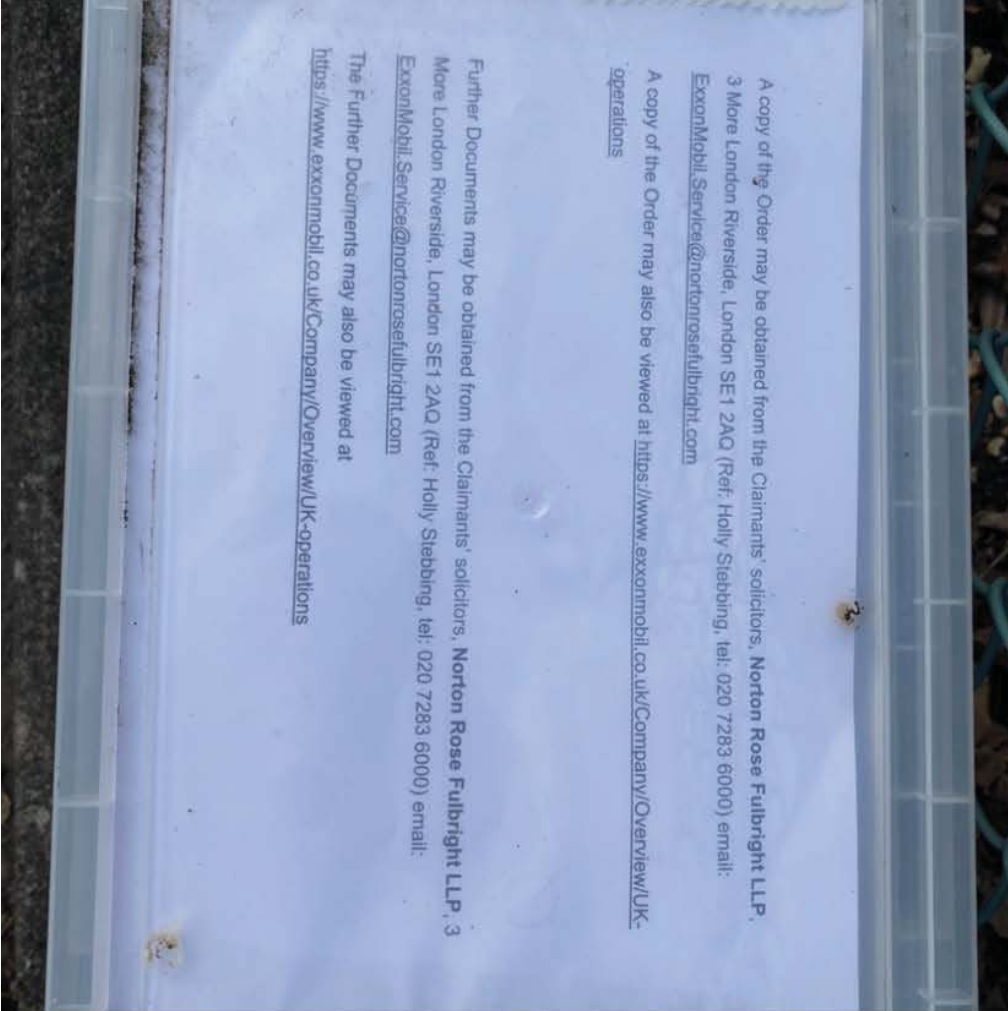
26 mm

0 ev

f1.8

1/2463 s





Add a Caption

Wednesday • 4 Oct 2023 • 16:34

Adjust

IMG_4421

Screenshot

PNG



No lens information

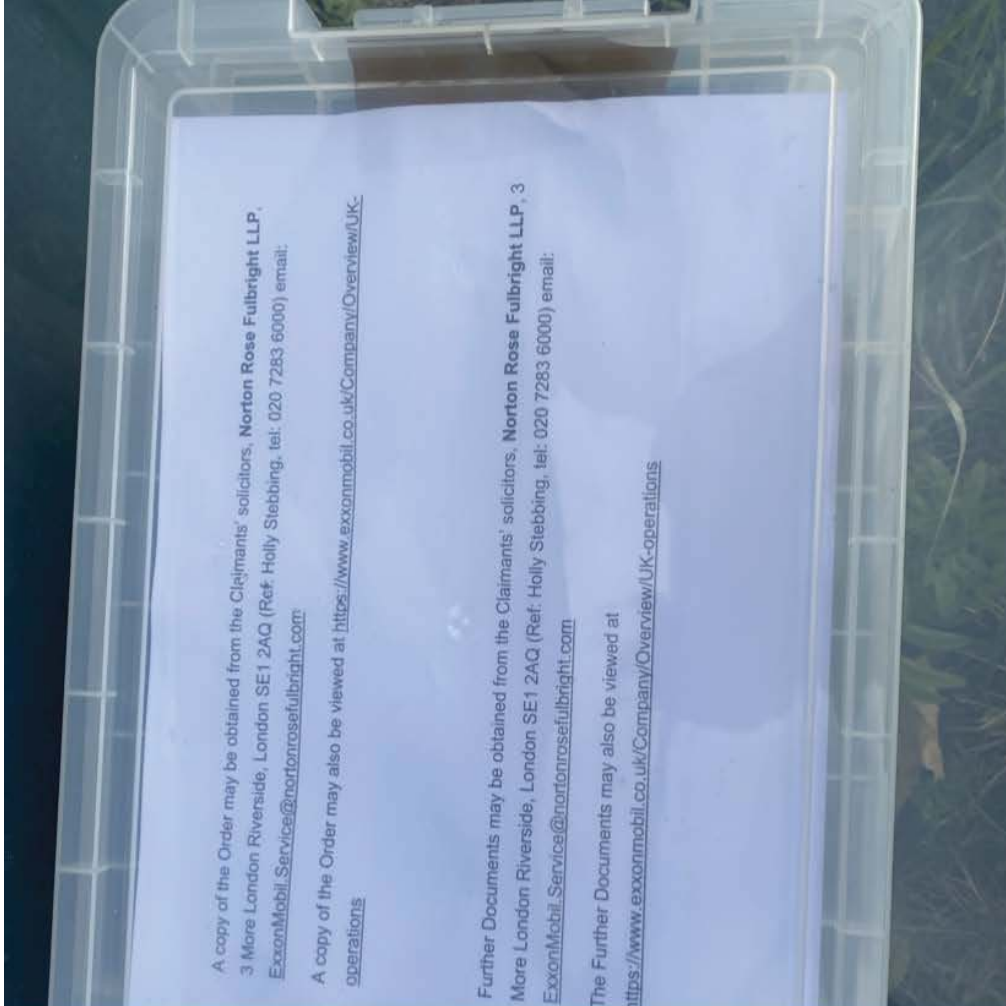
1 MP • 828 × 1792 • 3 MB



Add a location...

Show in All Photos





Add a Caption

Wednesday • 4 Oct 2023 • 16:30

Adjust

IMG_4420

Apple iPhone 11

HEIF

Wide Camera — 26 mm f1.8

12 MP • 3024 × 4032 • 1,1 MB

ISO 32

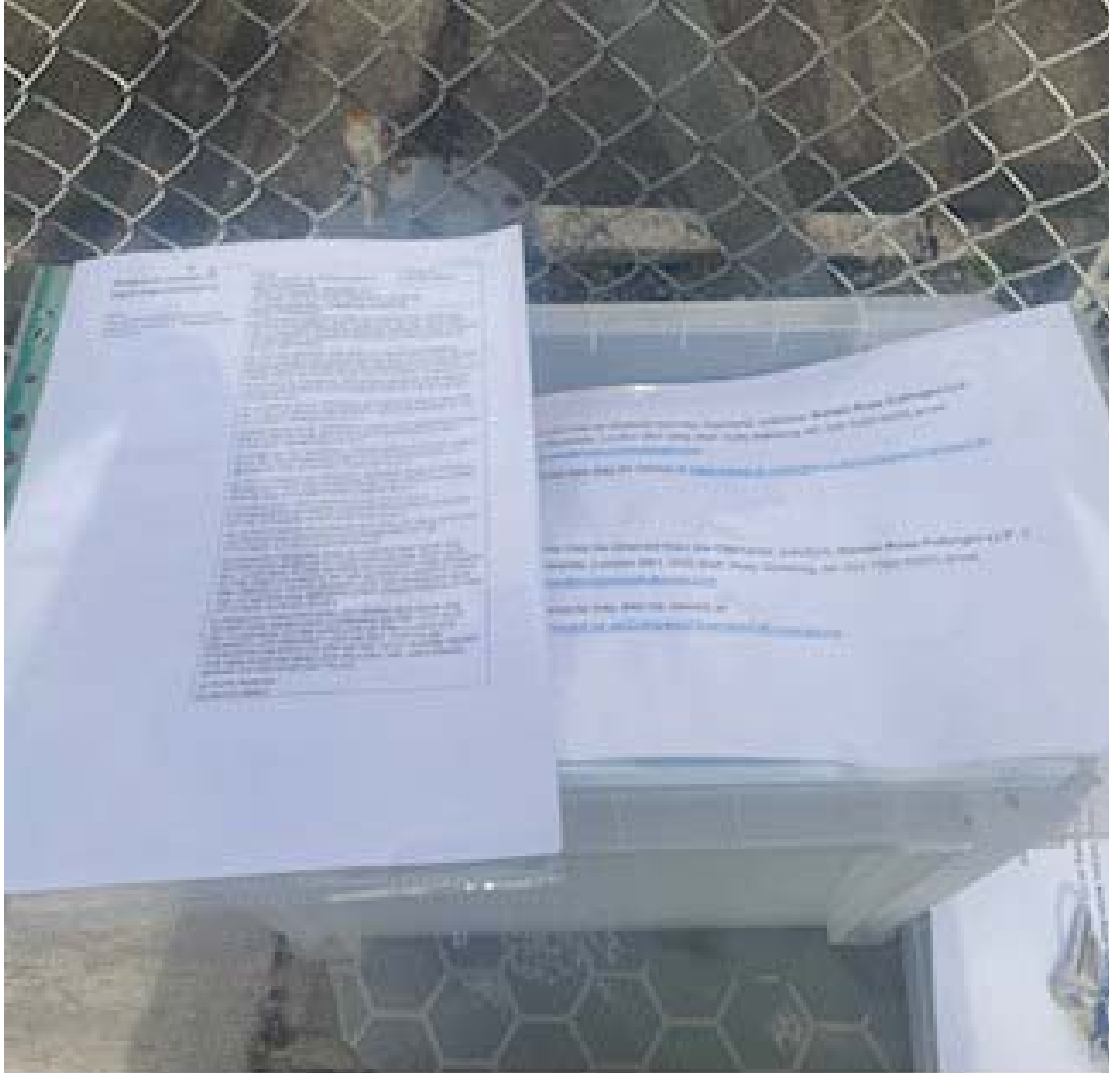
26 mm

0 ev

f1.8

1/1025 s





Add a Caption

Thursday • 5 Oct 2023 • 09:33

Adjust

👍 IMG_1802

Apple iPhone 12

HEIF

Wide Camera — 26 mm *f*1.6

12 MP • 3024 × 4032 • 1.9 MB

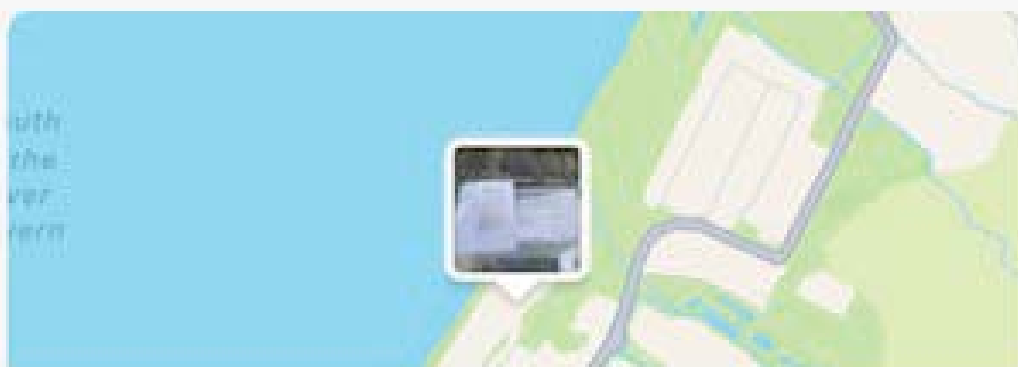
ISO 32

26 mm

0 ev

*f*1.6

1/5556 s





Back up now



Add to album



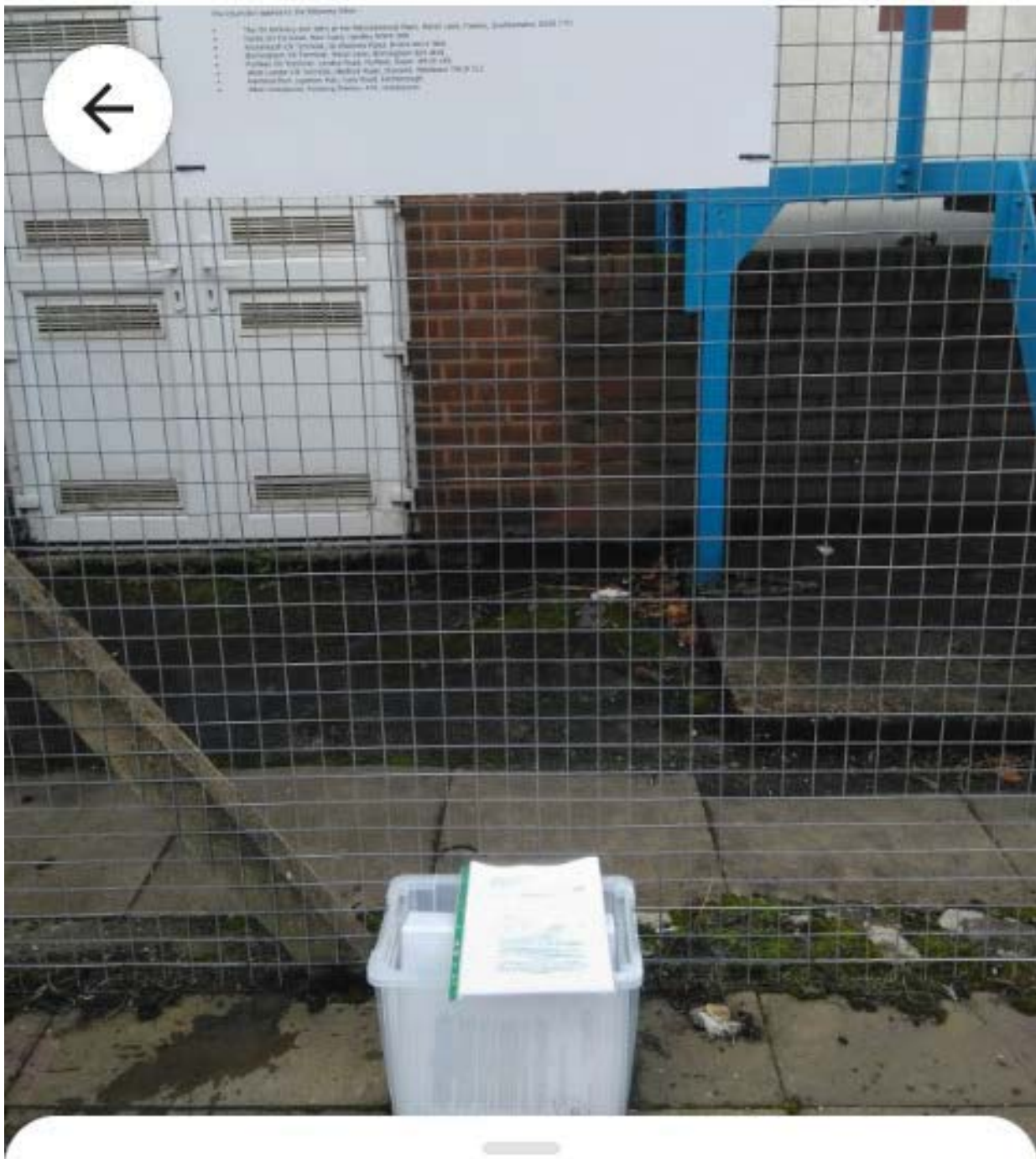
Delete from device



Move Location Folder

Tue, Oct 3, 2023 • 12:02

Add a caption



Back up now



Add to album

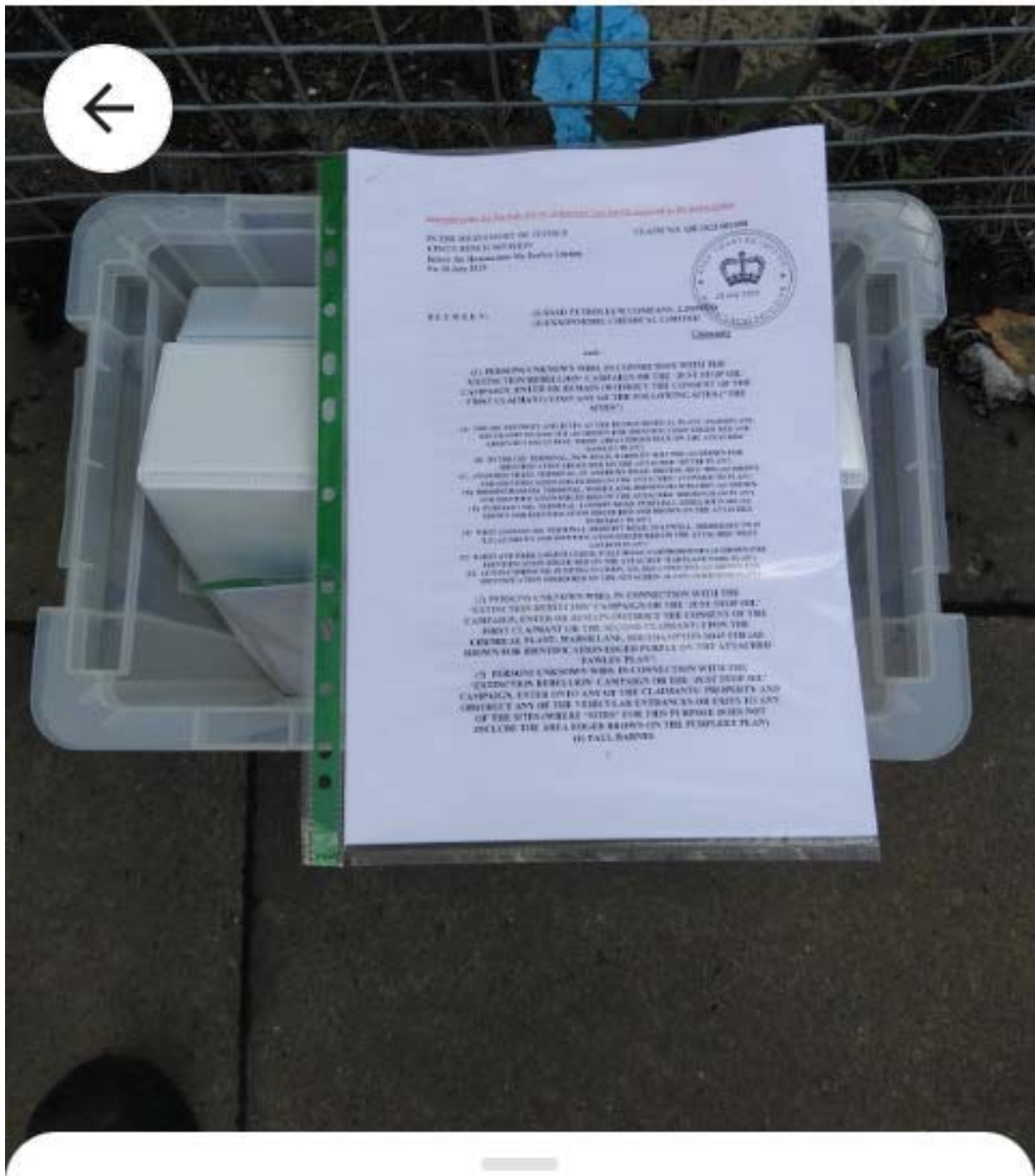


Delete from device



Mov
Loc
Fol

Tue, Oct 3, 2023 • 12:01



Back up now



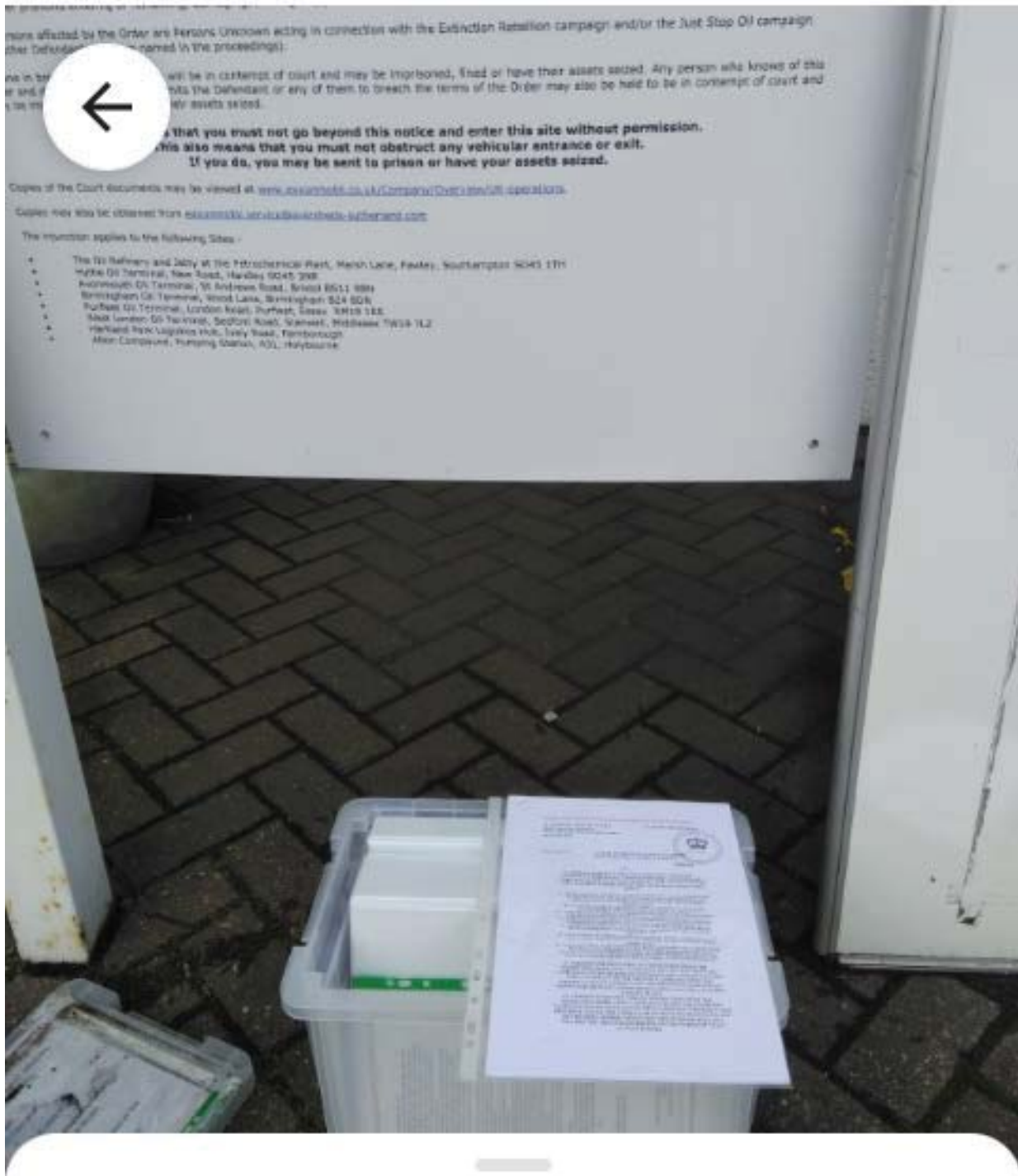
Add to album




Delete from device




Move Location Folder







Back up now



Add to album







Delete from device



Mov
Loc
Fol



Back up now Add to album Delete from device Move Location



Back up now



Move to folder

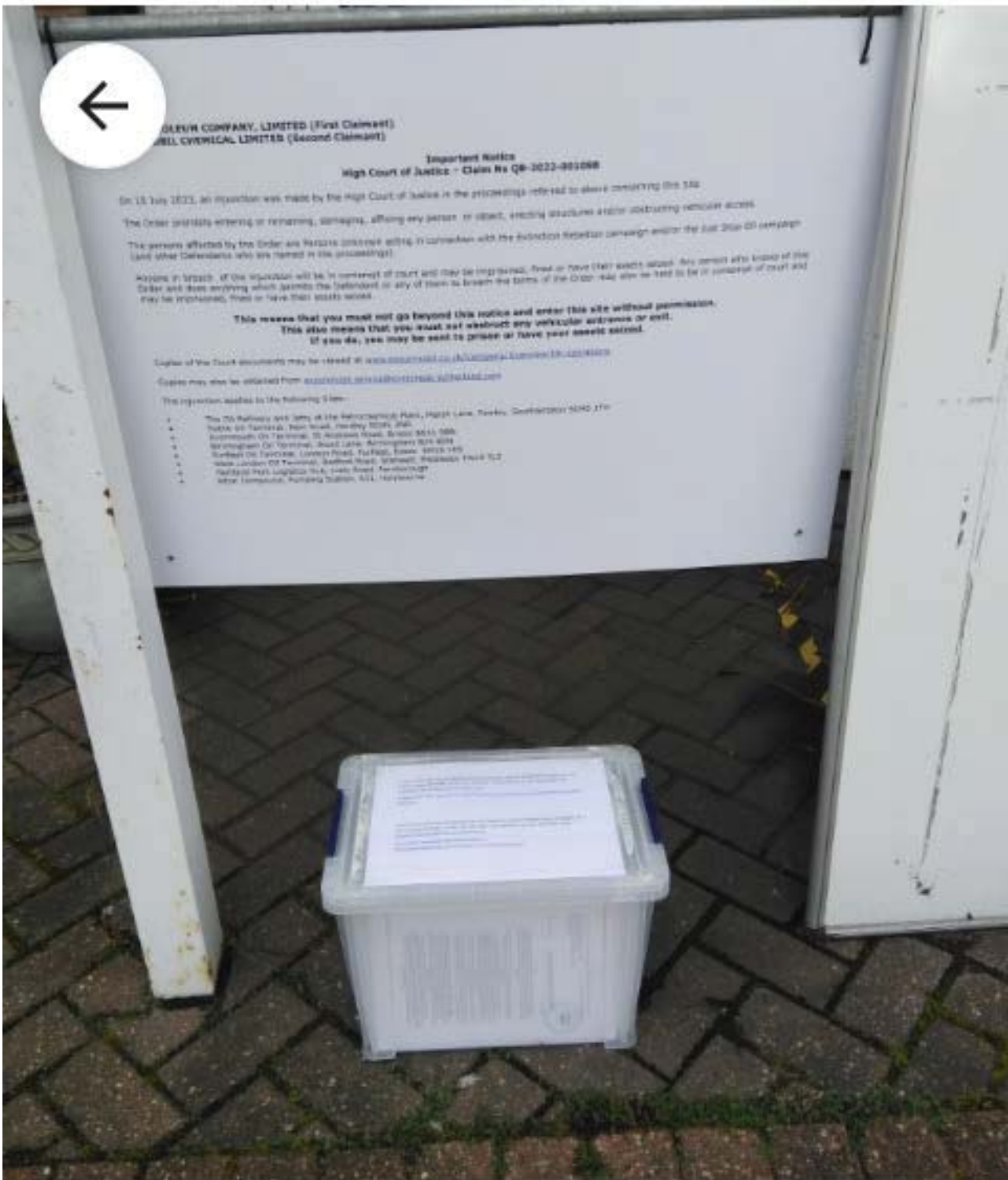


Copy to folder



Add album

Thu, Oct 5, 2023 • 09:57



Back up now



Move to folder



Copy to folder



Add album



Some of the Court documents may be viewed at www.government.nl/uk/consular/consular-services

Copy this link to share: form-00000001@uk.usembassy.gov

The number applies to the following cases:

- The EU Embassy and Jolly at the Metropolitan Court, March Lane, Faversham, Southampton SO41 1TN
- Hyde 00 Terminal, New Road, Haverly SO40 3PB
- Southampton 00 Terminal, St Andrew Road, Shirley SO11 2BB
- Birmingham 00 Terminal, Wood Lane, Birmingham B24 0WQ
- Port of London 00 Terminal, London Road, Rotherhithe, Royal Docks, SE16 1LE
- West London 00 Terminal, Station Road, Stanwell, Middlesex TW19 0LZ
- Herford Park Logistics Hub, Tulse Road, Farnborough
- Hillier Commercial, Pumping Station, A11, Ipswich



Back up now



Move to folder



Copy to folder



Add album

NORTON ROSE FULBRIGHT

Norton Rose Fulbright LLP
One Cabot Square
London EC4A 3DF
United Kingdom
Tel: +44 20 7293 8000
Fax: +44 20 7293 8000
DX 85 London
nortonrosefulbright.com

2 October 2023

To whom it may concern

We enclose, by way of service, notice of change of solicitors dated 2 October 2023 (the **Notice**) and enclose the order of Mr Justice Linden dated 15 July 2023 (intimated on 21 July 2023) (the **Order**). This Notice is being served in the same method as prescribed at paragraph 17 of the **Order**.

Please be advised that **Norton Rose Fulbright LLP** is now the legal representative for Esso Petroleum Company Limited (the **Esso Defendants**) in the proceedings in relation to the **Just Stop Oil** Campaign. The Esso Defendants have sought and been granted summary judgment in relation to the **Order** and the Esso Defendants have sought and been granted summary judgment in relation to the **Order** and the Esso Defendants have sought and been granted summary judgment in relation to the **Order** and the Esso Defendants have sought and been granted summary judgment in relation to the **Order**.

Accordingly, any request for copies of the Notice should be directed to Norton Rose Fulbright LLP, rather than Everheds Sutherland (International) LLP, at the address stated above or by emailing esso@nortonrosefulbright.com. The Esso Defendants wish to apply to vary or discharge the **Order**, notice should be emailed to esso@nortonrosefulbright.com. A copy of the Notice may also be viewed at <https://www.eccourtsmodj.co.uk/CaseManagement/DocumentPublicSpecified>.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Notice of change of legal representative

Note: You should tick either box A or B, as appropriate, and box C, if necessary, as appropriate.

In the name of	Claim No.
HIGH COURT OF JUSTICE, KING'S BENCH DIVISION (including ref)	QB-2022-001098
(1) ESSO PETROLEUM COMPANY, LIMITED	
(2) EXXONMOBIL CHEMICAL LIMITED	
Name of Defendants	
Name of Claimant	
IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE CLAIMANT) UPON ANY OF THE FOLLOWING SITES ("THE SITES")	
(A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO4 1TH (AS SHOWN FOR THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')	
(B) THE OIL TERMINAL, NEW ROAD, HARDLEY SO4 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'AVONMOUTH PLAN')	
(C) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B14 4RN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')	
(D) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 8RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED 'HARTLAND AND PARK PLAN')	
(E) WEST LONDON OIL TERMINAL, BROWN BOY, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')	
(F) HARTLAND PARK LOGISTICS HERVEY ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND AND PARK PLAN')	
(G) ALTON COMPOUND, PUMPING STATION, A11, HOLLYBOURSE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'ALTON COMPOUND PLAN')	
(H) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE CLAIMANT) UPON ANY OF THE FOLLOWING SITES ("THE SITES")	
(I) THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO4 1TH (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')	
(J) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PREMISES OR EXITS TO ANY OF THE SITES WHERE "SITES" FOR THIS PURPOSE DOES NOT INCLUDE THE AREA EDGED BROWN ON THE PURFLEET PLAN)	
(K) PAUL BARNES	
(L) DIANA HERT	

Amended under the Slip Rule, CPR 40.12, dated 21st July 2023, as approved by Mr Justice Linden

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
Before the Honorable Mr Justice Linden
On 19 July 2023



CLAIM NO. QB-2022-001098

BETWEEN: (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 CLAIMANT) UPON ANY OF THE FOLLOWING SITES ("THE SITES")

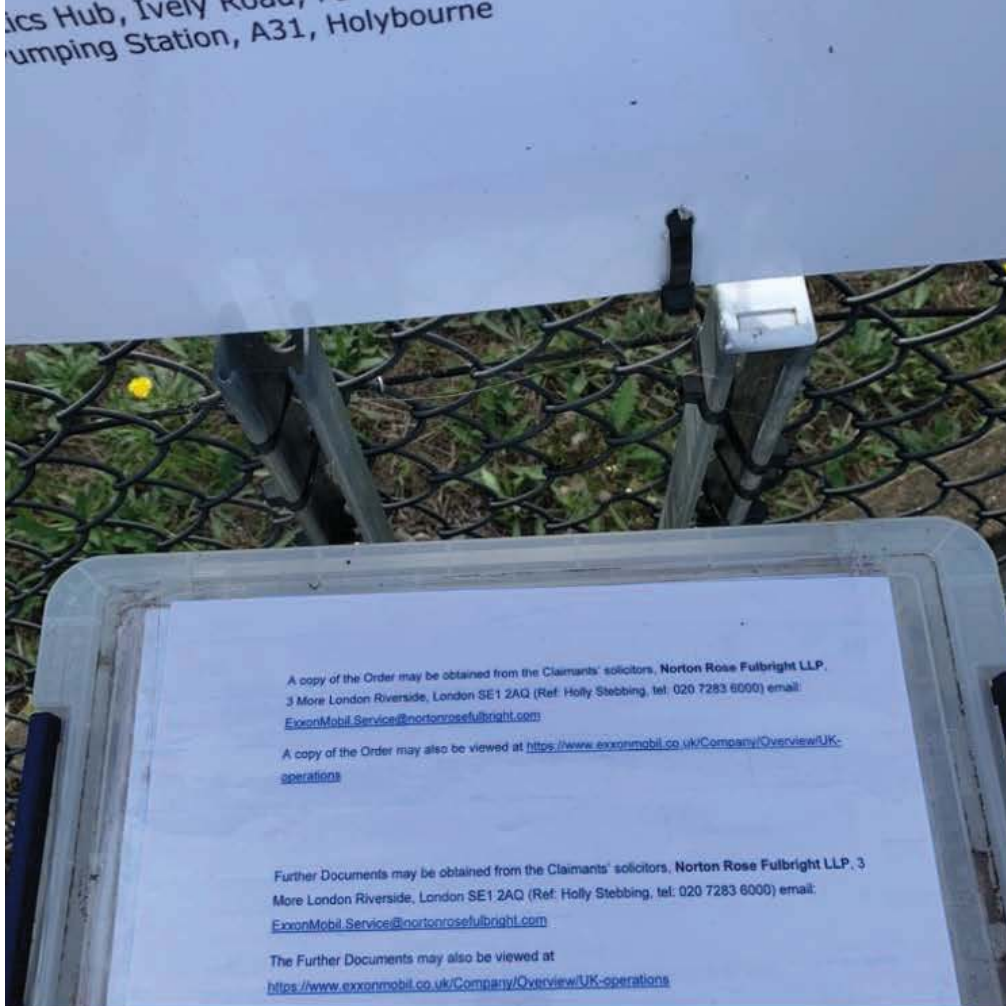
- (A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO4 1TH (AS SHOWN FOR THOSE AREAS EDGED BLUE ON THE ATTACHED 'FAWLEY PLAN')
- (B) THE OIL TERMINAL, NEW ROAD, HARDLEY SO4 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HYTE PLAN')
- (C) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B14 4RN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'BIRMINGHAM PLAN')
- (D) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 8RS (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND AND PARK PLAN')
- (E) WEST LONDON OIL TERMINAL, BROWN BOY, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'WEST LONDON PLAN')
- (F) HARTLAND PARK LOGISTICS HERVEY ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED 'HARTLAND AND PARK PLAN')
- (G) ALTON COMPOUND, PUMPING STATION, A11, HOLLYBOURSE (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 CLAIMANT) UPON ANY OF THE FOLLOWING SITES ("THE SITES")

- (I) THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO4 1TH (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED 'FAWLEY PLAN')
- (J) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS' PREMISES OR EXITS TO ANY OF THE SITES WHERE "SITES" FOR THIS PURPOSE DOES NOT INCLUDE THE AREA EDGED BROWN ON THE PURFLEET PLAN)

(K) PAUL BARNES

(L) DIANA HERT



Add a Caption

Thursday • 5 Oct 2023 • 10:33

Adjust

IMG_0581

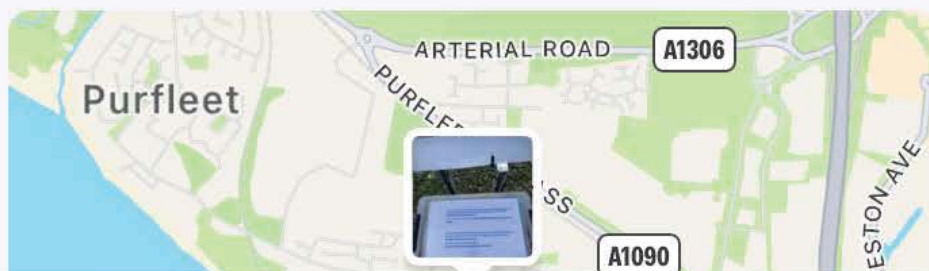
Apple iPhone XR

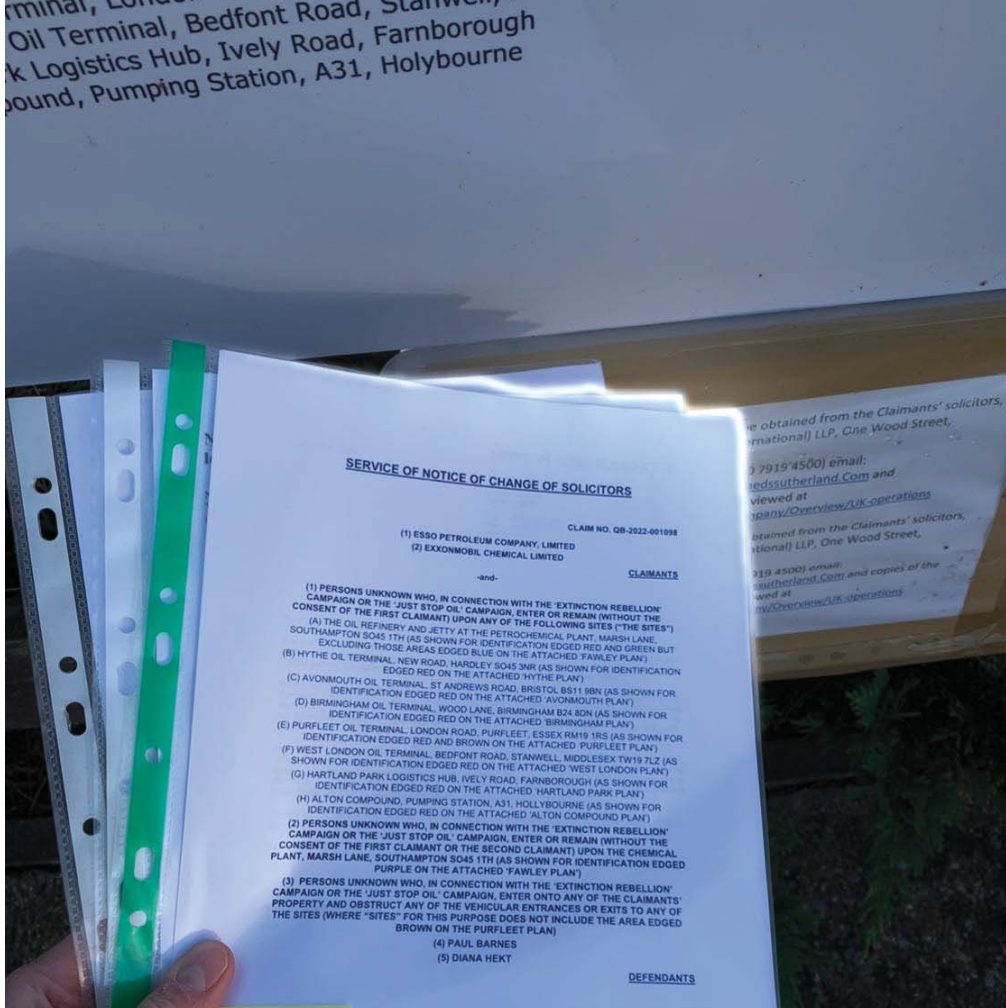
HEIF

Rear Camera — 26 mm f1.8

12 MP • 3024 × 4032 • 1.5 MB

ISO 25 | 26 mm | 0 ev | f1.8 | 1/945 s





Add a Caption

Tuesday • 3 Oct 2023 • 09:50

Adjust

IMG_1798

Apple iPhone XS

HEIF

Wide Camera — 26 mm f1.8

12 MP • 3024 x 4032 • 1.5 MB

ISO 25

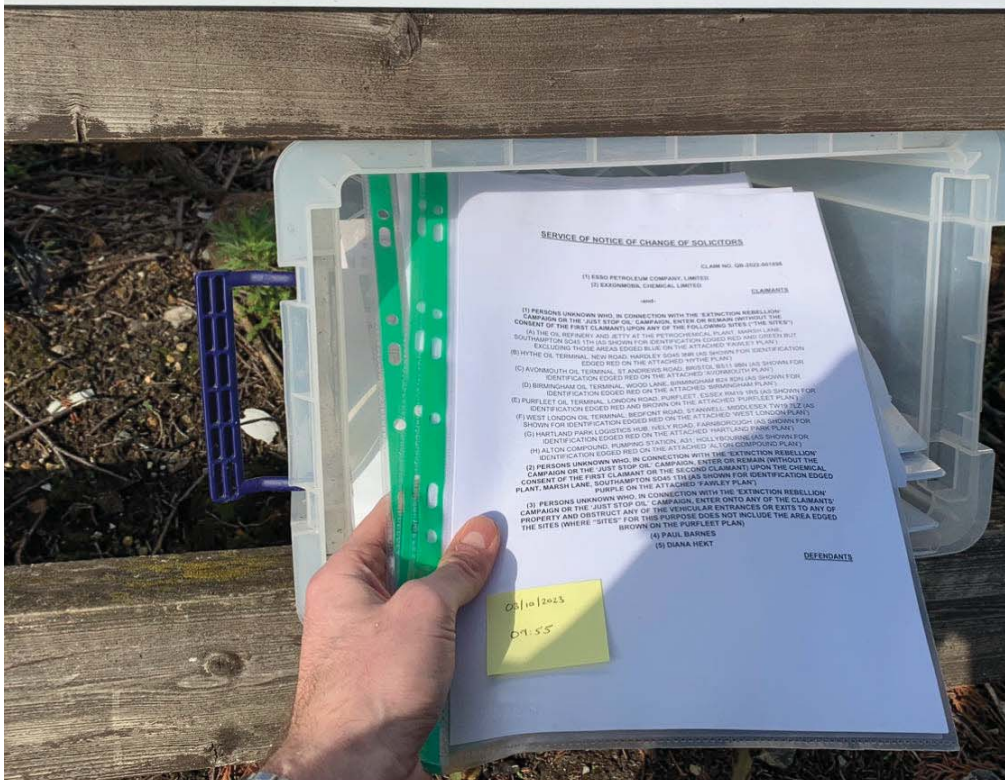
26 mm

0 ev

f1.8

1/732 s





Add a Caption

Tuesday • 3 Oct 2023 • 09:51

Adjust

IMG_1800

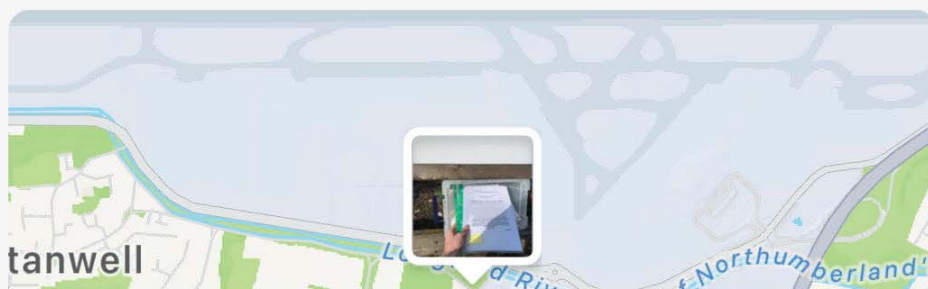
Apple iPhone XS

HEIF

Wide Camera — 26 mm f1.8

12 MP • 4032 x 3024 • 2.2 MB

ISO 25 | 26 mm | 0 ev | f1.8 | 1/3788 s





Add a Caption

Wednesday · 4 Oct 2023 · Adjust
15:06

📷 IMG_7711

Apple iPhone XR

HEIF

Rear Camera — 26 mm *f*1.8

12 MP · 4032 × 3024 · 1.6 MB

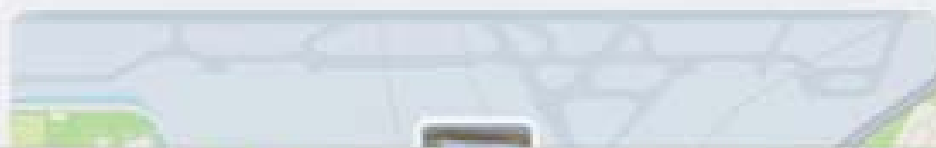
ISO25

26mm

0ev

*f*1.8

1/577s



Edit





Add a Caption

Wednesday · 4 Oct 2023 · [Adjust](#)
15:09

IMG_7716

Apple iPhone XR

HEIF

Rear Camera — 26 mm *f*1.8

12 MP · 4032 × 3024 · 2.3 MB

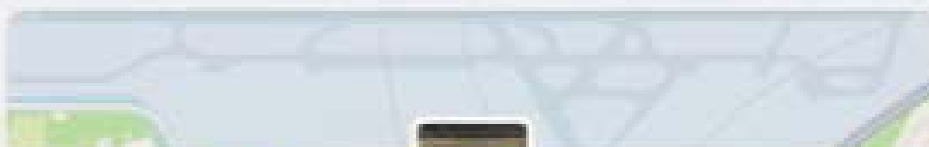
ISO25

26mm

0ev

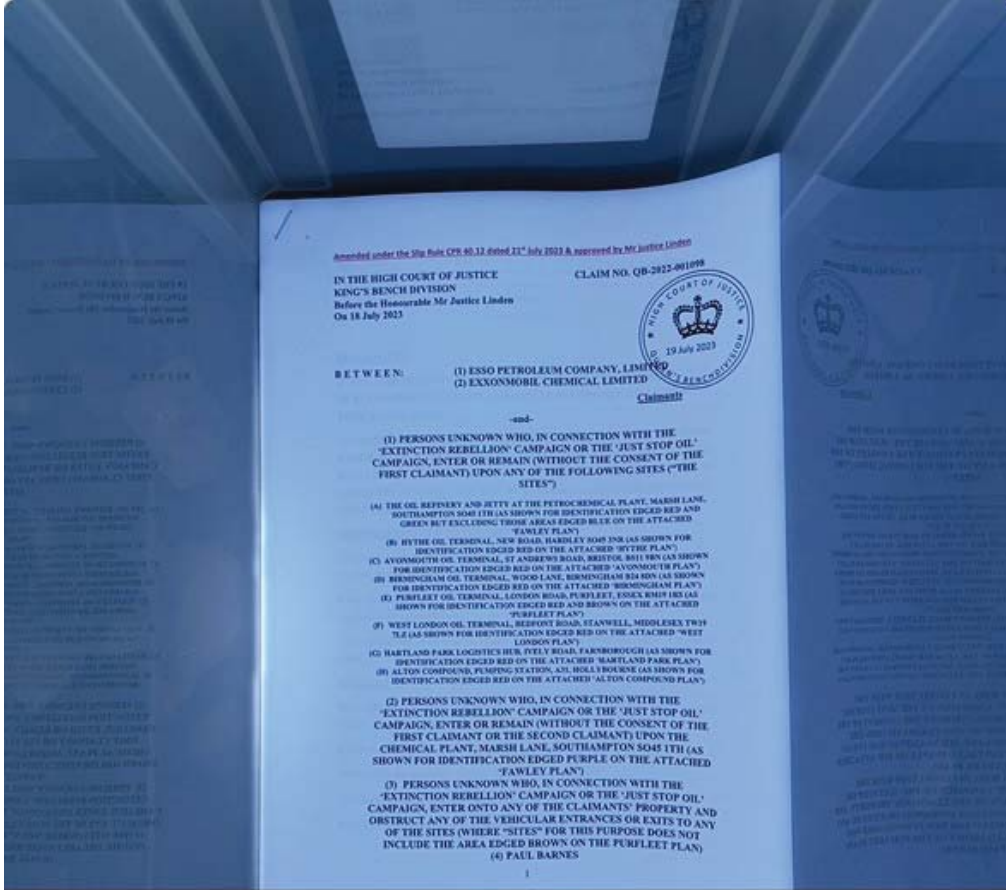
*f*1.8

1/643s



Edit





Add a Caption

Tuesday • 3 Oct 2023 • 10:11

Adjust

IMG_0783

Apple iPhone 13

HEIF

Wide Camera — 26 mm f1.6

12 MP • 3024 × 4032 • 2.9 MB

ISO 50

26 mm

0 ev

f1.6

1/891 s



Farnborough - Fleet

Adjust



SE

\$

SW

120

150

180

210

240

☉ 180°S (T) ☉ 51°17'6"N, 0°48'33"W ±9ft ▲ 265ft

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

A copy of the Order may also be viewed at <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>

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

The Further Documents may also be viewed at
<https://www.exxonmobil.co.uk/Company/Overview/UK-operations>

04 Oct 2023, 14:48:48



Add a Caption

Tuesday · 3 Oct 2023 · 13:03

[Adjust](#)

IMG_0793

Apple iPhone 13

HEIF

Wide Camera — 26 mm f1.6

12 MP · 3024 × 4032 · 5.2 MB

ISO50

26mm

Dev

f1.6

1/4484s

[Add a location...](#)





Add a Caption

Tuesday · 3 Oct 2023 · 13:03

[Adjust](#)

IMG_0792

Apple iPhone 13

HEIF

Wide Camera — 26 mm f1.6

12 MP · 3024 × 4032 · 4.3 MB

ISO50

26mm

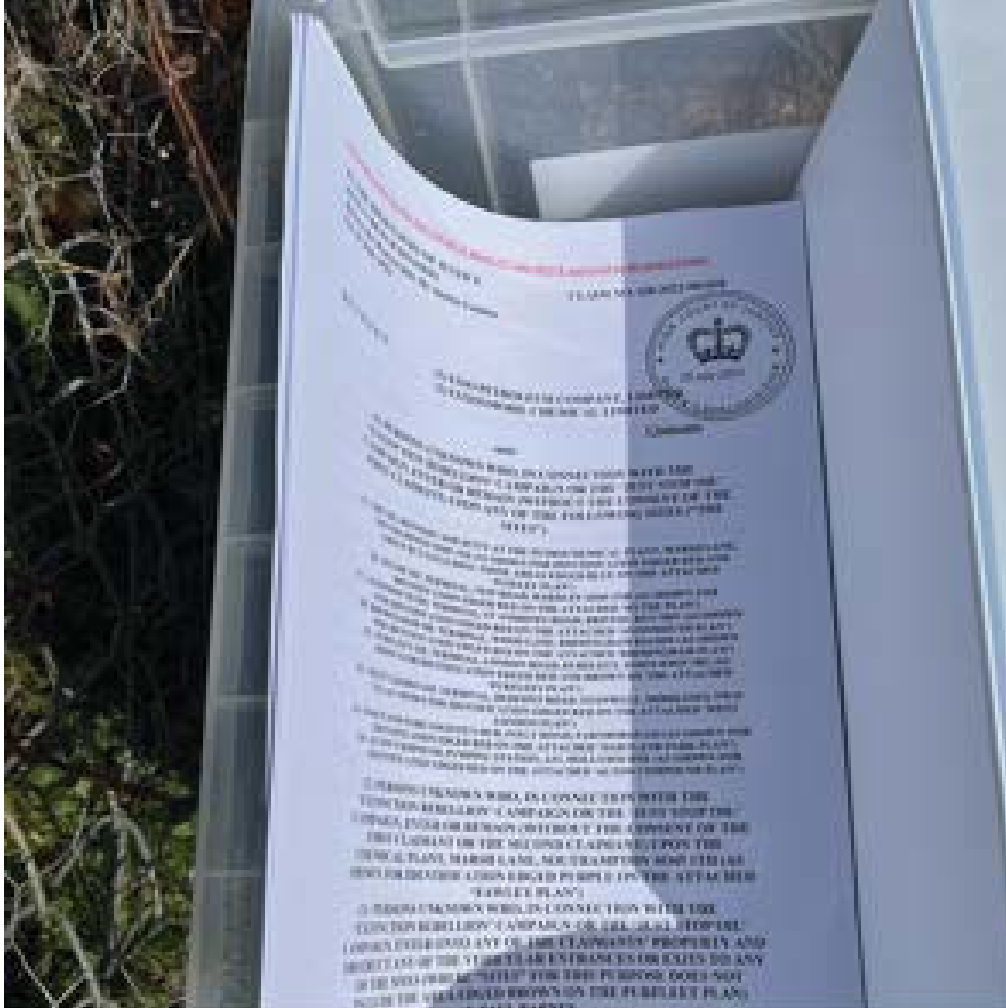
Dev

f1.6

1/5848s

[Add a location...](#)





Add a Caption

Tuesday • 3 Oct 2023 • 13:02

Adjust

IMG_0791

Apple iPhone 13

HEIF

Wide Camera — 26 mm f1.6

12 MP • 3024 × 4032 • 2.4 MB

ISO50

26mm

0ev

f1.6

1/15152s

Add a location...





Add a Caption

Tuesday · 3 Oct 2023 · 12:37

[Adjust](#)

IMG_0790

Apple iPhone 13

HEIF

Wide Camera — 26 mm f1.6

12 MP · 3024 × 4032 · 4.3 MB

ISO50

26mm

Dev

f1.6

1/2755s

[Add a location...](#)





Add a Caption

Tuesday · 3 Oct 2023 · 12:37

Adjust

IMG_0789

Apple iPhone 13

HEIF

Wide Camera — 26 mm f1.6

12 MP · 3024 × 4032 · 3.4 MB

ISO50

26mm

Dev

f1.6

1/5556s

Add a location...



SERVICE OF NOTICE OF CHANGE OF SOLICITORS

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

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

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

- (4) PAUL BARNES
(5) DIANA HEKT

DEFENDANTS



2 October 2023

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, notice of change of solicitors dated 2 October 2023 (the **Notice**) and enclose the order of Mr Justice Linden dated 18 July 2023 (amended on 21 July 2023) (the **Order**). This Notice is being served in the same method as prescribed at paragraph 17 of the Order.

Please be advised that **Norton Rose Fulbright LLP** is now the legal representative for Esso Petroleum Company, Limited and ExxonMobil Chemical Limited (the **Claimants**) 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 (the **Defendants**) with claim number QB-2022-001098.

Accordingly, any request for copies of the Notice should be directed to **Norton Rose Fulbright LLP**, rather than Eversheds Sutherland (International) LLP, at the address stated above or by emailing ExxonMobil.Service@nortonrosefulbright.com. Likewise, should the Defendants wish to apply to vary or discharge the Order, notice should be given in accordance with paragraph 6 of the Order to **Norton Rose Fulbright LLP** by emailing ExxonMobil.Service@nortonrosefulbright.com.

A copy of the Notice may also be viewed at <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>.

Yours faithfully

Norton Rose Fulbright LLP

Norton Rose Fulbright LLP

Enc.



COMPANY

UK operations

Exxon Mobil Corporation is the world's leading publicly-owned energy company and it, or its affiliated companies, operates facilities or markets products in most of the world's countries. It is the parent company of the Esso, Mobil and ExxonMobil companies that operate in the United Kingdom.

Injunction

Notice of change in legal representation – 2 October 2023



Sealed Final Order dated 18 July 2023



ESSO v PU - Trial Bundle 1 - 10.07.23



ESSO v PU - Trial Bundle 2 - 10.07.23



U.K. Pipelines

We operate the largest privately owned underground oil pipeline distribution network in the U.K. – around 700 kilometers of pipeline. The majority of refinery products are transported by pipeline to distribution terminals at Hythe, Avonmouth, Birmingham, west London and Purfleet. The remaining products are transported by sea or by road.

In 2017 we announced the **Southampton to London Pipeline Project** that will replace 90 km of the 105 km pipeline that transports aviation fuel from Fawley refinery to the terminal in west London.





Refining and marketing overview

ExxonMobil is best known in the UK for our famous brands: Esso and Mobil. We are one of the largest petrol retailers in the UK. We serve around 800,000 customers every day, 365 days of the year, through our retail network of around 1,100 Esso-branded service stations.

Learn more →

From: Madeline Hallwright
Sent: 09 October 2023 11:43
To: xr-legal@riseup.net; enquiries@extinctionrebellion.uk
Cc: Holly Stebbing
Subject: Claim No. QB-2022-001098 | Notice of Change of Solicitors [NRF_EMEA-UK.FID3210555]
Attachments: 2023.10.02 - Operating Sites Injunction - Notice.pdf

Tracking:	Recipient	Delivery	Read
	xr-legal@riseup.net		
	enquiries@extinctionrebellion.uk		
	Holly Stebbing	Delivered: 09/10/2023 11:43	Read: 09/10/2023 11:55
	1001267389 _ PENDING_ Esso Operating Sites Injunction Reviews Emails _1001267389_		

To whom it may concern

Re: Claim No. QB-2022-001098 | Notice of Change of Solicitors

We refer to the order of Mr Justice Linden dated 18 July 2023 (amended on 21 July 2023) (the **Order**).

We enclose, by way of service pursuant to paragraph 17 of the Order, notice of change of solicitors dated 2 October 2023 (the **Notice**).

Accordingly, please be advised that **Norton Rose Fulbright LLP** is now the legal representative of Esso Petroleum Company, Limited and ExxonMobil Chemical Limited (the **Claimants**) 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 (the **Defendants**) with claim number QB-2022-001098.

Any request for copies of any documents should therefore be directed in future to **Norton Rose Fulbright LLP**, rather than Eversheds Sutherland (International) LLP, at the below address or by emailing ExxonMobil.Service@nortonrosefulbright.com. Likewise, should the Defendants wish to apply to vary or discharge the Order, notice should be given in accordance with paragraph 6 of the Order to **Norton Rose Fulbright LLP** by emailing ExxonMobil.Service@nortonrosefulbright.com.

A copy of the Notice may also be viewed at <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>.

Yours faithfully

Norton Rose Fulbright LLP
 3 More London Riverside, London, SE1 2AQ, United Kingdom
 Tel +4420 7283 6000

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

Notice of change of legal representative

Note:

You should tick either box A **or** B as appropriate **and** box C. Complete details as necessary.

In the HIGH COURT OF JUSTICE, KING'S BENCH DIVISION	Claim No. QB-2022-001098
Name of Claimants (including ref.) (1) ESSO PETROLEUM COMPANY, LIMITED (2) EXXONMOBIL CHEMICAL LIMITED	
Name of Defendants (1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT) UPON ANY OF THE FOLLOWING SITES (“THE SITES”) (A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED ‘FAWLEY PLAN’) (B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘HYTHE PLAN’) (C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘AVONMOUTH PLAN’) (D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘BIRMINGHAM PLAN’) (E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED ‘PURFLEET PLAN’) (F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘WEST LONDON PLAN’) (G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘HARTLAND PARK PLAN’) (H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘ALTON COMPOUND PLAN’) (2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED ‘FAWLEY PLAN’) (3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS’ PROPERTY AND OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES (WHERE “SITES” FOR THIS PURPOSE DOES NOT INCLUDE THE AREA EDGED BROWN ON THE PURFLEET PLAN) (4) PAUL BARNES (5) DIANA HEKT	

We give notice that

A my legal representative (*insert name and address*)

--

has ceased to act for me and I shall now be acting in person.

B we (*insert name of legal representative*)

NORTON ROSE FULBRIGHT LLP

have been instructed to act on behalf of the claimants in this claim
in place of (*insert name and address of previous legal representative*).

EVERSHEDS SUTHERLAND (INTERNATIONAL) LLP
--

C we have served notice of this change on every party to the claim (and on the former legal representative).

Address to which documents about this claim should be sent (including any reference)

NORTON ROSE FULBRIGHT LLP 3 MORE LONDON RIVERSIDE LONDON Postcode <table border="1" style="display: inline-table; vertical-align: middle;"> <tr> <td>S</td><td>E</td><td>1</td><td></td><td></td> </tr> </table> <table border="1" style="display: inline-table; vertical-align: middle;"> <tr> <td>2</td><td>A</td><td>Q</td><td></td><td></td> </tr> </table>	S	E	1			2	A	Q			If applicable	
	S	E	1									
	2	A	Q									
	Telephone no.	020 7283 6000										
	Fax no.											
DX no.	DX 85 LONDON											
Your ref.	1001267389											

Email	HOLLY.STEBBING@NORTONROSEFULBRIGHT.COM
-------	--

Signed



Claimants' legal representative

Position or
office held

PARTNER

If signing on behalf of firm or company

Date

0	2	/	1	0	/	2	0	2	3
---	---	---	---	---	---	---	---	---	---

For further details of the courts www.gov.uk/find-court-tribunal

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

From: Madeline Hallwright
Sent: 09 October 2023 11:43
To: juststopoilpress@protonmail.com
Cc: Holly Stebbing
Subject: Claim No. QB-2022-001098 | Notice of Change of Solicitors [NRF_EMEA-UK.FID3210555]
Attachments: 2023.10.02 - Operating Sites Injunction - Notice.pdf

Tracking:	Recipient	Delivery	Read
	juststopoilpress@protonmail.com		
	Holly Stebbing	Delivered: 09/10/2023 11:43	Read: 09/10/2023 11:56
	1001267389 _ PENDING_ Esso Operating Sites Injunction Reviews Emails _1001267389_		

To whom it may concern

Re: Claim No. QB-2022-001098 | Notice of Change of Solicitors

We refer to the order of Mr Justice Linden dated 18 July 2023 (amended on 21 July 2023) (the **Order**).

We enclose, by way of service pursuant to paragraph 17 of the Order, notice of change of solicitors dated 2 October 2023 (the **Notice**).

Accordingly, please be advised that **Norton Rose Fulbright LLP** is now the legal representative of Esso Petroleum Company, Limited and ExxonMobil Chemical Limited (the **Claimants**) 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 (the **Defendants**) with claim number QB-2022-001098.

Any request for copies of any documents should therefore be directed in future to **Norton Rose Fulbright LLP**, rather than Eversheds Sutherland (International) LLP, at the below address or by emailing ExxonMobil.Service@nortonrosefulbright.com. Likewise, should the Defendants wish to apply to vary or discharge the Order, notice should be given in accordance with paragraph 6 of the Order to **Norton Rose Fulbright LLP** by emailing ExxonMobil.Service@nortonrosefulbright.com.

A copy of the Notice may also be viewed at <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>.

Yours faithfully

Norton Rose Fulbright LLP
 3 More London Riverside, London, SE1 2AQ, United Kingdom
 Tel +4420 7283 6000

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

Notice of change of legal representative

Note:

You should tick either box A **or** B as appropriate **and** box C. Complete details as necessary.

In the HIGH COURT OF JUSTICE, KING'S BENCH DIVISION	Claim No. QB-2022-001098
Name of Claimants (including ref.) (1) ESSO PETROLEUM COMPANY, LIMITED (2) EXXONMOBIL CHEMICAL LIMITED	
Name of Defendants (1) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT) UPON ANY OF THE FOLLOWING SITES (“THE SITES”) (A) THE OIL REFINERY AND JETTY AT THE PETROCHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN FOR IDENTIFICATION EDGED RED AND GREEN BUT EXCLUDING THOSE AREAS EDGED BLUE ON THE ATTACHED ‘FAWLEY PLAN’) (B) HYTHE OIL TERMINAL, NEW ROAD, HARDLEY SO45 3NR (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘HYTHE PLAN’) (C) AVONMOUTH OIL TERMINAL, ST ANDREWS ROAD, BRISTOL BS11 9BN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘AVONMOUTH PLAN’) (D) BIRMINGHAM OIL TERMINAL, WOOD LANE, BIRMINGHAM B24 8DN (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘BIRMINGHAM PLAN’) (E) PURFLEET OIL TERMINAL, LONDON ROAD, PURFLEET, ESSEX RM19 1RS (AS SHOWN FOR IDENTIFICATION EDGED RED AND BROWN ON THE ATTACHED ‘PURFLEET PLAN’) (F) WEST LONDON OIL TERMINAL, BEDFONT ROAD, STANWELL, MIDDLESEX TW19 7LZ (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘WEST LONDON PLAN’) (G) HARTLAND PARK LOGISTICS HUB, IVELY ROAD, FARNBOROUGH (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘HARTLAND PARK PLAN’) (H) ALTON COMPOUND, PUMPING STATION, A31, HOLLYBOURNE (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED ‘ALTON COMPOUND PLAN’) (2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 1TH (AS SHOWN FOR IDENTIFICATION EDGED PURPLE ON THE ATTACHED ‘FAWLEY PLAN’) (3) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN, ENTER ONTO ANY OF THE CLAIMANTS’ PROPERTY AND OBSTRUCT ANY OF THE VEHICULAR ENTRANCES OR EXITS TO ANY OF THE SITES (WHERE “SITES” FOR THIS PURPOSE DOES NOT INCLUDE THE AREA EDGED BROWN ON THE PURFLEET PLAN) (4) PAUL BARNES (5) DIANA HEKT	

We give notice that

A my legal representative (*insert name and address*)

--

has ceased to act for me and I shall now be acting in person.

B we (*insert name of legal representative*)

NORTON ROSE FULBRIGHT LLP

have been instructed to act on behalf of the claimants in this claim
in place of (*insert name and address of previous legal representative*).

EVERSHEDS SUTHERLAND (INTERNATIONAL) LLP
--


C we have served notice of this change on every party to the claim (and on the former legal representative).

Address to which documents about this claim should be sent (including any reference)

NORTON ROSE FULBRIGHT LLP 3 MORE LONDON RIVERSIDE LONDON Postcode <table border="1" style="display: inline-table; vertical-align: middle;"> <tr> <td>S</td><td>E</td><td>1</td><td></td><td></td> </tr> </table> <table border="1" style="display: inline-table; vertical-align: middle;"> <tr> <td>2</td><td>A</td><td>Q</td><td></td><td></td> </tr> </table>	S	E	1			2	A	Q			If applicable	
	S	E	1									
	2	A	Q									
	Telephone no.	020 7283 6000										
	Fax no.											
DX no.	DX 85 LONDON											
Your ref.	1001267389											

Email	HOLLY.STEBBING@NORTONROSEFULBRIGHT.COM
-------	--

Signed



Claimants' legal representative

Position or
office held

PARTNER

If signing on behalf of firm or company

Date

0	2	/	1	0	/	2	0	2	3
---	---	---	---	---	---	---	---	---	---

For further details of the courts www.gov.uk/find-court-tribunal

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO. QB-2022-001098

[xxx]

On [date]

B E T W E E N:

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

Claimants

-and-

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

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

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

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

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

Defendants

DRAFT / ORDER

RECITALS

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

UPON the application of the Claimants dated 13 October 2023

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

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

AND UPON the Court considering this application without notice to the Defendants

IT IS ORDERED THAT:

1. Service of the Notice on the First, Second and Third Defendants in the same manner as prescribed at paragraph 17 of the Order shall stand as good service and accordingly, pursuant to CPR 6.15 and 6.27, retrospective permission is granted to the Claimant to serve the Notice on the First, Second and Third Defendants in such alternative manner. Pursuant to CPR 6.15(3) and 6.27, the Notice shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in paragraph 17 of the Order were completed.
2. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), permission is granted to the Claimants to serve this order, its associated documents and any further documents in this claim by way of alternative method, such method as prescribed at paragraph 17 of the Order. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the order shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in paragraph 17 of the Order were completed.
3. The Order shall be varied at follows:

At paragraph 6:

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

At paragraph 14:

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

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

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

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

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

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

At paragraph 17:

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

17.1 fixing copies thereof in clear transparent sealed containers at a minimum number of 2 locations on the perimeter of each of the Sites together with a notice which states (a) that copies of the Further Documents may be obtained from the Claimants' solicitors, Norton Rose Fulbright LLP, 3 More London Riverside, London SE1 2AQ (Ref: Holly Stebbing, tel: 020 7283 6000) email:

ExxonMobil.Service@nortonrosefulbright.com; and (b) that copies of the Further Documents may be viewed at the website referred to in Paragraph 17.2 of this Order;

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

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

(a) xr-legal@riseup.net

(b) enquiries@extinctionrebellion.uk

(c) juststopoilpress@protonmail.com

4. Pursuant to CPR 23.10, the First, Second and Third Defendants shall have the right to apply to have this order set aside or varied in accordance with the amended paragraph 6 of the Order. Any such application must be made within 7 days of this order.
5. There shall be no order as to costs.

[date] 2023

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

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
Before the Honourable Mr Justice Linden
On 18 July 2023**

CLAIM NO. QB-2022-001098



B E T W E E N:

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

Claimants

-and-

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

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

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

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

(4) PAUL BARNES

(5) DIANA HEKT

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANT

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

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

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

RECITALS

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

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

AND UPON the application dated 14 June 2023

AND UPON hearing Leading Counsel and Junior Counsel for the Claimants

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

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

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

IT IS ORDERED THAT:

NAMED DEFENDANTS

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

FURTHER EVIDENCE

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

THE INJUNCTIONS

3. Until 11 July 2028, or further order in the meantime, the First Defendant must not:
 - 3.1 enter or remain upon any part of the First Claimant's properties ("the Sites") without the consent of the First Claimant at:
 - (1) the Oil Refinery and Jetty at the Petrochemical Complex, Marsh Lane, Southampton SO45 1TH (as shown for identification edged red and green but excluding those areas edged blue on the attached 'Fawley Plan').
 - (2) Hythe Terminal, New Road, Hardley, SO45 3NR (as shown for identification edged red on the attached 'Hythe Plan').
 - (3) Avonmouth Terminal, St Andrews Road, Bristol BS11 9BN (as shown for identification edged red on the attached 'Avonmouth Plan').

- (4) Birmingham Terminal, Wood Lane, Birmingham B24 8DN (as shown for identification edged red on the attached ‘Birmingham Plan’).
 - (5) Purfleet Terminal, London Road, Purfleet, Essex RM19 1RS (as shown for identification edged red and brown on the attached ‘Purfleet Plan’).
 - (6) West London Terminal, Bedfont Road, Stanwell, Middlesex TW19 7LZ (as shown for identification edged red on the attached ‘West London Plan’).
 - (7) Hartland Park Logistics Hub, Ively Road, Farnborough (as shown for identification edged red on the attached ‘Hartland Park Plan’).
 - (8) Alton Compound, Pumping Station, A31, Hollybourne (as shown for identification edged red on the attached ‘Alton Compound Plan’);
- 3.2 damage any part of any of the Sites;
 - 3.3 affix themselves or any person or object to any part of any of the Sites;
 - 3.4 erect any structures on any part of any of the Sites;
4. Until 11 July 2028, or further order in the meantime, the Second Defendant must not without the consent of the First Claimant or Second Claimant:
- 4.1 enter or remain upon any part of the Second Claimant’s property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH (“the Chemical Plant”) (as shown for identification edged purple on the attached ‘Fawley Plan’);
 - 4.2 damage any part of the Chemical Plant;
 - 4.3 affix themselves or any person or object at the Chemical Plant;
 - 4.4 erect any structures on any part of the Chemical Plant.
5. Until 11 July 2028, or further order in the meantime, the Third Defendant must not enter onto the Claimants’ property and obstruct any of the vehicular entrances or exits to any of the Sites (where “Sites” for this purpose does not include the area edged brown on the Purfleet Plan) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

VARIATION OR DISCHARGE OF THIS ORDER

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

REVIEW HEARINGS

9. Within 14 days of the judgment of the Supreme Court in *Wolverhampton City Council v London Gypsies and Travellers* (2022/0046) being handed down, the Claimants will apply to the King's Bench Division for a review of this Order. Subject to the views of the judge who considers the matter, such review may be conducted on paper in the event that there is no material change in the law as stated by the Court of Appeal in *London Borough of Barking & Dagenham & Others v Persons Unknown* [2022] EWCA Civ 13; [2023] QB 295.
10. Subject to the paragraph above, the injunctions made herein shall be reviewed on each anniversary of this order (or so close thereto as is convenient having regard to the Court's list) with a time estimate of 2.5hrs (plus reading time). The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing.
11. The Claimants shall file and serve a trial bundle not less than 7 days before the review hearing.
12. Skeleton arguments on behalf of any represented party shall be lodged and exchanged, with bundle of authorities, not less than 3 days before the review hearing.

INTERPRETATION OF THIS ORDER

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

SERVICE OF THIS ORDER

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

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

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

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

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

- (a) xr-legal@riseup.net
- (b) enquiries@extinctionrebellion.uk
- (c) juststopoilpress@protonmail.com

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

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

SERVICE OF OTHER DOCUMENTS

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

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

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

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

- (a) xr-legal@riseup.net
- (b) enquiries@extinctionrebellion.uk
- (c) juststopoilpress@protonmail.com

18. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the Further Documents shall be deemed to be served on the First, Second and Third Defendants on the latest date on which all of the methods of service referred to in Paragraph 17 above have been completed.
19. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in Paragraph 17 of this Order shall stand as good service of the Further Documents on the First, Second and Third Defendants.
20. Pursuant to CPR 81.4(2)(c) and (d), the Court dispenses with the requirement for personal service in relation to the Fifth Defendant.

COSTS

21. No order as to costs.

THE COURT

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

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

- King's Bench Division, Royal Courts of Justice, Strand WC2A 2LL
- The office are open between 10.00am and 4.30pm Monday to Friday (except Bank Holidays)
- The telephone number is 020 3936 8957
- The email address is kjudgeslistingoffice@justice.gov.uk

SERVICE OF THE ORDER

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

18 July 2023

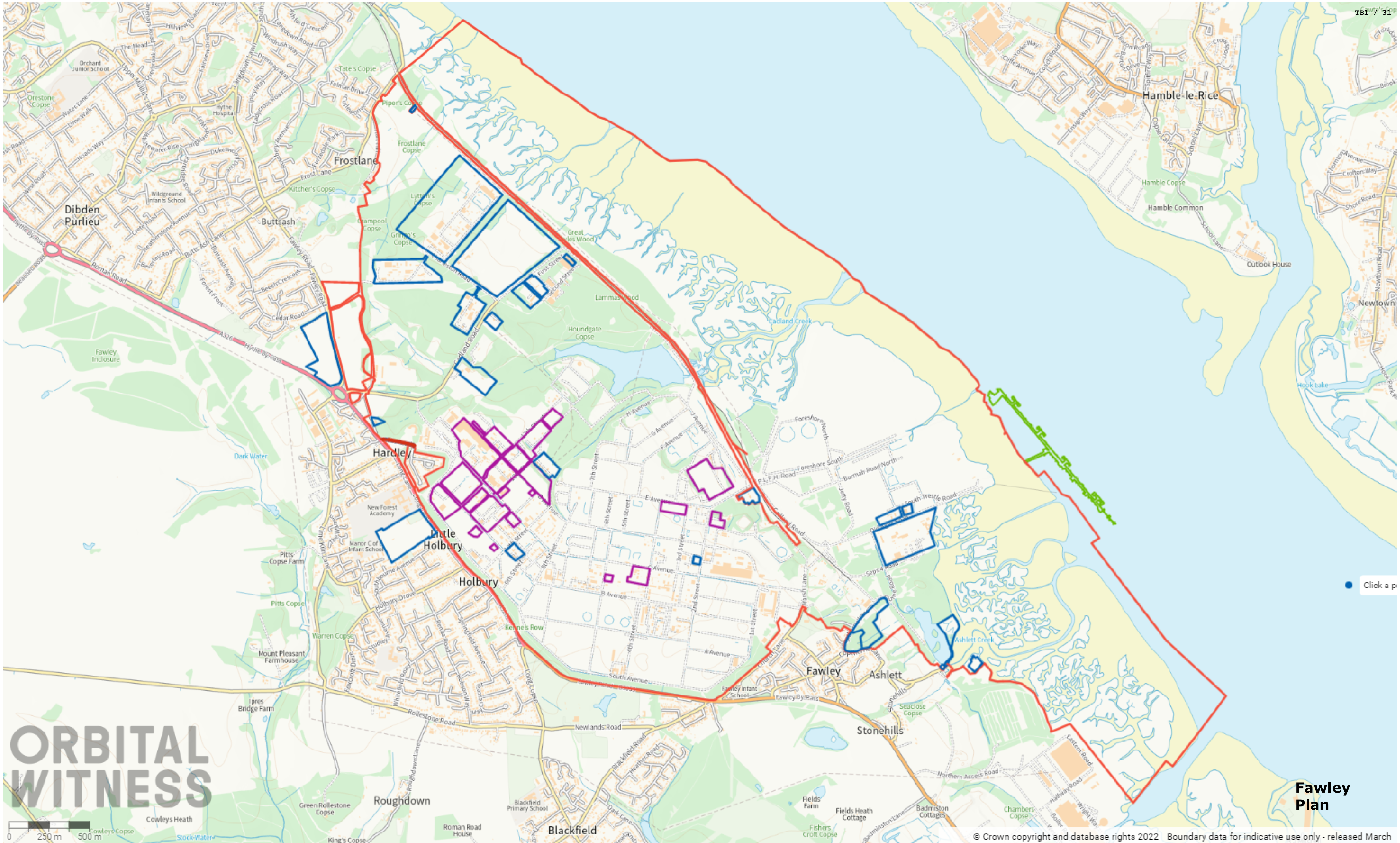
SCHEDULE 1

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

- (1) First Witness Statement of Stuart Sherbrooke Wortley dated 4 April 2022 together with the exhibits marked “SSW1” - “SSW9”.
- (2) First Witness Statement of Anthony Milne dated 3 April 2022 together with the exhibits marked “AM1” – “AM15”.
- (3) First Witness Statement of Nawaaz Allybokus dated 5 April 2022 together with the exhibit marked “NA1”.
- (4) Second Witness Statement of Nawaaz Allybokus dated 5 April 2022 together with the exhibit marked “NA2”.
- (5) First Witness Statement of Martin Pullman dated 27 February 2023 together with exhibits marked “MP1” and “MP2”.
- (6) Third Witness Statement of Nawaaz Allybokus dated 22 April 2022 together with the exhibit marked “NA3”.
- (7) Fourth Witness Statement of Nawaaz Allybokus dated 22 April 2022 together with the exhibit marked “NA4”.
- (8) Fifth Witness Statement of Nawaaz Allybokus dated 20 March 2023 together with the exhibit marked “NA5”.
- (9) Sixth Witness Statement of Nawaaz Allybokus dated 24 May 2023 together with the exhibit marked “NA6”.
- (10) Second Witness Statement of Martin Pullman dated 6 June 2023 together with the exhibits marked “MP3” – “MP5”.
- (11) Seventh Witness Statement of Nawaaz Allybokus dated 13 June 2023 together with the exhibits marked “NA7” – “NA8”.
- (12) Eighth Witness Statement of Nawaaz Allybokus dated 4 July 2023 together with the exhibit marked “NA9”.
- (13) Ninth Witness Statement of Nawaaz Allybokus dated 11 July 2023 together with the exhibit marked “NA10”.
- (14) Witness Statement of Sarah Pemberton dated 11 July 2023.
- (15) Tenth Witness Statement of Nawaaz Allybokus dated 12 July 2023.

SCHEDULE 2 - Plans

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

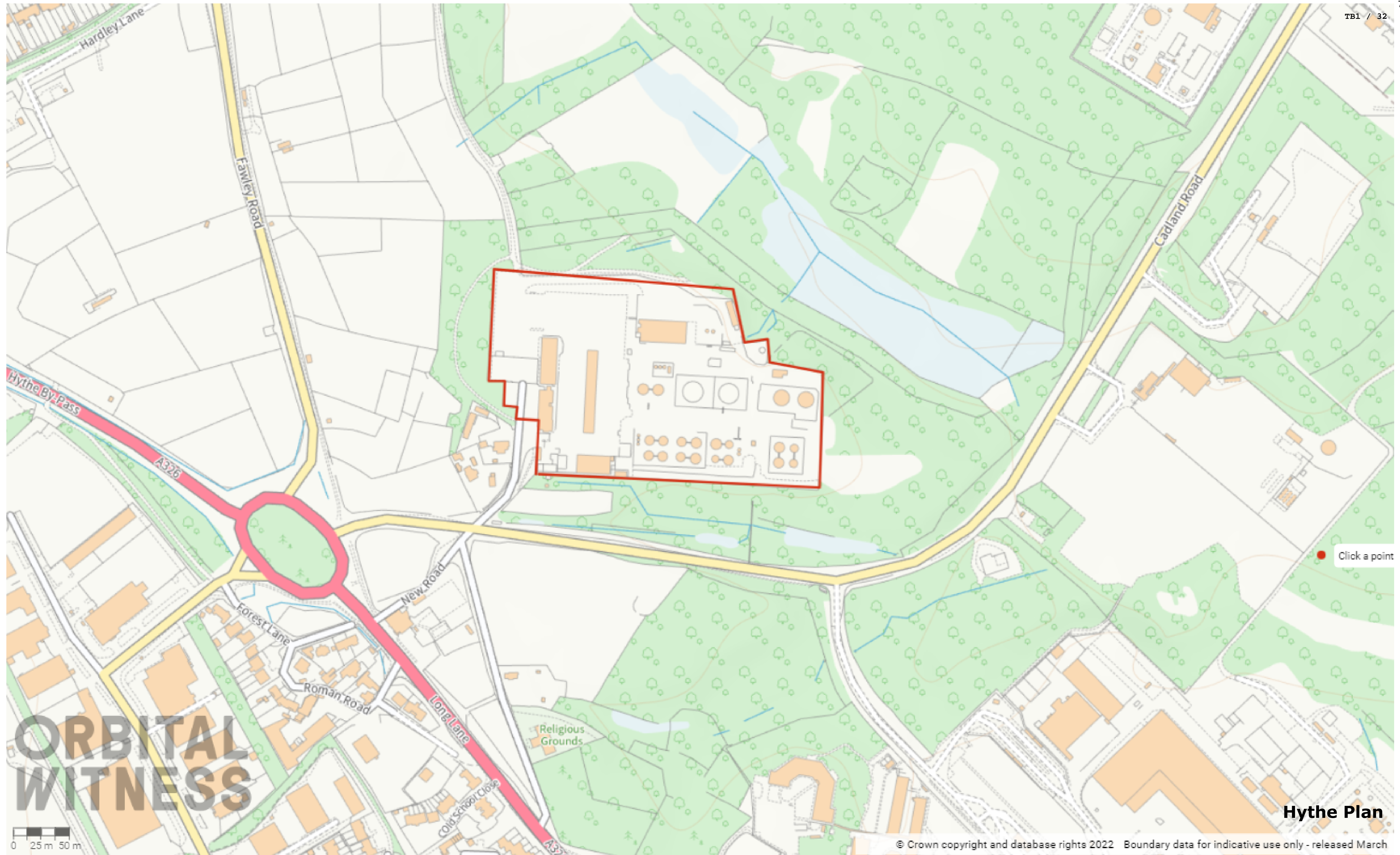


ORBITAL WITNESS

0 250 m 500 m

Fawley Plan

Click a p

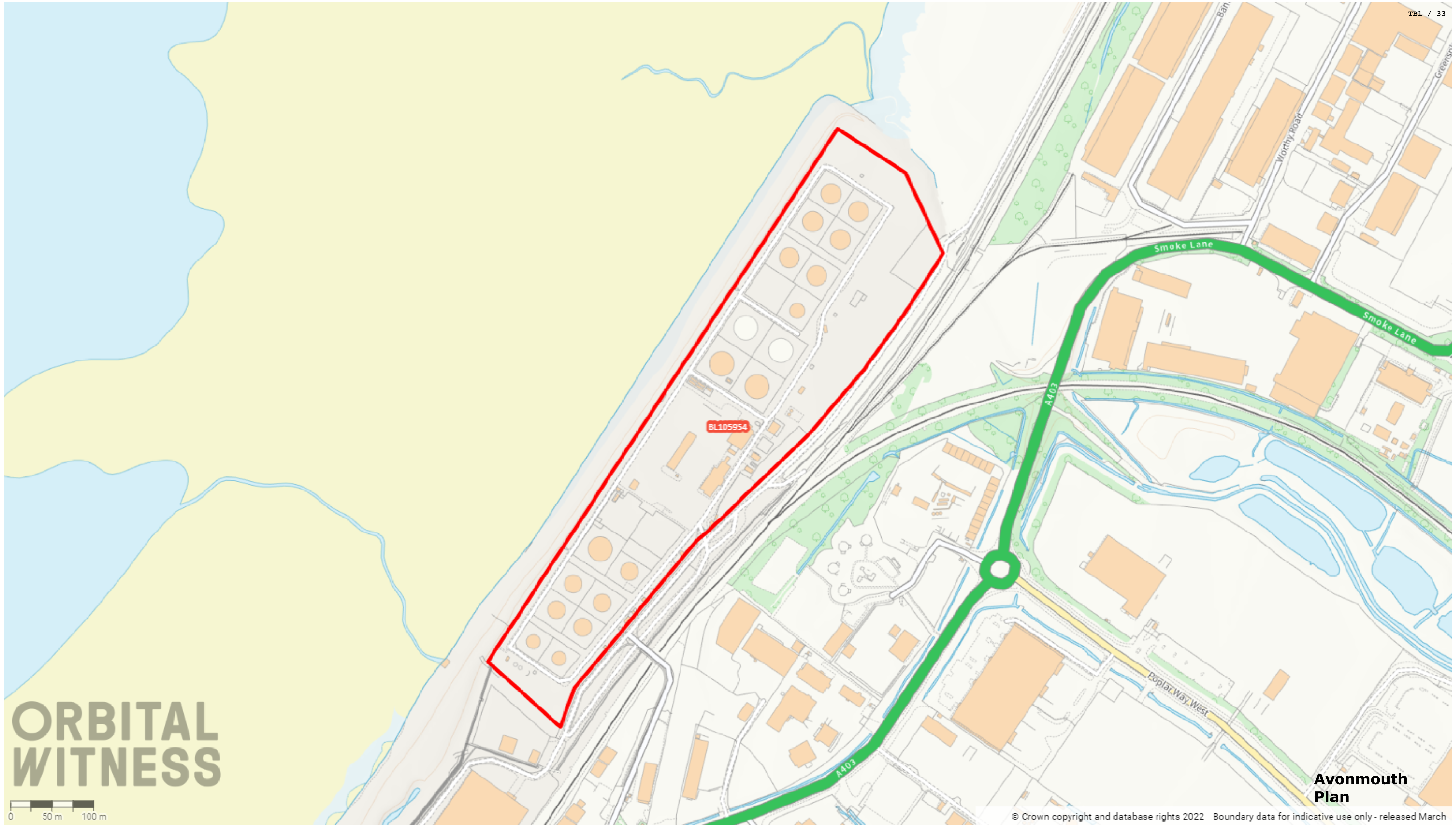


**ORBITAL
WITNESS**

0 25 m 50 m

Hythe Plan

ORBITAL WITNESS



BL105954

Smoke Lane

Smoke Lane

A403

A403

Poplar Way West

Avonmouth Plan



**ORBITAL
WITNESS**

0 25m 50m

**Birmingham
Plan**



ORBITAL WITNESS

0 25 m 50 m

Purfleet Thames Terminal

Purfleet Plan

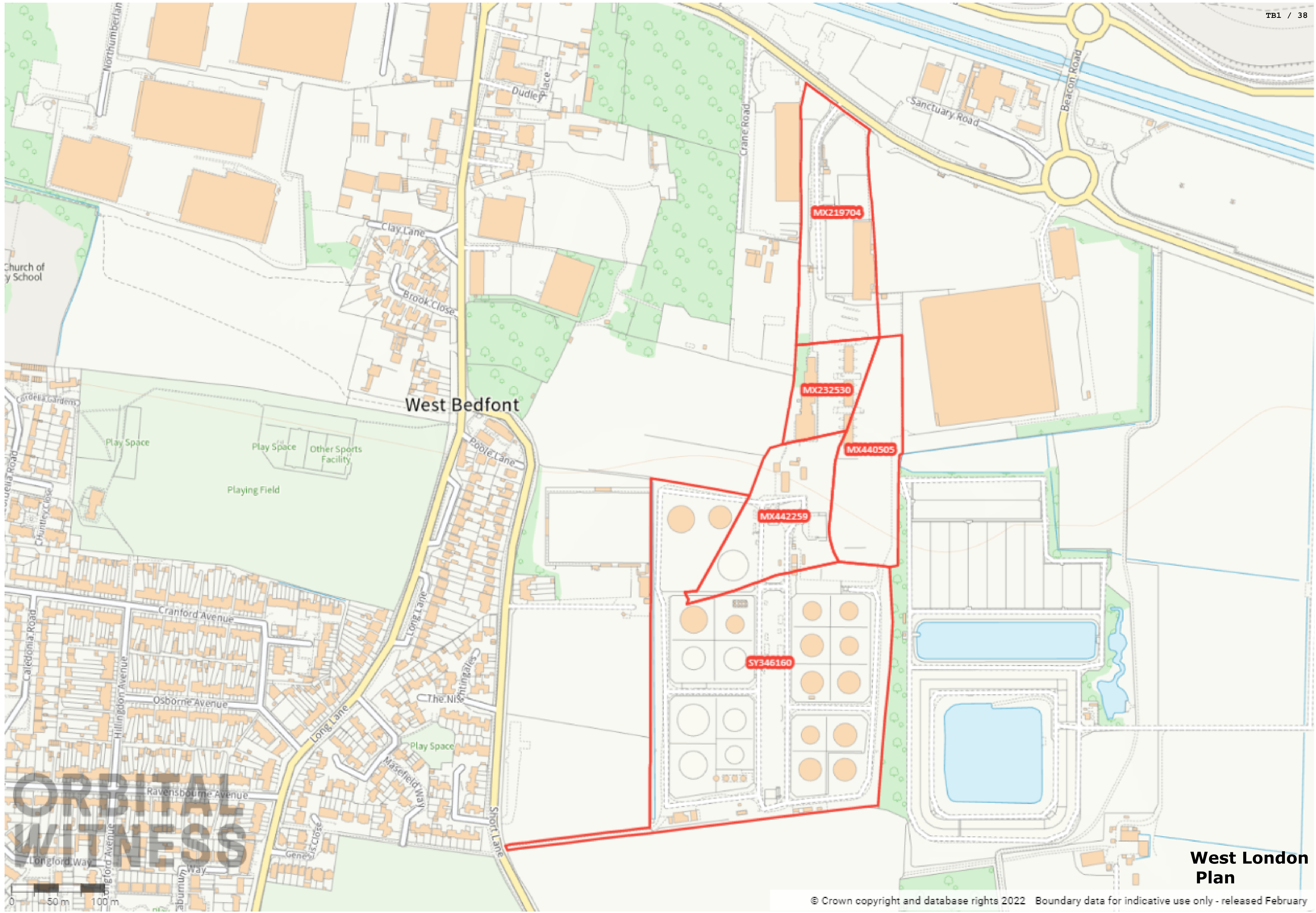


ORBITAL WITNESS

0 25 m 50 m

Purfleet Thames Terminal

**Purfleet
Plan B**



West London Plan



**ORBITAL
WITNESS**

**Hartland
Park Plan**



ORBITAL WITNESS



Alton Compound Plan