

Application notice

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In the High Court of Justice King's Bench Division	
Claim no.	QB-2022-001317
Fee Account no.	PBA0087028
Warrant no. <small>(if applicable)</small>	
Claimant <small>(including ref.)</small>	(1) Thurrock Council (2) Essex County Council
Defendants <small>(including ref.)</small>	(1) Madeline Adams, (2)- (22) Other named Defendants as listed on Schedule 1 to Claim Form, (22) Persons known 27 March 2024
Date	27 March 2024

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

Sharpe Pritchard LLP	QB-2022-001317
	Sub Event ID: 33

2. Are you a Claimant Defendant Legal Representative
 Other (*please specify*)

If you are a solicitor whom do you represent

Claimants

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

The Claimants seek an order:

- (i) to add 33 named Defendants to the Claim for injunctive relief, pursuant to CPR 19.4;
- (ii) to continue the power of arrest in the interim injunction Order pending the final hearing of the Claim;
- (iii) to discontinue against the Seventy-Fifth Defendant (in so far as it is necessary to do so) pursuant to CPR 38.2(2); and
- (iv) directions to final hearing.

This application is made in accordance with para 1 of the order of the Honourable Mrs Justice Jefford DBE dated 20 December 2023, and the Claimants request that it is heard at the case management hearing taking place on 19 April 2024 in accordance with para 2 of that 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 telephone hearing
6. How long do you think the hearing will last? Hours Minutes
Is this time estimate agreed by all parties? 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?

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

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

1. The witness statement of Adewale Adesina dated 20 March 2024 and its exhibits
2. The witness statement of Detective Superintendent Stephen Jennings dated 23 March 2024 and its exhibits

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.

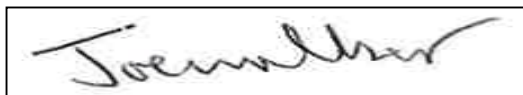
No

Statement of Truth

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

- I 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

27

Month

March

Year

2024

Full name

Joseph Walker

Name of applicant's legal representative's firm

Sharpe Pritchard LLP

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

Legal Director

Applicant's address to which documents should be sent.

Building and street

Elm Yard, 10-16 Elm Street

Second line of address

Town or city

London

County (optional)

Postcode

WC1X 0BJ

If applicable

Phone number

020 7405 4600

Fax number

DX number

Your Ref.

JW/1329/48

Email

jwalker@sharpepritchard.co.uk

Continuation sheets to Application on Form N244 dated 27 March 2024

D No.	Name	Address for service
230	Alice Wharrie	[REDACTED]
231	Anne Hart	[REDACTED]
232	Anthony Whitehouse	[REDACTED]
233	Callum Goode	[REDACTED]
234	Caroline Cattermole	[REDACTED]
235	Christopher Bennett	[REDACTED]
236	Christopher Hardy	[REDACTED]
237	David Nixon	[REDACTED]
238	Isabel Walters	[REDACTED]
239	Jade Calland	[REDACTED]
240	Jane Touil	[REDACTED]
241	Joe Howlett	[REDACTED]
242	John Jordan	[REDACTED]
243	Jonathan Coleman	[REDACTED]
244	Judy Judkins	[REDACTED]
245	Karan Wildin	[REDACTED]

246	Kayleigh Matthews	[REDACTED]
247	Larch Maxey	[REDACTED]
248	Lindsay Hart	[REDACTED]
249	Margaret Reid	[REDACTED]
250	Mia Powell	[REDACTED]
251	Phoebe Plummer	[REDACTED]
252	Sam Parry Holland	[REDACTED]
253	Samuel Johnson	[REDACTED]
254	Sarah MacDonald	[REDACTED]
255	Seiriol Davies	[REDACTED]
256	Simon Reding	[REDACTED]
257	Stephen Gingell	[REDACTED]
258	Suzie Webb	[REDACTED]
259	Victoria Lindsell	[REDACTED]
260	Wendy Cocks	[REDACTED]
261	Diana Martin	[REDACTED]

262	Tony Muir	
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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

The Honourable [Judge]
[Date]

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

(223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH

VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

Defendants

Draft DIRECTIONS ORDER

UPON the application of the Claimants dated 27 March 2024 (the ‘Application’), made in accordance with the Order of the Honourable Mrs Justice Jefford DBE dated 20 December 2023 and by which the Claimants seek (i) to add 33 named Defendants to the Claim for injunctive relief, (ii) to continue the power of arrest in the interim injunction Order pending the final hearing of the Claim, (iii) to discontinue against the Seventy-Fifth Defendant (in so far as it is necessary to do so) and (iv) directions to final hearing

AND UPON hearing Natalie Pratt of counsel for the Claimants and no Defendant either appearing or being represented

IT IS ORDERED THAT:

Addition of further Defendants

1. The Claimants are permitted to add the persons named at Schedule 2 of this Order as Defendants to the proceedings (the ‘**Additional Defendants**’), and are permitted to amend the Claim Form accordingly.

2. The Claimants shall serve on the **Additional Defendants** the Amended Claim Form (in which the Additional Defendants are named) within 21 days of this Order. Service of the Amended Claim Form on the **1st to 229th Defendants** is dispensed with.

Power of arrest

3. The power of arrest provided for at paragraph 3 of the Order of the Honourable Mrs Justice Foster DBE dated 26 January 2023 shall continue until the final determination of the Claim.

Discontinuance

4. The Claimants are permitted to discontinue the Claim against the Seventy-Fifth Defendant, Xavier Gonzalez Trimmer, and the interim injunction dated 26 January 2023 is discharged against the Seventy-Fifth Defendant (only) accordingly.

Further directions

5. The Claimants shall file and serve any evidence upon which they will seek to rely at the trial of the Claim by 4.30pm on 14 October 2024.
6. The Defendants must file and serve any evidence upon which they will seek to rely at the trial of the Claim by 4.30pm on 11 November 2024;
7. The Claimants may (if so advised) file and serve any evidence in reply by 4.30pm on 25 November 2024;
8. The trial of the Claim shall be listed for trial on the first available date after 16 December 2024 with a time estimate of 3 days. A further day should be allocated for judicial pre-reading. In the event that the time estimate requires revision (whether upwards or downwards), the Claimants shall inform the Court as soon as it is reasonably practicable to do so.
9. The Claimants shall file and serve a hearing bundle 7 days before the date of the trial. The Claimants need only serve those named Defendants who have acknowledged service of the Claim and/or filed evidence in defence of the Claim or indicated that they intend to participate in the trial of the Claim (if any).
10. Skeleton arguments shall be filed and served 3 days before the date of the trial. The Claimants need only serve those named Defendants who have acknowledged service of the Claim and/or filed evidence in defence of the Claim or indicated that they intend to participate in the trial of the Claim (if any).
11. Solicitors for the Claimants shall liaise with the KB Judges Listing Office as to the audio-visual technology required at the trial of the Claim (if any).

Alternative service

12. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission, in addition to personal service, or in the alternative to personal service, to serve the **1st to 222nd Defendants**, the **230th to 262nd Defendants** and any further named Defendants with the

Amended Claim Form (where applicable), the Application and evidence in support, all further evidence in the Claim and this Order (12.1 – 12.5 to be treated conjunctively):

- 12.1. **Websites:** placing a copy of the documents to be served on the Claimants' websites and Facebook pages; and
 - 12.2. **Email:** sending a copy of the documents to be served to Just Stop Oil, Youth Climate Swarm, Extinction Rebellion and Insulate Britain at the following email addresses: juststopoilpress@protonmail.com; youthclimateswarm@protonmail.com; press@extinctionrebellion.uk; insulatebritainpress@protonmail.com

and providing a web link at which they can access the documents to be served; and
 - 12.3. **Post:** where an address of a named Defendant is known to the Claimants, by posting a copy of the documents to be served together with a covering letter by way of first-class post;
 - 12.4. **Text messages:** sending a text message to any named Defendant for whom the Claimants have a mobile telephone number, notifying them that an injunction order has been sought and/or granted against them with a power of arrest (as applicable), and providing a web link at which the Defendant can access the documents to be served;
 - 12.5. **Placing signs:** on A-Road entry points and exit points to the administrative area of Thurrock, and within 50 metres of The Fuel Terminals and on the A130 and B1014 between the entrance to Canvey Island and the roundabout known as the Waterside Road roundabout on Canvey Island, stating that there is a High Court Injunction in place prohibiting protest on the highway and providing a web link and QR code at which the documents to be served can be found; or
 - 12.6. **Where requested:** the documents to be served may be served by email where the Defendant has requested that they be served by email, by sending the email to the address provided by the Defendant; or
 - 12.7. **Lawyers:** By serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
13. The **deemed date of service** of any documents referred to in paragraph 12 above shall be the day on which service of the document or documents is completed in accordance with paragraph 12 above.
 14. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission to serve the **223rd to the 229th Defendants** with the Application and evidence in support, all further evidence in the Claim and this Order by the methods in paragraphs 12.1, 12.2 and 12.5 above (to be read conjunctively).
 15. The **deemed date of service** of any of the documents referred to in paragraph 14 above shall be the day on which service of the document or documents is completed in accordance with paragraph 14 above.

Costs

16. No order as to costs on the Application to discontinue against the Seventy-Fifth Defendant.

17. Save for the above, costs in the case.

SCHEDULE 1 – NAMED DEFENDANTS

1. Madeline Adams
2. Mary Adams
3. David Addy
4. Amber Alexandar
5. Mina-Mae Alexander
6. Eric Anderson
7. Christine Aslett
8. Nicholas Aslett
9. Lachlan Ayles
10. Stephanie Aylett
11. Pete Bailey
12. William Bajwa
13. Jeremy Banks
14. Colin Barrington
15. Kai Bartlett
16. Joshua Bates
17. Christopher Bennett
18. Gillian Bird
19. John Blanco
20. John Blewett
21. Poppy Bliss
22. Hilary Bond
23. Trevor Boulden
24. Geoffroy Bowman
25. Simon Bramwell
26. Joseph Bream
27. Scott Breen
28. Stephen Brett
29. Emily Brocklebank
30. Claire Brook
31. Emma Brooker
32. Michael Brown
33. Judith Bruce
34. Madeleine Budd
35. Tes Burns
36. Benjamin Buse
37. Catherine Cannon
38. Rebecca Cassar
39. Jessica Causby
40. Susan Chamberlayne
41. Sally Chapman
42. Vishal Chauhan
43. Katherine Chesterman
44. Phillipa Clarke
45. Oliver Clegg
46. Orla Coghlan
47. John Coghlan
48. Ruth Cook

49. Heather Cooper
50. Jasmine Corkhill Harris
51. Joy Susan Corrigan
52. Richard Crane
53. David Crawford
54. Rosemary Croft
55. Joseph Daldorph
56. Beverley Ann Daniel
57. Ben Delap
58. Gaie Delap
59. Gabriella Ditton
60. Igors Djomins
61. Laura Doehlei
62. Marguerite Doubleday
63. Ella Eason
64. Christine Essex
65. Janet Flynn
66. Michael Forton
67. Phoebe Frewer
68. Amy Friel
69. Robin Gardner
70. Cressida Gething
71. Alasdair Gibson
72. Hugo Glashier
73. Stephanie Golder
74. William Goldring
75. Xavier Gonzalez Trimmer
76. Alfie Goodland
77. Emma-Rose Goodwin
78. Sophie Greenland
79. Aaron Gunning
80. Louisa Hadden
81. Catherine Hallett
82. Finn Halsall
83. Jake Handling
84. Gareth Harper
85. Louise Harris
86. Patrick Hart
87. Yvonne Hayward
88. Selma Heimedinger
89. Jonathan Herbert
90. Noah Herfort
91. Suzanne Hetherington
92. Sarah Hirons
93. Rupert Horlick
94. Adrian Howlett
95. Eric Hoyland
96. Abigail Hubbucks
97. Hannah Hunt
98. Emma Ireland

99. Pavel Ivanov
100. Rik Jansen
101. Ruth Jarman
102. Stephen Jarvis
103. Russell Jarvis
104. John Johnson
105. Hannah Johnston
106. Timothy Jones
107. Pascale Kann
108. Hallum Kelly
109. Linda Latter
110. Charles Laurie
111. Peter Lay
112. Eben Lazarus
113. Isobel Lewis
114. Elanor Lewis-Holmes
115. Joseph Linheart
116. El Litten
117. Rebecca Lockyer
118. Felix Lozano
119. Barbara Lund
120. Jacqueline Macey
121. Catharine Maclean
122. Jacob Main
123. Elizabeth McCormack
124. Eilidh McFadden
125. Nathan McGovern
126. Louis McKechnie
127. Lilah McKim
128. Grace McMeekin
129. Adalaide Meaney
130. Anna Middleton
131. Hannah Miles
132. Benjamin Mitchell
133. Darcy Mitchell
134. Deborah Mitchell
135. Teddy Monroe
136. Fiona Moore
137. Stefania Morosi
138. Paul Morozzo
139. Virgenia Morris
140. Paul Morrison
141. Zak Mullen
142. Alexandra Mulvey
143. Reuben Mychalecky
144. Richard Newell-Price
145. Ben Newman
146. Alexander Newnham
147. Jessica Norgard
148. Rachel Norris

149. Rose Norris
150. George Oakenfold
151. Nicholas Onley
152. Jakub Pabiniak
153. Ella-Rose Paez
154. Sophie Page-Hall
155. Susan Parfitt
156. Dillon Parsons
157. Rose Patterson
158. Ethan Paul
159. Rosalind Pears
160. Abigail Percy-Ratcliff
161. Ursula Pethick
162. Jacqueline Phillips
163. Mitchel Phillips-White
164. Robert Possnett
165. Matthew Powell
166. Emily Price
167. Robert Price
168. Amy Pritchard
169. Felix Reeves-Whymark
170. Anna Retallack
171. Anne Richards
172. Bethan Roberts
173. Jasmin Robertson
174. Sebastian Roblyn
175. Isabel Rock
176. Elizabeth Rosser
177. Christian Rowe
178. Finn Roweth
179. Adelheid Russenberger
180. Isla Sandford
181. Daniel Sargison
182. James Sargison
183. Cat Scothorne
184. James Sebley
185. Rosa Sharkey
186. Sophie Sharples
187. Susan Sidey
188. James Skeet
189. Hannah Skwarska
190. Jacqueline Slade
191. Oliver Slaughter
192. David Smartknight
193. Heather Smith
194. Joshua Smyth
195. David Squire
196. Katherine Steer
197. Oliver Stevens
198. Madeleine Stewart

199. Ferdi Suleyman
200. Vivien Talbot
201. Ben Taylor
202. Jacqueline Teggim
203. Zachary Tenquist
204. David Thorneywork
205. Hannah Torrance-Bright
206. Lucy Trinder
207. Morgan Trowland
208. Jan Van Der Knapp
209. Rik Venhoutteghem
210. Sally Webber
211. Leonard Weber
212. Miranda Whelehan
213. Philip White
214. Edred Whittingham
215. Alexander Wilcox
216. Clare Wilson
217. Thomas Winter
218. Carol-Ann Wood
219. Lizia Woolf
220. Amorel Kennedy
221. Grace Lally
222. Morien Morgan

SCHEDULE 2 – ADDITIONAL DEFENDANTS

230	Alice Wharrie
231	Anne Hart
232	Anthony Whitehouse
233	Callum Goode
234	Caroline Cattermole
235	Christopher Bennett
236	Christopher Hardy
237	David Nixon
238	Isabel Walters
239	Jade Calland
240	Jane Touil
241	Joe Howlett
242	John Jordan
243	Jonathan Coleman
244	Judy Judkins
245	Karan Wildin
246	Kayleigh Matthews
247	Larch Maxey
248	Lindsay Hart
249	Margaret Reid
250	Mia Powell
251	Phoebe Plummer
252	Sam Parry Holland
253	Samuel Johnson
254	Sarah MacDonald
255	Seiriol Davies
256	Simon Reding
257	Stephen Gingell
258	Suzie Webb
259	Victoria Lindsell
260	Wendy Cocks
261	Diana Martin
262	Tony Muir