

IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION  
BETWEEN:

CLAIM NO: QB-2022-001241

SHELL UK LIMITED

Claimant

and

PERSONS UNKNOWN ENTERING OR REMAINING AT THE  
CLAIMANT'S SITE KNOWN AS SHELL HAVEN, STANFORD-LE-HOPE,  
(AND AS FURTHER DEFINED IN THE PARTICULARS OF CLAIM)  
WITHOUT THE CONSENT OF THE CLAIMANT, OR BLOCKING THE  
ENTRANCES TO THAT SITE

Defendants

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ORDER

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PENAL NOTICE

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

IMPORTANT NOTICE TO DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible.

Any other person who knows of this Order and does anything which helps or permits the Defendants 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.

A Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instructions or with his encouragement.

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

## **RECITALS**

**UPON** the hearing of the Claimants' Application dated 14 April 2022

**UPON** the Claimant having not given notice to any other person of the making of this application

**AND UPON HEARING** Leading Counsel for the Claimant

**AND UPON READING** the documents set out in the First Schedule to this Order

**AND UPON** the Claimant giving and the Court accepting the undertakings set out in Second Schedule to this Order

**AND UPON** the Claimant confirming that this Order is not intended to prohibit any lawful protest outside any of the Site in so far as any such protest does not obstruct any of the vehicular entrances or exists to the Sites

## **DEFINITIONS**

1. In this Order:

1.1. "***Shell Haven***" means the parts of the First Claimant's land known as Shell Haven, Stanford-Le-Hope, Essex which are enclosed or bounded by fences, gates, gateways and parts of the River Thames. The general location of the said boundaries are shown in red on the plan attached to this Order at Appendix 1 and marked "Plan of Shell Haven Site".

1.2. The "***Claim Documents***" means the documents listed in the First Schedule to this Order.

## **INJUNCTION**

2. Until trial or further order, the Defendants must not do any of the following:

2.1. enter or remain upon any part of the Sites without the consent of the Claimant;

2.2. cause damage to any part of Shell Haven;

- 2.3. affix themselves to any part of the Sites, or to any other person or object on Shell Haven;
  - 2.4. erect any structure upon Shell Haven;
  - 2.5. place any object on the Sites, or in front of the entrances to Shell Haven;
  - 2.6. block any of the entrances to Shell Haven to vehicular or pedestrian traffic.
3. A Defendant who is ordered not to do something must not do it himself/herself/themselves or in any other way. He/she/they must not do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions, or by another person acting with his/her/their encouragement.

#### **VARIATION OR DISCHARGE**

4. The Defendants may apply to vary or discharge this Order at any time upon giving not less than 24 hours' notice to the Claimants' solicitors at the email address set out later in this Order.
5. Any person applying to vary or discharge this Order must provide their full name and address (including an address for service) and must also apply to be joined as a named defendant to the proceedings at the same time.
6. The Claimants have liberty to apply to extend or vary this Order or to seek further directions.

#### **RETURN DATE**

7. If not previously discharged or modified, the Court will reconsider the continuation of this order and its terms at a hearing at 10:30am on 28 April 2022 at The Royal Courts of Justice, Strand London.

#### **SERVICE OF DOCUMENTS**

8. Pursuant to CPR 6.15 and 6.27, service of this Order and of the Claim Documents shall be effected upon the Defendants as follows:

- 8.1. The Claimants shall affix at each entrance to each of the Sites, and around the perimeters of each of the Sites at no fewer than 10 locations, warning notices, no smaller than A3 in size. The said warning notices shall:
- (i) warn of the existence and general nature of this Order, and of the consequences of breaching it;
  - (ii) identify a point of contact and contact details from which copies of the Order and Claim Documents may be requested.
  - (iii) identify a website address (the “Claim Documents URL”) at which copies of the Order and the Claim Documents may be viewed and downloaded.
- 8.2. The Claimants shall upload to the Claim Documents URL copies of the Order and the Claim Documents and a note of the hearing at which his Order was granted.
- 8.3. The Claimants shall send by email a copy of the Order and a link to the Claim Documents URL to each of the email addresses listed in the Third Schedule to this Order.
9. Pursuant to CPR 6.12(3) and 6.27, this Order shall be deemed to be served on the latest date on which all of the methods of service referred to in paragraph 8 have been completed, such date to be verified by the completion of a certificate of service or witness statement.
10. Service of any further document in these proceedings upon the Defendants (other than any Defendant who is subsequently named in these proceedings) shall be validly effected by:
- (i) sending it by email to each of the email addresses listed in the Third Schedule to the Order;
  - (ii) uploading it to the Claim Documents URL website; and
  - (iii) sending a copy to any person who has previously requested a copy of the Claim Documents from the Claimants or their solicitors, either by post or email (as was requested by that person).

Such service shall be deemed effective on the latest date on which all of the said steps shall have been completed.

11. The Court will provide sealed copies of this Order for service by the Claimant's Solicitors.

12. Until further order, no party shall be required to file an Acknowledgement of Service, Admission or Defence to this claim.

### **COSTS**

13. Costs are reserved.

### **COMMUNICATION WITH THE COURT**

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

Queen's Bench Division

Royal Courts of Justice

Strand

WC2A 2LL.

The offices are open between 10.00 a.m. and 4.30 p.m. Monday to Friday (except Bank Holidays). The telephone number is 020 7947 6000

### **COMMUNICATIONS WITH THE CLAIMANTS**

15. The Claimants' solicitors and their contact details are:

emma.pinkerton@cms-cmno.com

0207 367 3000

### **First Schedule**

**(documents read by the court in considering the making of this Order)**

In the course of considering the making of this Order, the Court read the following documents:

1. Claim Form
2. Particulars of Claim
3. Application notice dated 14 April 2022
4. Witness Statement of Stephen Ian Brown dated 13 April 2022
5. Witness Statement of Emma Margaretha Florence Pinkerton dated 14 April 2022

### **Second Schedule**

**(Undertakings given to the Court)**

The First Claimant gave the following undertakings to the Court:

1. To issue an Application Notice for the continuation of the injunction, to be considered at the hearing on the return date.
2. To serve the Claim Documents in accordance with the terms of paragraph 8 of this Order.
2. To pay any damages which the Defendants (or any other party served with or notified of this Order) shall sustain as a result of the making of this Order, and which the Court considers ought to be paid.

## **Third Schedule**

### Appendix

#### **1. EXTINCTION REBELLION UK**

- 1.1 [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)
- 1.2 [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk)
- 1.3 [xrvideo@protonmail.com](mailto:xrvideo@protonmail.com)
- 1.4 [xr-action@protonmail.com](mailto:xr-action@protonmail.com)
- 1.5 [xraffinitysupport@protonmail.com](mailto:xraffinitysupport@protonmail.com)
- 1.6 [xr-arrestwelfare@protonmail.com](mailto:xr-arrestwelfare@protonmail.com)
- 1.7 [artsxr@gmail.com](mailto:artsxr@gmail.com)
- 1.8 [xr-CitizensAssembly@protonmail.com](mailto:xr-CitizensAssembly@protonmail.com)
- 1.9 [xr.connectingcommunities@gmail.com](mailto:xr.connectingcommunities@gmail.com)
- 1.10 [xrdemocracy@protonmail.com](mailto:xrdemocracy@protonmail.com)
- 1.11 [xrnotables@gmail.com](mailto:xrnotables@gmail.com)
- 1.12 [integration@rebellion.earth](mailto:integration@rebellion.earth)
- 1.13 [xr-international@protonmail.com](mailto:xr-international@protonmail.com)
- 1.14 [xr-legal@riseup.net](mailto:xr-legal@riseup.net)
- 1.15 [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk)
- 1.16 [xr-newsletter@protonmail.com](mailto:xr-newsletter@protonmail.com)
- 1.17 [xr-peoplesassembly@protonmail.com](mailto:xr-peoplesassembly@protonmail.com)
- 1.18 [xrpoliceliason@protonmail.com](mailto:xrpoliceliason@protonmail.com)
- 1.19 [rebelringers@rebellion.earth](mailto:rebelringers@rebellion.earth)
- 1.20 [xr.regenerativeculture@gmail.com](mailto:xr.regenerativeculture@gmail.com)
- 1.21 [xr-regionaldevelopment@protonmail.com](mailto:xr-regionaldevelopment@protonmail.com)
- 1.22 [RelationshipsXRUK@protonmail.com](mailto:RelationshipsXRUK@protonmail.com)
- 1.23 [xr.mandates@gmail.com](mailto:xr.mandates@gmail.com)
- 1.24 [socialmedia@extinctionrebellion.uk](mailto:socialmedia@extinctionrebellion.uk)
- 1.25 [xrsocialmediaevents@gmail.com](mailto:xrsocialmediaevents@gmail.com)
- 1.26 [eventsxr@gmail.com](mailto:eventsxr@gmail.com)
- 1.27 [xrbristol.regional@protonmail.com](mailto:xrbristol.regional@protonmail.com)
- 1.28 [xrcymru@protonmail.com](mailto:xrcymru@protonmail.com)
- 1.29 [xr.eastengland@protonmail.com](mailto:xr.eastengland@protonmail.com)

- 1.30 [xrlondoncoord@gmail.com](mailto:xrlondoncoord@gmail.com)
- 1.31 [XRMidlands@protonmail.com](mailto:XRMidlands@protonmail.com)
- 1.32 [xrne@protonmail.com](mailto:xrne@protonmail.com)
- 1.33 [support@xrnorth.org](mailto:support@xrnorth.org)
- 1.34 [xrni@rebellion.earth](mailto:xrni@rebellion.earth)
- 1.35 [xrscotland@gmail.com](mailto:xrscotland@gmail.com)
- 1.36 [XR-SouthEastRegionalTeam@protonmail.com](mailto:XR-SouthEastRegionalTeam@protonmail.com)
- 1.37 [xr.regional.sw@protonmail.com](mailto:xr.regional.sw@protonmail.com)
- 1.38 [talksandtraining.xrbristol@protonmail.com](mailto:talksandtraining.xrbristol@protonmail.com)
- 1.39 [xrcymrutalksandtraining@gmail.com](mailto:xrcymrutalksandtraining@gmail.com)
- 1.40 [eoexrtnt@protonmail.com](mailto:eoexrtnt@protonmail.com)
- 1.41 [xrlondoncommunityevents@gmail.com](mailto:xrlondoncommunityevents@gmail.com)
- 1.42 [xrmidlandstraining@protonmail.com](mailto:xrmidlandstraining@protonmail.com)
- 1.43 [XRNE.training@protonmail.com](mailto:XRNE.training@protonmail.com)
- 1.44 [xrnw.training@gmail.com](mailto:xrnw.training@gmail.com)
- 1.45 [xryorkshire.training@gmail.com](mailto:xryorkshire.training@gmail.com)
- 1.46 [xrni.tt@rebellion.earth](mailto:xrni.tt@rebellion.earth)
- 1.47 [talksandtrainings.scotland@extinctionrebellion.uk](mailto:talksandtrainings.scotland@extinctionrebellion.uk)
- 1.48 [xrttse@gmail.com](mailto:xrttse@gmail.com)
- 1.49 [xrsw.trainings@gmail.com](mailto:xrsw.trainings@gmail.com)

## **2. JUST STOP OIL**

- 2.1 [Ring2021@protonmail.com](mailto:Ring2021@protonmail.com)
- 2.2 [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- 2.3 [youthclimateswarm@protonmail.com](mailto:youthclimateswarm@protonmail.com)

## **3. YOUTH CLIMATE SWARM**

- 3.1 [youthclimateswarm@protonmail.com](mailto:youthclimateswarm@protonmail.com)

Signed: Mr Justice Sweeting

Dated Thursday 14 April 2022