

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

**(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE  
'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL'  
CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE  
FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE  
CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 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

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FIFTH WITNESS STATEMENT  
OF HOLLY STEBBING

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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 (**NRF**). I am duly authorised to make this witness statement on behalf of the Claimants.
- 1.2 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.
- 1.3 There is now produced and shown to me a paginated bundle of true copy documents marked [**HS5**]. All references to documents in this statement are to **Exhibit HS5** unless otherwise stated.

## **2 Background**

- 2.1 I have read the Witness Statements of Anthony Milne (the Claimants' Global Security Adviser) dated 3 April 2022.
- 2.2 The incidents detailed at paragraphs 8 and 9 of Mr Milne's Witness Statement prompted the Claimants to commence proceedings for an injunction to restrain protestors from engaging in unlawful conduct at the Sites.
- 2.3 On 7 April 2022, Mrs Justice Ellenbogen granted an interim injunction to restrain the Defendants from trespassing and / or causing a nuisance at the Sites.
- 2.4 On 27 April 2022, Mr Justice Bennathan extended this injunction until 27 April 2023.
- 2.5 On 18 July 2023, Mr Justice Linden granted a final injunction to restrain the Defendants from trespassing and / or causing a nuisance at the Sites.
- 2.6 I make this witness statement in connection with the annual review hearing of the injunctions set out in Mr Justice Linden's Order dated 18 July 2023 (as amended on 21 July 2023 and on 16 October 2023) (the **Injunctions**) (the **Linden Order**).
- 2.7 On 29 January 2024, the Linden Order was reviewed by Mrs Justice Ellenbogen following the Supreme Court's judgment in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, in order to assess whether the decision in that case necessitated amendments to the Linden Order. She found it did not and granted the same relief (the **Ellenbogen Order**).
- 2.8 On 10 July 2024, at the first annual review hearing, Mrs Justice Tipples made no order as to the continuing effect of the Ellenbogen Order (the **Tipples Order**). The

Tipples Order also acknowledged the assurances that the Claimants had received from the Fifth Defendant not to breach the Injunctions.

- 2.9 Following the hearing, the Claimants and the Fourth Defendant entered into a consent order pursuant to which the Fourth Defendant gave undertakings to the Court not to protest at the Sites (the **Consent Order**). The Consent Order was sealed by the Court on 15 August 2024.
- 2.10 Pursuant to the Claimants' without notice application filed on 13 December 2024, the Ellenbogen Order, the Consent Order and the Tipples Order were amended under the slip rule on 21 January 2025 to correct a typographical error in the description of the sites referred to as the "Oil Refinery and Jetty at the Petrochemical Plant, Marsh Lane, Southampton" and the "Chemical Plant, Marsh Lane, Southampton". The orders amended under the slip rule are together the **Amended Orders**.
- 2.11 For the reasons set out below, the Claimants consider that the Injunctions should remain in place until 11 July 2028, subject to the built-in annual reviews described at paragraphs 8 to 10 of the Ellenbogen Order.
- 2.12 I also make this witness statement to:
- (a) record service of the Tipples Order;
  - (b) record the steps taken to notify the Defendants of the Consent Order;
  - (c) record service of the Amended Orders;
  - (d) record the steps taken to notify the Defendants of the review hearing on 9 July 2025 (the **Review Hearing**); and
  - (e) record the steps taken to renew the undertaking provided by the Fourth Defendant in the Consent Order and the assurance provided by the Fifth Defendant acknowledged in the Tipples Order.

### **3 Statement in support of application**

- 3.1 I have set out below a number of pertinent developments that evidence the continuing threat as well as evidence that shows the Injunctions have been restraining individuals from potentially causing disturbance on the Sites. These details have been provided to me by the Claimants and / or obtained from public sources. In light of the duty of full and frank disclosure, I have also set out evidence which may be interpreted as a reduction in this threat.

- 3.2 Overall, the Claimants consider that there remains an ongoing threat to the Sites which necessitates the continuation of the Injunctions, especially due to the hazardous nature of the Sites.

**Extinction Rebellion and Just Stop Oil protest and related activity**

- 3.3 Over the last year, Extinction Rebellion and Just Stop Oil continued to focus their attention on disruptive protest against the continued use of oil and gas and oil and gas businesses, like the Claimants:

- (a) On 24 July 2024, multiple environmental activist groups (including Just Stop Oil, Last Generation, Oil Kills, Stay Grounded, and others) targeted airports in at least six different European countries. The targets included Heathrow Airport, London, UK (which I am informed by the Claimants Site F provides jet fuel to); Cologne-Bonn Airport and Frankfurt Airport, Germany; Oslo Gardermoen Airport, Norway; Vantaa Airport, Helsinki Finland; Barcelona Airport, Spain; and Zurich and Geneva Airports, Switzerland. The activists demanded an end to the extraction and burning of fossil fuels by year 2030. In Frankfurt the protest included protestors cutting a perimeter fence and heading onto the runway. This led to over 140 flights being cancelled and the airport described this protest as severely dangerous and possibly putting human life at risk. At Heathrow, seven members of Just Stop Oil were arrested and three others taken into custody to prevent similar disruption. [HS5/6-9]
- (b) On 29 July 2024, Just Stop Oil Activists blocked the departures gates at Gatwick Airport in an attempt to disrupt members of the public from making their flights. In explaining this protest, Just Stop Oil declared “*areas of key importance to the fossil fuel economy will be declared sites of civil resistance around the world*”. [HS5/10-16]
- (c) On 30 July 2024, two Just Stop Oil protesters were arrested on suspicion of criminal damage after dousing parts of Heathrow Terminal 5 in orange paint. [HS5/17-20]
- (d) On 1 August 2024, Just Stop Oil protesters blocked access to departure gates at Heathrow Terminal 5 as part of their campaign to disrupt airports in summer 2024 [HS5/21-25]. Seven of these protesters were arrested at the airport and a further ten protesters were arrested nearby based on the police suspecting that these activists would contribute to the disruption. [HS5/26-27]
- (e) On 5 August 2024, four Just Stop Oil protesters were arrested at Manchester Airport on suspicion of planning to cause a public nuisance after being found

with items that the police verified would have caused “*damage and significant disruption*”. [HS5/28-29]

- (f) On 14 October 2024, ten activists from Extinction Rebellion blockaded the entrance to the UK Oil & Gas plc Horse Hill oil production site in Surrey, in protest against continued extraction. In its own press release, Extinction Rebellion stated it would “*stop any vehicles from entering the site*” and activists sat on the road directly outside the gate entrance. [HS5/30-34]
- (g) On 8 January 2025 Extinction Rebellion occupied the Manchester office of Marsh the insurance broker. On the “XR North” (being Extinction Rebellion North) X social media account, it stated this was because it was “*funding our destruction*” by insuring fossil fuel projects”. [HS5/35-36]

#### **Other relevant activity**

- 3.4 On 20 January 2025, members of the activist group Shut the System sabotaged the fibre optic cables of major insurance companies in London, Leeds, Birmingham and Sheffield, causing disruption to their internet operations. These insurers were targeted due to their work underwriting oil and gas activities. [HS5/37-41]
- 3.5 In March 2025, members of the newly formed activist group Citizen’s Arrest Network (**CAN**) targeted executives of oil and gas companies by accosting them on streets in the United Kingdom and confronting them with legal documents. These documents included draft “indictment papers” and “evidence dossiers” detailing crimes that CAN allege the executives have committed as leaders of their respective organisations. To date, targets have included the CEOs of Shell, EnQuest and Serica Energy - all of whom have been singled out because they work for notable oil and gas companies. As of today, CAN has over 15,000 followers across its social media profiles and is publicising direct altercations close to the workplaces of oil and gas employees. [HS5/42-45]
- 3.6 An offshoot of Just Stop Oil’s youth wing is understood to have started “Youth Demand”, a new activist organisation that blocked roads in central London in April 2025 in protest against fossil fuel companies and arms sales to the State of Israel. Youth Demand has threatened to take part in disruptive protests, including to “shut down” London (where one of the Claimants’ sites protected by the Injunctions is located), until its climate goals are met. [HS5/46-60]

#### **Plans to continue disruptive protests in 2025**

- 3.7 On 27 March 2025, Just Stop Oil announced its plans to end disruptive protests and re-strategise their resistance efforts after a final demonstration on 26 April 2025.

[HS5/61-63] For the following reasons, I do not think the Court can, at this stage, consider that the announcement to end disruptive protests demonstrates there is no longer a continued threat to the Sites from Just Stop Oil or otherwise:

- (a) Extinction Rebellion made a similar announcement on 31 December 2022 yet has since engaged in disruptive action as demonstrated by the evidence at paragraph 3.3(e) and (g) above. [HS5/64-65]
- (b) The announcement by Just Stop Oil does not mean it or its members will not undertake further disruptive activity whether under the banner of Just Stop Oil or similar groups. On 28 April 2025, Just Stop Oil posted on its X social media account *“Just Stop Oil may have finished actions but we aren’t going anywhere. People will continue their resistance in the courts, and something new is building”*. [HS5/66-67]
- (c) In fact, on 16 May 2025, it was reported that despite Just Stop Oil’s previous announcement, its members still have strong intentions to seek public attention by using highly disruptive strategies. Audio recordings of an alleged private internal Just Stop Oil meeting record a co-ordinator summarising the views of the group to remain *“action based”*, make sure they are *“not becoming something more like Greenpeace”* and to continue doing acts like *“Darwin’s grave”* (this would appear to be a reference to two Just Stop Oil activists spray-painting Charles Darwin’s grave at Westminster Abbey in January 2025) and *“citizens arrests”*. Further it was *“very important to do the spicy stuff”* and that *“to do protest stuff you have to do naughty stuff”*. The protester admitted Just Stop Oil had had conversations with CAN and were *“extremely jealous of the stuff they have been doing”* however, if CAN had been *“more spicy”* they would have gained more media attention. A *“rest”* and *“reset”* was needed before coming back and there was consensus that the group should *“carry on with civil disobedience, direct action, because it’s the most effective thing to do”*. Finally, in the *“second go around”* it was *“very much needed”* that they had to be so unpopular with the public. A transcription of this report can be seen at [HS5/68-76].
- (d) On 19 May 2025, Just Stop Oil posted on its X account an image stating *“Just Getting Started”*. [HS5/77]
- (e) It has been reported that some members of Just Stop Oil and Extinction Rebellion have splintered off to join other activist groups such as CAN and Youth Demand. On 5 May 2025 Youth Demand posted on its X account that *“This summer Youth Demand and Just Stop Oil are running a joint 6-week training course to build the next generation of revolutionary organisers we*

need". [HS5/78]. The Guardian reported on 5 April 2025 that an activist involved in Extinction Rebellion "*helps run the Citizens Arrest Network*". [HS5/79-85]

- (f) On 6 June 2025 the Times reported in relation to Youth Demand, "*Activists from the supposedly disbanded group [Just Stop Oil], however, were playing a central role in recruiting new members to Youth Demand to help its goal of bringing London to a halt. Events were even advertised using the JSO logo.*" The Times also quoted a Just Stop Oil activist as saying, "*This is an inhale before we breath out and expand into brand new territory, into something even bigger than we've tried before.*" [HS5/86-93]
- (g) Though the names and tactics may evolve, the evidence in this statement demonstrates that for a number of the activists the primary objective remains disruptive demonstrations against organisations they believe stand opposed to their demands, which includes oil and gas companies.

**Failure to provide assurances that no further direct action will occur**

- 3.8 I refer to paragraph 67 of the judgment of Mr Justice Linden on 10 July 2023 where, in deciding to grant the Injunctions, he stated that:

*"it would have been very easy for Extinction Rebellion or Just Stop Oil to give assurances or evidence to the court that there was no intention to return to their activities of 2021/2022, and no risk of trespass on the Sites or damage to property by protestors in the foreseeable future, but they did not do so".*

- 3.9 I am not aware that Just Stop Oil and Extinction Rebellion have since provided any assurances or evidence to the Court or to the Claimants that they do not intend to return to protesting at the Sites in the foreseeable future. The Claimants have taken steps to notify the Defendants of this hearing and with the exception of the fifth Defendant (as explained below) the Claimants have had no response. I believe that, when taken with the evidence outlined above, this suggests that there remains a real risk of future unlawful activity at the Sites if the injunction is not renewed.

**Other injunctions to restrain protestors granted in 2024/2025**

- 3.10 The Claimants have not been alone in seeking to maintain injunctions that restrain the unlawful conduct of protestors opposed to the oil and gas industry. I am aware of the following injunctions:

Claim No.	Parties	Locations affected by order	Date and length of injunction
<b>North Warwickshire</b>			
QB-2022-001236	<p><b>Claimant:</b> North Warwickshire Borough Council</p> <p><b>Defendants:</b> (1-18) Named Defendants (19) Persons Unknown (20-158) Named Defendants</p>	Kingsbury Oil Terminal	<p>Injunction, Power of Arrest on 14 April 2022 (as varied on 6 May 2022)</p> <p>Interim Injunction Order granted on 9 May 2022 until hearing of the claim.</p> <p>Final hearing listed for 11 June 2024. Only 24 of the 157 named Defendants have offered to provide undertakings not to engage in further unlawful activity against the North Warwickshire Borough Council.</p> <p>In the final judgment given on 6 September 2024, the Court considered that injunctive relief with a power of arrest attached was appropriate and the injunction should continue for 3 years from the date of the hearing subject to annual reviews.</p>
<b>Shell</b>			
QB-2022-001259	<p><b>Claimant:</b> Shell International Petroleum Company Limited</p> <p><b>Defendants:</b> Persons Unknown in connection with Just Stop Oil, Extinction Rebellion and Youth Climate Swarm</p>	Shell Centre Tower (office building)	<p>Further interim injunction granted on 24 April 2024 until 12 November 2024 with directions for a final review hearing</p> <p>In the final judgment given on 5 December 2024, the Court considered that injunctive relief was appropriate and granted a final order of 5 years relief from the date of the hearing subject to annual review.</p>
QB-2022-001241	<p><b>Claimant:</b> Shell U.K. Limited</p> <p><b>Defendants:</b> Persons Unknown in connection with Just Stop Oil, Extinction Rebellion</p>	Shell Haven Oil Refinery, Stanford-Le-Hope (oil refinery)	<p>Further interim injunction granted on 24 April 2024 until 12 November 2024 with directions for a final review hearing</p> <p>In the final judgment given on 5 December 2024, the Court considered that injunctive relief was appropriate and granted a</p>

Claim No.	Parties	Locations affected by order	Date and length of injunction
	and Youth Climate Swarm		final order of 5 years relief from the date of the hearing subject to annual review.
QB-2022-001240	<p><b>Claimant:</b> Shell U.K. Oil Products Limited</p> <p><b>Defendants:</b> (1) Persons Unknown in connection with Just Stop Oil, Extinction Rebellion and Youth Climate Swarm (2) 14 Named Defendants</p>	Any Shell Petrol Station in England and Wales	<p>Further interim injunction granted on 24 April 2024 until 12 November 2024 with directions for a final review hearing.</p> <p>Only one out of the 14 named Defendants agreed to an undertaking not to engage in relevant protest activities by the time of the final hearing.</p> <p>In the final judgment given on 5 December 2024, the Court considered that injunctive relief was appropriate and granted a final order of 5 years relief from the date of the hearing subject to annual review.</p>
<b>Thurrock Council and Essex County Council</b>			
QB-2022-001317	<p><b>Claimant:</b> (1) Thurrock Council (2) Essex County Council</p> <p><b>Defendants:</b> (1) Madeline Adams (2-222) Other Named Defendants (223-229) Persons Unknown</p>	<p>Roads within Thurrock and Essex Council boundaries</p> <p>Administrative areas of Thurrock and Essex</p> <p>Fuel Terminals:</p> <ul style="list-style-type: none"> <li>• The Navigator Fuel Terminal, West Thurrock</li> <li>• The Esso Fuel Terminal, Purfleet</li> <li>• Exolum Storage Ltd, Grays</li> <li>• Oikos Storage Limited, Essex</li> </ul>	<p>Original Injunction Order dated 1 June 2022 extended by order dated 27 January 2023 “<i>until and subject to any further order</i>”.</p> <p>At the first annual review hearing on 12 July 2024, the court ordered that the injunctions should continue until and including 12 July 2029 subject to annual review hearings of the injunctions to the extent that they relate to Persons Unknown.</p> <p>At the final hearing on 9 October 2024, the court considered that injunctive relief was appropriate and the injunctions should continue for 5 years from the date of the hearing subject to annual reviews.</p>

Claim No.	Parties	Locations affected by order	Date and length of injunction
<b>UK Oil Pipelines Ltd and West London Pipeline and Storage Ltd</b>			
PT-2022-000303	<p><b>Claimants:</b></p> <p>(1) UK Oil Pipelines Ltd</p> <p>(2) West London Pipeline and Storage Ltd</p> <p><b>Defendants:</b></p> <p>Persons Unknown</p>	Buncefield and Kingsbury Terminals	Final Injunction granted on 24 April 2022 for 5 years until 20 October 2028 subject to annual review.
<b>Valero</b>			
QB-2022-000904	<p><b>Claimants:</b></p> <p>(1) Valero Energy Ltd</p> <p>(2) Valero Logistics UK Ltd</p> <p>(3) Valero Pembrokeshire Oil Terminal Ltd</p> <p><b>Defendants:</b></p> <p>(1) and (2) Persons Unknown</p> <p>(3-19) Named Defendants</p>	<p>Pembroke oil refinery, Pembroke</p> <p>Pembroke oil refinery jetties, Pembroke</p> <p>Manchester oil terminal, Trafford Park</p> <p>Kingsbury oil Terminal, Tamworth</p> <p>Plymouth oil terminal, Plymouth</p> <p>Cardiff oil, Cardiff</p> <p>Avonmouth oil terminal, Avonmouth</p> <p>Pembrokeshire terminal, Milford Haven</p>	<p>Final injunction granted on 24 January 2024 for 5 years until 13 December 2028.</p> <p>At the most recent review hearing on 24 January 2025, the Court upheld the injunction.</p>
<b>Exolum</b>			
QB-2022-001142	<p><b>Claimants:</b></p> <p>Exolum Pipeline Systems Ltd</p> <p>Exolum Storage Ltd</p> <p>Exolum Seal Sands Ltd</p> <p><b>Defendants:</b></p> <p>Persons Unknown</p>	Various terminals and associated equipment	Final injunction granted for one year on 23 January 2023 and extended until 20 February 2025

- 3.11 In each of these annual reviews, heard recently, the Court considered there to be a sufficient risk of direct action by protest groups against claimants' activities within the oil and gas industry (or related parties) to maintain the injunctions.

#### **Effect of the Ellenbogen Order**

- 3.12 I believe that the Ellenbogen Order continues to have a deterrent effect: protecting the Sites from potentially dangerous activity.
- 3.13 The impact of the Ellenbogen Order and similar orders has been cited by Just Stop Oil when explaining its decision not to target sites such as those subject to this order. For example, on 13 September 2023 the Just Stop Oil X account posted that the reason behind disruptive protests in Portsmouth which involved blocking roads was "*injunctions that make protests impossible at oil refineries, oil depots and even petrol stations*" [HS5/94]. This post, together with Just Stop Oil's failure to provide assurances to the Claimants (or Court) that no further direct action will occur plus their disruptive airport protests and other activity as detailed above, indicate that Just Stop Oil still have an interest in targeting and disrupting oil and gas production facilities and but for the Ellenbogen Order would continue to do so.

### **4 Continuation of the Order**

- 4.1 The Claimants are applying for the Ellenbogen Order (as amended on 21 January 2025) to remain in place in its current form until 11 July 2028, subject to the built-in annual reviews described at paragraphs 8 to 10 of the Order.

### **5 Service of the Tipples Order**

#### **Service on Defendants 1, 2 and 3**

- 5.1 Service of the Tipples Order on the First, Second and Third Defendants was effected as follows:
- (a) By no later than 25 July 2024, the Tipples Order was uploaded to the following webpage (the **Webpage**):
- <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>
- A copy of the Webpage (including links to the Tipples Order) can be seen at [HS5/96].
- (b) I am informed by the Claimants that, by no later than 23 July 2024:

- (i) copies of the Tipples Order were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites; and
- (ii) a notice which states that copies of the Tipples Order may be obtained from the Claimants' solicitors, NRF, and may also be viewed on the Webpage was added to each plastic container.

Photographs of the clear plastic containers, with the Tipples Order placed in the plastic containers, can be seen at **[HS5/97-104]**.

- (c) On 19 July 2024, an associate at NRF sent emails enclosing copies of the Tipples Order and explaining that further copies may be obtained from NRF or viewed at the Webpage to the following email addresses:

[xr-legal@riseup.net](mailto:xr-legal@riseup.net)

[enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

[iuststopoilpress@protonmail.com](mailto:iuststopoilpress@protonmail.com)

Copies of the emails sent by an associate at NRF can be seen at **[HS5/105 and HS5/106]**.

- (d) Confirmation of delivery was received on 19 July 2024 in respect of each of the emails sent to the addresses listed at paragraph 5.1(c) above. Copies of the confirmation emails can be found at **[HS5/107 and HS5/108]**.
- (e) In addition, automatic replies were received on 19 July 2024 from [enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk) and [xr-legal@riseup.net](mailto:xr-legal@riseup.net), which appear to be automatic responses to any emails received. A copy of the relevant emails can be seen at **[HS5/109 and HS5/110]**.

#### **Service on Defendants 4 and 5**

- 5.2 Pursuant to paragraph 4 of the Tipples Order, on 19 July 2024, an associate at NRF sent emails enclosing copies of the Tipples Order to the email addresses associated with the Fourth and Fifth Defendants. Copies of the emails sent by an associate at NRF can be seen at **[HS5/111-113 and HS5/114-117]**.
- 5.3 Confirmation of delivery was received on 19 July 2024 in respect of the emails sent to the addresses associated with the Fourth and Fifth Defendants. Copies of the confirmation emails can be found at **[HS5/118 and HS5/119]**.

## 6 Service of the Consent Order

6.1 The Claimants took the following steps to serve the First, Second and Third Defendants with the Consent Order:

- (a) By no later than 21 August 2024, the Consent Order was uploaded to the Webpage.

A copy of the Webpage (including links to the Consent Order) can be seen at **[HS5/96]**

- (b) I am informed by the Claimants that, by no later than 22 August 2024:
- (i) copies of the Consent Order were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites; and
  - (ii) a notice which states that copies of the Consent Order may be obtained from the Claimants' solicitors, NRF, and may also be viewed on the Webpage was added to each plastic container.

Photographs of the clear plastic containers, with the Consent Order placed in the plastic containers and the large warning notices can be seen at **[HS5/120-126]**.

- (c) On 19 August 2024, an associate at NRF sent emails enclosing copies of the Consent Order and explaining that further copies may be obtained from NRF or viewed at the Webpage to the following email addresses:

[xr-legal@riseup.net](mailto:xr-legal@riseup.net)

[enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

[juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)

Copies of the emails sent by an associate at NRF can be seen at **[HS5/127 and HS5/128]**.

- (d) Confirmation of delivery was received on 19 August 2024 in respect of each of the emails sent to the addresses listed at paragraph 6.1(c) above. Copies of the confirmation emails can be found at **[HS5/129 and HS5/130]**.
- (e) In addition, automatic replies were received on 19 August 2024 from [enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk) and [xr-legal@riseup.net](mailto:xr-legal@riseup.net), which appear to

be automatic responses to any emails received. A copy of the emails can be seen at **[HS5/131 and HS5/132]**.

- 6.2 On 15 August 2024, an associate at NRF sent an email enclosing a copy of the Consent Order to the Fourth Defendant via the email address [PBHPXR@protonmail.com](mailto:PBHPXR@protonmail.com). A copy of this email can be found at **[HS5/133]**. Confirmation of delivery was received the same day and can be seen at **[HS5/224]**.
- 6.3 On 19 August 2024, an associate at NRF sent an email enclosing a copy of the Consent Order to the Fifth Defendant via the email address [hekt@outlook.com](mailto:hekt@outlook.com). A copy of this email can be found at **[HS5/134]**. Confirmation of delivery was received the same day and can be seen at **[HS5/135]**.

## **7 Service of the Amended Orders**

### **Service on Defendants 1, 2 and 3**

- 7.1 The Claimants took the following steps to serve the First, Second and Third Defendants with the Amended Orders:

- (a) By no later than 10 February 2025, the Amended Orders were uploaded to the Webpage.

A copy of the Webpage can be seen at **[HS5/96]**.

- (b) I am informed by the Claimants that, by no later than 14 February 2025:
- (i) copies of the Amended Orders were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites;
  - (ii) a notice which states that copies of the Amended Orders may be obtained from the Claimants' solicitors, NRF, and may also be viewed on the Webpage was added to each plastic container; and
  - (iii) four amended large warning notices, in the form annexed to the Ellenbogen Order (as amended on 21 January 2025) were fixed in conspicuous places around the perimeter of each of the Sites.

Photographs of the clear plastic containers, with the Amended Orders placed in the plastic containers and the large warning notices can be seen at **[HS5/136-156]**.

- (c) On 10 February 2025, a trainee solicitor at NRF sent emails enclosing copies of the Amended Orders and explaining that further copies may be obtained from NRF or viewed at the Webpage to the following email addresses:

[xr-legal@riseup.net](mailto:xr-legal@riseup.net)

[enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

[juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)

Copies of the emails can be seen at [HS5/157 and HS5/158].

- (d) Confirmation of delivery was received on 10 February 2025 in respect of each of the emails sent to the addresses listed above. Copies of the confirmation emails can be found at [HS5/159 and HS5/160].
- (e) In addition, automatic replies were received on 10 February 2025 from [enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk) and [xr-legal@riseup.net](mailto:xr-legal@riseup.net), which appear to be automatic responses to any emails received. A copy of the relevant emails can be seen at [HS5/161 and HS5/162].

#### **Service on Defendants 4 and 5**

- 7.2 A trainee solicitor at NRF sent emails enclosing copies of the Amended Orders to the email addresses of the Fourth and Fifth Defendants. Copies of the emails can be seen at [HS5/163 and HS5/164] and confirmation of delivery was received on 10 February 2025 [HS5/165 and HS5/166].

## **8 Notification of the Review Hearing**

- 8.1 Although there is no express requirement in the Orders referred to above for notification of the Review Hearings, the Claimants, however, followed the steps for notice provided for in the Amended Orders. The Claimants took the following steps to notify the First, Second and Third Defendants of the Review Hearing:

- (a) By no later than 1 April 2025, the notice and letter from NRF dated 3 April 2025 confirming the Review Hearing (the **Review Hearing Notice**) was uploaded to the Webpage.

A copy of the Webpage (including links to the Review Hearing Notice) can be seen at [HS5/96].

- (b) I am informed by the Claimants that, by no later than 10 April 2025, copies of the Review Hearing Notice were placed in clear plastic containers at a minimum of 2 locations on the perimeter of each of the Sites. [HS5/167-174]
- (c) On 10 April 2025, an associate at NRF sent emails enclosing copies of the Review Hearing Notice and explaining that further copies may be obtained from NRF or viewed at the Webpage to the following email addresses:

[xr-legal@riseup.net](mailto:xr-legal@riseup.net)

[enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

[juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)

Copies of the emails sent by an associate at NRF can be seen at [HS5/175-HS5/178].

- (d) Confirmation of delivery was received on 10 April 2025 in respect of each of the emails sent to the addresses listed at paragraph 6.1(c) above. Copies of the confirmation emails can be found at [HS5/179 and HS5/180].
- (e) In addition, automatic replies were received on 10 April 2025 from [enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk) and [xr-legal@riseup.net](mailto:xr-legal@riseup.net), which appear to be automatic responses to any emails received. A copy of the emails can be seen at [HS5/181 and HS5/182].

8.2 On 10 April 2025, an associate at NRF sent emails enclosing copies of the Review Hearing Notice to the email addresses of the Fourth and Fifth Defendants to notify them of the Review Hearing. Copies of the emails can be seen at [HS5/183-189 and HS5/190-196] and confirmations of delivery were received on 10 April 2025 [HS5/197 and HS5/198].

## **9 Claimants' monitoring of documents served at the Sites**

- 9.1 Since the last review hearing, the Claimants have carried out monthly checks to make sure the Warning Notices and plastic containers have remained in place at the Sites.
- 9.2 When arranging for service of the Amended Orders and amended Warning Notices in February 2025, I became aware that in February 2024 (i.e. the previous year) the Claimants had identified that some of the Sites only had two Warning Notices in place. They promptly rectified this. Paragraph 12.3 of the Ellenbogen Order requires four Warning Notices be fixed in conspicuous places around the perimeter of the Sites.

- 9.3 In my third witness statement in support of the 2024 annual review I stated I had been informed there were four Warning Notices at all the Sites. Photographic evidence of the four Warning Notices from all the Sites was provided. However, I now understand that as at February 2024 this was not the case for all Sites.
- 9.4 The Claimants appreciate that they are benefiting from injunctive relief, which has been granted at the Court's discretion and understand the importance of complying with the procedural steps required by the Court, especially as it relates to persons unknown. I apologise therefore that these procedural steps were not completed until February 2024 and that my third witness statement filed in support of the 2024 annual review hearing did not cover this. Steps to correct the omission were taken when the omission was appreciated. I do not consider that this has caused any prejudice to the Defendants in light of (i) the fact each site had at least two Warning Notices at conspicuous places around the perimeter, (ii) the other methods of notification that were completed – such as to inform any Defendant about the existence of the injunction – and (iii) there was no breach of the Ellenbogen Order during this period.

## **10 Renewal of Undertakings from Defendants 4 and 5**

- 10.1 In July 2024, the Fourth Defendant provided undertakings to the Court through the Consent Order not to breach the Injunctions and the Fifth Defendant gave the Claimants the assurances acknowledged in the Tipples Order. These undertakings and assurances expire on 30 June 2025. The Claimants consequently sought to renew the Fourth and Fifth Defendants' undertakings/assurances for another year.
- 10.2 On 10 April, and 7 May 2025, an associate at NRF sent emails enclosing copies of new undertakings to the email addresses of the Fourth and Fifth Defendants respectively to invite them to give undertakings until next year (the **2026 Undertaking**). The 2026 Undertaking is materially identical to those previously given except it expires on the later of 31 July 2026 or the date of the next annual review hearing. [HS5/183-204]
- 10.3 On 15 June 2025, the Fifth Defendant returned a signed copy of the 2026 Undertaking via email to NRF, confirming her willingness to be subject to her undertaking for another year instead of to the Injunctions. [HS5/217-223] This was following further emails from NRF making clear which document the Claimants wished her to sign after the incorrect document was returned. Copies of the emails and delivery notices can be seen at [HS5/205-211 and HS5/215-216]
- 10.4 The Fourth Defendant has at the date of this statement not replied to the Claimants. On 12 June 2025 an associate from NRF sent a follow-up email to the Fourth

Defendant and received a delivery failure notification stating the mailbox was full. The previous two emails had been delivered. Copies of the emails and delivery receipts can be seen at [HS5/212-214]. The Claimants will continue to try to contact the Fifth Defendant up to the Review Hearing.

**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:

A handwritten signature in blue ink, appearing to read 'Holly Stebbing', written over a horizontal line.

**HOLLY STEBBING**

Date: 20 June 2025

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

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

(4) PAUL BARNES

(5) DIANA HEKT

Defendants

---

n

FIFTH WITNESS STATEMENT  
OF HOLLY STEBBING

---

3 More London Riverside  
London SE1 2AQ  
United Kingdom

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+44 20 7283 6500  
DX 85 London

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

**(2) PERSONS UNKNOWN WHO, IN CONNECTION WITH THE  
'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL'  
CAMPAIGN, ENTER OR REMAIN (WITHOUT THE CONSENT OF THE  
FIRST CLAIMANT OR THE SECOND CLAIMANT) UPON THE  
CHEMICAL PLANT, MARSH LANE, SOUTHAMPTON SO45 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 "HS5"

This is the exhibit marked "HS5" referred to in the Fifth Witness Statement of Holly Stebbing.



Holly Stebbing

Dated: 20 June 2025

## HS5 Witness Statement Exhibit Index

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3.	Just Stop Oil protesters arrested at Heathrow airport	30 July 2024	HS5/17 - 20
4.	Just Stop Oil's second Heathrow protest	01 August 2024	HS5/21 - 25
5.	Just Stop Oil second Heathrow protest – At least 17 protesters arrested	01 August 2024	HS5/26 - 27
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7.	Extinction Rebellion protesters blockade Surrey oil field	14 October 2024	HS5/30 - 34
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17.	Youth Demand post on X, Seeds for Revolution Training Programme with Just Stop Oil	5 May 2025	HS5/78
18.	The Guardian article, What next for climate activism now Just Stop Oil is 'hanging up the hi vis'?	5 April 2025	HS5/79 – 85
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CLIMATE IN CRISIS

## More than 100 flights canceled in Germany as environmental activists target airports across Europe

Environmental groups said they planned to target airports this summer, calling for governments around the world to end the extraction and burning of fossil fuels by 2030.



— Passengers line up Thursday at the departures hall at Frankfurt Airport in Germany.

Daniel Roland / AFP - Getty Images

July 25, 2024, 1:44 PM GMT+1 / Source: [The Associated Press](#)

**By The Associated Press**

FRANKFURT, Germany – Germany’s busiest airport canceled more than 100 flights Thursday as [environmental activists](#) launched a coordinated effort to disrupt air travel across Europe at the height of the [summer holiday season](#) to highlight the [threat posed by climate change](#).

Frankfurt Airport said flights were halted for safety reasons after [climate activists](#) breached security fences, triggering a response from police, firefighters and airport security officers. All runways were back in operation by 7:50 a.m. local time, it said. About 140 flights have been cancelled so far, but [further disruptions](#) are expected throughout the day, the airport said.

Environmental groups said they planned to target airports around Europe this summer to remind people about the [link between fossil fuels](#), such as those used by airliners, and climate change. The groups are calling for governments around the world to end the extraction and burning of fossil fuels by 2030.

“We sharply condemn these unauthorized demonstrations, and we reserve the right to take legal action against the participants,” Frankfurt Airport said. “Their activities pose severe danger to flight operations – possibly putting human life at risk.”

#### Watch: Climate protesters spray-paint Stonehenge

00:54



Climate data showed that Monday was [the hottest day ever recorded](#) as human-caused climate change continues to drive unprecedented heat and growing weather extremes. Global

investments in planet-warming oil and gas are expected to increase by 7% this year, [according to the International Energy Agency](#), despite global promises to slash fossil fuel use.

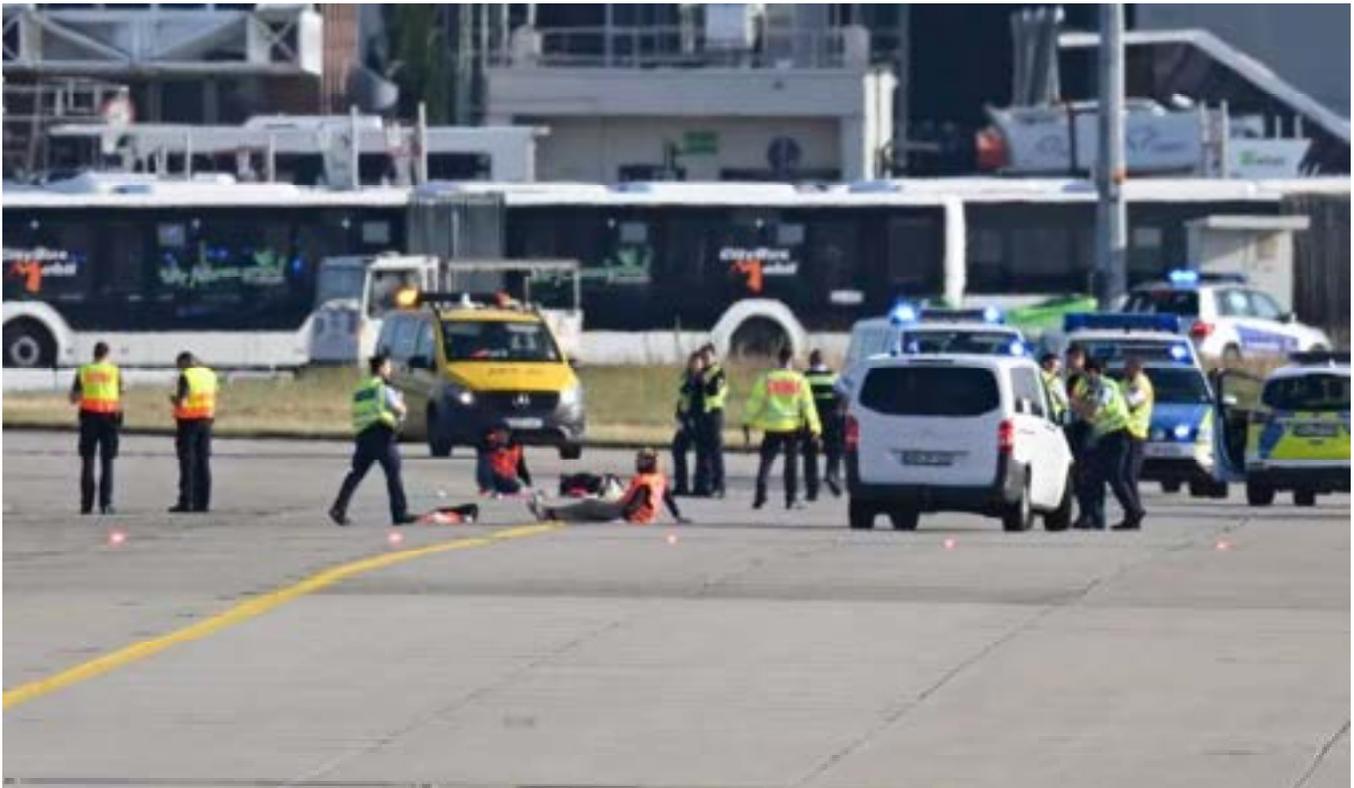
Flying is considered one of the most carbon-intensive activities, but the aviation industry is expected to grow steadily over the coming decades despite efforts to contain the climate crisis.

The [Last Generation](#) group, which organized the Frankfurt demonstration, said six protesters cut holes in the perimeter fence and headed toward the runways on foot, bicycles and skateboards.

It was the second time in as many days that a protest by Last Generation caused disruption at a German airport.

On Wednesday, five protesters glued themselves to a taxiway at [Cologne-Bonn Airport](#), forcing a roughly three-hour halt to flights. That protest resulted in 31 flights being canceled. There were other protests or attempted protests in other European countries.

Climate activists staged similar actions in Finland, Norway, Switzerland and Spain on Wednesday.



— Emergency personnel on the tarmac at Frankfurt Airport, where environmental activists launched a coordinated effort to disrupt air travel Thursday. Arne Dedert / dpa via AP

At Helsinki Airport, a handful of protesters blocked the main check-in area for about 30 minutes, but police said the demonstration caused no delays to flights or other disruption.

At Oslo's main Gardermoen airport, three activists managed to enter the runway area early Wednesday, waving banners and disrupting air traffic for about half an hour. Police said there were no major flight delays.

Police in London said Wednesday that they prevented a planned protest at Heathrow Airport that could have had a significant impact on Europe's largest airport. Seven members of the group known as Just Stop Oil were arrested at Heathrow and three others were taken into custody at other locations as part of an "intelligence-led" operation, the Metropolitan Police Service said in a statement.

One of those arrested in London was Sean Callaghan, 29, who described himself as an environmental educator.

"I'm taking action at airports this summer because it is impossible for me to see a way in which we can inspire and enthuse students about the future of our planet," Callaghan said in a video posted on social media.

Last week, the German Cabinet approved legislation that would [impose tougher penalties](#) on people who break through airport perimeters.

The bill, which still requires approval by lawmakers, foresees punishment ranging up to a two-year prison sentence for people who intentionally intrude on airside areas of airports such as taxiways or runways, endanger civil aviation, or enable someone else to. Currently such intrusions only draw a fine.

Travel > News & Advice

# Just Stop Oil activists block Gatwick Airport departure gates in London

Those jetting away from the UK's second-busiest airport came face-to-face with climate protesters inside the terminal

Benjamin Parker • Monday 29 July 2024 11:20 BST • 46 Comments



Gatwick passengers step over Just Stop Oil activists blocking airport entrance



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**Just Stop Oil** protesters have blocked an entrance to a security search area at **Gatwick airport** in an apparent attempt to disrupt travellers trying to make their **flights**.

Seven activists entered the airport's South Terminal this morning, with the group stating that "the situation is currently developing".

A spokesperson for the aviation hub told *The Independent* that despite the protest, London Gatwick is open and "operating normally today".

"There are a small number of protesters at the airport who have now been arrested and are being removed from the airport," they added.

Images and videos shared across social media, as well as on the group's website, show the protesters sitting on the floor.

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**UK city ranked most expensive in western Europe for city break – and it isn't London**

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**Father pays tribute to teenager who died in beach 'disturbance' filmed by bystanders**

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So far, it seems that most people are able to get past the protest without too much difficulty.

*The Independent* has contacted Sussex Police for further details.

**Just Stop Oil**  

@JustStop\_Oil · [Follow](#)

 **BREAKING: GATWICK DEPARTURE GATES BLOCKED**

 7 Just Stop Oil supporters have disrupted the southern terminal at Gatwick airport, joining 21 other groups in the [@\\_oilkills](#) international uprising.

 Demand our government Just Stop Oil by 2030 — [actionnetwork.org/petitions/sign...](https://actionnetwork.org/petitions/sign...)

Watch on X

8:40 AM · Jul 29, 2024 

 1.3K  Reply  Copy link

[Read 2.5K replies](#)

“As long as political leaders fail to take swift and decisive action to protect our communities from the worst effects of climate breakdown, Just Stop Oil supporters, working with other groups internationally, will take the proportionate action necessary to generate much needed political pressure,” the group has previously said in a statement.

“This summer, areas of key importance to the fossil fuel economy will be declared sites of civil resistance around the world.”

The group added today’s demo at Gatwick is a part of the international campaign Oil Kills, and said 21 groups across 12 countries have demonstrated at 17 airports so far.

According to Simon Calder, *The Independent's* travel correspondent and who used to work in the security search area at Gatwick South terminal, the process will have made little difference to the flow of passengers.

“The location where the protesters sat on the floor is just one of several entrances to the security search area, with passengers simply needing to take a short detour.

“In addition, the timing was odd: the protest began after the big early morning surge of passengers, so the terminal will have been relatively quiet.”

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#### RECOMMENDED

**Plane flew for 10 minutes with no one at the controls after co-pilot fainted**

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**Pope Leo confirms stance on gay marriage and abortion**

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Last week, **Just Stop Oil** activists suspected of planning to disrupt Heathrow **Airport were arrested**. None of the group were able to get into the airport

It also comes days after **two other members were found guilty of criminal damage** after throwing tomato soup at Vincent van Gogh's *Sunflowers* inside **London's** National Gallery.

**More about:** [Gatwick Airport](#) [Protesters](#) [Just Stop Oil](#)

Travel > News & Advice

# Just Stop Oil protesters arrested at Heathrow airport on suspicion of criminal damage

'Unlawful and irresponsible' protests will not be tolerated, warns the UK's busiest airport

Benjamin Parker • Tuesday 30 July 2024 10:18 BST • 0 Comments



Just Stop Oil spray paint over Heathrow Airport departure board



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Two **Just Stop Oil** protesters have been arrested at **London's Heathrow airport** on

Floors and passenger information screens were sprayed in the latest incident of the climate activists targeting aviation hubs.

The protest group said Phoebe Plummer, 22, and Jane Touil, 58, entered Heathrow at around 8.35am on Tuesday (30 July), with police and security arriving within minutes.

Officers from the Metropolitan Police remain at the scene to “deal with any further offences”

A Heathrow spokesperson said: “Working with partners we have quickly resolved a protest incident in Terminal 5 and all involved have been removed from the airport. The airport continues to operate as normal and passengers are travelling as planned. We are in full agreement that the aviation industry needs to decarbonise, but unlawful and irresponsible protest activity is not the way forward and will not be tolerated.”

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One of the protesters, Ms Plummer, was freed on bail this week after being found guilty of causing criminal damage to Vincent Van Gogh's painting *Sunflowers* in 2022.

The incident comes a day **after protesters from the group blocked an entrance to a security search area at Gatwick airport** in an apparent attempt to disrupt travellers trying to make their flights.

Images and videos shared across social media, as well as on the Just Stop Oil website, show them sitting on the floor. In some, people can be seen stepping over the the protesters.

Eight people were arrested and a spokesperson for Gatwick said the airport continued to operate as usual.

In a statement, Just Stop Oil said: “As long as political leaders fail to take swift and decisive action to protect our communities from the worst effects of climate breakdown, Just Stop Oil supporters, working with other groups internationally, will take the proportionate action necessary to generate much needed political pressure. This summer, areas of key importance to the fossil fuel economy will be declared sites of civil resistance around the world.”

**More about:** [Terminal 5](#) [Heathrow Airport](#) [Just Stop Oil](#) [Protesters](#)

Travel > News & Advice

# Heathrow sees second Just Stop Oil arrests in a week as protesters block search area

Airport brands the action 'irresponsible' and says it led to no significant delays

Benjamin Parker • Thursday 01 August 2024 13:04 BST • 2 Comments



Protesters blocking part of Heathrow Terminal 5 (*Just Stop Oil*)



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Seven **Just Stop Oil** protesters have been arrested after blocking a passenger search area at **Heathrow** Airport's Terminal 5.

The protesters, part of the climate activist group known for their controversial tactics, were detained by Metropolitan Police officers on suspicion of public order offences.

It comes just days after **parts of the same terminal at the UK's busiest airport was sprayed with orange paint by protestors.**

At around 8.50am this morning (1 August), the protesters positioned themselves in front of a busy walkway, holding signs with messages such as "Oil Kills" and "Sign the Treaty", as part of their ongoing campaign against fossil fuels.

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Despite their efforts to disrupt operations, both Heathrow Airport and the Metropolitan Police confirmed that the protest was quickly managed with minimal impact on passengers. Passengers continued to access security lanes either side of where the group sat.



Heathrow has been struck by the climate activists two this week (*Just Stop Oil*)

The demonstrators were reportedly removed from the area within 20 minutes, allowing travellers to continue accessing security lanes on either side of the protest without significant delays.

In a statement, Scotland Yard confirmed the arrests, emphasising the swift response by officers: “Seven Just Stop Oil protesters have been arrested on suspicion of public order offences after they blocked a passenger search area at Terminal 5, Heathrow. Officers swiftly attended and removed the protesters with minimal disruption caused.”

A spokesperson for Heathrow Airport condemned the protest as “unlawful and irresponsible”, adding: “Our priority will always be to maintain the safety of passengers and colleagues, and we’ll continue to work closely with our partners and the police in taking proportionate action to protect travel plans this summer.”

The protest is believed to be part of a broader ‘Oil Kills’ campaign, which has seen climate activists targeting airports around the world.

On Tuesday, two Just Stop Oil members, Phoebe Plummer, 22, and Jane Touil, 58, were arrested after dousing departure boards at the same terminal with paint.

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Both women were subsequently remanded in custody after appearing at Westminster Magistrates' Court.

And on Monday, **protesters blocked an entrance to a security search area at Gatwick airport** in an apparent attempt to disrupt travellers trying to make their flights.

Also in July, Frankfurt – Germany's busiest airport – was **forced to halt flights after climate activists evaded security**, cutting through a fence and glueing themselves to various points on the airfield. The week before saw **Cologne-Bonn Airport come to a standstill after climate activists glued themselves to a runway**.

Since then, in Finland, activists were photographed obstructing the security gates at Helsinki Vantaa Airport. In Norway, three activists reportedly breached the perimeter fence of Oslo's Gardermoen Airport. Norwegian media reported that these individuals were removed by authorities within 30 minutes of gaining access.

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More about: [Heathrow](#) [Terminal 5](#) [Protesters](#) [Just Stop Oil](#) [UK](#)



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NEWS | LONDON

# Heathrow Airport: At least 17 Just Stop Oil protesters arrested over disruption plans

Just Stop Oil said seven protesters were arrested at Heathrow Terminal 5, with at least 10 others arrested on public transport



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**JACOB PHILLIPS**  
1 AUGUST 2024

 2 COMMENTS



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At least 17 Just Stop Oil protesters have been arrested for trying to disrupt Heathrow Airport, the environmental group has said.

Six people have been arrested after blocking the departure gates at Heathrow Terminal 5, alongside a person filming.

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# Just Stop Oil protesters arrested at airport



| The group were found with items police said would be used to disrupt the airport

5 August 2024

**Four environmental activists who police said planned to cause "significant disruption" at a major airport have been arrested.**

The group of Just Stop Oil protesters were detained by officers near Manchester Airport on suspicion of conspiring to cause a public nuisance.

Three woman, aged 21, 30, and 53, and a man aged 23, were found with items police said would have been used to cause "damage and significant disruption"

to airport operations.

Ch Supt Mark Dexter said the arrests prevented a "determined and targeted attack which would have brought significant delays".

## 'Disruptive'

The four activists have been held in police custody for questioning, the force said.

A Just Stop Oil spokeswoman said its four supporters had been planning to take nonviolent action as part of its campaign to end the extraction and burning of fossil fuels by 2030.

They would "accept any legal consequences" following their arrests, she added.

Ch Supt Dexter, Greater Manchester Police's head of specialist operations, said the right to protest had to be balanced with the rights of the public to "go about their lives without being subject to unacceptable disruption".

He said police had been working with the airport and other forces to share intelligence to prevent "disruptive and targeted attacks on our airports".

*Listen to the best of [BBC Radio Manchester on Sounds](#) and follow BBC Manchester on [Facebook](#), [X](#), and [Instagram](#). You can also send story ideas to [northwest.newsonline@bbc.co.uk](mailto:northwest.newsonline@bbc.co.uk)*

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## Campaigners blockade Surrey oil field to protest UK Oil & Gas flouting Supreme Court ruling

October 14, 2024 by Extinction Rebellion

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**Contact:** Carol XR UK Press Team: 07791 737093 [press@extinctionrebellion.uk](mailto:press@extinctionrebellion.uk)

Early media link [here](#)

Archival picture line [here](#)

***Oil firm continues to pump oil from Horse Hill site, while Surrey County Council turns blind eye, despite planning consent being quashed by Supreme Court in June***

Today, ten Extinction Rebellion campaigners are blocking the entrance to the UK Oil & Gas Horse Hill oil extraction site in Horley, Surrey, near Gatwick Airport, to protest the company's continued extraction of fossil fuels at the site in blatant contravention of a landmark Supreme Court ruling made earlier this year.

UK Oil & Gas (UKOG) has not had planning permission to extract fossil fuels from the site since the Supreme Court decided to quash planning consent for the Horse Hill site in June this year.

However, four months on Surrey County Council has yet to enforce the Supreme Court ruling, despite knowing UKOG is ignoring the ruling and continuing to extract oil from the site.

The protestors have pledged to stop any vehicles from entering the site. They are holding placards stating "Surrey County Council, stop UKOG flouting Supreme Court Horse Hill ruling", "CEO Stephen Sanderson Stop Pumping Oil Unlawfully At Horse Hill" and "No More Planet Killing Emissions – Time To Restore Horse Hill To Nature".

The Supreme Court case, brought by Extinction Rebellion climate activist Sarah Finch, on behalf of the Weald Action Group, centred around Surrey County Council's 2019 decision to grant UKOG planning permission to drill for up to 3.3 million tonnes of crude oil for 20 years at its Horse Hill site, near Gatwick Airport. [1]

Finch argued that under the correct interpretation of the Environmental Impact Assessment (EIA) Regulations 2017 environmental impact assessments must take into account downstream emissions caused by burning extracted oil.

She took her fight to the Supreme Court after three appeal court judges were split over the lawfulness of the county council's decision to grant permission for 20 years of oil drilling and production and she won.

The landmark Supreme Court judgement clarifies that planners must consider the effects of burning the fossil fuel produced before granting planning permission for its production – which did not happen at Horse Hill.

The ruling has sent shock waves across the industry and has led to a number of other planning applications being quashed around the UK [2] alongside Horse Hill's and is now threatening the major North Sea projects Rosebank and Jackdaw [3], leading the Times to declare: "The words 'Finch ruling' now invoke dread in oil, coal and gas company boardrooms" [4].

Not so, it seems, at UKOG, owners of Horse Hill Developments Ltd, where the Supreme Court decision has effectively been ignored as they continue to produce oil unlawfully from HH-1 at Horse Hill, the company's only producing well[5].

**Protestor Deborah Elliott from Reigate, which is two miles from the site, said:** "It's shocking that UKOG had no plan to cease production if they lost their planning permission, which was the inevitable consequence of the Weald Action Group's win. I believe this shows UKOG's contempt for the Supreme Court and its decision."

The legal case was brought against Surrey County Council, the local authority who granted planning permission in September 2019, just nine weeks after it declared a Climate Emergency [6].

Surrey County Council is well aware that UKOG is operating without planning permission, but appears reluctant to enforce the Supreme Court judgement by putting a stop on the works at Horse Hill [7].

**James Knapp, a father of three from Dorking, who is also taking part in the demonstration, said:** "Stephen Sanderson, CEO of failing oil company UKOG, is making Surrey County Council look weak and ineffectual in the face of blatantly unlawful oil extraction. The site has been plagued by incidents in its short history including a rig fire [8], local residents and grazing horses affected by noxious fumes, hundreds of thousands of pounds worth of damage from the earthquake swarm which coincided with oil workers returning to the site[9], and a fine from the Health and Safety Executive for irregularities which left the oil well vulnerable in blow out situations [10]."

**Another protestor, Extinction Rebellion campaigner Jackie Macey, 69, a retired teacher, said:** "It's really quite simple. Surrey County Council need to tell Mr Sanderson to stop all activity at Horse Hill until UKOG have planning permission. They will be enforcing a Supreme Court judgement and no reasonable person could possibly criticise them for that, so I urge them now to do what they should have done as soon as the Supreme Court decision was handed down; instruct them to stop the works now. If Mr Sanderson then continues to flout the law he would be liable to criminal prosecution. If a new planning

application does ever arrive from UKOG, we will be making the case that the site should be restored to nature, enough is enough!”

**Reverend Helen Burnett, a Parish priest who lives within five miles of Horse Hill is also protesting at the gates of the site. She said:** “The Supreme Court decision was a beacon of light in a world of dire climate news. With UK crop yields plummeting, flooding at scale on every continent, droughts, intense hurricanes supercharged by a hotter sea, one after the other. This new normal isn’t static, it will get worse as we continue to burn more fossil fuels. I urge Surrey’s Officers and Councillors to respect the Supreme Court decision, and order UKOG to stop work at Horse Hill immediately.”

### Notes to Editors

[1] <https://www.supremecourt.uk/cases/uksc-2022-0064.html>

[2] <https://www.theguardian.com/environment/2024/sep/13/high-court-blocks-cumbria-plan-for-first-new-uk-coalmine-in-30-years>

<https://www.bbc.co.uk/news/articles/cm2979zg0d0o?>

[3] <https://drillordrop.com/2024/08/29/sarah-finch-judgement-impacts-north-sea-oil-and-gas/>

[4] <https://www.thetimes.com/uk/environment/article/sarah-finch-activist-fossil-fuels-oil-gas-glb2s7qqh>

[5] <https://drillordrop.com/2024/10/02/supreme-court-oil-site-operates-without-permission/>

[6] <https://drillordrop.com/2019/07/09/surrey-declares-climate-emergency-as-campaigners-stage-die-in/>

[7] [https://surreycc.public-i.tv/core/portal/webcast\\_interactive/903159/start\\_time/2349000](https://surreycc.public-i.tv/core/portal/webcast_interactive/903159/start_time/2349000)

At 56.30 Cllr Ernest Mallett brings up the question of issuing a stop order on the Horse Hill works and Planning Development Officer Sian Saadeh replies.

[8] <https://drillordrop.com/2019/11/03/fire-at-horse-hill-oil-site/>

[9] <https://drillordrop.com/2019/05/10/latest-earth-tremor-prompts-call-for-release-of-data-on-oil-operations/>

[10] <https://drillordrop.com/2019/06/21/gatwick-gusher-broke-safety-laws-over-blowout-preventer/>

## About Extinction Rebellion

Extinction Rebellion (XR) is a decentralised, international and politically non-partisan movement using nonviolent direct action and civil disobedience to persuade governments to act justly on the Climate and Ecological Emergency.

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[XR UK Local Groups](#) | View a map of all local groups

[XR UK website](#) | Find out more about XR UK

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Time has almost entirely run out to address the climate and ecological crisis which is upon us, including the sixth mass species extinction, global pollution, and increasingly rapid climate change. If urgent and radical action isn't taken, we're heading towards 4 ° C warming, leading to societal collapse and mass loss of life. The younger generation, racially marginalised communities and the Global South are on the frontline. No-one will escape the devastating impacts.

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# Extinction Rebellion occupy office of Top 50 broker in latest protest

By  James Cowen 9 January 2025

## It comes after a campaign group warned of more insurance-related protests in 2025

Extinction Rebellion (XR) occupied one of Marsh's UK offices in its latest round of insurance-related protests.

Earlier this week (8 January 2025), the group targeted the broker's Manchester office in 12 Booth Street, Belvedere.

The protest was related to fossil fuels, with protesters calling for the support of such projects to be ended.

In a post on X, XR's northern arm said: "Local residents are occupying the office lobby in Manchester to ask Marsh to stop 'funding our destruction' by insuring fossil fuel projects and instead 'insure our future' by moving towards a green economy."



Read: [Climate activists issue protest threat](#)

Read: [Climate protesters list 2025 demands to insurance industry](#)

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Marsh is ranked second in *Insurance Times*' [Top 50 Brokers](#) 2024 report, with it securing a revenue of £1.76bn for the year ending December 2023.

## Campaign

The protest comes following multiple protests during late 2024.

**Read: [Extinction Rebellion and Just Stop Oil occupy multiple insurance offices](#)**

**Read: [Extinction Rebellion blockade Gherkin as more insurance firms targeted](#)**

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These were part of the Insure Our Survival campaign, which aims to stop insurance firms from insuring new fossil fuel projects.

Speaking to *Insurance Times*, Isabelle L'Héritier, European co-coordinator at Insure Our Future, alleged that some insurers' actions were hindering progress toward reducing emissions and transitioning to renewable energy.

She warned that if they "refuse to stop supporting the expansion of fossil fuels", the group will "hold them accountable".

"Insurers must not ignore the fundamental and consistent prediction of climate scientists – any delay in cutting emissions drastically today will put lives, economies and the future of humanity in unacceptable danger tomorrow," she added.



# 'Hundreds' of insurers 'lose wifi' as protesters cut fibre optic cables



By **James Cowen** | 21 January 2025

**'No ethics? No wifi,' protest group says as it calls for 'immediate end to support for new fossil fuel projects'**

Major insurers are said to have experienced wifi failures after being targeted by protest group Shut The System.

The group said on Instagram yesterday (20 January 2025) that it had cut the fibre optic cables of "hundreds" of insurance companies in its latest round of protests.

Lloyd's of London, which has over 50 insurance companies and more than 380 registered Lloyd's brokers, as well as the Walkie Talkie, which is where firms such as Ascot, Markel and Tokio Marine Kiln are based, were among buildings targeted in London.



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NO ETHICS? NO WIFI - insurance companies headquartered at some of the most iconic UK sky-scrapers experience wifi failures after #ShutTheSystem activists cut fibre optic cables in the City of London. Full demands <https://shutthesystem.wordpress.com/>

#Ascot #Hardy #Kiln #LancashireSyndicate #TokioMarine #Markel #ArielRe #CityofLondon

#StopInsuringFossilFuels #ClimateChage #CovertActivism #EcoGenocide

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Shut The System also said that it had targeted the offices of insurers in other parts of London and the UK as well, with Axa, AIG, Chubb and Chaucer among firms listed by the group.



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BREAKING NEWS: #ShutTheSystem activists disrupt the wifi systems of hundreds of insurance companies across the UK, demanding an immediate end to support for new fossil fuel projects and mandatory transition plans for all clients involved in the fossil fuel industry

#WalkieTalkie #LloydsOfLondon #AXA #Allianz #AIG #Markel #Chubb #WRBerkeley #Chaucer #TalbotAIG

#StopInsuringFossilFuels #ClimateChage #CovertActivism #EcoGenocide

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The group said it had disrupted the wifi as it wanted an “immediate end to support for new fossil fuel projects and mandatory transition plans for all clients involved in the fossil fuel industry”.

It added: “No ethics? No wifi. Insurance companies headquartered at some of the most iconic UK skyscrapers experience wifi failures after Shut The System activists cut fibre optic cables.”

*Insurance Times* has contacted firms for a comment on the disruption they may have faced.

## Other protest

This comes after Extinction Rebellion (XR) occupied one of Marsh’s UK offices earlier this month (9 January 2025).

**Read: [Extinction Rebellion occupy office of Top 50 broker in latest protest](#)**

**Read: [Climate protesters list 2025 demands to insurance industry](#)**

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The protest was related to fossil fuels, with protesters calling for the support of such projects to be ended.

In a post on X, XR’s northern arm said: “Local residents are occupying the office lobby in Manchester to ask Marsh to stop ‘funding our destruction’ by insuring fossil fuel projects and instead ‘insure our future’ by moving towards a green economy.”

Meanwhile, Isabelle L’Héritier, European co-coordinator at Insure Our Future, alleged that some insurers’ actions were hindering progress toward reducing emissions and transitioning to renewable energy.

She warned that if they “refuse to stop supporting the expansion of fossil fuels”, the group will “hold them accountable”.

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## MORE JAMES COWEN



**Family-owned £1.2m GWP broker acquired after 51 years**

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## The biggest people moves this week



# A new campaign group is targeting the CEOs of big polluters for citizen's arrests



by **Tom Pashby** — 22 April 2025 in **Analysis** Reading Time: 6 mins read

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Bosses of oil and gas companies, and a privatised water utility company, have been targeted with attempted citizen's arrests by a new direct action group hoping to achieve environmental justice. [Online legal resources](#)

Actions by the [Citizen's Arrest Network \(CAN\)](#) started appearing on social media feeds in March and April 2025, showing smartly dressed members of the group approaching senior executives of companies and attempting to perform citizen's arrests.

## The Citizen's Arrest Network: a new direct action group fighting the CEOs of big polluters

The activists said they had dossiers which they say provide evidence of crimes ranging from public nuisance to mismanagement of customer funds.

As of 16 April 2025, CAN has targeted executives including CEOs of [fossil fuel](#) companies [BP](#), [Shell](#), [Perenco](#), [EnQuest](#), [Harbour Energy](#), and [Serica](#). Privatised water firm Thames Water [was also singled out](#).

CAN claims it has been successful in placing the company representatives under citizen's arrest, but it appears that it has not physically held the individuals, and no police action appears to have taken place. [Online legal resources](#)

[Tactical training for officers](#)

The companies did not provide comment when approached by the *Canary*.

The *Canary* spoke with Citizen's Arrest Network spokesperson Gail Lynch, who said CAN started because there was no response to the climate crisis "by anyone with any true power" and "things were only getting worse" despite petitions, letters, marches, and protests.

Lynch said:

*This is mirrored in other industries where profit comes first and the impacts are ignored.*

She continued:

*It feels like this relentless, almost desperate drive to maximise financial return at all costs is well and truly out of control.*

Lynch said protests against environmentally damaging activities:

*get panned in the media and activists are increasingly penalised for their attempts to raise awareness.*

More than a dozen activists from [Extinction Rebellion](#) and [Just Stop Oil](#) have been jailed for their parts in direct action protests in recent years. The custodial sentences were handed out [following a crackdown on](#) environmental activism by the [Conservative](#) government. The [Labour](#) government appears content to carry on with the authoritarian treatment of protesters.

Therefore, Lynch said that:

*It was time for something different, and so almost two years ago, the idea was borne and a huge amount of research began. How could we approach the individuals behind the logos and request that they cease and desist? The executives at the helm of these organisations are the ones taking the decisions, and therefore need to be held to account.*

## Killing of health insurance exec threw focus on corporate leaders

In December 2024, United Healthcare CEO Brian Thompson [was killed](#) in New York City, in an attack apparently motivated by a hatred of the conduct of private health insurance companies and their denial of care to Americans.

The killing of Thompson sent jitters around corporate executives that they might personally be targeted because of public perceptions of the conduct of their companies.

In the aftermath of the attack, mainstream media outlets expressed shock at the lack of sympathy expressed by the public towards the CEO's family, and the admiration some showed towards suspect Luigi Mangione.

In a March 2025 statement on its website, CAN [said it handed](#) "draft indictment papers" against executives at BP and Shell to the Crown Prosecution Service (CPS) because the group:

*believes that all executive staff at both oil majors have been instructed to stay away from head offices.*

The statement said CAN believed the "stay away" notice has been issued "in response to citizen's arrests" carried out by the group.

## How legitimate are citizen's arrests?

The Police and Criminal Evidence Act 1984 [says that](#):

And it states that:

*anyone whom he has reasonable grounds for suspecting to be committing an indictable offence.*

Lynch said:

*Whilst we might imagine a stand up citizen tearing after and rugby tackling a bank robber to the ground, that's not how it reads in law.*

University of Reading's Reading Centre for Climate and Justice director professor Chris Hillson told the *Canary* there are "technical risks" to performing citizen's arrests.

The risks include the possibility of the citizen's arrest itself being a criminal offence or being sued in a civil court for assault or false imprisonment, he said.

## Why is CAN using citizen's arrests in particular?

Lynch said CAN is:

*simply motivated by the need for these individuals to stop, think twice about the harm their work causes and recognise that they have the power to make the change that is needed.*

She continued that executives who don't stop and change their ways:

*need to be arrested, charged and prosecuted on grounds of Public Nuisance for the serious harm they inflict by virtue of their employment.*

She also said CAN:

*is not a protest, it's a legal campaign operating within the bounds of the law.*

Lynch told the *Canary* that CAN wants the companies the group is targeting to:

*realise they can not hide anymore, we see them, and we know the individuals leading the charge towards irreparable damage to our planet's health.*

Moreover, she expressed that:

*If people think twice about taking up such jobs in the future, that's a win, but the best thing would be that they accept that their days are done and start in earnest a true shift to cheaper, cleaner energy for all.*

She also said she wants the campaign to pass "the pub test" and get the public talking about why CAN is carrying out its actions:

*We want local communities everywhere talking about why we did what we did, do what we do and agree that it's an important way to shine a light on people behind the scenes taking harmful decisions and doing damaging business.*

## CAN needs support for its legal endeavours

She also made a plea for funding to support the legal side of CAN's work:

*We need funds to support our legal endeavours and to bring justice to bear on people who are breaking the law.*

*Lawyers are committed and generous with their time but they need to be paid and the research takes time to uncover and be carefully checked. In short we need resource and money to help us hold the biggest culprits to account.*

CAN's crowdfunder can be found [here](#), or [via its website](#). CAN is on [Facebook](#), [Instagram](#), [TikTok](#), [X](#), and [Bluesky](#).

## Climate campaigning needed 'more than ever'

Hilson told the *Canary* that:

*In the end these arrests are more performative than real.*

However, the performativity of the act does not necessarily mean it is not effective. He explained:

*Throwing paint at works of art and stopping traffic no longer really work for the climate and environmental movement.*

*Those types of protests have been criminalised, making them harder; but they are in any event viewed by many members of the public as 'irresponsible', which has put them off the message.*

Hilson added that he thought:

*climate and environmental messages need to be landing now more than ever.*

*This new tactic of citizens' arrests, in contrast, looks much more like 'responsible' citizenly behaviour.*

*And the arrests squarely target those who are, in a very different sense, responsible for climate and environmental harm, and not members of the public.*

*Those being arrested now become seen as the irresponsible ones.*

*Featured image supplied*



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NEWS | LONDON

# Youth Demand protest: Activists block roads in central London as they threaten to 'shut down' city

Protesters blocked a number of key routes in London on Saturday



YOUTH DEMAND PROTESTERS BLOCKED ROADS IN CENTRAL LONDON ON SATURDAY

YOUTH DEMAND

**BILL BOWKETT | JACOB PHILLIPS**  
5 APRIL 2025

 3 COMMENTS





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Youth Demand have “swarmed” roads in central London to highlight the situation in Gaza and the ongoing climate crisis.

Around 65 activists gathered at Brunswick Square Gardens at around 11am before splitting into two groups and blocking traffic on Euston Road near King’s Cross station at 12.15pm.



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The groups could be seen holding signs saying “Youth Demand an End to Genocide” and “Stop Arming Israel”, while waving green flares as they blocked the road for around 10 minutes.

Police officers arrived shortly after and issued the group with a warning under Section 7 of the Public Order Act.

#### RECOMMENDED



**Brooklyn Beckham breaks his silence after 'snubbing' David's 50th birthday party**



**Amanda Owen labels ex husband Clive a 'frustrating and horrible thing' in TV clash**



**Linda Nolan’s stepson dies after star's 'hopes he would outlive her'**



**What is fart walking and is it good for you?**

Just over an hour later at 1.30pm Youth Demand protesters again split into two groups and blocked further routes in central London.

One group of protesters blocked Old Street Junction until around 1.55pm, while another group of 20 activists took action at Baker Street for around half an hour.

Youth Demand, an offshoot of Just Stop Oil's youth wing, has demanded the UK government impose a full arms and trade embargo on Israel and immediately halt the development of new oil and gas projects.

The group, which describes itself as leaderless but guided by a "strategy team", said politicians had committed a "betrayal of our generation," and warned of an "unimaginable outbreak of collective power, creativity, love and defiance."

Youth Demand hit the headlines recently after six of its female supporters were arrested at a Quaker meeting house in central London — the first such arrests at a Quaker site in living memory, according to the faith group.

Quakers in Britain condemned the move as an "aggressive violation" after Metropolitan Police officers detained the women at Westminster Meeting House on suspicion of conspiracy to cause a public nuisance.

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More than 30 officers were said to have been involved in the arrests, which police said were linked to concerns over plans to "shut down" London this month using disruptive tactics.

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**Protesters shout 'justice for genocide'**

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Youth Demand activists were moved on by police officers during its pro-Palestinian rally in central London.

The campaigners began gathering at Lincoln's Inn Fields and made their way to King's Cross station.

Youth Demand said its supporters divided into two groups and at around 12.15pm a group of 40 blocked traffic on Euston Road near King's Cross.

Scotland issued the protesters with a warning under section seven of the Public Order Act, Youth Demand said, and the group moved on after 10 minutes.

No arrests were made.

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## **Youth Demand 'action' meeting offering 'legal advice' to newcomers**

**Youth Demand** 

@youth\_demand · [Follow](#)

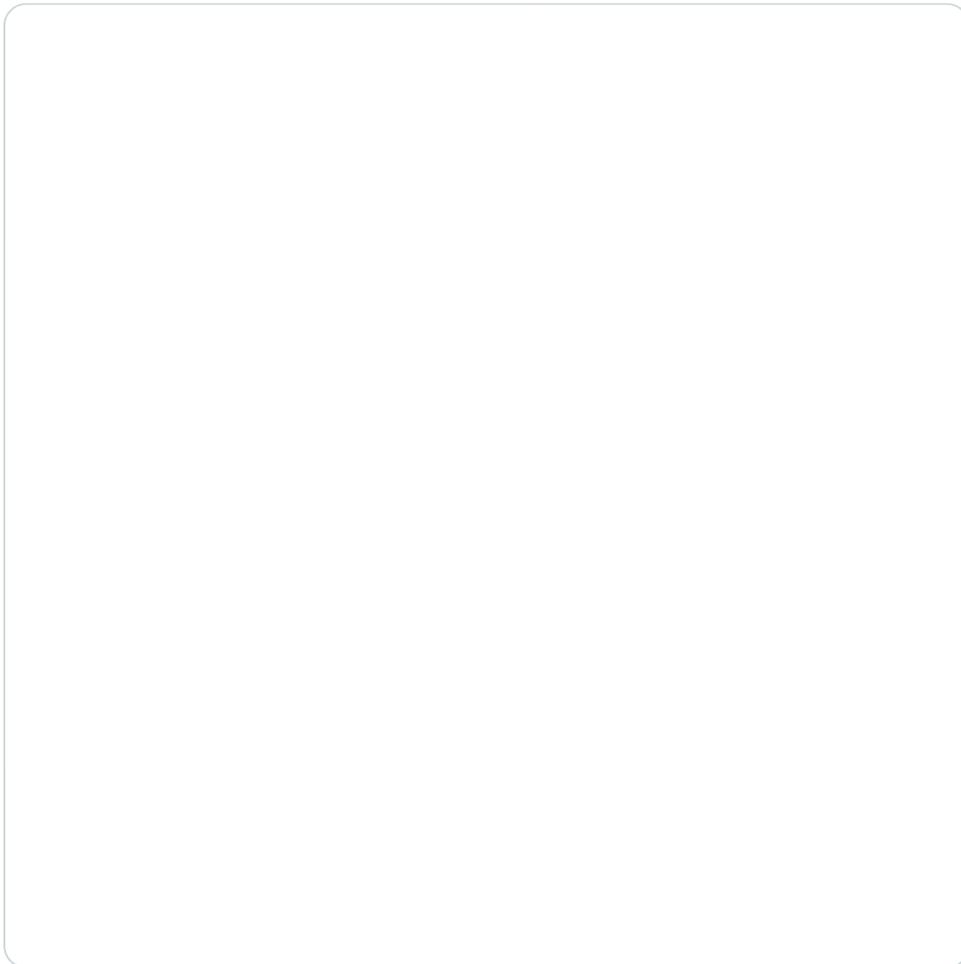


This Sunday @ Golden Lane Community Centre 14:00-20:30!!

**ACTION TRAINING** 2pm-6pm

Hear the plan, learn about nonviolent action, and get trained to swarm with us - plus meet others in resistance! We strongly recommend everyone attends a training before taking

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which is adjacent to the Barbican in the City of London.

The group states: “These briefings are key for getting all the info you need to join us in the streets — hear the plan, get legal, support, and accessibility info, and find out how you get involved!”

It comes after Youth Demand told The Guardian that as many as 200 people have expressed interest in joining in upcoming action following the recent police raid at a Quaker meeting house.

🕒 5 APRIL 2025

## Youth Demand protest is about to begin

**Youth Demand**  X  
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 **YOUTH DEMAND ACTIONS ARE BEGINNING!** 

 **RALLY:** Tuesday 1st April @ 6.30pm, Senate House Library, Malet Street, WC1E 7HU

 **SWARMING ACTION:** Saturday 5th April @ 11am, Lincoln's Inn Fields, WC2A 3BP

In April, there will be open rallies & actions EVERY Tuesday & Saturday. [Show more](#)

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Youth Demand's 'Swarming Action' protest at Lincoln's Inn Fields is

We will bring you details from the gathering when we can.

🕒 5 APRIL 2025

### Youth Demand 'targeted with 150 arrests since inception'



**SARTI WAS ARRESTED IN 2023 FOR SPRAYING ORANGE PAINT ON KING'S COLLEGE CAMBRIDGE**

JUST STOP OIL

Youth Demand spokesperson Chiara Sarti claims that since the group was launched, its members have been targeted with 150 arrests.

“This kind of police repression is just part of life now,” the PhD student at the University of Cambridge told the Middle Eastern Eye website.

🕒 5 APRIL 2025

## What has happened at previous Youth Demand protests in London?



Youth Demand began protesting last summer, with many of their stunts occurring in London.

Early action included activists painting the Labour Party headquarters in Southwark red, spraying the Ministry of Defence in Whitehall with paint, and blocking Waterloo Bridge.

Last October, protesters plastered a photo of a Gazan mother and child over the glass of Picasso's 1901 painting 'Motherhood (La Maternité) at the National Gallery in Trafalgar Square.

Another previous demonstration in the capital included three people

Sir Keir Starmer's Kentish Town home in April last year.

Leonorah Ward, 21, Zosia Lewis, 23, and Daniel Formentin, 24, were each handed suspended prison sentences following the incident.

🕒 5 APRIL 2025

## Rallies to take place every Thursday and Saturday in April



Youth Demand rallies are taking place every Thursday and Saturday in April.

The first rally commenced this week, when protesters gathered at Senate House Library on Malet Street, Bloomsbury.

Today, the group are scheduled to meet again at 11am at Lincoln's Inn Fields, Holborn.

🕒 5 APRIL 2025

## Protest group at centre of Quaker house arrests



Recently, Youth Demand gained media attention when Metropolitan Police officers raided a Quaker meeting house in Westminster, arresting six women attending a Youth Demand gathering. The raid was condemned by the Quaker community as an aggressive violation of their place of worship.

## Who are Youth Demand?



Youth Demand has vowed to “shut down” London by swarming the capital’s roads and holding demonstrations during a month-long period of action in April.

[Find out more about the group here.](#)

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## Just Stop Oil is hanging up the hi vis

Press / March 27, 2025

Three years after bursting on the scene in a blaze of orange, at the end of April we will be hanging up the hi vis.

Just Stop Oil's initial demand to end new oil and gas is now government policy, making us one of the most successful civil resistance campaigns in recent history. We've kept over 4.4 billion barrels of oil in the ground and the courts have ruled new oil and gas licences unlawful.

So it is the end of soup on Van Goghs, cornstarch on Stonehenge and slow marching in the streets. But it is not the end of trials, of tagging and surveillance, of fines, probation and years in prison. We have exposed the corruption at the heart of our legal system, which protects those causing death and destruction while prosecuting those seeking to minimize harm. Just Stop Oil will continue to tell the truth in the courts, speak out for our political prisoners and call out the UK's oppressive anti-protest laws. We continue to rely on small donations from the public to make this happen.

This is not the end of civil resistance. Governments everywhere are retreating from doing what is needed to protect us from the consequences of unchecked fossil fuel burning. As we head towards 2°C of global heating by the 2030s, the science is clear: billions of people will have to move or die and the global economy is going to collapse. This is unavoidable. We have been betrayed by a morally bankrupt political class.



short of a revolution is going to protect us from the coming storms.

We are calling on everyone who wants to be a part of building the new resistance to join us for the final Just Stop Oil action in Parliament Square on April 26th. [Sign up here](#). See you on the streets.

## ENDS

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Press email: [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)

High quality images & video here: <https://juststopoil.org/press-media>

Website: <https://juststopoil.org/>

Facebook: <https://www.facebook.com/JustStopOil/>

Instagram: <https://www.instagram.com/just.stopoil/>

Twitter: [https://twitter.com/JustStop\\_Oil](https://twitter.com/JustStop_Oil)

Youtube: <https://juststopoil.org/youtube>

TikTok: <https://www.tiktok.com/@juststopoil>

## Notes to Editors

[1] Just Stop Oil is committed to nonviolent direct action to resist the destruction of our communities as a result of climate breakdown. We do not consent to plans that will result in 3C of warming and mass death.

**We demand an emergency plan to Just Stop Oil by 2030.** Our government must work with other governments to end the extraction and burning of all oil, gas and coal by 2030.

Just Stop Oil is a member of the A22 Network of civil resistance projects.

Just Stop Oil 'Blue Lights' policy: our policy is, and has always been, to move out of the way for emergency vehicles with siren sounding and 'blue lights' on.

We take all possible steps to ensure that no-one's safety is compromised by our actions.

[2] During our 3 year history Just Stop Oil supporters have been arrested 3,300 times and imprisoned 180 times, for having broken laws that were drafted by the fossil fuel industry. 7 people are now in prison serving sentences of up to 4 years and 8 are on remand. 16 Just Stop Oil supporters are due to be sentenced in the next few months.



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### About us

**Just Stop Oil** is a nonviolent civil resistance group in the UK. In 2022 we started taking action to demand the UK Government stop licensing all new oil, gas and coal projects. We have won on this . **Civil resistance works.**

Just Stop Oil ended it's street campaign in 2025, whilst we continue our resistance in the courts and prisons.

A new revolutionary direct action campaign is coming. Help us build what's next.

# WE QUIT

## WE QUIT

**December 31, 2022 by Extinction Rebellion**

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When XR burst onto the scene four years ago, few could have imagined the seismic shift it would bring about in the climate movement, the climate conversation, and the world at large.

But despite the blaring alarm on the climate and ecological emergency ringing loud and clear, very little has changed. Emissions continue to rise and our planet is dying at an accelerated rate.

The root causes? A financial system prioritising profits over life, a media failing to inform the public and hold power to account, and a reckless government entrenched in corruption and suppressing the right to protest injustice.

As we ring in the new year, we make a controversial resolution to temporarily shift away from public disruption as a primary tactic. We recognise and celebrate the power of

disruption to raise the alarm and believe that constantly evolving tactics is a necessary approach. What's needed now most is to disrupt the abuse of power and imbalance, to bring about a transition to a fair society that works together to end the fossil fuel era. Our politicians, addicted to greed and bloated on profits won't do it without pressure.

We must be radical in our response to this crisis and determined in our efforts to address the climate and ecological emergency, even if it means taking a different approach than before. In a time when speaking out and taking action are criminalised, building collective power, strengthening in number and thriving through bridge-building is a radical act.

XR is committed to including everyone in this work and leaving no one behind, because everyone has a role to play. This year, we prioritise attendance over arrest and relationships over roadblocks, as we stand together and become impossible to ignore.

The conditions for change in the UK have never been more favourable – it's time to seize the moment. The confluence of multiple crises presents us with a unique opportunity to mobilise and move beyond traditional divides. No one can do this alone, and it's the responsibility of all of us, not just one group. It may be uncomfortable or difficult, but the strength of all social, environmental, and justice movements lies in working together. As our rights are stripped away and those speaking out and most at risk are silenced, we must find common ground and unite to survive.

It's no secret that those in power are hoarding wealth and power at the expense of ordinary people, while ignoring the consequences of their greed. Emissions continue to rise, but they couldn't care less. But people do care, and changes to democracy that free and empower the voices of the people through Citizens Assemblies could balance the tables and bring about the positive societal tipping point we all need.

Choose Your Future – 21st April and beyond – The Big One – Houses of Parliament – 100,000 people.

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Just Stop Oil   
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 WE HUNG UP THE HI VIS

 On Saturday, hundreds of people marched from St James' Park to the Shell building to mark the end of Just Stop Oil's actions. We hung up our hi vis, and asked the question WHAT'S NEXT?

 Just Stop Oil has been the most successful civil resistance campaign in recent UK history, achieving our demand of no new oil and gas licences. Thousands of people have been arrested since 2022, with hundreds spending time in prison. There are still 11 people imprisoned, with more expected to join them in May.

 Just Stop Oil may have finished actions, but we aren't going anywhere. People will continue their resistance in the courts, and something new is building.

 Ordinary people are building a revolution. A new movement rooted in local communities on a scale that Just Stop Oil never dreamt of. Because the fascists are coming. We face 2 degrees of global heating in the 2030s. The super rich are bleeding us dry.

 Help fund the next phase of nonviolent civil resistance:  
[juststopoil.org/donate](https://juststopoil.org/donate)

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## **“JSO Plots 'Criminal Comeback'” GB News Exclusive 16 May 2025 – Transcript**

**[00:00:00.00] - Speaker 1**

Now, I was getting pretty bored of their juvenile antics at the altar of climate change. Their vandals threw soup over artworks in galleries. They defaced Stonehenge. They ambushed theatre plays in the West End and blocked traffic, scaled motorway gantries, and doused private jets in paint, and even disrupted sports events. Just Stop Oil, remember them, they said they were disbanding because their demand to end new oil and gas licences in Britain had been adopted as government policy. Their actions, of course, cost the public purse tens of millions of pounds in police and court time. Well, despite Ed Miliband bowing to their demands, I can exclusively reveal that Just Stop Oil are plotting a very big comeback regardless. Ben Leo Tonight has gained access to secret Just Stop Oil meetings where members have been discussing a big U-turn with plans to cause absolute chaos across Britain by sabotaging Tesla vehicles, picketing petrol stations, and arresting so-called climate criminals. Speaking during an online meeting on Thursday night this week, one coordinator, simply known as Dave, said protests should continue being action-based and warned against becoming peaceful activists such as Greenpeace.

**[00:01:11.18] - Speaker 3**

We had a fantastic breadth...a range of people in our group. So I'll read out the main bits that I noticed anyway. There was, it kind of like felt like--it seemed like there's a lot of goodwill towards staying action-based, not becoming something more like Greenpeace, or anyway, doing stuff. Certain target of things I think were like very much things like 'Darwin's grave', 'citizens' arrest' things like that which seemed very popular.

**[00:01:42.10] - Speaker 1**

So the meeting continued with Dave insisting it was very important to keep doing the spicy and naughty stuff in a bid to secure media headlines.

**[00:01:52.09] - Speaker 3**

It seemed like it was very important that we do the spicy stuff because if we don't do the spicy stuff, it ends up like Chris Packham. Recently he did this thing and he was saying he got no media attention in broadsheets at all. So effectively, to do protest stuff, you have to do naughty stuff.

**[00:02:11.16] - Speaker 1**

Then interestingly, the group discussed how they'd get protest ideas back to who they describe as a core team.

**[00:02:18.23] - Speaker 3**

There's ideas about--how do we get ideas back up to the core team, or whatever you think will be the core team, and there's some frustration around that. Maybe figure out a good format, maybe like a 50-word brief, that's all you can do. So it's easy for the people in the core team to process.

**[00:02:37.06] - Speaker 1**

It's interesting listening to that. I want to know just who the core team is. Who are these professional protesters reporting to? And who's paying them? Chillingly, the group then went on to say they'd carry out citizens arrests on so-called climate deniers.

**[00:02:52.00] - Speaker 3**

There will be a conversation going on with somebody who was involved in the Citizen's Arrest Network. We were all extremely jealous of the stuff that they've been doing there. Also from them, the idea that they got a lot of good media, but they didn't get as much media as they thought they were. If they had managed to arrest bigger fish or maybe be more spicy, that would have made the difference.

**[00:03:15.02] - Speaker 1**

Well, there was some introspection from the Just Stop Oil group when they questioned whether they needed to be so unpopular with the public.

**[00:03:22.19] - Speaker 3**

JSO is a bit radical, which is the least worst thing to deal with coming out. It's tricky, though, as we go along. Sometimes people run out of courage as they're caring for people and they're busy and their lives are going on as well. So a reset now and a bit of a rest might be just what's needed, and we can come back now. We had other people as well who were just wondering about, is direct action really needed? Do we really need to be so unpopular with the public? And in our second go around, there was quite a strong feeling that, yes, it is needed. It's very much needed.

**[00:04:00.24] - Speaker 1**

And the meeting came to an end when they concluded how they'd proceed with Just Stop Oil's revival, also talking about keeping protesters in safehouses in a bid to keep up morale.

**[00:04:11.15] - Speaker 6**

It looks like everyone agrees that we need to do—carry on with civil disobedience, direct action, because it's the most effective thing to do. And the camaraderie of the safehouses is a really good thing to building that kind of community.

**[00:04:30.01] - Speaker 1**

So what we have here is a group of climate zealots planning and plotting to commit criminal acts funded by God knows who and being put up in safehouses like some sort of organised Mafia. Talking of organisation, the climate agenda is indeed an organised agenda with big money behind it. Who is paying to bus these protesters from London and Stonehenge to airports and art galleries and sports stadiums? Who's paying them to live in Just Stop Oil safehouses, where groups of scruffy do-gooders make meticulous plans to make Britain colder and poorer? The police and the government should be cracking down on Just Stop Oil's plans for criminality before they're able to get back off the ground again. The last thing Britain needs is more disruption and outright vandalism from eco-loons, especially when the Labour government is already happy to carry on, rather, the deranged march to net zero. We'll be passing our findings onto the police. Let's get the thoughts now of my panel, the Journalist and Communications Advisor, Linda Jubily, the Senior Reporter at Guido Fawkes, Ellie Weekly, and the former Labour Special Advisor, Paul Richards. Good evening, panel. Good evening. Welcome along. No Eurovision here. Let me tell you that.

**[00:05:39.00] - Speaker 1**

Good. No breaking out into song. Glad to hear it. Ellie, let's start with you. Welcome along to the show. You're Ben Leo's Tonight debut, I think, is it?

**[00:05:45.05] - Speaker 2**

I think I was on one with you a couple of months ago. There we go.

**[00:05:49.08] - Speaker 1**

Well, let's pretend it is. What do you make of this? We infiltrated this meeting. They said they were hanging up their high vis. Now they're planning more criminality.

**[00:05:56.17] - Speaker 2**

Well, they clearly don't understand that not all publicity is good publicity, right? There's a reason they're so unpopular with these protests, blocking ambulances from going across the road. I mean, in 2023, what, Met spent £20 million on these protests? So they're not popular anymore. Over the last decade, the climate change thing became a new religion, as it were, something for people to fight for, and often backed by celebs, usually ones that take private jets like Emma Thompson and all the rest of it. But now, this protesting and criminal action damages their message, which they obviously have accepted in some ways, but still not enough to think "we're going to carry on doing this". It's unbelievable, really. Yeah, quite right.

**[00:06:40.03] - Speaker 1**

Linda, should Just Stop Oil, and whatever name they give themselves on their comeback, should they be classed as domestic terrorists?

**[00:06:46.24] - Speaker 4**

I think that might be going a step too far. But the fact of the matter is, we have to accept that they're not going to stop. I mean, these people have an almost evangelical belief in what they're doing. And although they've had some serious reprimands in terms of prison sentences, I believe, recently, they are going to carry on. I mean, why wouldn't they? They believe in what they're doing. Actually, the point of a protest is to cause massive inconvenience. So they are just going to have to calibrate what they're doing. I'm not saying I advocate this, but they are probably going to calibrate what they're doing by carrying on with protests which they believe may not cause the public such disruption. I can't really understand why they are kicking up a fuss about Tesla cars, though. I know that they hate Elon Musk, but the fact of the matter is electric cars, surely.

**[00:07:36.23] - Speaker 1**

Who knows? Nothing they do makes sense. Quite frankly, they're a bunch of nutters. Paul, what do you make of it? Quite chillingly, it's been revealed in this meeting, they're going to start carrying out citizens' arrests on what they call "climate deniers". That's quite chilling in my book.

**[00:07:51.12] - Speaker 5**

Well, they're not going to get very far legally with that, are they? Because that's obviously not what citizens' arrest is for. I mean, any observer of the ultra-left would tell you that they would immediately split into an ultra-faction and a moderate-faction. That happens in all these different movements. So there was this idea they were hanging up their boots and going mainstream, and we've won, and all that was plainly nonsense. There was always going to be a faction that wants to carry on smashing stuff up. And the reason is that they're narcissists. I mean, and Ellie used the word religious, and you said it's like an evangelical--it is like a religious cult, and the people within it, for them, the protest is the end result. The cause is no longer relevant.

**[00:08:31.06] - Speaker 1**

They are being emboldened, I'd argue, by people such as Ed Miliband, who, I mean, just to quote, quit last time, in April, last time, a few weeks ago, because they said that the government had pledged to renew a new oil and gas licence.

**[00:08:42.21] - Speaker 5**

But that was plainly nonsense. I mean, that was just smoke and mirrors, wasn't it? I think what this tape reveals, and I bet you that you guys are not the only person or people taping their meetings. The security services are keeping tabs on them, too, because they knew that that was...

**[00:08:55.05] - Speaker 1**

Do you reckon so?

**[00:08:56.10] - Speaker 4**

Oh, yeah, I'm sure that's happening.

**[00:08:58.04] - Speaker 5**

I'm sure they are. I want my money to be spent on that, if that is the case, because they are disrupting the economy and they do stop people going about their business, and they have nothing to do with the labour government.

**[00:09:07.22] - Speaker 4**

The security service would absolutely have to be monitoring this organisation.

**[00:09:11.50] Speaker 5**

Of course. Absolutely!

**[00:09:12.04] - Speaker 1**

I don't know. I think they've got their hands full, Ellie, with jihadis and Islamists and whoever else. I know for a fact that counter terror teams all across the country are stretched. I'm not sure Just Stop Oil will probably take a list of priorities.

**[00:09:24.20] - Speaker 2**

No, I think they do, actually, because whenever there are protests in all forms, you do see the police out on the street making being sure there's not a huge amount of disruption. But when they so-called "hung up their high vis" a couple of weeks ago, they did mention the fact that they wanted their protesters to stop getting arrested. So effectively, the measures that the Tories brought in helped prevent these protests. But I think you're totally right that there's always a spectrum within these groups. You have the extremists and you have the less extreme, and I think those extremists will carry on regardless.

**[00:09:54.07] - Speaker 4**

But I think it's not just counter-terrorism, it's also intelligence. The fact of the matter is I'd be amazed if some of the key people in these groups were not on watch lists.

**[00:10:04.57] - Speaker 1.**

Well Roger Hallam who from Extinction Rebellion, he's currently serving prison time, so he's inside.

**[00:10:08.53] - Speaker 4**

Obviously.

**[00:10:09.52] - Speaker 1**

I mean, I want to know who's funding these people. I know who funds the previous version of Just Stop Oil—it's the climate emergency fund in LA. One of the massive donors is an heiress of John Getty, the oil baron, who made tens of billions—and isn't it ironic that the heiress of an oil dynasty with billions and billions under their control are now funding Just Stop Oil?

**[00:10:30.31] - Speaker 4**

Can I just say as well, what you've got to watch for is that Just Stop Oil activists or protesters, don't stop infiltrating local political groups like residence groups or residence associations, and they don't start to turn their march that way—inwards, that I'm sure that has happened.

**[00:10:50.11] - Speaker 5.**

It's called entrances isn't it, where the extremists will join the mainstream to skew it.

**[00:10:54.06] – Speaker 4**

That's absolutely right.

**[00:10:55.04] - Speaker 5.**

The thing I would say though is that young people getting involved need to know that they may end up with a prison sentence. They know—these guys that you've taped seducing young people into this kind of activity—

**[00:11:06.55] - Speaker 4.**

Well the young girl who threw soup over the Van Gogh painting, I think she—one of them got 20 months, the other one got two years.

**[00:11:13.47] - Speaker 5.**

I mean it's tragic really, it's awful.

**[00:11:15.46] - Speaker 4**

It is, it is. But, I mean hilariously, YouGov did a poll amongst those people who thought that the government wasn't doing enough to fight climate change and 58% agreed that they should have those sort of sentences and a quarter of them thought that actually the judge was too lenient, so you know they are not getting away with this sort of thing.

**[00:11:31.29] – Speaker 5**

It's a young life ruined though, isn't it? I mean, you know, who has persuaded that person to do that? I mean I feel...

**[00:11:37.24] - Speaker 4:**

Yeah, you know, when you are young, you are very malleable and easily influenced.

**[00:11:41.20] - Speaker 1**

Yeah, absolutely.

There was a poll in 2022, a YouGov Poll showing that 58% of UK adults supported Just Stop Oil and their bid to stop new oil and gas. I mean, it was three years ago. But, I don't believe that now.

**[00:11:52.09] - Speaker 2**

Yeah, I guarantee that's changed since then.

**[00:11:55.06] – Speaker 4**

I guarantee you, in the area where I live, Just Stop Oil certainly has a component in some organizations, in some associations. I absolutely guarantee you.

**[00:12:05.56] – Speaker 1**

Ellie, you also mentioned that the police spent, was it £20 million on this process?

**[00:12:09.52] –Speaker 2**

Well, yes.

**[00:12:10.51] – Speaker 1**

I'd argue they were there to protect, Just Stop Oil, not to police the criminality and the disruption that Just Stop Oil were carrying out. I mean, how many times have we seen drivers who are completely annoyed at the road being blocked, getting penalised and arrested for getting irate at people sitting in the road?

**[00:12:22.39] – Speaker 4**

Mm.

**[00:12:25.36] – Speaker 1**

The police were there to help. Just Stop Oil.

**[00:12:28.33] – Speaker 2**

Well, I don't know if they were there to help Just Stop Oil, but they were also—they were obviously there to make sure that no violence, um, broke out. And again, I, I really do think that since 2022 and 23, the sentiment has changed. You know, they are not so popular that people are, ....

**[00:12:41.19] – Speaker 4**

No.

**[00:12:43.18] – Speaker 2**

....not saying, they're saying now that actually people blocking roads and stopping people from, you know, going to hospitals via ambulances,...

**[00:12:49.09] – Speaker 4**

That is terrible.

**[00:12:51.10] – Speaker 2**

...and it's terrible. And now, and so they are, you know, this—these sorts of protests are damaging the message and they, and they have, and they have done, so.

**[00:12:57.04] – Speaker 1**

Well look, we, we infiltrated that meeting this week. We're going to be passing on the recordings to the authorities. Because as far as I'm concerned, they're just plotting, criminality.

And if it was anybody else—if it was... if it was somebody planning to, or plotting to, I don't know, do a cannabis grow or sell drugs or, I don't know, anything, then they'd be—they'd be nicked for it, quite rightly, for conspiracy. So why are eco protestors and campaigners immune?

**[00:13:21.40] – Speaker 1**

In March when Just Stop Oil—or the end of April, March time—announced they were stepping down, they released a statement outside, I think it was Parliament. Supporters of the group announced that after three years of disruptive process, they would be ending their campaign.

The group's Hannah Hunt, whose speech on Valentine's Day 2022, marks the beginning of the campaign, made an announcement outside Downing Street as well. She said:

*“Three years after bursting on the scene in a blaze of orange, at the end of April, the Just Stop Oil campaign will be hanging up the high-vis. Just Stop Oil's, demands to end new oil and gas is now government policy making us one of the most successful civil resistance campaigns in recent history”.*

GB News did contact Just Stop Oil tonight and we are awaiting a response.

Just Stop Oil @JustStopOil

Chloe Naldrett speaks at Shell HQ

We have hung up the HI Vis

A nonviolent revolution is coming, bigger than ever.

Fund the next phase of civil resistance: [juststopoil.org/donate](https://juststopoil.org/donate)



11:49 AM · May 12, 2025 · 3,606 Views

0:11 / 1:24

44 106 39 8

Post

Just Stop Oil @JustStopOil

It's Official: We're JUST GETTING STARTED

Corrupt politicians serving billionaires. Ordinary people struggling to survive. Media shifting blame from their mates on mega yachts to the people in small boats.

Nothing short of a political and economic revolution will get us out of this mess.

Help build the revolution: [juststopoil.org/donate](https://juststopoil.org/donate)



12:28 PM · May 19, 2025 · 25.8K Views

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 Youth Demand  @youth\_demand

 Seeds of Revolution: Training Programme

 Saturday 14th + Sunday 15th June, 11am - 6pm  Waterloo Action Centre, London SE1 7AA

 Register here: [bit.ly/4IX51aS](https://bit.ly/4IX51aS)

This summer Youth Demand and Just Stop Oil are running a joint 6-week training course to build the generation of revolutionary organisers we need. It is being launched in London on the 14th + 15th of June!

 There will be inspiring and practical sessions covering all the theory and practice for pulling off the nonviolent democratic revolution that is coming. We will be covering how to mass mobilise, how to run local groups and build momentum, the basics of planning actions and how to build an effective strategy. Guest speakers and trainers will be joining us!

 There will be free food & accommodation provided. And if travel expenses would stop you from coming to the weekend, email [youthdemand@proton.me](mailto:youthdemand@proton.me) and we can help!

This is the training programme that will inspire people across the UK to build the revolution we need. You do not want to miss this!!





**Environmental activism**

● This article is more than **2 months old**

# What next for climate activism now Just Stop Oil is 'hanging up the hi-vis'?

After three years, thousands of arrests and a state crackdown on protests, the group is ending direct action after a polarising campaign

**Matthew Taylor and Damien Gayle**

Sat 5 Apr 2025 06.00 BST

**O**n the morning of Valentine’s Day 2022, Hannah Hunt stood at the gates of Downing Street to announce the start of a new kind of climate campaign, one that would eschew mere protest and instead move into “civil resistance”.

Last week, three years and thousands of arrests later, in a neat tie-up exemplary of Just Stop Oil’s (JSO) love of media-savvy stunts, [Hunt went to the same spot again](#) -

this time to announce the group would be “hanging up the hi-vis”.

In the history of UK climate activism, there has been perhaps no more polarising a campaign. Derided as [“eco-zealots” in the Daily Mail](#) and [condemned as “selfish” by the Sun](#), which even sent a reporter to testify against them in court, JSO is as likely to be remembered for the chaos it caused as for its victories.

The group’s tactics of blocking roads, halting sports events and targeting national treasures enraged politicians, pundits and the public alike. By 2023, polling showed 64% of people disapproved of JSO.



Just Stop Oil activists interrupt Sigourney Weaver performance in *The Tempest* - video

Despite the demonisation, the impact of this relatively small group of peaceful protesters is in little doubt. Its campaigners kept the issue of new fossil fuel production on the agenda of even the least environmentally minded news outlets.

Indeed in the group’s parting statement, members claimed to have been “one of the most successful civil resistance campaigns in recent history”, saying that their key demand for a moratorium on new oil and gas licences was “now government policy”.

And perhaps more significantly, JSO proved there was a group of people in the UK prepared to endure public opprobrium - and often prison - to raise the alarm about a crisis that experts warn threatens the future of humanity. So why stop now?

For Graeme Hayes, a sociologist at Aston University, who has spent years covering Just Stop Oil, the end of the campaign came as no surprise. It followed the same pattern as its forerunners, [Extinction Rebellion](#) (XR) and Insulate Britain.

“It is in the DNA of these organisations that they do not carry on long term,” Hayes said. “Not least because the people involved, even in the best of worlds, tend to find that they exhaust their energies, that the constant wider social conflict they face is intense and takes its toll.”



📷 JSO activists outside Harrods department store in Knightsbridge, London. Photograph: Ian West/PA

That wider social impact has been intensified by the introduction of some of the most draconian laws around the right to protest in UK history. In 2022, MPs passed the [Police, Crime, Sentencing and Courts Act](#), a direct response to XR’s mass protests, giving police an armoury of new powers to impose conditions on demonstrations.

The following year, in a direct response to the likes of JSO, parliament passed the [Public Order Act](#), creating a series of offences targeting direct action, as the government simultaneously lowered the threshold of disruption at which police could intervene in a protest from “serious” to “more than minor”.

At the same time, courts are handing down increasingly harsh sentences, prosecutors have sought more severe conspiracy charges, and the government has taken action in the courts to narrow the scope of defences available to protesters.

Katy Watts, a lawyer at the human rights organisation Liberty, said: “That has all created this climate in which it is harder to engage in protest, particularly some of those specific direct action tactics. It’s harder to lawfully demonstrate on the streets, and the penalties or the consequences for committing protest offences have become more and more severe.”

The cost to activists has been substantial. According to JSO's data, over three years their supporters were arrested about 3,300 times. Seven are serving jail sentences, of up to four years, and a further eight are on remand awaiting sentencing. "We think there have been 180 instances of remand and/or prison sentences handed down," a JSO spokesperson said.



📷 Roger Hallam says climate activists are facing the most repressive laws in modern UK history. Photograph: Ollie Millington/Getty Images

More may yet be sent to jail. Trials for JSO actions are scheduled through 2025 and 2026 and, for those who took action with [Insulate Britain](#), into 2027.

Roger Hallam, the co-founder of XR, Insulate Britain and JSO, is one of those who has been at the sharp end of the state crackdown. He **was jailed for five years** for a conspiracy to **block traffic on the M25**. His sentence was recently **reduced to four years on appeal** but he remains behind bars.

Reflecting on the end of JSO, Hallam told the Guardian that building the group had been "the most fulfilling period of my life, working in a culture of dedication to the common good, rooted in respect, service, and trust.

"While our impact may seem marginal and the crisis worsens, this is not due to a lack of effort - thousands have been arrested, hundreds imprisoned, facing the most repressive laws in modern UK history."

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Many within the movement believe they are at a similar inflection point to the one activists faced after the first wave of XR protests, when the radicals who went on to found Insulate Britain and JSO split from those who felt the need to moderate their actions.

Some groups, such as [Shut the System](#), have departed from the model of accountability espoused by JSO and XR in favour of a clandestine approach, inspired by counterparts in Europe and the writings of the [radical social ecologist Andreas Malm](#).



📷 The London offices of McKinsey and Co, a management consultancy firm, are sprayed with black liquid by Cut the Ties climate protesters. Photograph: Guy Bell/Rex/Shutterstock

Other groups have taken a different tack. [The Citizens Arrest Network](#), which has non-violently targeted the chief executives of polluting companies, aims to shift the legal accountability away from activists and to those it sees as responsible for the crisis.

“I think something like XR would be more difficult now,” said Nuala Lam, a longtime climate justice activist who was involved with XR and now helps run the Citizens

Arrest Network. “The possibility of having a broad diverse movement where people from different backgrounds can get involved at different levels has been severely limited.”

While XR still exists, it no longer operates as a movement capable of mass disruptive protests of the kind that brought London to a standstill in 2019.

Several people involved in XR and JSO told the Guardian the challenge now was to mobilise the “climate-aware majority” - the large proportion of the population that is aware of the coming crisis, are deeply afraid about what it means for their own lives and that of their children, but are yet to take action.



📷 A JSO protester smears orange paint over the Alan Gilbert building at the University of Manchester in a campaign against funding from fossil fuel firms. Photograph: Christopher Furlong/Getty Images

Sam Nadel, the director of Social Change Lab, which researches the impact of protest, sees a continuing role for radical groups. He says groups such as JSO can have a “radical flank effect”, driving support for more moderate counterparts.

“In our 2024 Nature paper, we found that awareness of a **Just Stop Oil** protest made people more likely to support Friends of the Earth,” Nadel said. “People exposed to Just Stop Oil’s actions were also more likely to engage in pro-climate activities like volunteering, donating to charity, or contacting their MP. The message? Even unpopular groups can have positive and widespread ripple effects.”

Hallam acknowledges that despite the efforts and sacrifice of those involved in JSO the climate crisis is getting worse. However, he said the true failure lay not with activists but with “the liberal class - journalists, doctors, lawyers, civil servants - who refused to stand by their professed values and engage in civil resistance.

“Now, the UK faces devastation, with the [Gulf Stream at risk of collapse](#) within decades and billions of lives in jeopardy. The political order will not survive what is coming ... Our elites have abandoned us. Only ordinary people can remake our world. And while we may have less, we will have spirit - and that is what truly matters.”

This article was amended on 16 April 2025. An earlier version implied that Extinction Rebellion had ceased to exist. In fact XR still exists, but its focus is no longer on being a movement capable of mass disruptive protests of the kind that brought London to a standstill in 2019.

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## Most viewed

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Youth Demand activists disrupted the London Marathon to urge the government to impose a trade embargo on Israel

PA

## Undercover at Youth Demand's awards for arrested activists

Our reporter attended three events that launched Youth Demand, the group taking up the mantle of public disruption from Just Stop Oil

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Lara Wildenberg | Video by [Sophia Crothall](#), Video Production Trainee

Friday June 06 2025, 9.35pm, The Times

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Clapping and cheering filled the basement room of a London community centre on a grey Saturday afternoon in May.

Two masters of ceremony were awarding prizes to everyone who had been arrested while carrying out protests for Youth Demand, blocking roads in the capital to the aggravation of motorists. There was a badge of honour for the bravest protesters.

There was an award called “Rizzing up the resistance” for everyone who had led chants or “generally brought the vibe”, and another called “Fried for Falestine” for those who had been burnt by a flare.

The award ceremony was part of a “strategy launch” for Youth Demand, one of three events attended by an undercover reporter from The Times to understand the group’s training techniques and plans for future public disruption.

Youth Demand is the latest activism campaign taking up the mantle of public disruption started by Extinction Rebellion, Insulate Britain and, most recently, Just Stop Oil.

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Youth Demand blocked traffic on Tower Bridge Road as they rallied in support of Palestine on April 5

JACK TAYLOR FOR THE SUNDAY TIMES

Accusing the government of “engaging in absolute evil”, Youth Demand has two aims: the end of all trade with Israel and raising £1 trillion by 2030 “from the fossil fuel elite”.

Dozens of members of the “non-violent civil resistance group” were arrested in April after they attempted to “shut London down” with over 70 roadblocks, as well as [throwing red powder paint in front of the men’s elite race at the London marathon](#) as it crossed Tower Bridge.

In a protest over the [Israel-Gaza war](#), supporters laid child-sized body bags outside the home of [David Lammy](#), foreign secretary, and hung a banner surrounded with red hand prints reading “Starmer stop the killing” at the home of the prime minister.

Over the course of a six-hour “non-violence training session” in April, a five-hour “strategy launch” in May and an evening social in June, The Times heard Youth Demand members being taught strategies likely to get them arrested as part of the “resistance” and told what to do if that happened.

One of the co-founders told attendees that Youth Demand was “not your classic revolutionary organisation, which does an event once a year then goes back to their Lenin book clubs”. Another organiser said the summer was an “inhale” as the group prepares for “something even bigger than we’ve tried before”.

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The sessions came just weeks after Just Stop Oil, perhaps the most notorious protest movement in recent years, [announced it would “hang up the high vis”](#) and end its programme of direct action. Campaigners said they had achieved their goals because of a government commitment to end new oil and gas extraction.

- [How Just Stop Oil was policed to extinction](#)

Activists from the supposedly disbanded group, however, were playing a central role in recruiting new members to Youth Demand to help its goal of bringing London to a halt. Events were even advertised using the JSO logo.

When asked to comment on the two groups’ connections, a spokesperson JSO said it was building “a new street movement” as resistance was “needed now more than ever”.



Undercover with Youth Demand

### A badge of honour

About 50 people attended the “strategy launch” in central London in a room adorned with Palestinian flags and banners reading “STOP ARMING GENOCIDE”.

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The majority were in their twenties and based in London, although some had travelled from further, including Manchester and Brighton. Many wore keffiyehs, traditional Palestinian scarves.

One of the organisers handing out awards said, “None of this may be able to go on your CV, but this badge will last a lifetime. Or as long as you don’t put it in the wash.”

He then outlined Youth Demand’s upcoming plans including biweekly “swarms” in London as well as poetry socials with vegan food.

The “swarm” is their signature protest, blocking busy roads with a line of people holding banners, flares and flags for about ten minutes, disrupting traffic and attracting attention, then dispersing before police arrive and repeating the process in another location.

It is a criminal offence to “wilfully obstruct” a road under the Highways Act 1980.

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The group’s priorities for summer, he said, were the retention and training of new recruits, as well as bolstering branches around the country.

A series of training events held in June, titled “Seeds for revolution”, as well as a summer camp in August involving swimming and campfires will be in partnership with the “demand-winning civil resistance experience” of JSO, the organiser said.

“We’ve already got a bunch of really experienced, really cool, speakers and trainers lined up for this. We’re really pulling on that civil resistance network that we’re plugged into, to get a better and deeper understanding,” he said to cheers from the audience.

Discussing the upcoming plans in collaboration with JSO, he continued, “This is the inhale before we breathe out and expand into brand new territory, into something even bigger than we’ve tried before. This is the start of something genuinely thrilling.”

Organisers claimed that although the April protest had resulted in the arrest of 35 members, the group had raised £30,000 in small donations and attracted even more recruits.

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They also appeared to feel emboldened by backlash at the end of March against the Met Police, who were criticised for [raiding a Quaker meeting house](#) to arrest six members for conspiracy to cause a public nuisance. One of the badges had read, “I got arrested in a Quaker meeting house and all I got was this lousy badge”.

“I do all my own stunts”

Another of those speaking to attendees was Meaghan Leon. The 27-year-old Londoner was one of two Youth Demand activists who attempted to disrupt Eurovision last month by trying to climb on to the stage during Israel’s performance.



Meaghan Leon said: “Somehow I have still never been in handcuffs”

Leon gave a speech to attendees at the strategy launch wearing a t-shirt that read “I do all my own stunts”.

“That was my first actual action, before that I was just doing swarms,” she said, “Somehow I have still never been in handcuffs, I’ve still never been in a jail cell, so you know what that means. I’ve just got to keep going.” The crowd cheered.

One attendee said in conversation that he hoped to encourage London members down to Brighton to block the main beachfront road on a busy summer’s day.

Another said she had avoided breaking pre-charge bail conditions by helping swarms from the pavement – filming for the group’s social media accounts – rather than being on the road.

Two members of JSO attended the strategy launch and took notes. One, with multiple arrests under his belt, said he had donated to Youth Demand and now wanted to join their protests after listening to the session. Another, who is awaiting trial, said JSO needed to “build numbers” and she would join if her legal proceedings allowed.

In March JSO announced that its last protests would be at the end of April, claiming it had succeeded because the government was planning to end new oil and gas extraction. Critics suggested they had run out of members who had managed to avoid criminal charges and remained willing to act. Supporters, however, hinted that they would reappear under a new name.

Born from JSO Students in January 2024, Youth Demand belongs to the Umbrella coalition, which also encompasses JSO.

Many of the organisers are facing legal proceedings for previous protests with the climate group.

When asked about its connections with Youth Demand, JSO told The Times: “We held our last action as Just Stop Oil at the end of April. But we said then and have continued to communicate, to our supporters and to the wider public, that resistance works and that it’s needed now more than ever. Governments everywhere are retreating from doing what is needed to protect us from the consequences of unchecked fossil fuel burning.

“We are creating a new strategy, to face this reality and to carry our responsibilities at this time. Just Stop Oil has shown that resistance works — ordinary people can bring about change by putting their bodies on the line week after week, risking arrest and even imprisonment. So we are building a new street movement rooted in local communities and dedicated to nonviolent civil resistance.”

## Non-violence

A few weeks earlier, at the same community centre, about 30 people turned up to a non-violence training session.

Part of the session included a mock swarm with attendees taking on different roles. Some held banners and practised standing their ground as organisers played furious members of the public trying to break up the roadblock. Designated “de-escalators” tried to calm down the pretend motorists who tried to tear flags from people’s hands.

A new recruit acting as “chant leader” asked for inspiration, with an organiser responding, “‘Free Palestine’ is a good one?” There was a designated “safety co-ordinator” as well as “media bees” who recorded the action.

One of the two organisers leading the event, [Jai Halai](#), an NHS worker from London, also gave a talk telling attendees about activists' rights and what to do if arrested.

Organisers also used videos of a JSO road-block as teaching material to point out what protesters did well and poorly. In one clip, an angry motorist attacks a protester.

“The man who attacked Daniel was in a collision, likely as a result of the slow march,” the other organiser said. “He was in that car with his pregnant wife, girlfriend at the time, and was obviously very upset by that, scared by that, angry and took that out on the first person in the slow march he came across.

“You can see her leading him away at the end of the video. He actually came back after — it's not shown in the video, sadly — he came back and apologised to Daniel afterwards, which I think just strongly shows testament that when you're in those fight or flight scenarios, you're not thinking in the same way at all. He regretted the violence he took at that very intense moment.”

### “Not a Lenin book club”

As well as Youth Demand's on street action, Sam Holland, one of their co-founders, gave a speech at the strategy launch calling for attendees to support Assemble.

Under the same Umbrella coalition as Youth Demand and Just Stop Oil, this political group aims to create a House of the People, a chamber representative of the UK public through a lottery.



Sam Holland, 22, said Youth Demand was “not your classic revolutionary organisation”

JACK TAYLOR FOR THE SUNDAY TIMES

Holland described Youth Demand and JSO — “one of the most serious resistance groups in the country” — as the street resistance wing to Assemble's political wing.

“This is why we are going to be focusing on training and strategising over the summer, we need time to build a strategy that actually works with the House of the People,” he said,

“I want emphasise that we're totally f\*\*\*ing serious about this, this is not your classic revolutionary organisation which does an event once a year then goes back to their Lenin book clubs. There are assemblies running across the

country as we speak.”

Making a comparison to the protests in Egypt in 2011, Holland called for Youth Demand to back Assemble in order to have a political system in place when the revolution comes.

“This is the spirit that leads to revolutions and this is the spirit we’re building with Youth Demand,” he said. “That’s what we’re going to do.”

Youth Demand said: “It is clear to everyone the UK government is breaking International Humanitarian Law by arming Israel’s genocide in Gaza. By spending our tax money to help Israel carry out its genocidal campaign in Gaza, they have made all of us complicit in the greatest crime of our age. Youth Demand supporters refuse to sit by and watch millions of innocent civilians starved and bombed to pieces. We will continue to engage in our proud tradition of nonviolent civil resistance until the UK government stops arming genocide.”

Assemble said: “Trust in Westminster has collapsed and we need a political system that actually includes those who feel disenfranchised and locked out. That’s why Youth Demand and Just Stop Oil are supporting the House of the People: they recognise that system-change can only come from political change, and that the people of the UK have a right and responsibility to contribute to the important decisions which are made by captured Lords and politicians.”

UK > Crime

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← Post



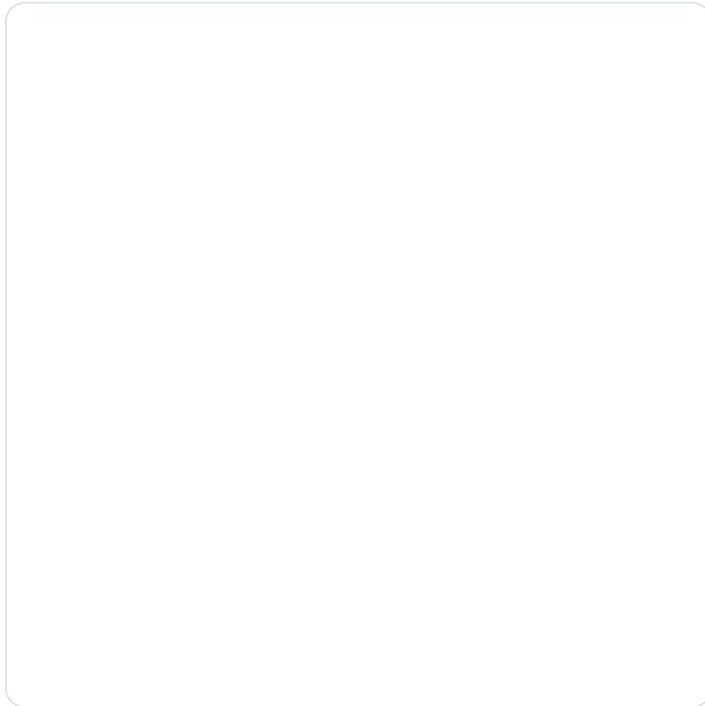
**Just Stop Oil** ✓  
@JustStop\_Oil



🛑 Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that make protests impossible at oil refineries, oil depots and even petrol stations.

💀 Our government issued 100 new oil and gas licences, confirming their disregard of human life. This is a last ditch attempt to stop our corrupt government taking more lives.

➡ They know new oil and gas is genocide – take action now at [juststopoil.org](https://juststopoil.org)



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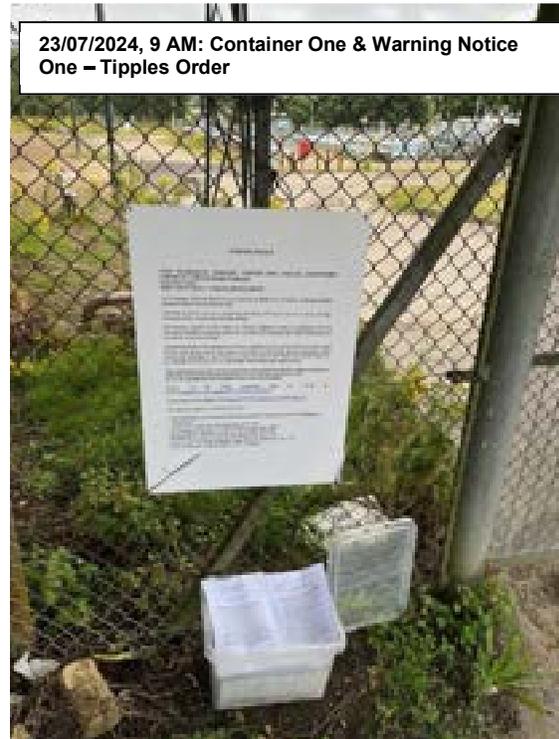
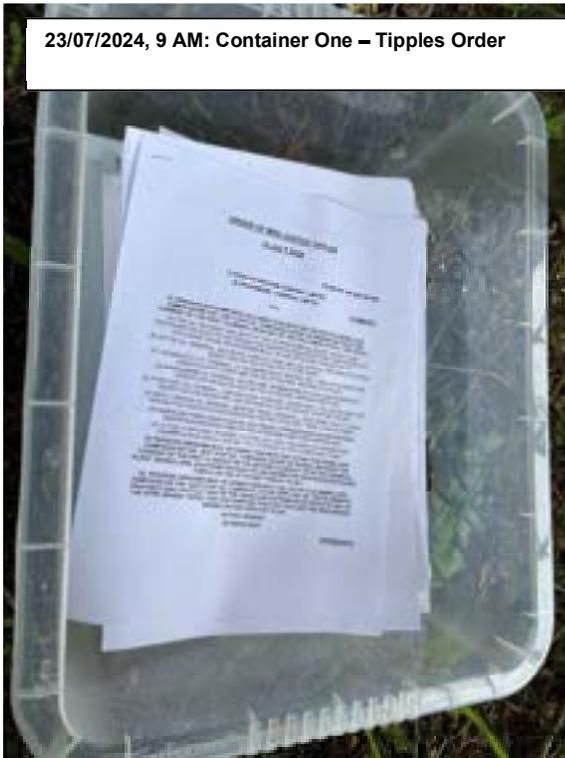
# Injunction

<b>Notice of 2025 Annual Review Hearing Date</b>	
<b>Operating Sites Injunction - Amended Order dated 21 January 2025</b>	
<b>Operating Sites Injunction – Notice and Consent Order</b>	
<b>King's Bench Associate's Order</b>	
<b>Order of Mrs Justice Tipples DBE – Continuation of Injunctive Relief</b>	
<b>Skeleton Argument Annual Review Hearing 10 Jul 2024</b>	
<b>Notice and Trial Bundle – 10 July 2024</b>	

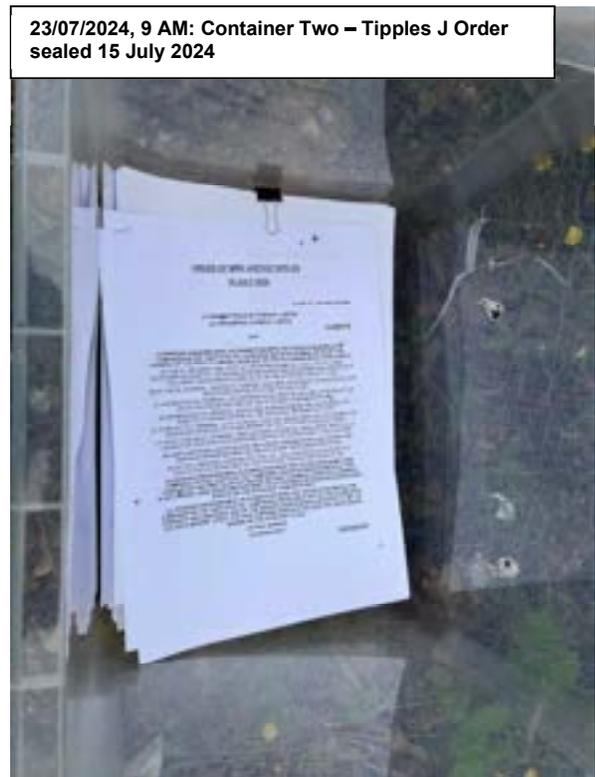
## Tipples Order – Evidence of Service at Esso Sites

### Alton Compound, Pumping Station, Hollybourne

#### Alton Location 1 – Outside main entrance gate to left-hand side



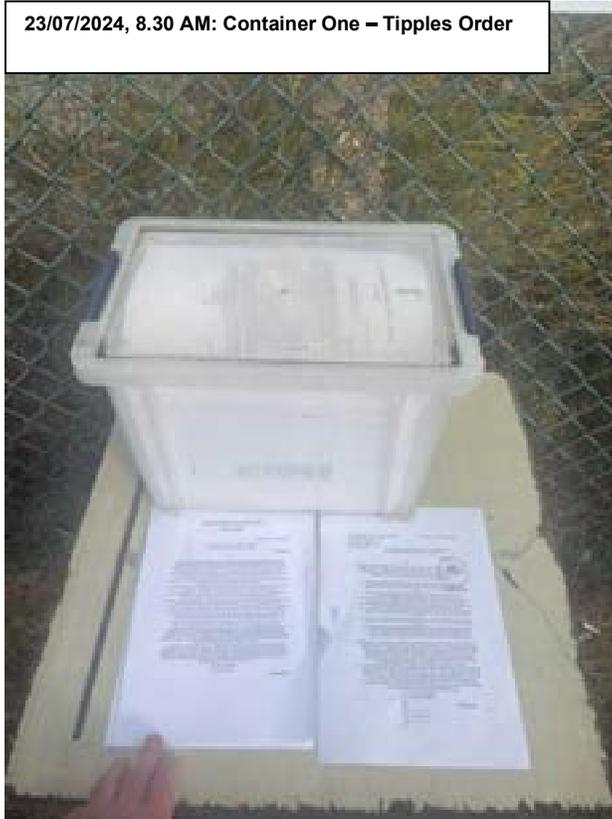
#### Alton Location 2 – Back exit gate on the left-hand side



**Avonmouth Oil Terminal, Bristol**

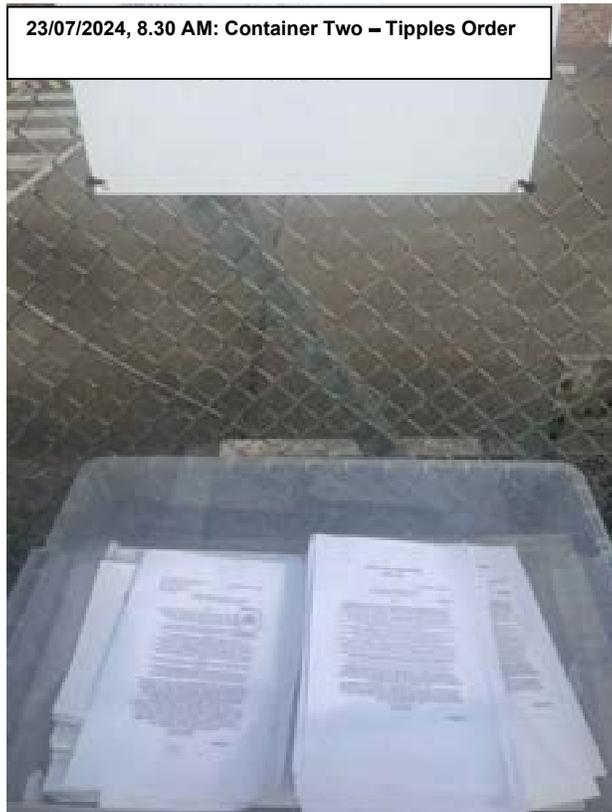
**Avonmouth Location 1 – By the pedestrian gate entrance**

23/07/2024, 8.30 AM: Container One – Tipples Order



**Avonmouth Location 2 – By the main vehicle entrance**

23/07/2024, 8.30 AM: Container Two – Tipples Order



## Birmingham Oil Location, Birmingham

### Birmingham Location 1 – Main pedestrian entrance for Esso building



21/07/2024, 9.19 AM: Container One & Warning Notice One – Tipples Order

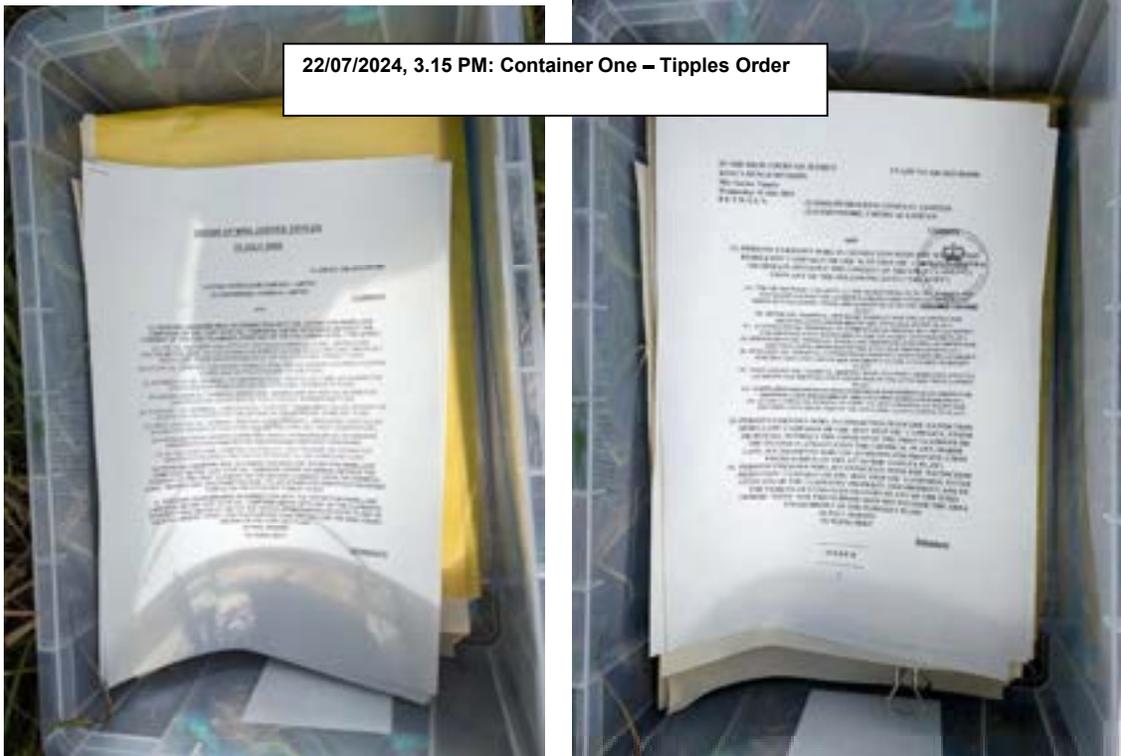
### Birmingham Location 2 – Next to driver pedestrian turnstile



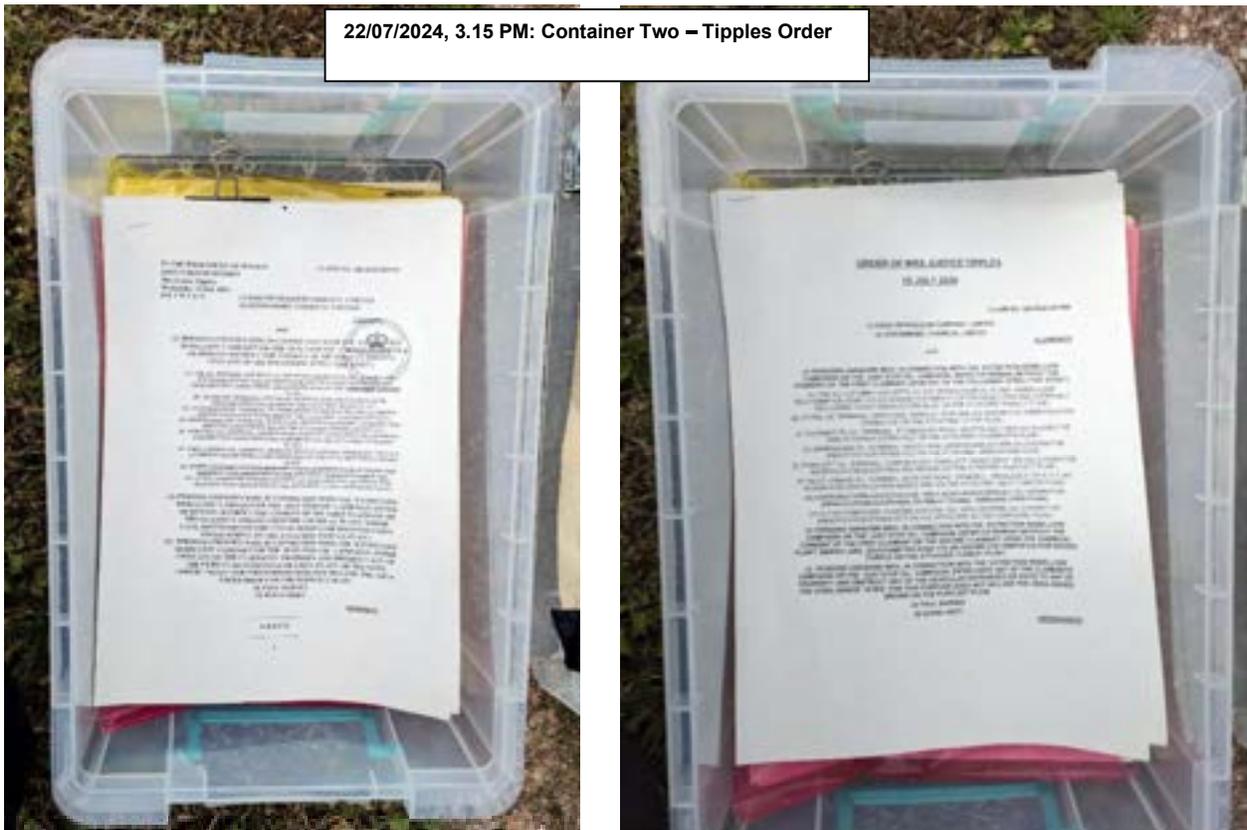
21/07/2024, 9.19 AM: Container Two – Tipples Order

The Oil Refinery and Jetty at the Petrochemical Plant, Fawley

Fawley Location 1 – Left hand side of fence on land boundary between public highway (Cadland Road) and ExxonMobil property



Fawley Location 2 – On left hand side perimeter fence at the end of Marsh Lane adjacent to gate 2 and admin entrance

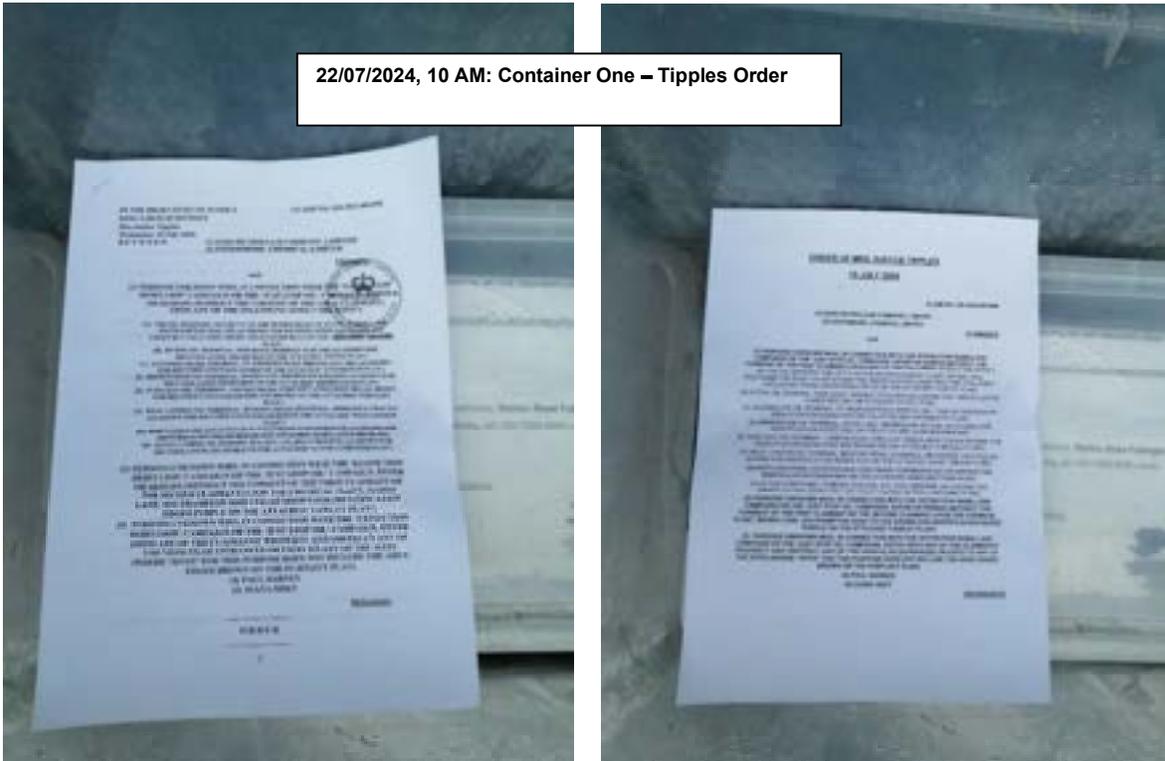


22/07/2024, 3.15 PM: Container Two & Warning  
Notice Two – Tipples Order

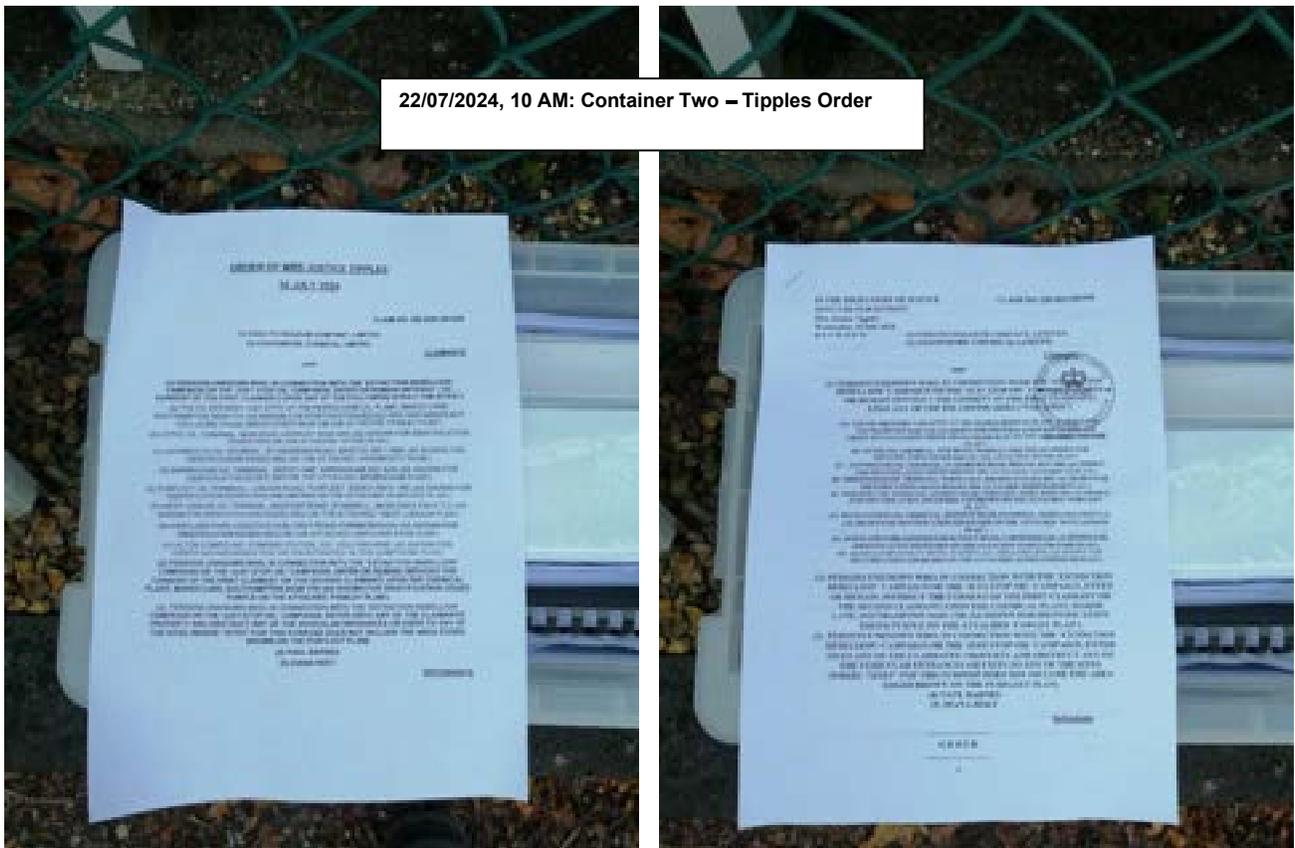


Hythe Oil Terminal, Hardley

Hythe Location 1 – On outside of fence, next to footpath from lower carpark up towards terminal entrance

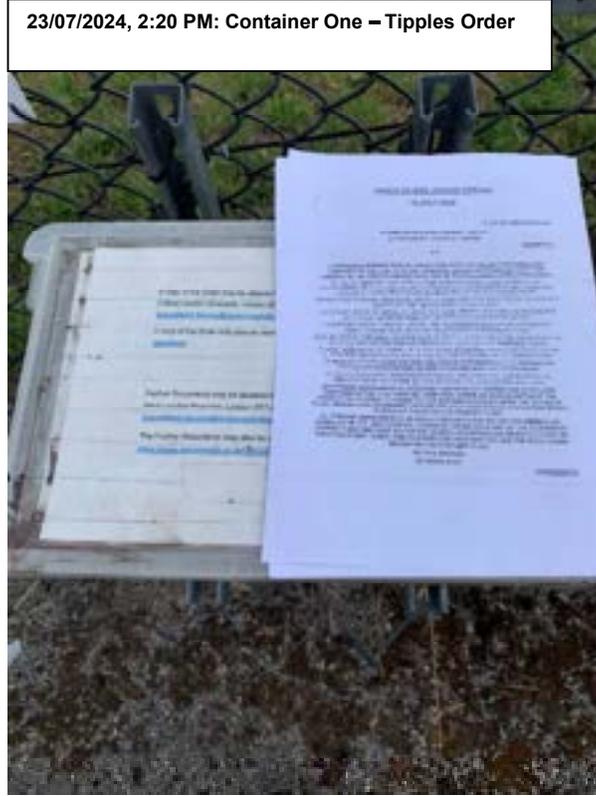


Hythe Location 2 – On outside of fence in top carpark, next to south emergency access gate

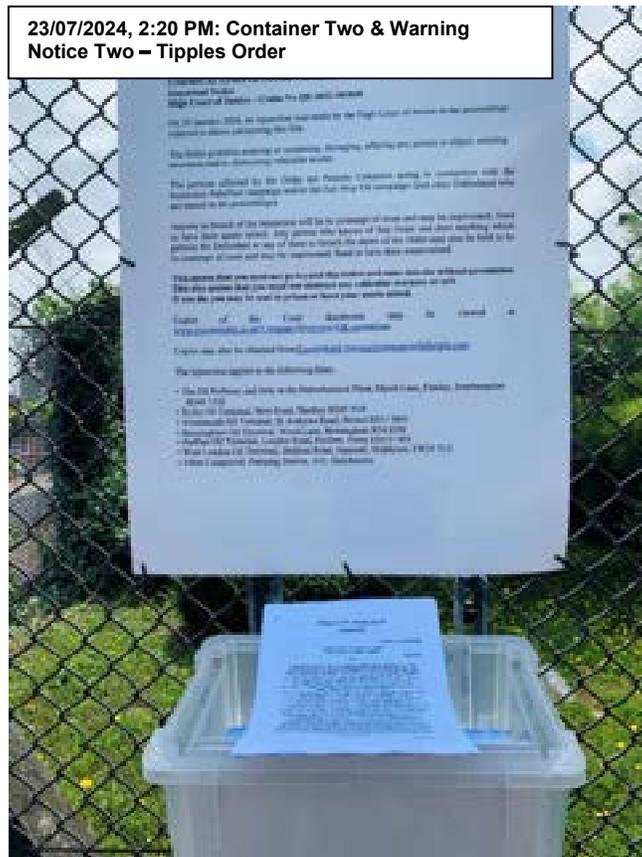


## Purfleet Oil Terminal, Essex

### Purfleet Location 1 – Attached to fence on exit from terminal

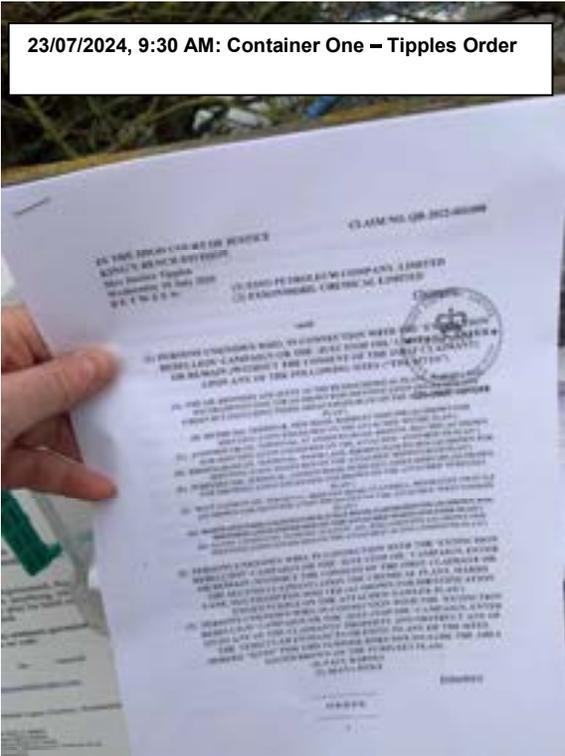


### Purfleet Location 2 - Attached to fence on entrance to terminal

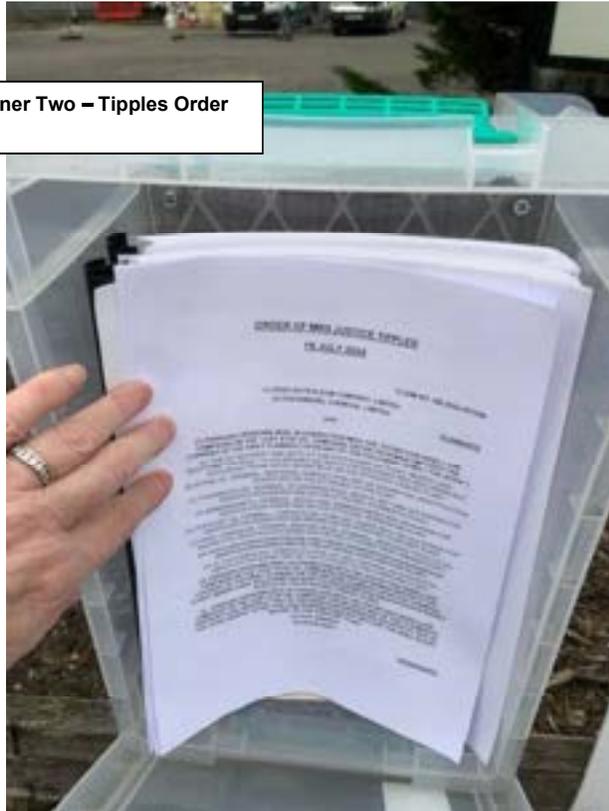
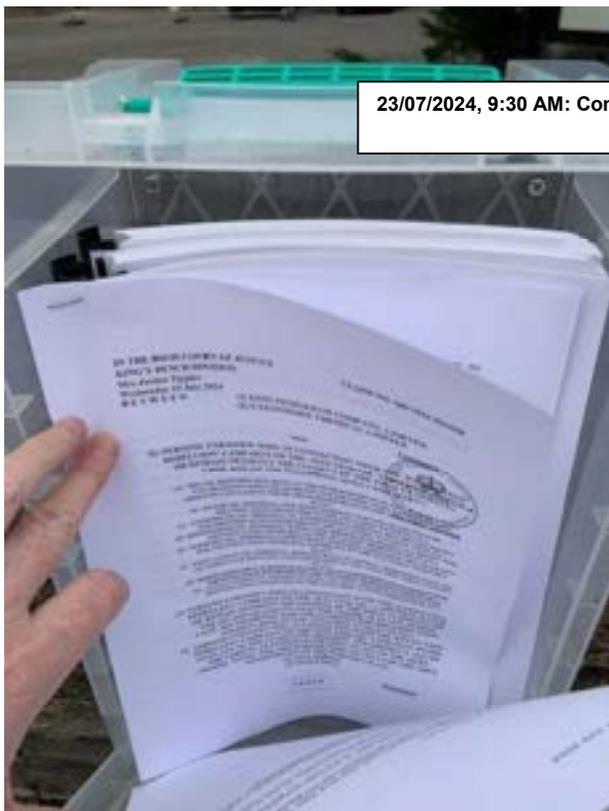


West London Oil Terminal, Middlesex

West London Location 1 – Attached to fence on the approach road to the terminal on the right-hand side of the entrance



West London Location 2 – Attached to fence on the approach road to the terminal on the left-hand side of the entrance



From: Scott Speirs  
Sent: 19 July 2024 17:37  
To: xr-legal@riseup.net; Extinction Rebellion  
Cc: Holly Stebbing  
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Order of Justice Tipples [NRF\_EMEA-UK.FID3192727]  
Attachments: King's Bench Associate's-Order.pdf

---

To whom it may concern

**Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown**

**Service of Order of Justice Tipples sealed 15 July 2024**

We refer to our letter dated 25 April 2024 in connection with the above mentioned proceedings, in which we provided notice that the date had been fixed for this year's injunction review hearing for Wednesday, 10 July 2024 (the **Review Hearing**).

We confirm that the Review Hearing has taken place. By way of service, we attach the Order of Justice Tipples, sealed on 15 July 2024, which maintains the injunctions granted in the Order of Justice Ellenbogen, dated 29 January 2024 (the **Tipples Order**).

Further copies of the Tipples Order may be obtained from Norton Rose Fulbright LLP, at the address stated below, or by emailing [ExxonMobil.Service@nortonrosefulbright.com](mailto:ExxonMobil.Service@nortonrosefulbright.com). A copy of the Tipples Order may also be viewed at <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>.

Yours faithfully  
Norton Rose Fulbright LLP

**Scott Speirs** | Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
[scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

From: Scott Speirs  
Sent: 19 July 2024 17:38  
To: juststopoilpress@protonmail.com  
Cc: Holly Stebbing  
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Order of Justice Tipples [NRF\_EMEA-UK.FID3210555]  
Attachments: King's Bench Associate's-Order.pdf

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To whom it may concern

**Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown**

**Service of Order of Justice Tipples sealed 15 July 2024**

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Yours faithfully  
Norton Rose Fulbright LLP

**Scott Speirs** | Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
[scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

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From: Microsoft Outlook  
Sent: 19 July 2024 17:37  
To: xr-legal@riseup.net; Extinction Rebellion  
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Order of Justice Tipples [NRF\_EMEA-UK.FID3192727]  
Attachments: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Order of Justice Tipples [NRF\_EMEA-UK.FID3192727].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[xr-legal@riseup.net](mailto:xr-legal@riseup.net) ([xr-legal@riseup.net](mailto:xr-legal@riseup.net))

[Extinction Rebellion](mailto:enquiries@extinctionrebellion.uk) ([enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk))

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Order of Justice Tipples [NRF\_EMEA-UK.FID3192727]

From: Microsoft Outlook  
Sent: 19 July 2024 17:38  
To: juststopoilpress@protonmail.com  
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Order of Justice Tipples [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Order of Justice Tipples [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com) ([juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com))

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Order of Justice Tipples [NRF\_EMEA-UK.FID3210555]

From: Extinction Rebellion <enquiries@extinctionrebellion.uk>  
Sent: 19 July 2024 17:38  
To: Scott Speirs  
Subject: Message Received - QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Order of Justice Tipples [NRF\_EMEA-UK.FID3192727]

---

**[External Email – Use Caution]**

Hello Scott Speirs,

This is an automated reply to let you know we received your message.

It'll be read - usually within 24 hours - and we'll send you a personal reply, or forward it to an appropriate person within Extinction Rebellion.

To view the status of the ticket or to add comments, you can visit  
<https://risingup.freshdesk.com/helpdesk/tickets/46701>

Thank you for contacting us,  
With Love & Kindness from

The XR Public Engagement Working Group

From: xr-legal@riseup.net  
Sent: 19 July 2024 17:38  
To: Scott Speirs  
Subject: Autoreply for XR Legal Support

---

[External Email – Use Caution]

Hi there,

Thanks for getting in touch with the XR Legal Support Team.

We have received your email and are working on getting a response to you ASAP! We are currently quite low in capacity and so our response to your email(s) might be delayed.

If you don't hear from us within two weeks, please email back and we will do our best to get to you sooner.

In the meantime, please have a look at our website (<https://www.informeddissent.info>), as this may have information to answer your questions.

If your email is related to an upcoming court appearance, we will prioritise your email and get a response to you ASAP. Please also email the XR Arrest Welfare Team ([XR-ArrestWelfare@protonmail.com](mailto:XR-ArrestWelfare@protonmail.com)) with the details of your court date.

If your email is related to trainings run by our team, see our Trainings Calendar for details about upcoming Trainings. This can be accessed at this link: <https://teamup.com/ksqtxh86ftomucpgu>

During Rebellions, where you need an urgent response or if someone has been arrested at an action you are at, please call the XR Legal Back Office on 07749 335574 and we will deal with your query that way.

In Solidarity,  
XR Legal Support Team

From: Scott Speirs  
Sent: 19 July 2024 17:12  
To: PBHPXR  
Cc: Holly Stebbing  
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: King's Bench Associate's-Order.pdf

---

Dear Paul

Please find attached by way of service the Order of Justice Tipples maintaining the injunction.

We draw your particular attention to the final recital (beginning "AND UPON the Claimants having received assurances from Diana Hekt..."), paragraph 3 and paragraph 5.

We would be grateful if you would let us know if you intend to provide the undertaking referred to below and we will inform the Court accordingly.

Yours sincerely  
Norton Rose Fulbright

**Scott Speirs** | Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com

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---

**From:** Scott Speirs  
**Sent:** 17 July 2024 12:06  
**To:** PBHPXR  
**Cc:** Holly Stebbing  
**Subject:** RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

Dear Paul

We would be grateful to know when you expect to be in a position to respond.

Yours sincerely  
Norton Rose Fulbright

**Scott Speirs** | Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
[scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com)

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[nortonrosefulbright.com](http://nortonrosefulbright.com)

---

**From:** PBHPXR <[PBHPXR@protonmail.com](mailto:PBHPXR@protonmail.com)>  
**Sent:** 16 July 2024 18:52  
**To:** Scott Speirs <[Scott.Speirs@nortonrosefulbright.com](mailto:Scott.Speirs@nortonrosefulbright.com)>  
**Cc:** Holly Stebbing <[Holly.Stebbing@nortonrosefulbright.com](mailto:Holly.Stebbing@nortonrosefulbright.com)>  
**Subject:** RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

I would be grateful if you could give me more time please.

HS5/111

Paul

Sent from [Proton Mail](#) for iOS

On Mon, Jul 15, 2024 at 17:51, Scott Speirs <[Scott.Speirs@nortonrosefulbright.com](mailto:Scott.Speirs@nortonrosefulbright.com)> wrote:

Dear Paul

**QB-2022-001098 Esso Petroleum and another v Persons Unknown and others**

Further to the below email, we would be grateful to know if you will agree to the attached undertaking.

Yours sincerely  
Norton Rose Fulbright

**Scott Speirs** | Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603

[scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com)

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---

**From:** Scott Speirs

**Sent:** 09 July 2024 16:46

**To:** [PBHPXR@protonmail.com](mailto:PBHPXR@protonmail.com)

**Cc:** Holly Stebbing <[Holly.Stebbing@nortonrosefulbright.com](mailto:Holly.Stebbing@nortonrosefulbright.com)>

**Subject:** QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

Dear Paul

**QB-2022-001098 Esso Petroleum and another v Persons Unknown and others**

We refer to the undertaking you provided to the Court on this matter in June 2023 (the **2023 Undertaking**). The 2023 Undertaking was referenced in the Order of Justice Linden of 10 July 2023 (the **Order**) as well as in his judgment.

The 2023 Undertaking expired on 30 June 2024. We, therefore, invite you provide a new undertaking on the same terms to the Court, that will expire on 30 June 2025. Please find attached a draft undertaking. Should you agree the attached, we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and documents can be served by email.

Yours sincerely  
Norton Rose Fulbright

**Scott Speirs** | Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603

[scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com)

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HS5/112

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From: Scott Speirs  
Sent: 19 July 2024 17:08  
To: Diana Hekt  
Cc: Holly Stebbing  
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF\_EMEA-UK.FID3210555]  
Attachments: King's Bench Associate's-Order.pdf

---

Dear Diana

Thank you for the below assurance, which has been accepted by the court.

Please find attached by way of service the Order of Justice Tipples maintaining the injunction. We draw your particular attention to the final recital (beginning "AND UPON the Claimants having received assurances from Diana Hekt..."), paragraph 2 and paragraph 5.

Yours sincerely  
Norton Rose Fulbright

Scott Speirs | Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world  
nortonrosefulbright.com

-----Original Message-----

From: Diana Hekt  
Sent: 10 July 2024 11:37  
To: Scott Speirs  
Cc: Holly Stebbing  
Subject: Re: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF\_EMEA-UK.FID3210555]

Dear Norton Rose Norton

I request to be removed from the 2024-2025 injunction above. I undertake not to break the injunction at any of the listed Esso sites.

Undertaking:

I undertake to the Court promising as follows:

4. Not to:

- (a) enter or remain on any part of the Sites (as defined above) without the Consent of the First Claimant.
- (b) damage any part of any of the Sites;
- (c) affix themselves or any person or object to any part of any of the Sites;
- (d) erect any structures on any part of any of the Sites.

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5. Not to:

(a) 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');

(b) damage any part of the Chemical Plant;

(c) affix themselves or any person or object at the Chemical Plant; 6. Not to enter onto the Claimants' property and obstruct any of the vehicular entrances or exits to any of the Sites (where "Sites" for this purpose does not include the area edged brown on the Purfleet Plan) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

AND TO BE BOUND BY THESE PROMISES UNTIL 30 June 2025

Signed

Diana Hekt

I hope this is what you require from me in order to be removed from the injunction for another year.

With thanks

Yours sincerely

Diana Hekt

---

From: Scott Speirs <[Scott.Speirs@nortonrosefulbright.com](mailto:Scott.Speirs@nortonrosefulbright.com)>

Sent: 09 July 2024 16:41

To: Diana Hekt

Cc: Holly Stebbing

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF\_EMEA-UK.FID3210555]

Dear Diana

QB-2022-001098 Esso Petroleum and another v Persons Unknown and others

We refer to the undertaking you provided to the Court on this matter in June 2023 (the 2023 Undertaking). The 2023 Undertaking was referenced in the Order of Justice Linden of 10 July 2023 (the Order) as well as in his judgment.

The 2023 Undertaking expired on 30 June 2024. We, therefore, invite you provide a new undertaking on the same terms to the Court, that will expire on 30 June 2025. Please find attached a draft undertaking. Should you agree the attached, we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and documents can be served by email.

Yours sincerely

Norton Rose Fulbright

Scott Speirs | Associate

Norton Rose Fulbright LLP

Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom Tel +44 20 7444 2441 | Mob +44 75111 76603 [scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com)

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[nortonrosefulbright.com](http://www.nortonrosefulbright.com)<<http://www.nortonrosefulbright.com/>>

From: Diana Hekt <[hekt@outlook.com](mailto:hekt@outlook.com)>

Sent: 09 July 2024 15:15

To: Scott Speirs <[Scott.Speirs@nortonrosefulbright.com](mailto:Scott.Speirs@nortonrosefulbright.com)>

HS5/115

Cc: Holly Stebbing <[Holly.Stebbing@nortonrosefulbright.com](mailto:Holly.Stebbing@nortonrosefulbright.com)>

Subject: Re: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF\_EMEA-UK.FID3210555]

Dear Norton Rose Fulbright

Thank you for your email. As a named defendant on the above injunction I would very much like to opt for the documents you are apparently obliged to send me to be referenced at

<https://www.exxonmobil.co.uk/company/overview/uk-operations>>)

or to be emailed to me (at [hekt@outlook.com](mailto:hekt@outlook.com)>) rather than continuing to have hard copies sent through the post.

Better still I would like to request at tomorrow's court hearing that my name be removed from the injunction altogether. I have no intention of breaching this injunction or any other.

I hope to hear your response soon.

With thanks

Diana Hekt

Get Outlook for Android<<https://aka.ms/ghei36>>

---

From: Scott Speirs <[Scott.Speirs@nortonrosefulbright.com](mailto:Scott.Speirs@nortonrosefulbright.com)>>

Sent: Tuesday, July 9, 2024 9:33:43 am

To: [hekt@outlook.com](mailto:hekt@outlook.com)> <[hekt@outlook.com](mailto:hekt@outlook.com)>>

Cc: Holly Stebbing <[Holly.Stebbing@nortonrosefulbright.com](mailto:Holly.Stebbing@nortonrosefulbright.com)>>

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF\_EMEA-UK.FID3210555]

Dear Diana

We have received a copy of your email sent to [ExxonMobil.Service@nortonrosefulbright.com](mailto:ExxonMobil.Service@nortonrosefulbright.com)>.

The Claimants are required by the Court to serve documents upon you as a Defendant in the injunction. In order to avoid being served with hard copy documents, we invite you to agree to accept service by email.

HS5/116

You can do this by confirming by return email that you will accept service of all documents related to this matter at the email address "[hekt@outlook.com](mailto:hekt@outlook.com)" and larger documents by email referencing that they can be found at <https://www.exxonmobil.co.uk/company/overview/uk-operations>>.

Given there is an annual review hearing listed in this matter tomorrow, if you provide the confirmation above by return we can raise your request with the Court at the hearing.

Yours sincerely

Norton Rose Fulbright

Scott Speirs | Associate

Norton Rose Fulbright LLP

Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom Tel +44 20 7444 2441 | Mob +44 75111 76603 [scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com)>

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From: Microsoft Outlook  
Sent: 19 July 2024 17:12  
To: PBHPXR  
Subject: Relayed: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: RE QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[PBHPXR \(PBHPXR@protonmail.com\)](mailto:PBHPXR@protonmail.com)

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

From: Microsoft Outlook  
Sent: 19 July 2024 17:08  
To: Diana Hekt  
Subject: Relayed: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF\_EMEA-UK.FID3210555]  
Attachments: RE QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF\_EMEA-UK.FID3210555].msg

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**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

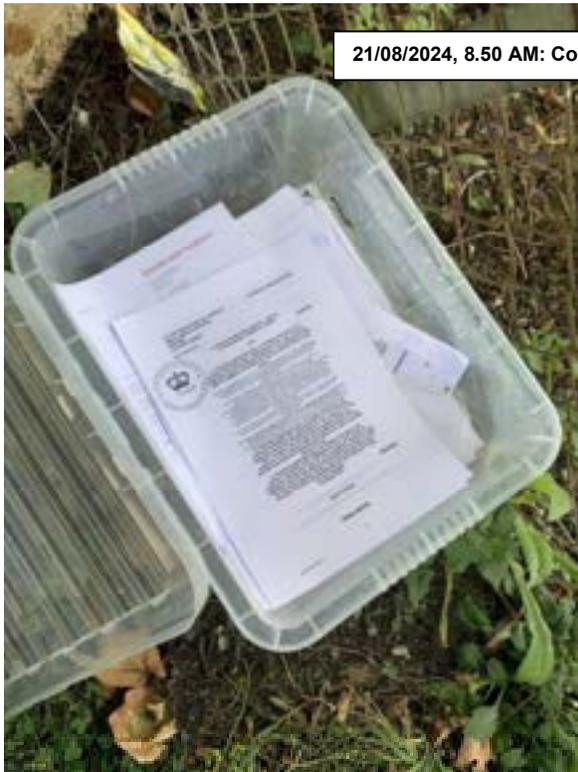
[Diana Hekt \(hekt@outlook.com\)](mailto:hekt@outlook.com)

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others - Service of Documents [NRF\_EMEA-UK.FID3210555]

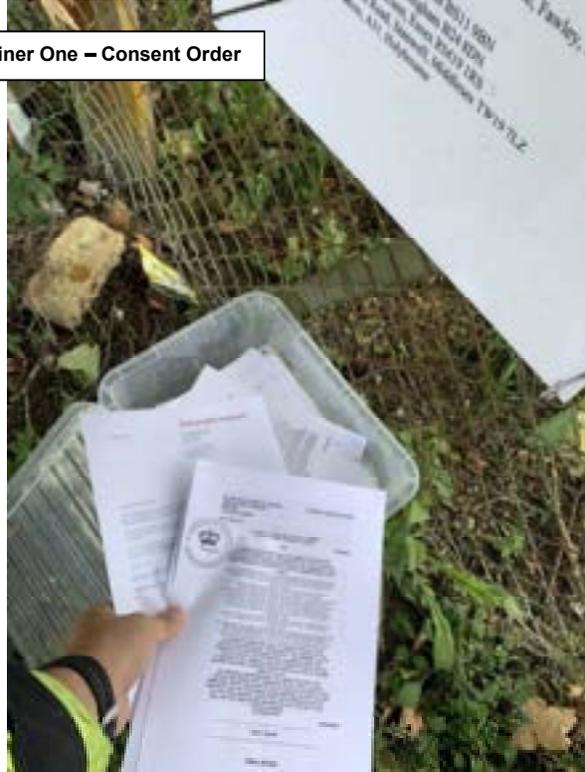
**Consent Order – Evidence of Service at Esso Sites**

**Alton Compound, Pumping Station, Hollybourne**

**Alton Location 1 – Outside main entrance gate to left-hand side**



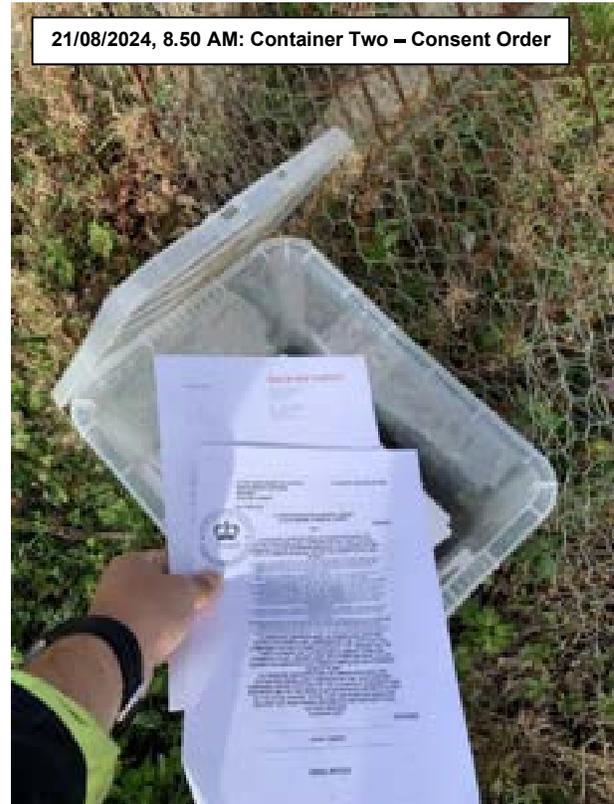
21/08/2024, 8.50 AM: Container One – Consent Order



**Alton Location 2 – Back exit gate on the left-hand side**



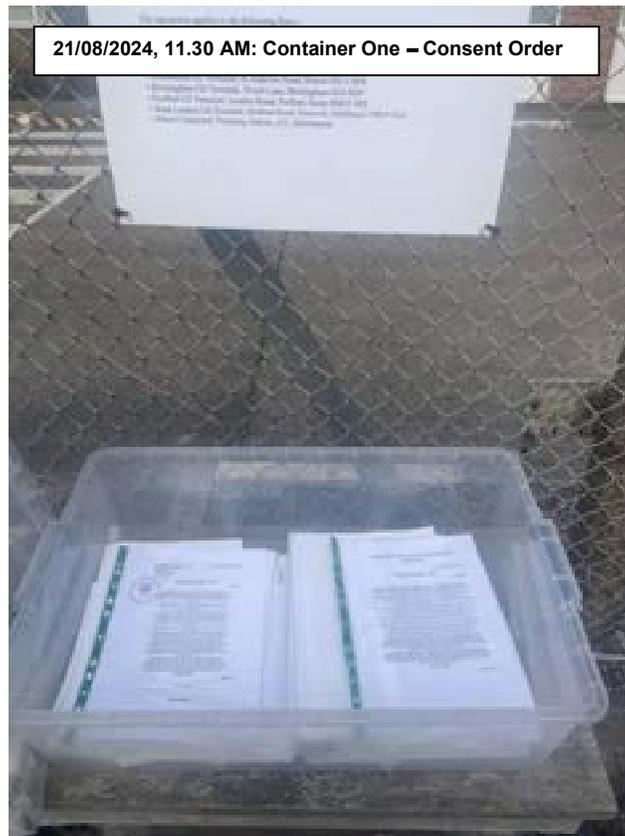
21/08/2024, 8.50 AM: Container Two & Warning Notice Two – Consent Order



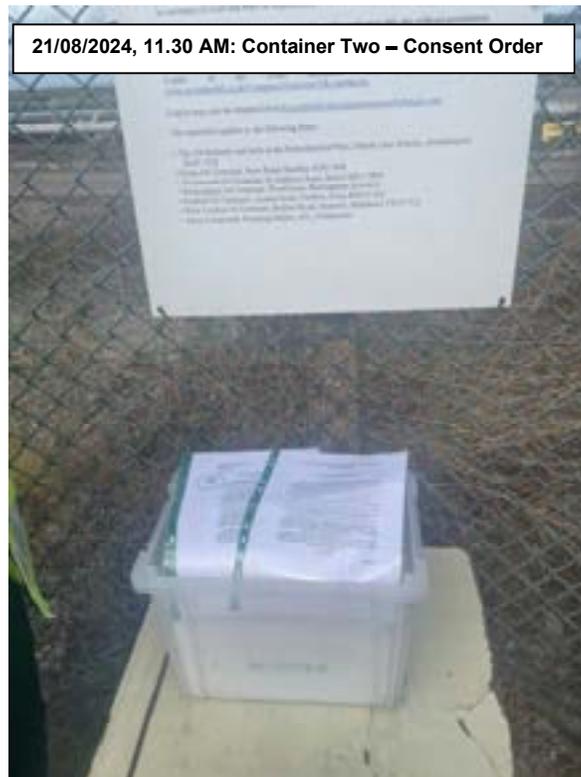
21/08/2024, 8.50 AM: Container Two – Consent Order

**Avonmouth Oil Terminal, Bristol**

**Avonmouth Location 1 – By the pedestrian gate entrance**

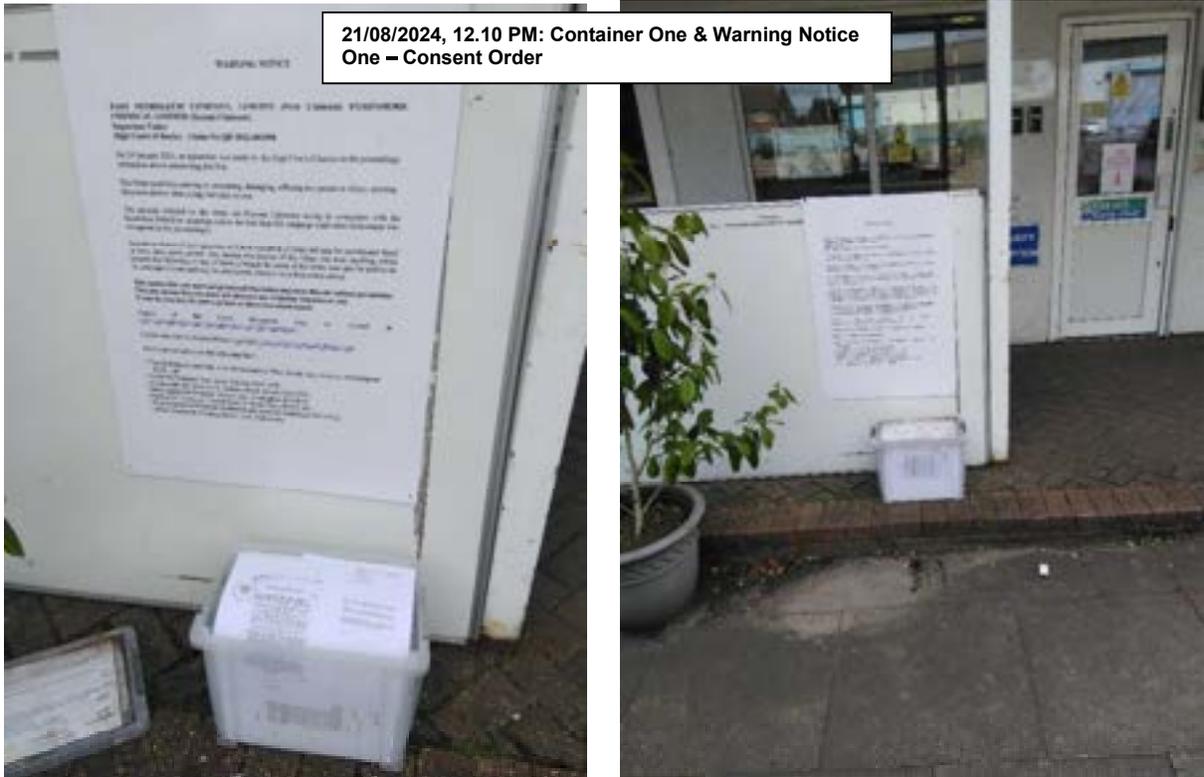


**Avonmouth Location 2 – By the main vehicle entrance**



**Birmingham Oil Location, Birmingham**

**Birmingham Location 1 – Main pedestrian entrance for Esso building**



**Birmingham Location 2 – Next to driver pedestrian turnstile**

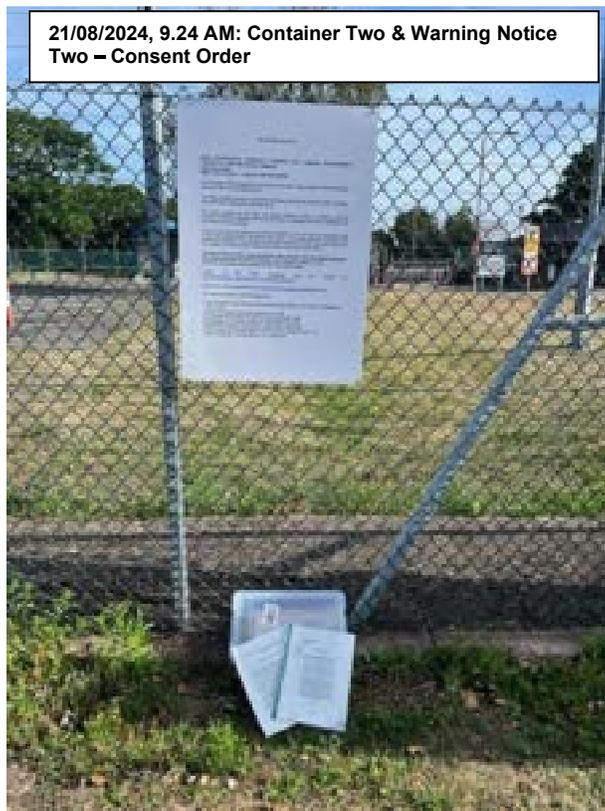


**The Oil Refinery and Jetty at the Petrochemical Plant, Fawley**

**Fawley Location 1 – Left hand side of fence on land boundary between public highway (Cadland Road) and ExxonMobil property**

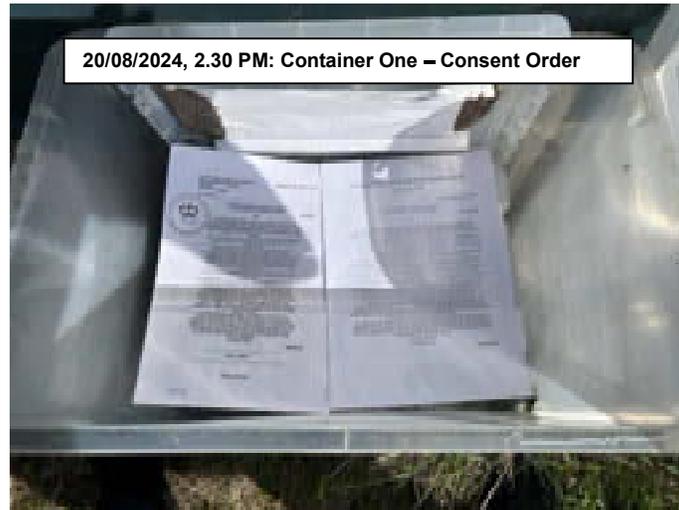


**Fawley Location 2 – On left hand side perimeter fence at the end of Marsh Lane adjacent to gate 2 and admin entrance**

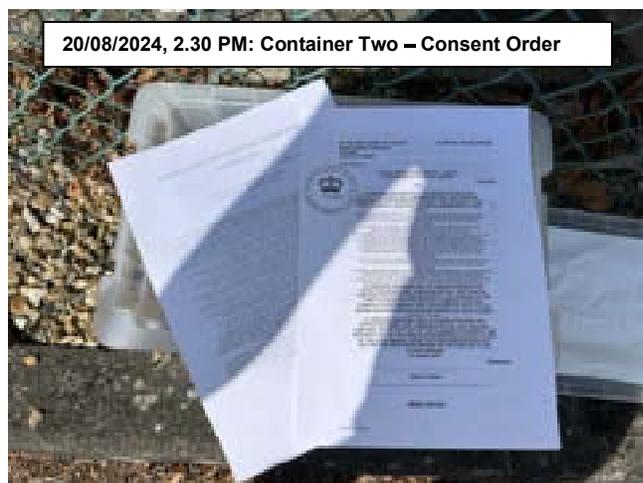


Hythe Oil Terminal, Hardley

Hythe Location 1 – On outside of fence, next to footpath from lower carpark up towards terminal entrance

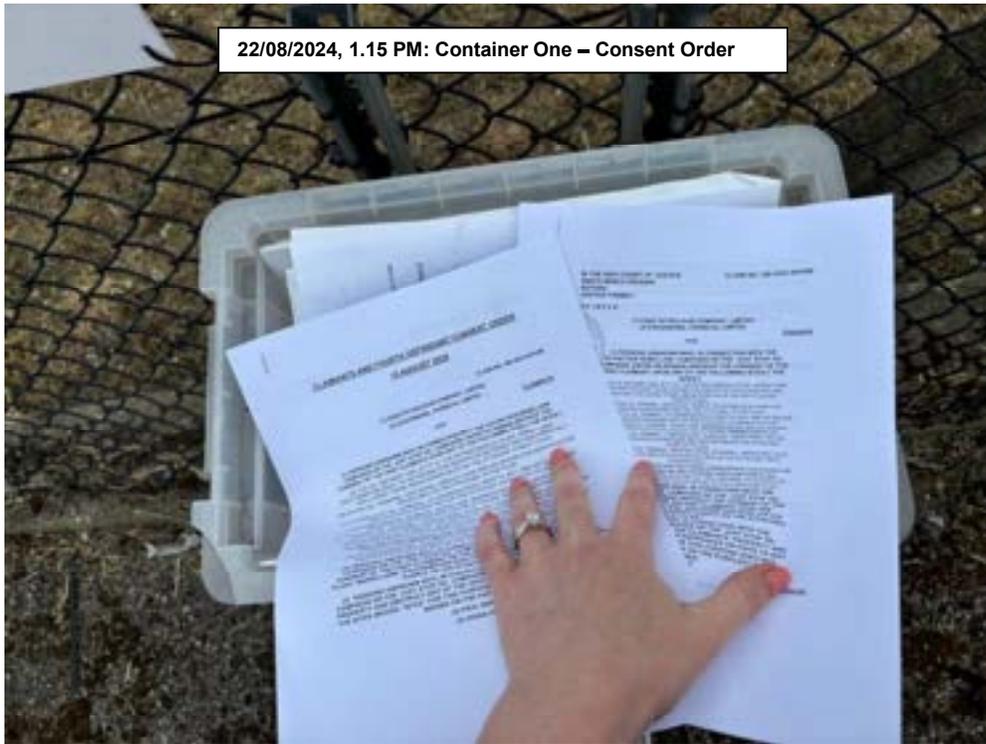


Hythe Location 2 – On outside of fence in top carpark, next to south emergency access gate

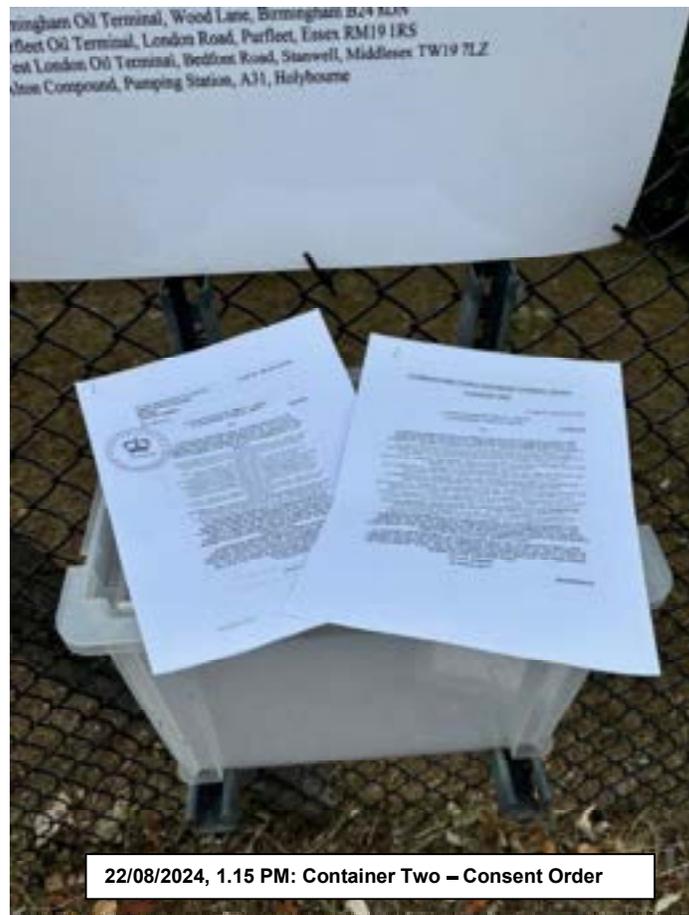


Purfleet Oil Terminal, Essex

Purfleet Location 1 – Attached to fence on exit from terminal

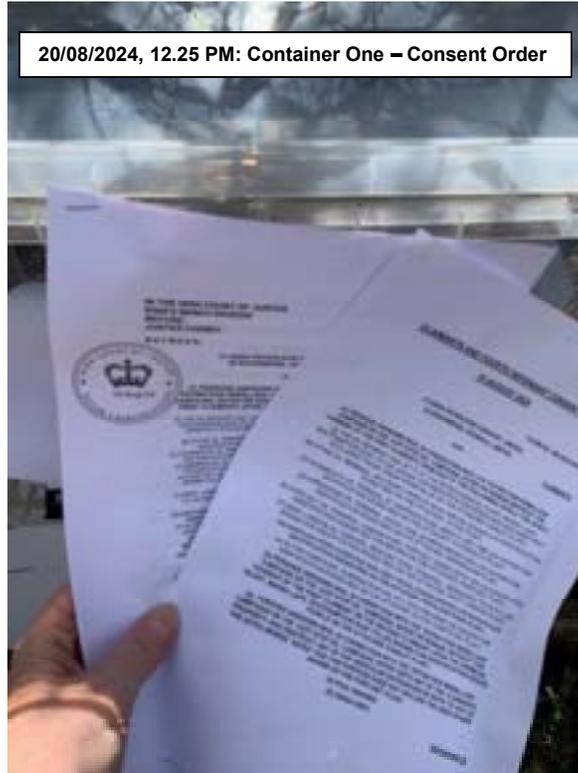


Purfleet Location 2 - Attached to fence on entrance to terminal

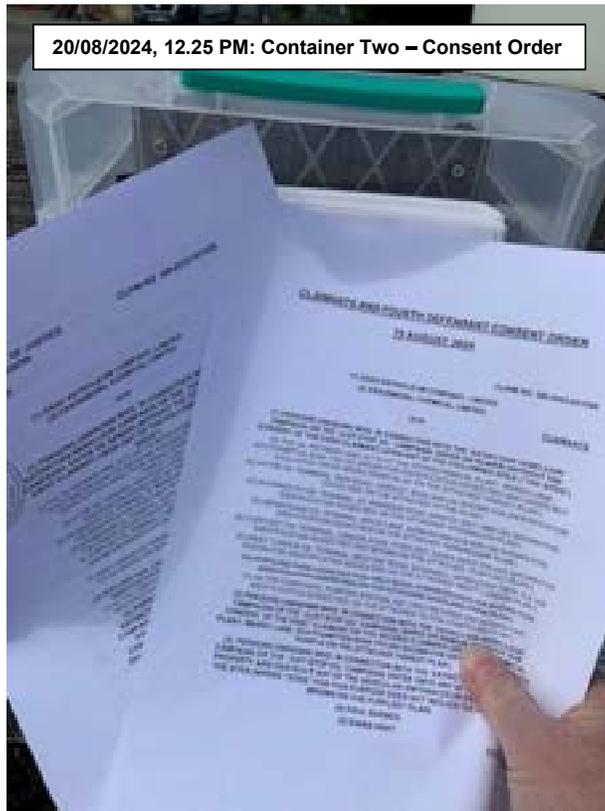


West London Oil Terminal, Middlesex

West London Location 1 – Attached to fence on the approach road to the terminal on the right-hand side of the entrance



West London Location 2 – Attached to fence on the approach road to the terminal on the left-hand side of the entrance



From: Scott Speirs  
Sent: 19 August 2024 15:11  
To: Extinction Rebellion; xr-legal@riseup.net  
Cc: Holly Stebbing  
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098-Documents.pdf

---

To whom it may concern

**Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown**

**Provision of Consent Order sealed 15 August 2024**

Please find attached the consent order between the Claimants and Fourth Defendant which has been sealed by the court. This is being provided to you by way of service as a Defendant in the case.

Further copies of the Consent Order may be obtained from Norton Rose Fulbright LLP, at the address stated below, or by emailing [ExxonMobil.Service@nortonrosefulbright.com](mailto:ExxonMobil.Service@nortonrosefulbright.com). A copy of the Consent Order may also be viewed at <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>.

Yours faithfully  
Norton Rose Fulbright LLP

**Scott Speirs** | Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
[scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

From: Scott Speirs  
Sent: 19 August 2024 15:10  
To: juststopoilpress@protonmail.com  
Cc: Holly Stebbing  
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098-Documents.pdf

---

To whom it may concern

**Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown**

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Yours faithfully  
Norton Rose Fulbright LLP

**Scott Speirs** | Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
[scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

From: Microsoft Outlook  
Sent: 19 August 2024 15:10  
To: juststopoilpress@protonmail.com  
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com) ([juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com))

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

From: Microsoft Outlook  
Sent: 19 August 2024 15:11  
To: Extinction Rebellion; xr-legal@riseup.net  
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Extinction Rebellion \(enquiries@extinctionrebellion.uk\)](mailto:enquiries@extinctionrebellion.uk)

[xr-legal@riseup.net \(xr-legal@riseup.net\)](mailto:xr-legal@riseup.net)

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

From: Extinction Rebellion <enquiries@extinctionrebellion.uk>  
Sent: 19 August 2024 15:12  
To: Scott Speirs  
Subject: Message Received - QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

---

**[External Email – Use Caution]**

Hello Scott Speirs,

This is an automated reply to let you know we received your message.

It'll be read - usually within 24 hours - and we'll send you a personal reply, or forward it to an appropriate person within Extinction Rebellion.

To view the status of the ticket or to add comments, you can visit <https://risingup.freshdesk.com/helpdesk/tickets/47060>

Thank you for contacting us,  
With Love & Kindness from

The XR Public Engagement Working Group

[Extinction Rebellion UK - General Enquiries powered by Freshworks](#) ..

From: xr-legal@riseup.net  
Sent: 19 August 2024 15:12  
To: Scott Speirs  
Subject: Autoreply for XR Legal Support

---

[External Email – Use Caution]

Hi there,

Thanks for getting in touch with the XR Legal Support Team.

We have received your email and are working on getting a response to you ASAP! We are currently quite low in capacity and so our response to your email(s) might be delayed.

If you don't hear from us within two weeks, please email back and we will do our best to get to you sooner.

In the meantime, please have a look at our website (<https://www.informeddissent.info>), as this may have information to answer your questions.

If your email is related to an upcoming court appearance, we will prioritise your email and get a response to you ASAP. Please also email the XR Arrest Welfare Team ([XR-ArrestWelfare@protonmail.com](mailto:XR-ArrestWelfare@protonmail.com)) with the details of your court date.

If your email is related to trainings run by our team, see our Trainings Calendar for details about upcoming Trainings. This can be accessed at this link: <https://teamup.com/ksqtxh86ftomucpgu>

During Rebellions, where you need an urgent response or if someone has been arrested at an action you are at, please call the XR Legal Back Office on 07749 335574 and we will deal with your query that way.

In Solidarity,  
XR Legal Support Team

From: Scott Speirs  
Sent: 15 August 2024 16:17  
To: PBHPXR  
Cc: Holly Stebbing  
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098-Documents.pdf

---

Dear Paul

Thank you for the below.

Please find attached by way service the sealed consent order.

Yours sincerely  
Norton Rose Fulbright

**Scott Speirs** | Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com  
**NORTON ROSE FULBRIGHT**  
*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

---

**From:** PBHPXR  
**Sent:** 26 July 2024 08:52  
**To:** Scott Speirs  
**Cc:** Holly Stebbing  
**Subject:** RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

Hi,

Please see attached 'Undertaking'.

Paul Barnes

Sent with [Proton Mail](#) secure email.

On Thursday, 25 July 2024 at 11:35, Scott Speirs <[Scott.Speirs@nortonrosefulbright.com](mailto:Scott.Speirs@nortonrosefulbright.com)> wrote:

Dear Paul

Thank you for agreeing. We would be grateful if you would sign and return the attached undertaking. Should you agree the attached, we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

Please note, pursuant to paragraph 2 of the attached undertaking, we will be able to serve you with bundles by email or by email referencing the ExxonMobil website when the Court requires us to serve documents on you.

Yours sincerely  
Norton Rose Fulbright

**Scott Speirs** | Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom

HS5/133

From: Scott Speirs  
Sent: 19 August 2024 15:08  
To: Diana Hekt  
Cc: Holly Stebbing  
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098-Documents.pdf

---

Dear Diana

Please find attached the consent order between the Claimants and Fourth Defendant which has been sealed by the court. This is being provided to you by way of service as a Defendant in the case.

Yours sincerely  
Norton Rose Fulbright

**Scott Speirs** | Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com

**NORTON ROSE FULBRIGHT**

*Law around the world*

[nortonrosefulbright.com](http://nortonrosefulbright.com)

From: Microsoft Outlook  
Sent: 19 August 2024 15:09  
To: Diana Hekt  
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Diana Hekt \(hekt@outlook.com\)](mailto:hekt@outlook.com)

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

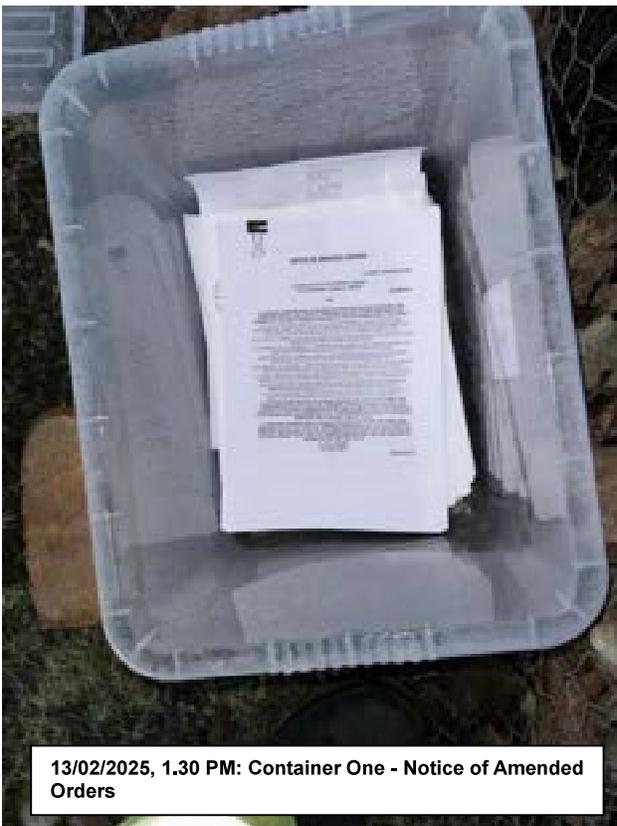
**Evidence of Service – Notice of Amended Orders & Amended Warning Notices**

**Alton Compound, Pumping Station**

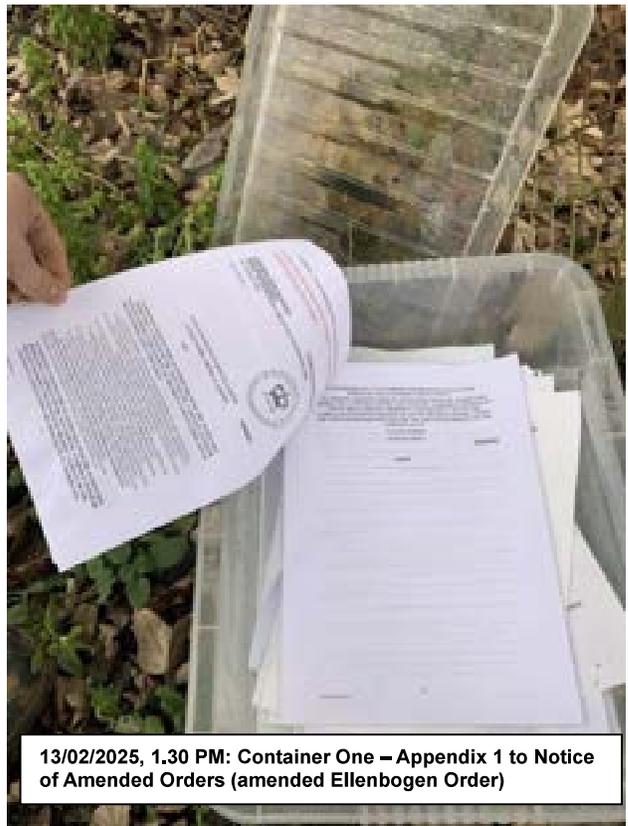
**Alton Location 1 – Outside main entrance gate to left-hand side**



**13/02/2025, 1.30 PM: Amended Warning Notice One & Container One with Notice of Amended Orders**

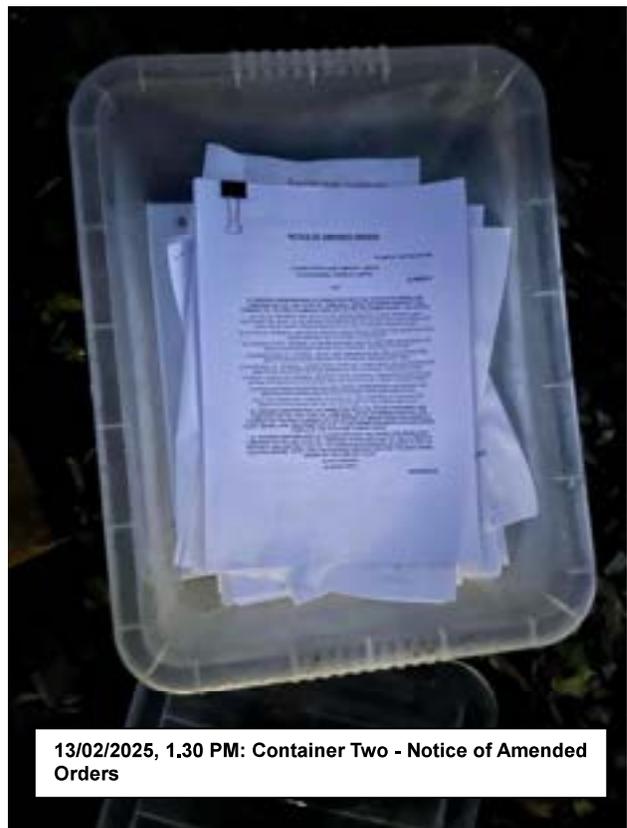


**13/02/2025, 1.30 PM: Container One - Notice of Amended Orders**



**13/02/2025, 1.30 PM: Container One – Appendix 1 to Notice of Amended Orders (amended Ellenbogen Order)**

**Alton Location 2 – Back exit gate on the left-hand side**



**Alton Location 3 – Transformer end vehicle gates on the right-hand side**

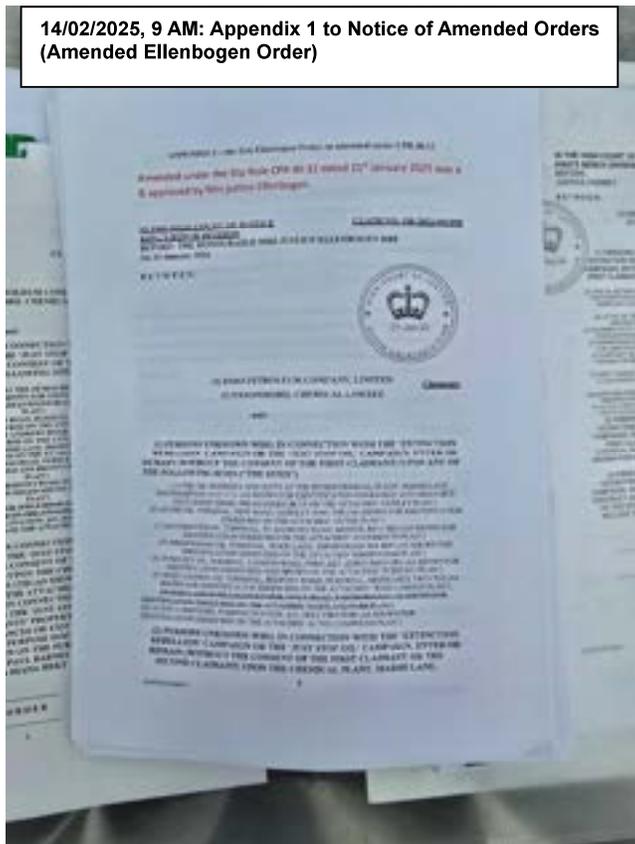
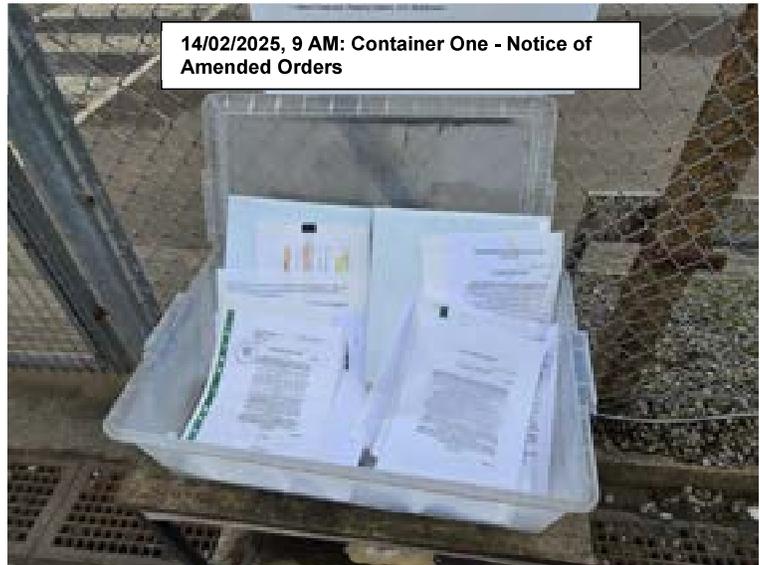


**Alton Location 4 – Side gate on the left-hand side of the main entrance gate**

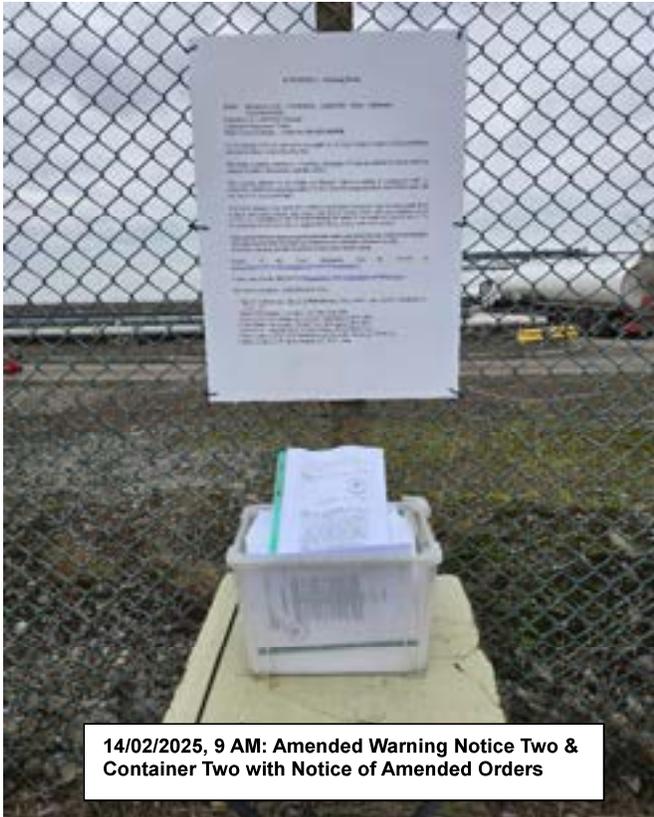


Avonmouth Oil Terminal

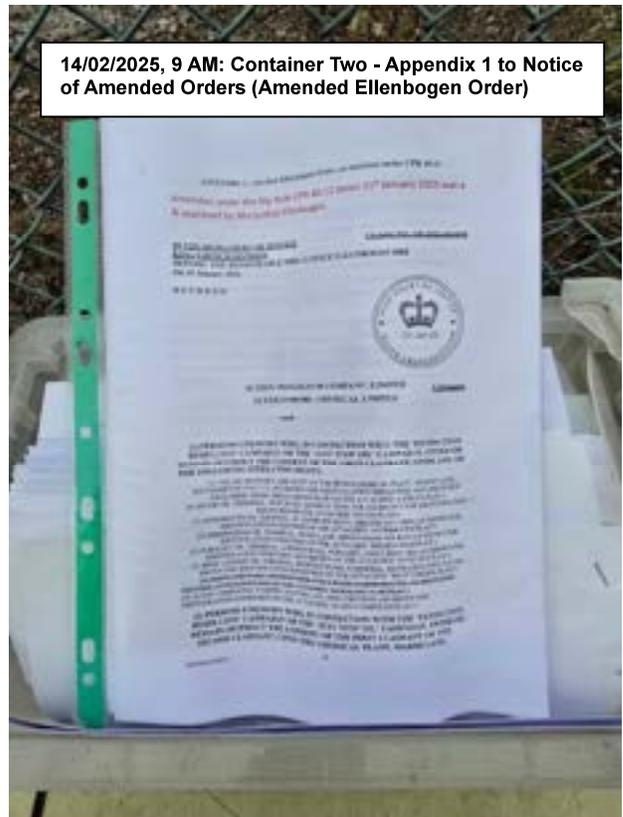
Avonmouth Location 1 – By the pedestrian gate entrance



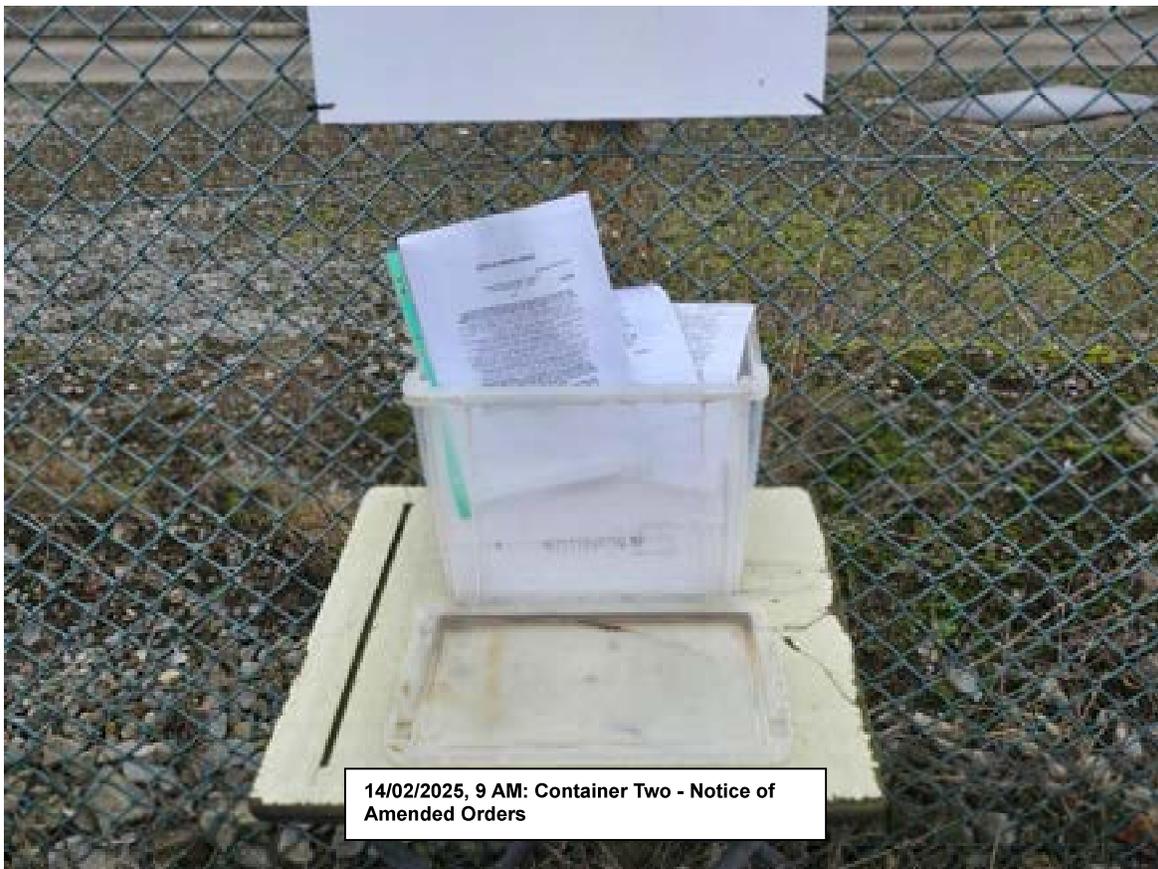
Avonmouth Location 2 – By the main vehicle entrance



14/02/2025, 9 AM: Amended Warning Notice Two & Container Two with Notice of Amended Orders



14/02/2025, 9 AM: Container Two - Appendix 1 to Notice of Amended Orders (Amended Ellenbogen Order)

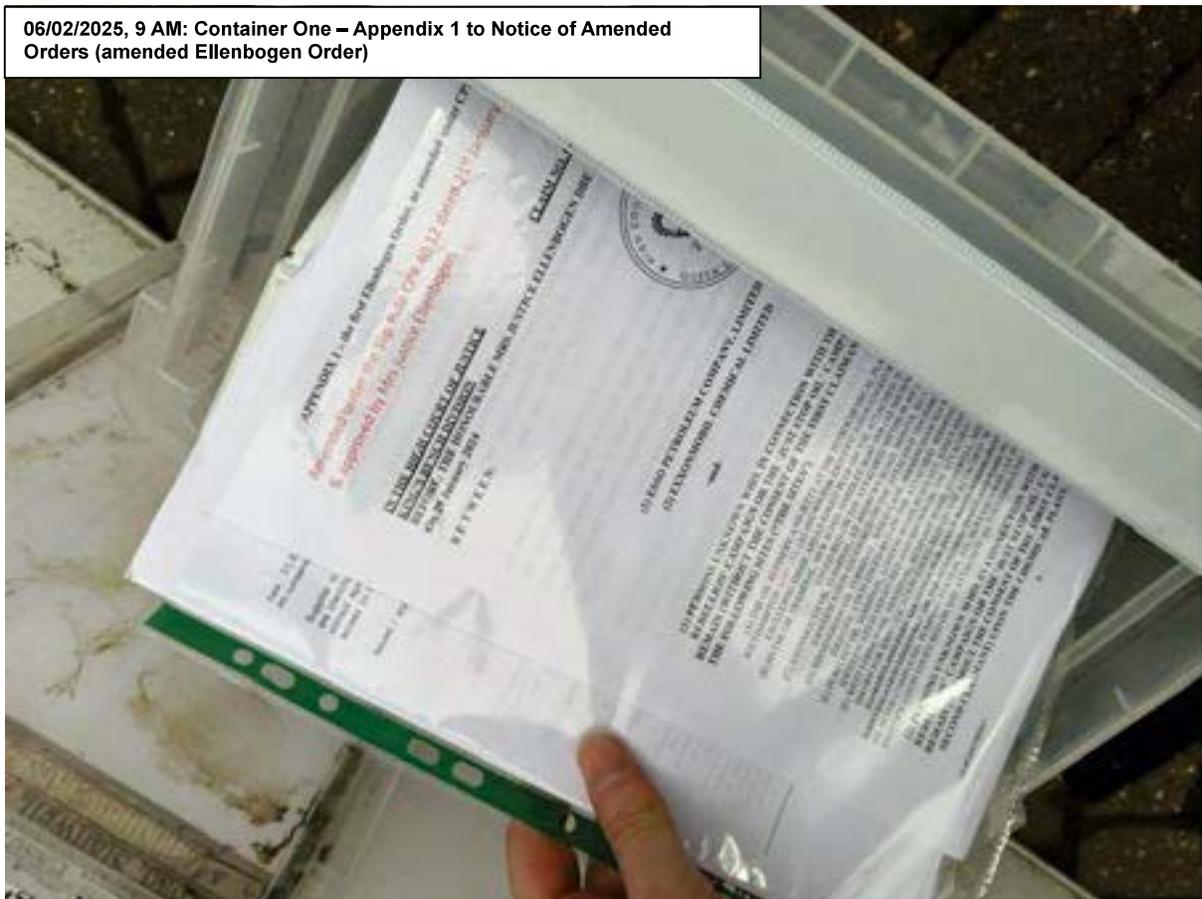


14/02/2025, 9 AM: Container Two - Notice of Amended Orders



Birmingham Oil Location

Birmingham Location 1 – Main pedestrian entrance for Esso building

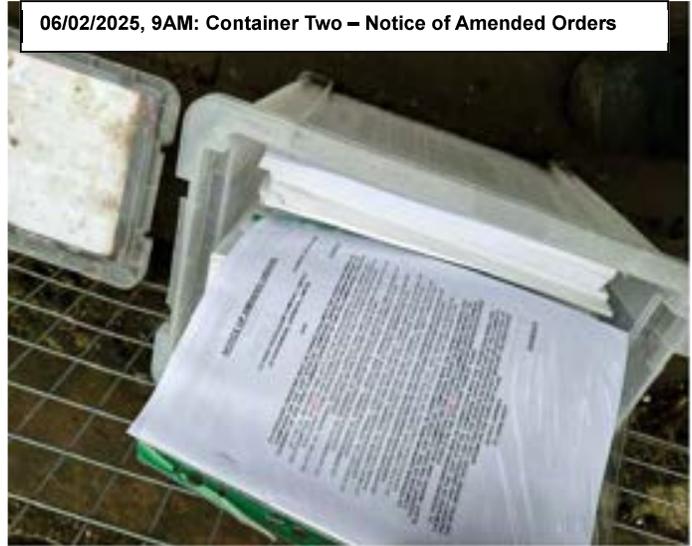


Birmingham Location 2 – Next to driver pedestrian turnstile

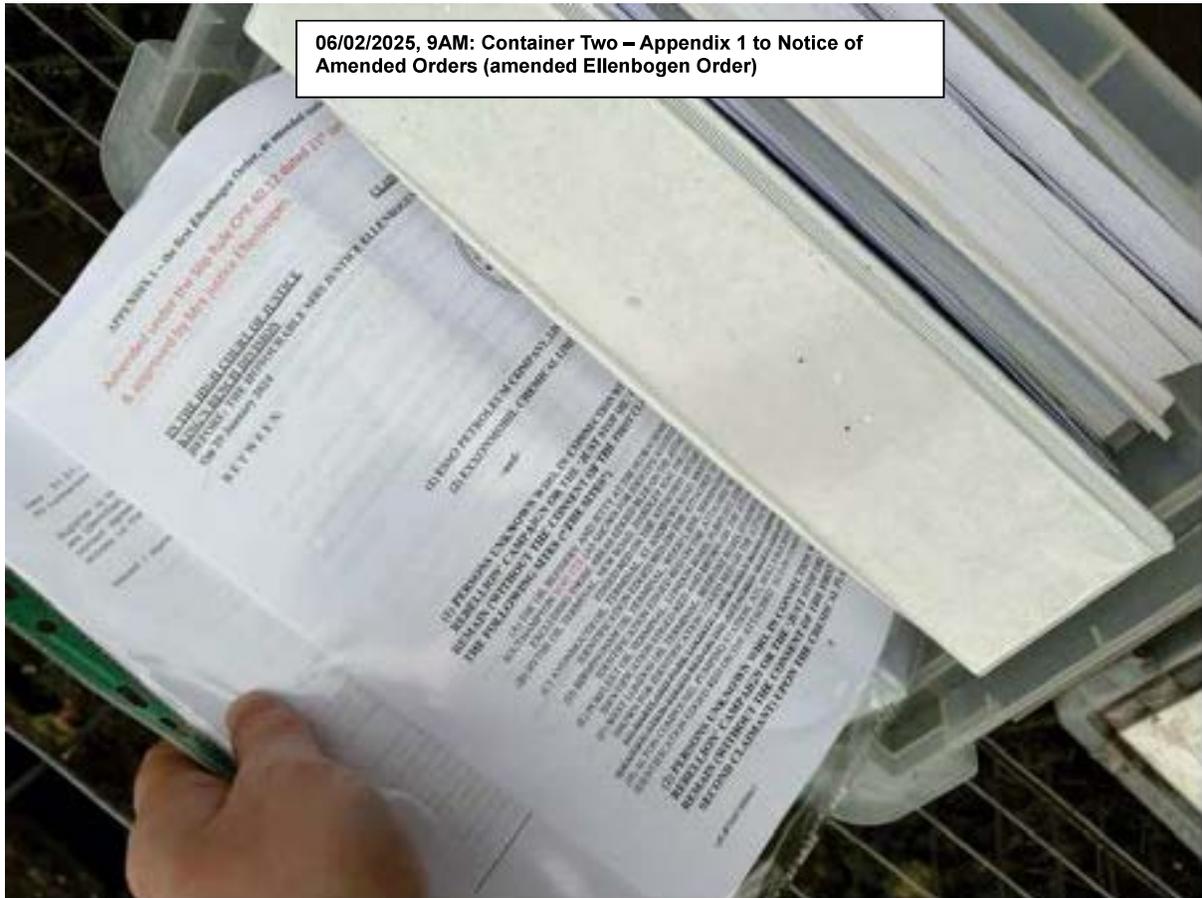
06/02/2025, 9 AM: Amended Warning Notice Two & Container Two with Notice of Amended Orders



06/02/2025, 9AM: Container Two – Notice of Amended Orders



06/02/2025, 9AM: Container Two – Appendix 1 to Notice of Amended Orders (amended Ellenbogen Order)



**Birmingham Location 3 – Wests side of the entrance roundabout**

06/02/2025, 9 AM: Amended Warning Notice Three



**Birmingham Location 4 – East side of the entrance roundabout**

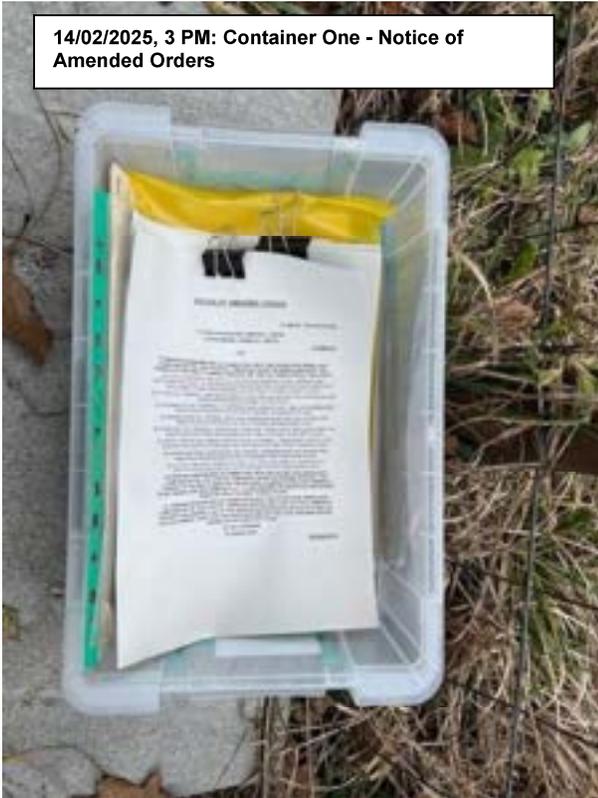
06/02/2025, 9 AM: Amended Warning Notice Four



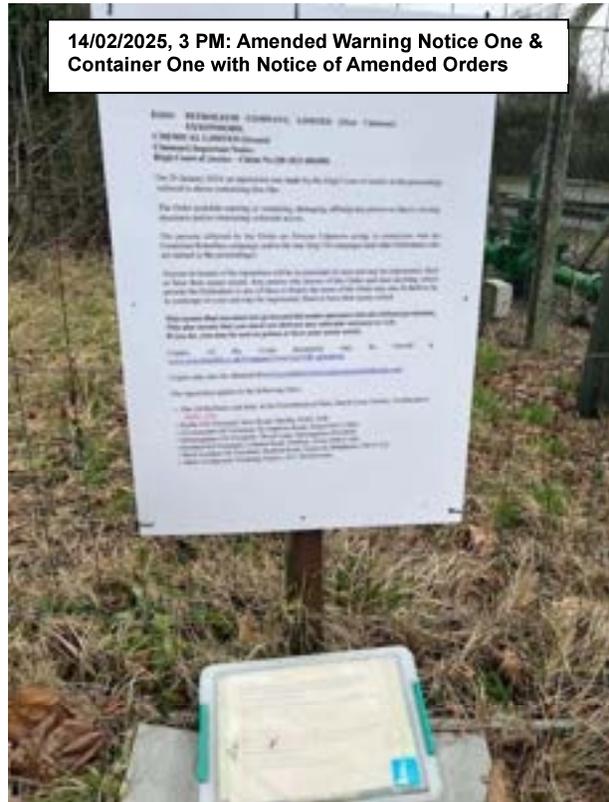
The Oil Refinery and Jetty at the Petrochemical Plant, Fawley

Fawley Location 1 – Left hand side of fence on land boundary between public highway (Cadland Road) and ExxonMobil property

14/02/2025, 3 PM: Container One - Notice of Amended Orders



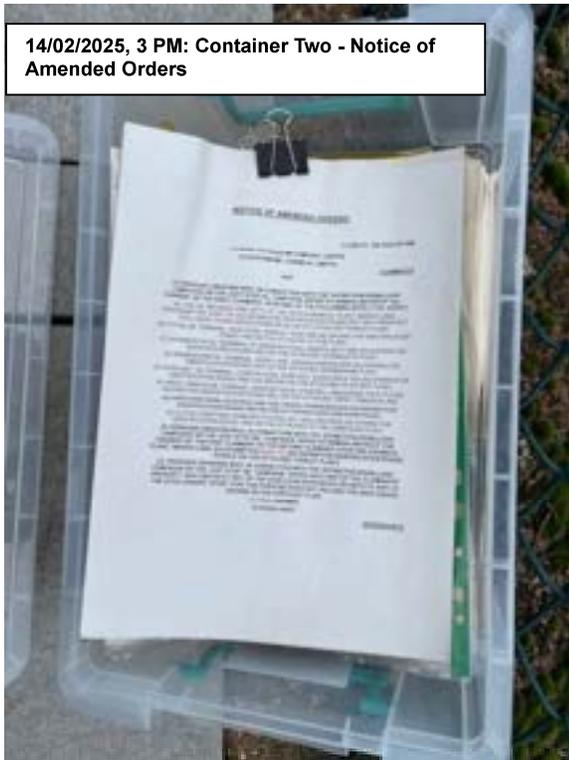
14/02/2025, 3 PM: Amended Warning Notice One & Container One with Notice of Amended Orders



14/02/2025, 3 PM: Container One - Appendix 1 to Notice of Amended Orders (amended Ellenbogen Order)



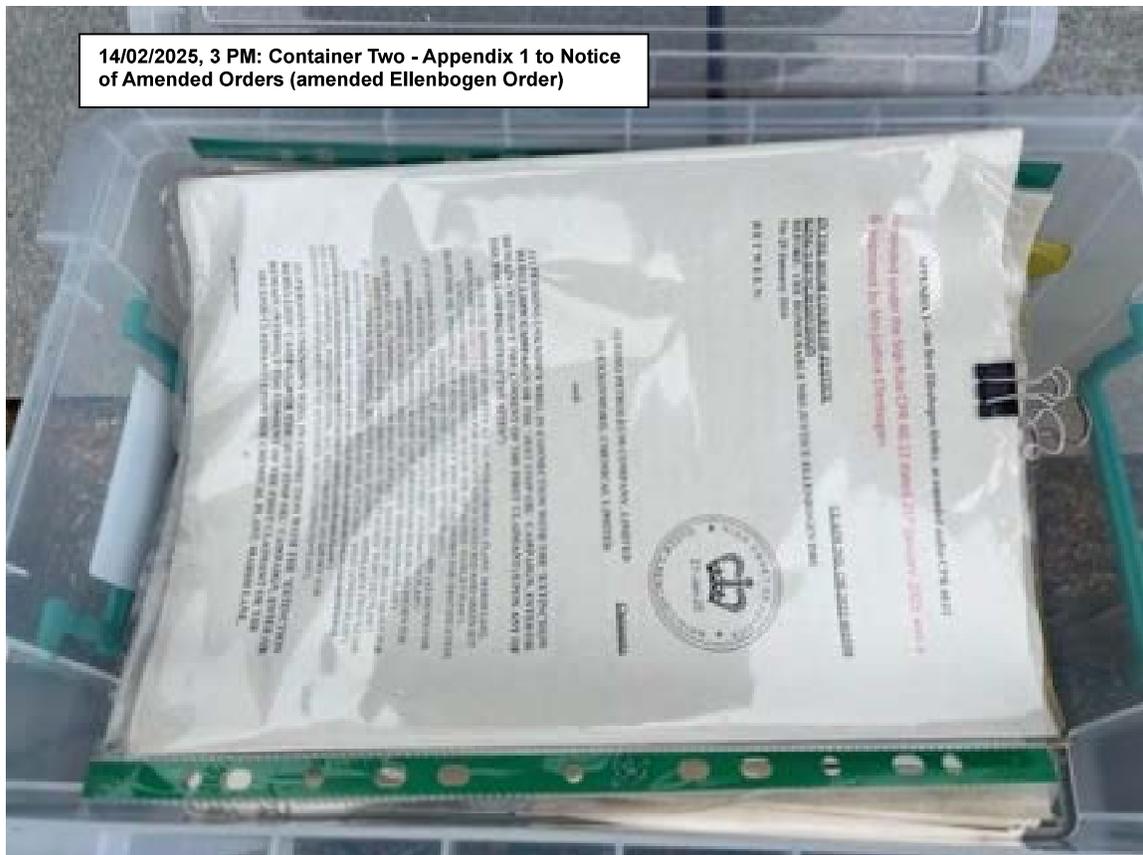
Fawley Location 2 – On left hand side perimeter fence at the end of Marsh Lane adjacent to gate 2 and admin entrance



14/02/2025, 3 PM: Container Two - Notice of Amended Orders



14/02/2025, 3 PM: Amended Warning Notice Two & Container Two with Notice of Amended Orders



14/02/2025, 3 PM: Container Two - Appendix 1 to Notice of Amended Orders (amended Ellenbogen Order)

**Fawley Location 3 – At wide-load gate entrance on right-hand side of site perimeter fence inside outer screening fence**



14/02/2025, 3 PM: Amended Warning Notice Three



14/02/2025, 3 PM: Amended Warning Notice Three

**Fawley Location 4 – Right-hand side of the refinery gate 3 entrance turnstiles**



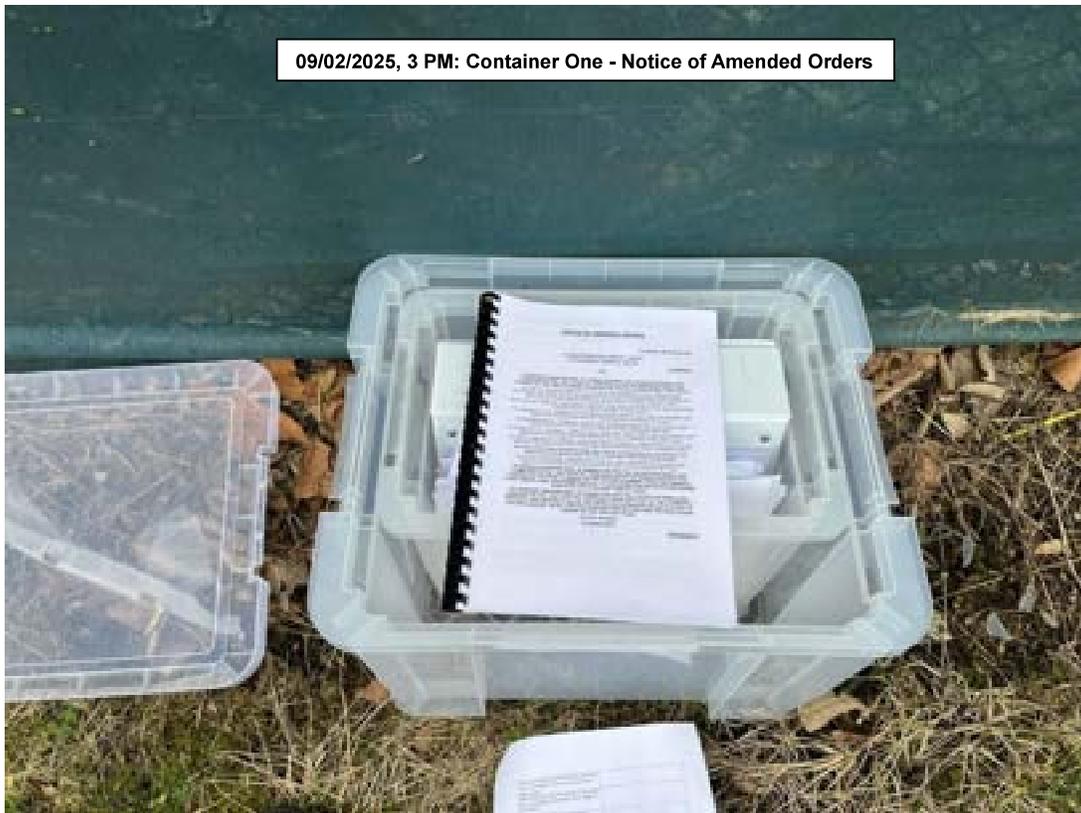
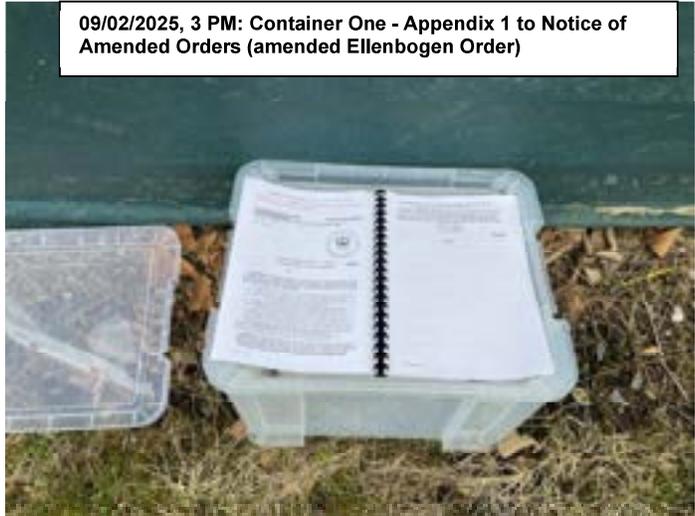
14/02/2025, 3 PM: Amended Warning Notice Four



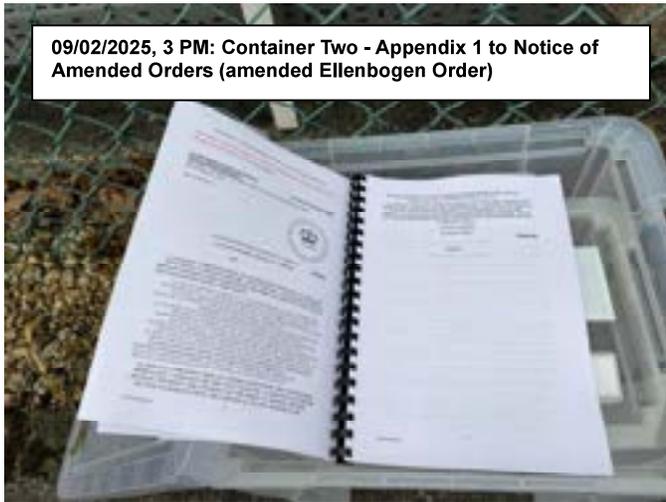
14/02/2025, 3 PM: Amended Warning Notice Four

Hythe Oil Terminal

Hythe Location 1 – On outside of fence, next to footpath from lower carpark up towards terminal entrance



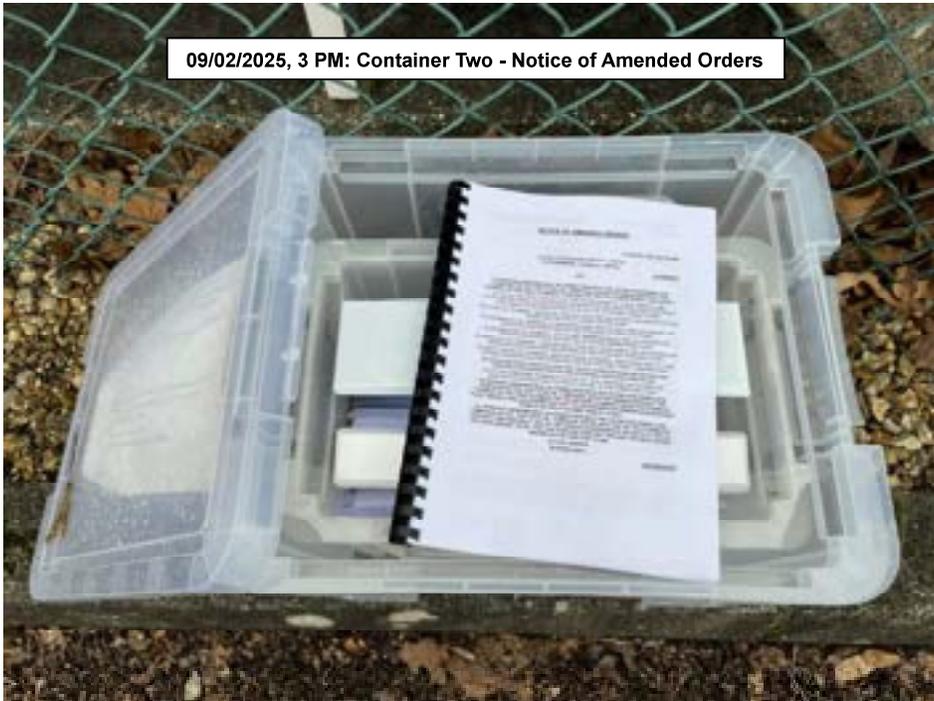
Hythe Location 2 – On outside of fence in top carpark, next to south emergency access gate



09/02/2025, 3 PM: Container Two - Appendix 1 to Notice of Amended Orders (amended Ellenbogen Order)

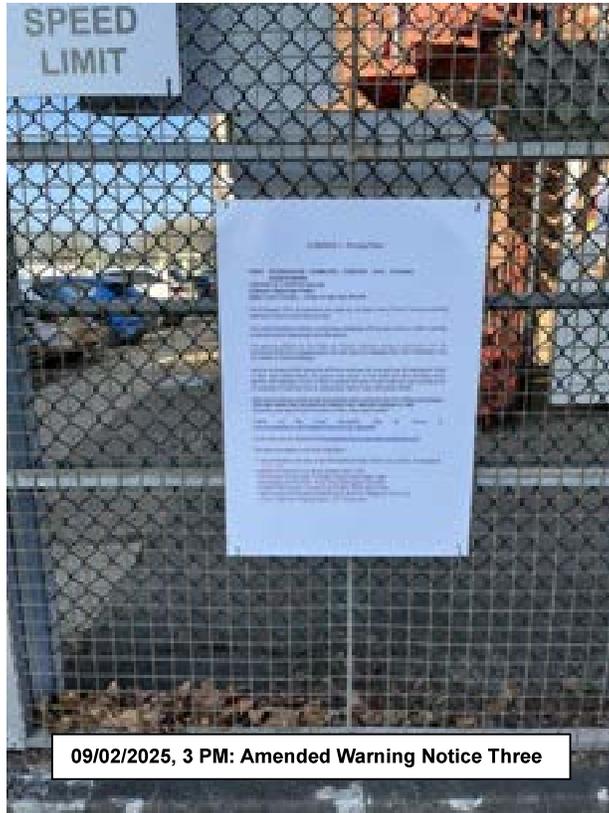


09/02/2025, 3 PM: Amended Warning Notice Two & Container Two with Notice of Amended Orders



09/02/2025, 3 PM: Container Two - Notice of Amended Orders

**Hythe Location 3 – On outside of main terminal entrance gate**



09/02/2025, 3 PM: Amended Warning Notice Three

**Hythe Location 4 – On outside of fence, next to north emergency access gate**

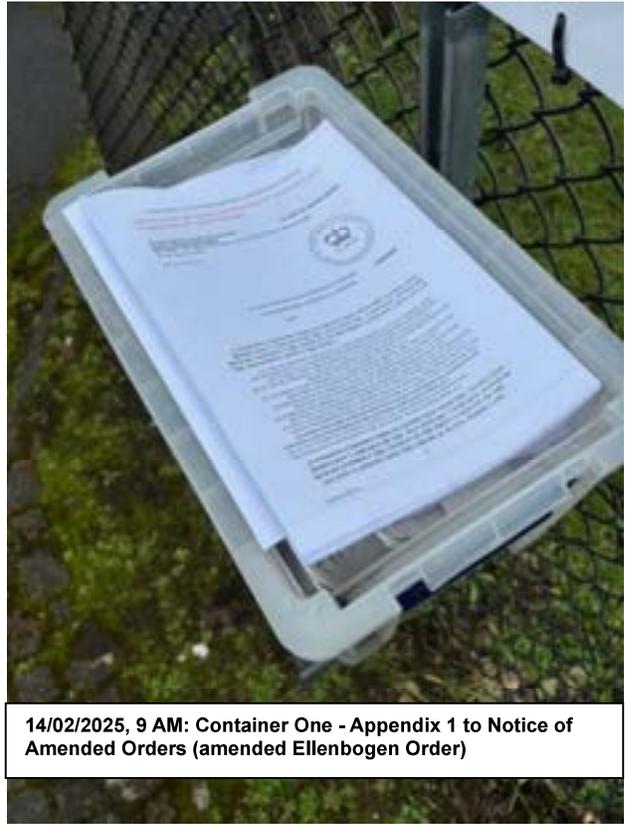
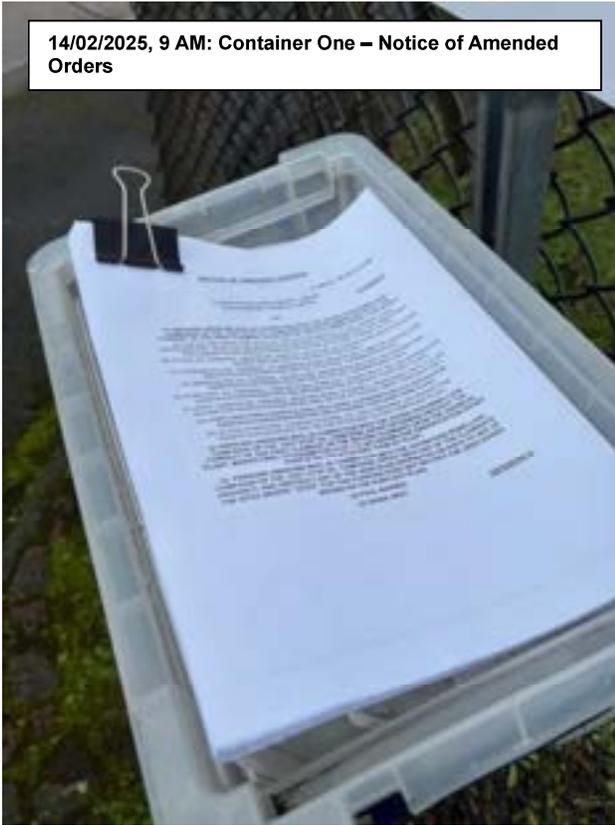


09/02/2025, 3 PM: Amended Warning Notice Four

Purfleet Oil Terminal

Purfleet Location 1 – Attached to fence on exit from terminal

14/02/2025, 9 AM: Container One – Notice of Amended Orders



14/02/2025, 9 AM: Container One - Appendix 1 to Notice of Amended Orders (amended Ellenbogen Order)



14/02/2025, 9 AM: Amended Warning Notice One & Container Two with Notice of Amended Orders



14/02/2025, 9 AM: Amended Warning Notice One

**Purfleet Location 2 - Attached to fence on entrance to terminal**

**14/02/2025, 9 AM: Container Two - Notice of Amended Orders**



**14/02/2025, 9 AM: Container Two - Appendix 1 to Notice of Amended Orders (amended Ellenbogen Order)**



**14/02/2025, 9 AM: Amended Warning Notice Two & Container Two with Notice of Amended Orders**



Purfleet Location 3 – Canteen gate entrance to tank farm



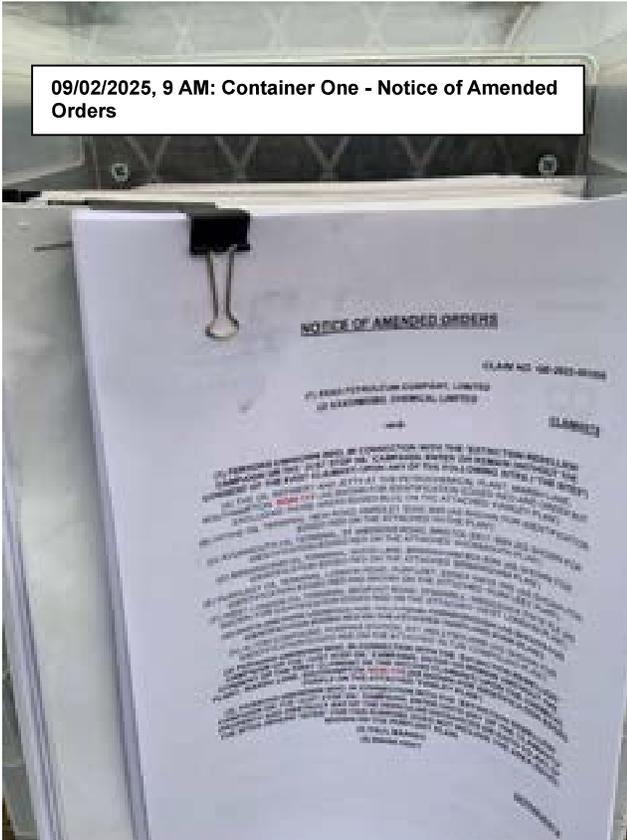
Purfleet Location 4 – Jetty gate, access to tank farm from footpath at southside of site



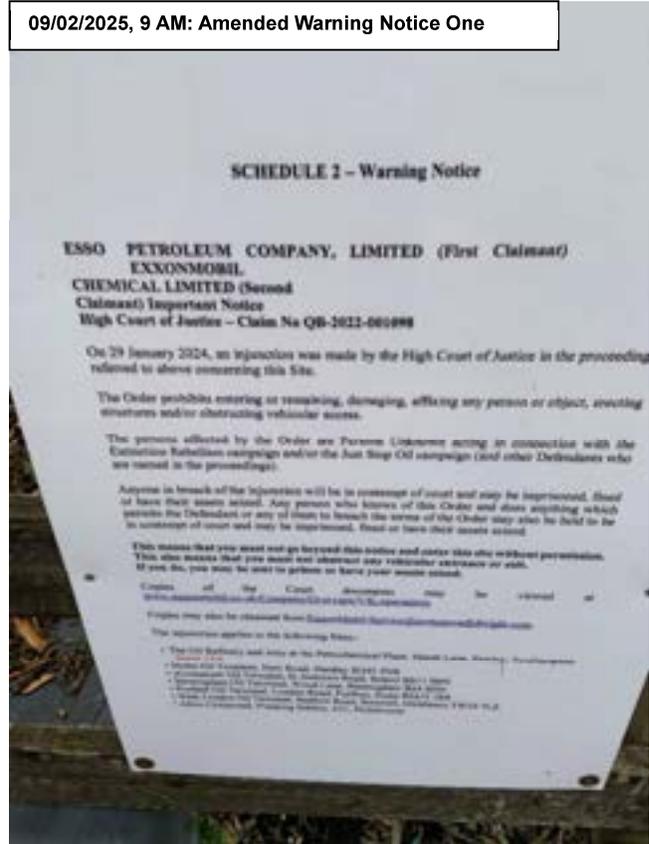
West London Oil Terminal

West London Location 1 – Attached to fence on the approach road to the terminal on the right-hand side of the entrance

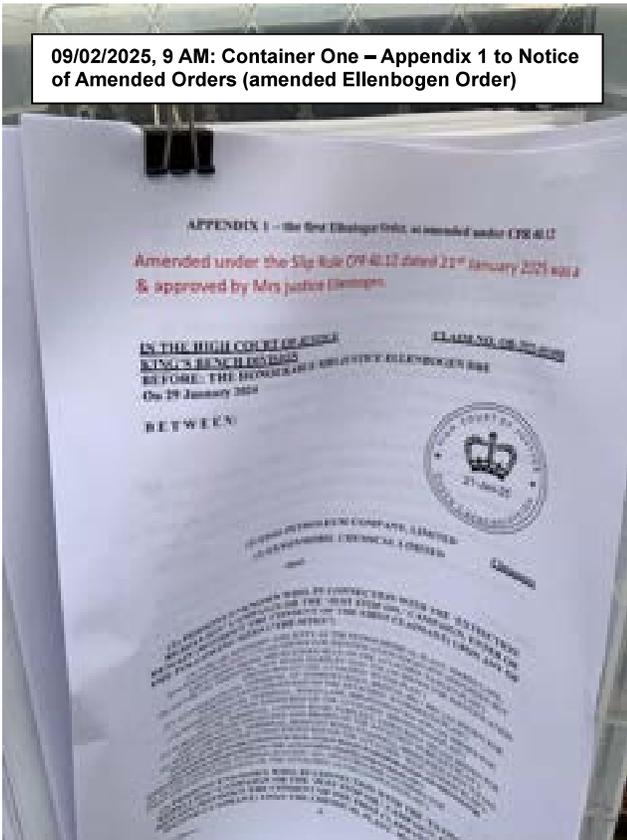
09/02/2025, 9 AM: Container One - Notice of Amended Orders



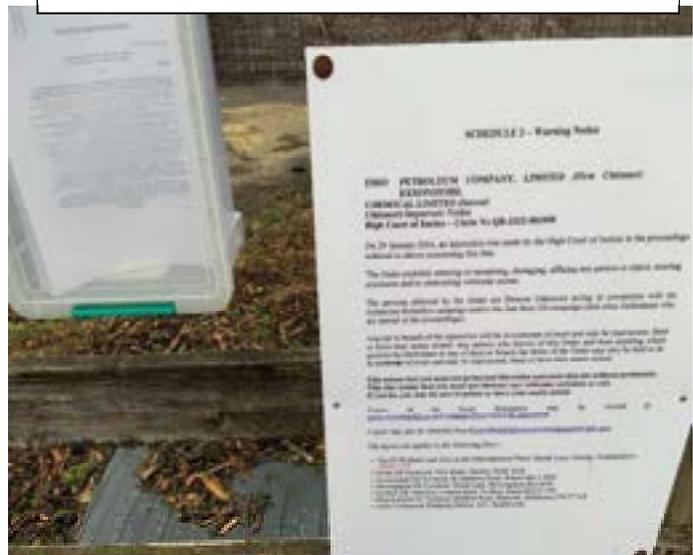
09/02/2025, 9 AM: Amended Warning Notice One



09/02/2025, 9 AM: Container One – Appendix 1 to Notice of Amended Orders (amended Ellenbogen Order)

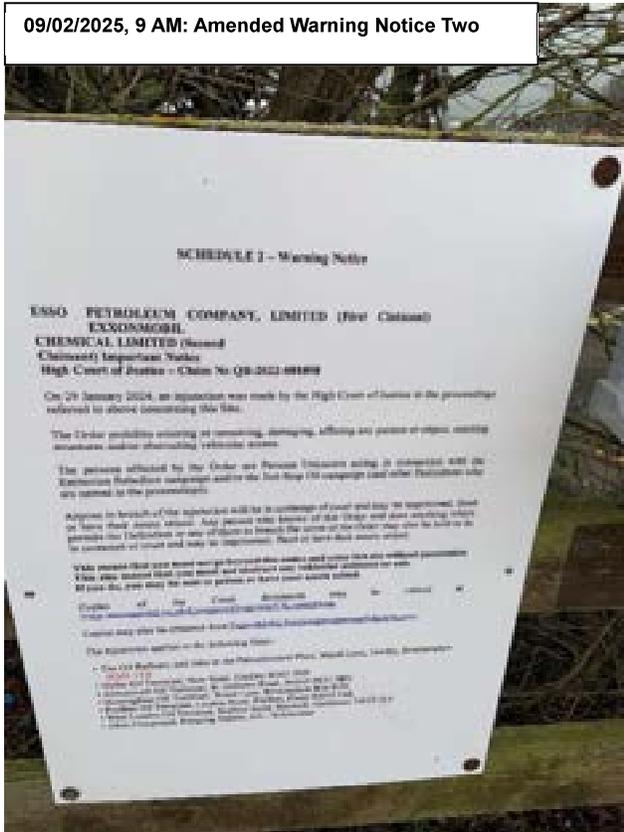


09/02/2025, 9 AM: Amended Warning Notice One & Container One with Notice of Amended Orders



West London Location 2 – Attached to fence on the approach road to the terminal on the left-hand side of the entrance

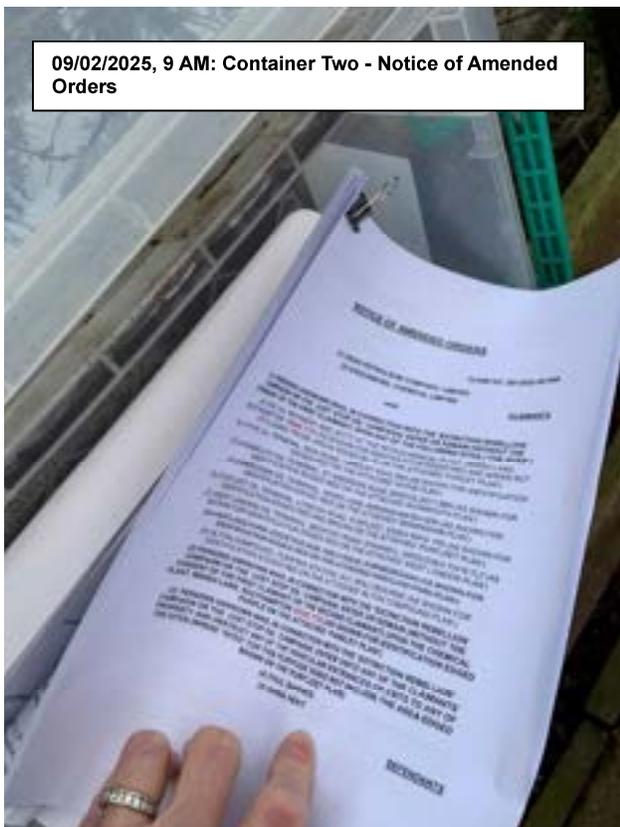
09/02/2025, 9 AM: Amended Warning Notice Two



09/02/2025, 9 AM: Amended Warning Notice Two & Container Two with Notice of Amended Orders



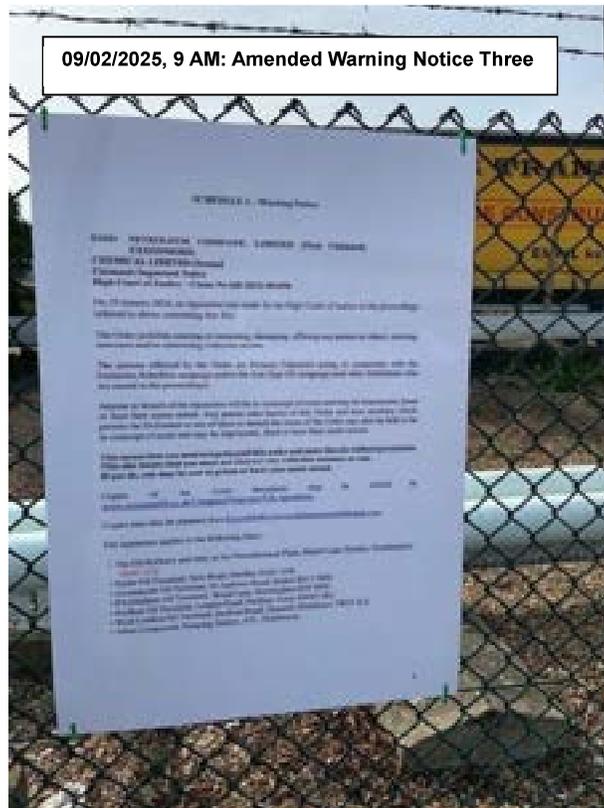
09/02/2025, 9 AM: Container Two - Notice of Amended Orders



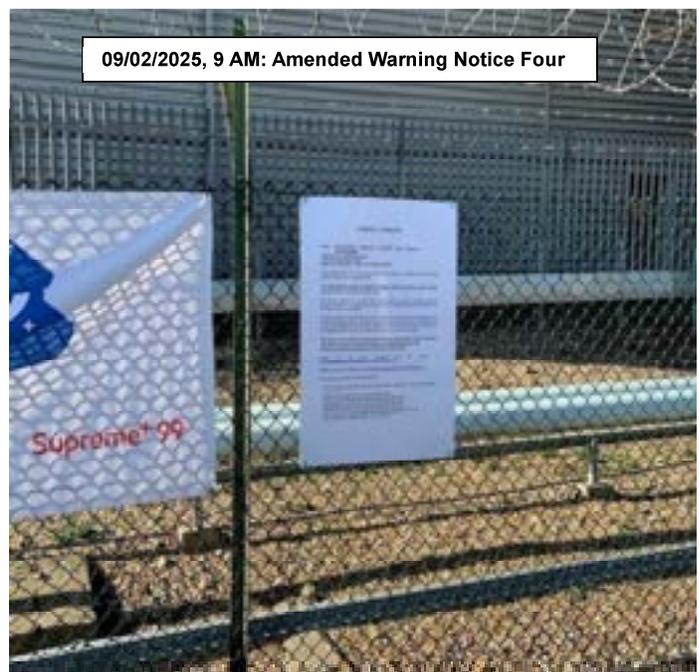
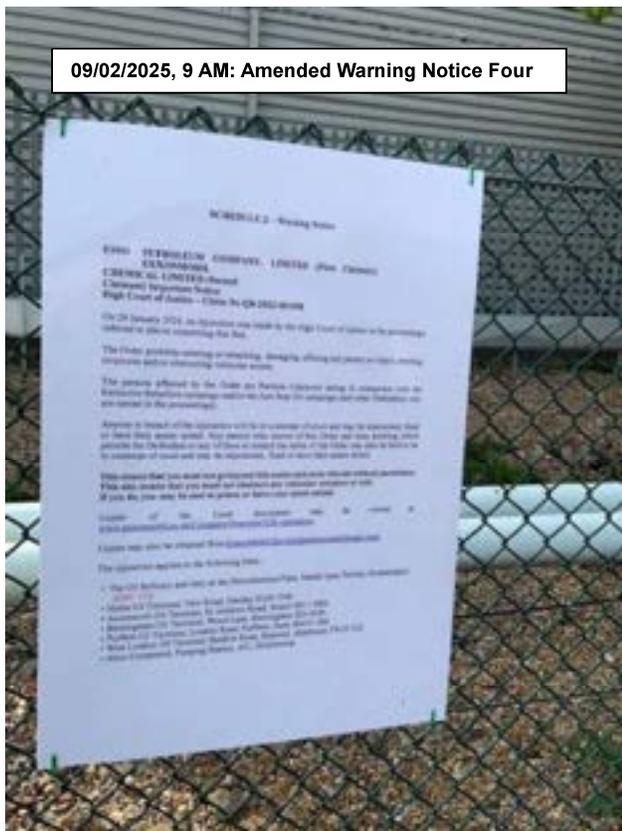
09/02/2025, 9 AM: Container Two – Appendix 1 to Notice of Amended Orders (amended Ellenbogen Order)



West London Location 3 – Sign on right-hand fence further up the entrance road to the site just opposite the pedestrian walkway and car park



West London Location 4 – On the right-hand fence just before the gatehouse entrance to site



From: Eleanor Clotworthy  
Sent: 10 February 2025 18:43  
To: juststopoilpress@protonmail.com  
Cc: Holly Stebbing; Madeline Hallwright  
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: 2025.01.21 - Sealed Ellenbogen Order (Slip Rule Amend to Fawley postcode).pdf; 2025.01.21 - Sealed Farbey Order (Slip Rule Amend to Fawley postcode).pdf; 2025.01.28 - Sealed Tipples Order (Slip Rule Amend to Fawley postcode).pdf; QB-2022-001098 - Claimant's without notice application dated 13 December 2024.pdf

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To whom it may concern

We enclose, by way of service:

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

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

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

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

Yours faithfully

**Norton Rose Fulbright LLP**

Norton Rose Fulbright LLP  
3 More London Riverside, London, SE1 2AQ, United Kingdom  
Tel [+44 20 7444 5899](tel:+442074445899) | Fax [+44 20 7283 6500](tel:+442072836500)  
[eleanor.clotworthy@nortonrosefulbright.com](mailto:eleanor.clotworthy@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

From: Eleanor Clotworthy  
Sent: 10 February 2025 18:41  
To: enquiries@extinctionrebellion.uk; xr-legal@riseup.net  
Cc: Holly Stebbing; Madeline Hallwright  
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: 2025.01.21 - Sealed Ellenbogen Order (Slip Rule Amend to Fawley postcode).pdf; 2025.01.21 - Sealed Farbey Order (Slip Rule Amend to Fawley postcode).pdf; 2025.01.28 - Sealed Tipples Order (Slip Rule Amend to Fawley postcode).pdf; QB-2022-001098 - Claimant's without notice application dated 13 December 2024.pdf

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Yours faithfully

**Norton Rose Fulbright LLP**

Norton Rose Fulbright LLP  
3 More London Riverside, London, SE1 2AQ, United Kingdom  
Tel +44 20 7444 5899 | Fax +44 20 7283 6500  
[eleanor.clotworthy@nortonrosefulbright.com](mailto:eleanor.clotworthy@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

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[nortonrosefulbright.com](http://nortonrosefulbright.com)

From: Microsoft Outlook  
Sent: 10 February 2025 18:42  
To: enquiries@extinctionrebellion.uk; xr-legal@riseup.net  
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk) ([enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk))

[xr-legal@riseup.net](mailto:xr-legal@riseup.net) ([xr-legal@riseup.net](mailto:xr-legal@riseup.net))

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

From: Microsoft Outlook  
Sent: 10 February 2025 18:43  
To: juststopoilpress@protonmail.com  
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com) ([juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com))

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

From: Extinction Rebellion <enquiries@extinctionrebellion.uk>  
Sent: 10 February 2025 18:43  
To: Eleanor Clotworthy  
Subject: Message Received - QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

---

**External Email - Use Caution**

Hello Eleanor Clotworthy,

This is an automated reply to let you know we received your message.

It'll be read - usually within 24 hours - and we'll send you a personal reply, or forward it to an appropriate person within Extinction Rebellion.

To view the status of the ticket or to add comments, you can visit <https://risingup.freshdesk.com/helpdesk/tickets/47673>

Thank you for contacting us,  
With Love & Kindness from

The XR Public Engagement Working Group

[Extinction Rebellion UK - General Enquiries powered by Freshworks](#)

From: xr-legal@riseup.net  
Sent: 10 February 2025 18:43  
To: Eleanor Clotworthy  
Subject: Autoreply for XR Legal Support

---

External Email - Use Caution

Hi there,

Thanks for getting in touch with the XR Legal Support Team.

We have received your email and are working on getting a response to you ASAP! We are currently quite low in capacity and so our response to your email(s) might be delayed.

If you don't hear from us within two weeks, please email back and we will do our best to get to you sooner.

In the meantime, please have a look at our website (<https://www.informeddissent.info>), as this may have information to answer your questions.

If your email is related to an upcoming court appearance, we will prioritise your email and get a response to you ASAP. Please also email the XR Arrest Welfare Team ([XR-ArrestWelfare@protonmail.com](mailto:XR-ArrestWelfare@protonmail.com)) with the details of your court date.

If your email is related to trainings run by our team, see our Trainings Calendar for details about upcoming Trainings. This can be accessed at this link: <https://teamup.com/ksqtxh86ftomucpgu>

During Rebellions, where you need an urgent response or if someone has been arrested at an action you are at, please call the XR Legal Back Office on 07749 335574 and we will deal with your query that way.

In Solidarity,  
XR Legal Support Team

From: Eleanor Clotworthy  
Sent: 10 February 2025 18:39  
To: hekt@outlook.com  
Cc: Holly Stebbing; Madeline Hallwright  
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: 2025.01.21 - Sealed Ellenbogen Order (Slip Rule Amend to Fawley postcode).pdf; 2025.01.28 - Sealed Tipples Order (Slip Rule Amend to Fawley postcode).pdf; 2025.01.21 - Sealed Farbey Order (Slip Rule Amend to Fawley postcode).pdf; QB-2022-001098 - Claimant's without notice application dated 13 December 2024.pdf

---

Dear Ms Hekt

We enclose, by way of service:

1. the amended orders of Mrs Justice Ellenbogen DBE dated 29 January 2024 (the **first Ellenbogen Order**), Mrs Justice Tipples DBE dated 10 July 2024 (the **Tipples Order**) and Mrs Justice Farbey DBE dated 15 August 2024 (the **Farbey Order**) (together, the **Orders**); and
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in relation to the Operating Sites injunction that the Claimants have sought and been granted against various Defendants connected to the Extinction Rebellion or Just Stop Oil campaigns with claim number QB-2022-001098.

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

Please note that, as you are not subject to the injunctions, no action is required of you. We are simply providing you with a copy of the Orders for your information, as we have been ordered to do so by the Court.

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

Yours faithfully

**Norton Rose Fulbright LLP**

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3 More London Riverside, London, SE1 2AQ, United Kingdom  
Tel [+44 20 7444 5899](tel:+442074445899) | Fax [+44 20 7283 6500](tel:+442072836500)  
[eleanor.clotworthy@nortonrosefulbright.com](mailto:eleanor.clotworthy@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

HS5/163

From: Eleanor Clotworthy  
Sent: 10 February 2025 18:36  
To: PBHPXR@protonmail.com  
Cc: Holly Stebbing; Madeline Hallwright  
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID1410257]  
Attachments: 2025.01.21 - Sealed Ellenbogen Order (Slip Rule Amend to Fawley postcode).pdf; 2025.01.21 - Sealed Farbey Order (Slip Rule Amend to Fawley postcode).pdf; 2025.01.28 - Sealed Tipples Order (Slip Rule Amend to Fawley postcode).pdf; QB-2022-001098 - Claimant's without notice application dated 13 December 2024.pdf

---

Dear Mr Barnes

We enclose, by way of service:

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**Norton Rose Fulbright LLP**

Norton Rose Fulbright LLP  
3 More London Riverside, London, SE1 2AQ, United Kingdom  
Tel +44 20 7444 5899 | Fax +44 20 7283 6500  
[eleanor.clotworthy@nortonrosefulbright.com](mailto:eleanor.clotworthy@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

From: Microsoft Outlook  
Sent: 10 February 2025 18:37  
To: PBHPXR@protonmail.com  
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID1410257]  
Attachments: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID1410257].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[PBHPXR@protonmail.com \(PBHPXR@protonmail.com\)](mailto:PBHPXR@protonmail.com)

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID1410257]

From: Microsoft Outlook  
Sent: 10 February 2025 18:39  
To: hekt@outlook.com  
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

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**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

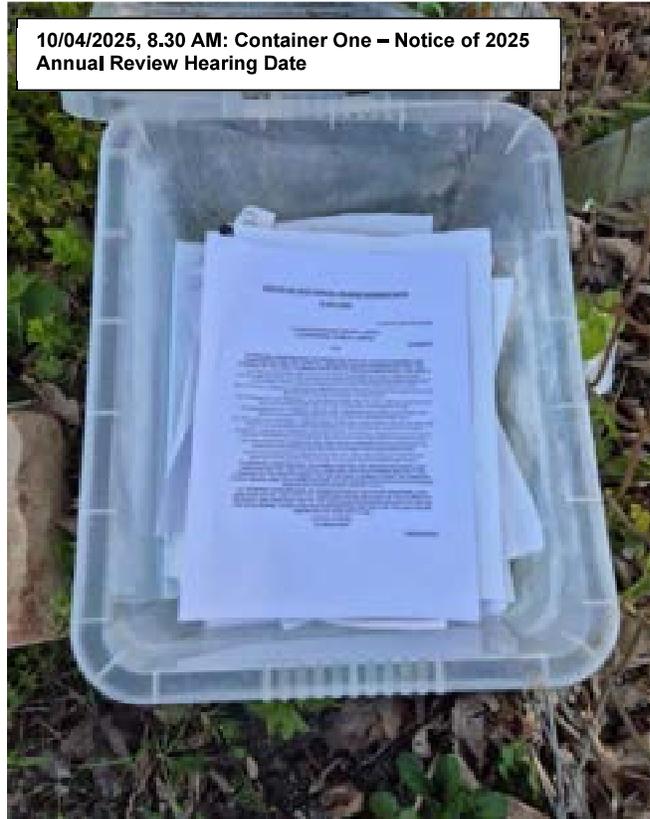
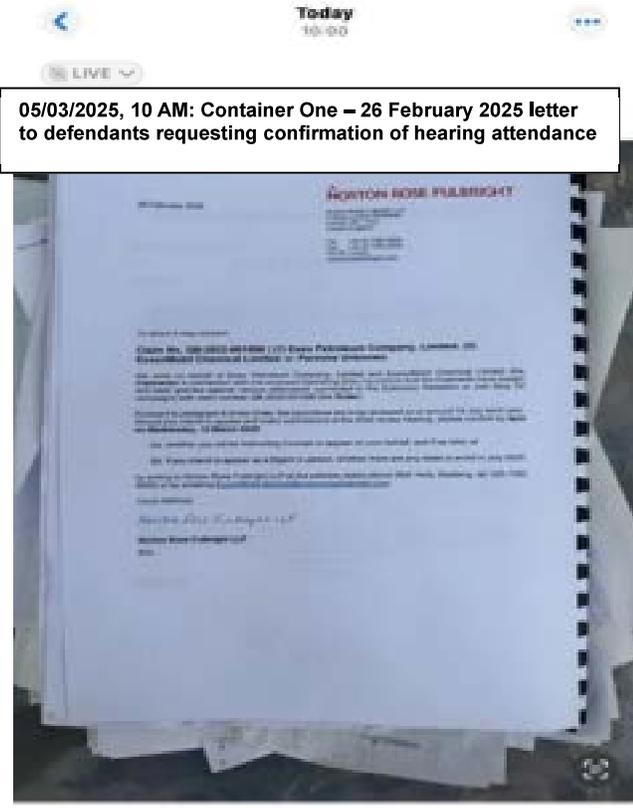
[hekt@outlook.com](mailto:hekt@outlook.com) ([hekt@outlook.com](mailto:hekt@outlook.com))

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

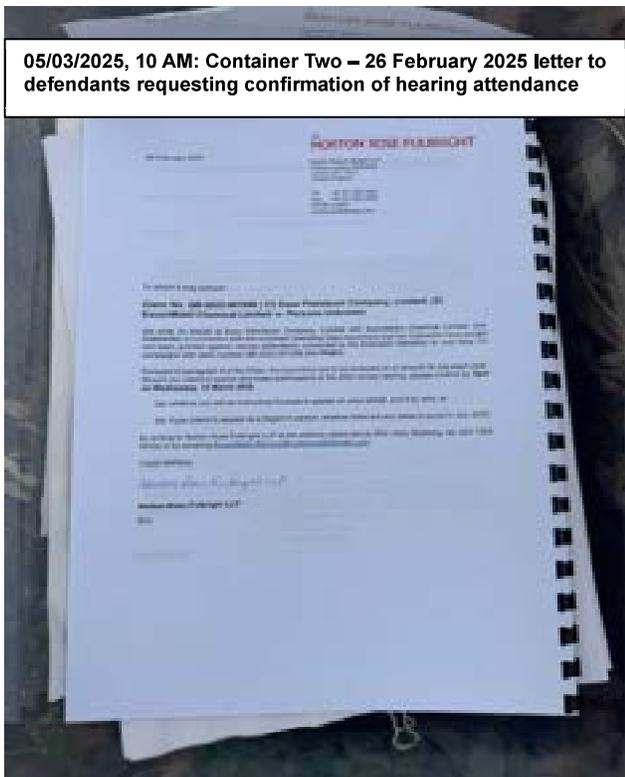
**Evidence of Service - Notice of 2025 Annual Review Hearing Date**

**Alton Compound, Pumping Station**

**Alton Location 1 – Outside main entrance gate to left-hand side**



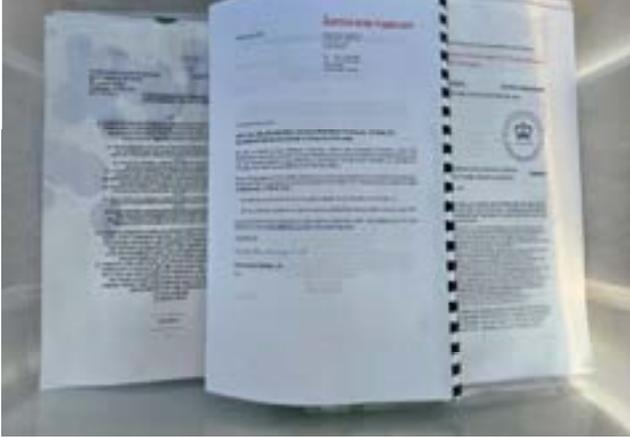
**Alton Location 2 – Back exit gate on the left-hand side**



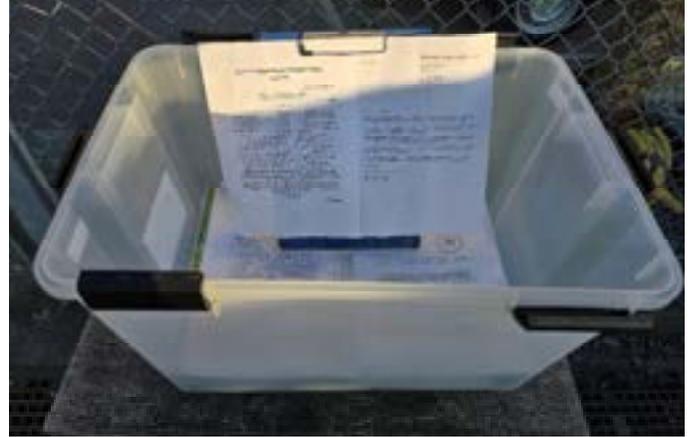
Avonmouth Oil Terminal

**Avonmouth Location 1 – By the pedestrian gate entrance**

06/03/2025, Container One: 26 February 2025 letter to defendants requesting confirmation of hearing attendance

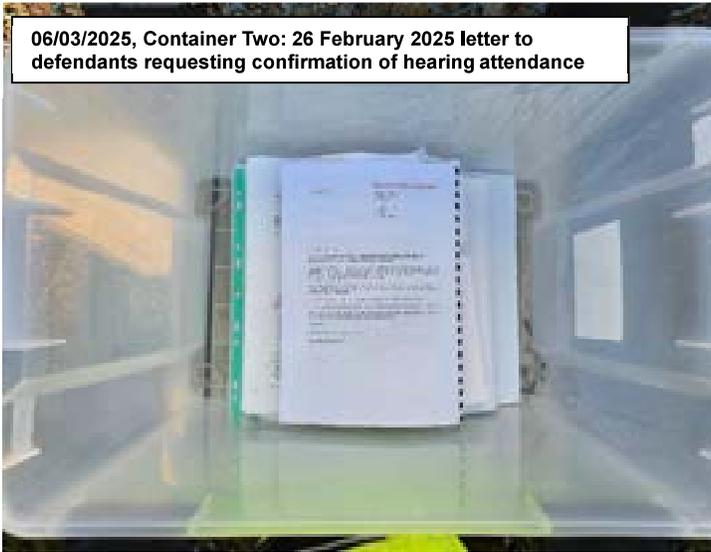


09/04/2025, 7.34 AM: Container One - Notice of 2025 Annual Review Hearing Date

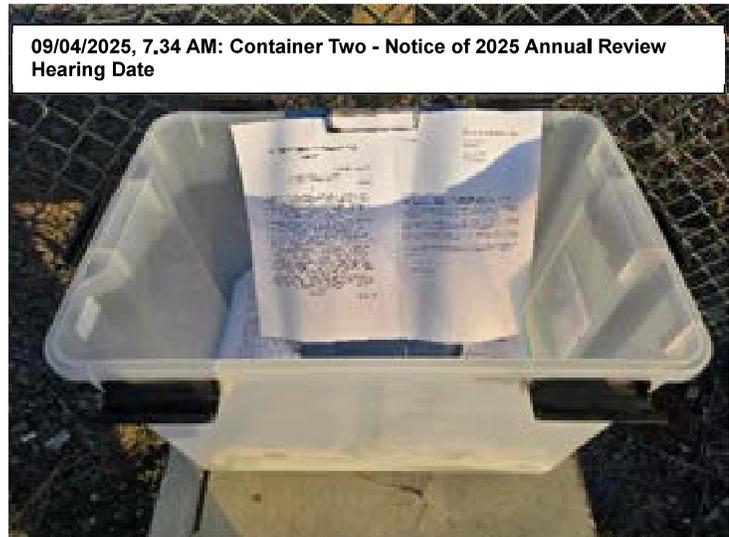


**Avonmouth Location 2 – By the main vehicle entrance**

06/03/2025, Container Two: 26 February 2025 letter to defendants requesting confirmation of hearing attendance

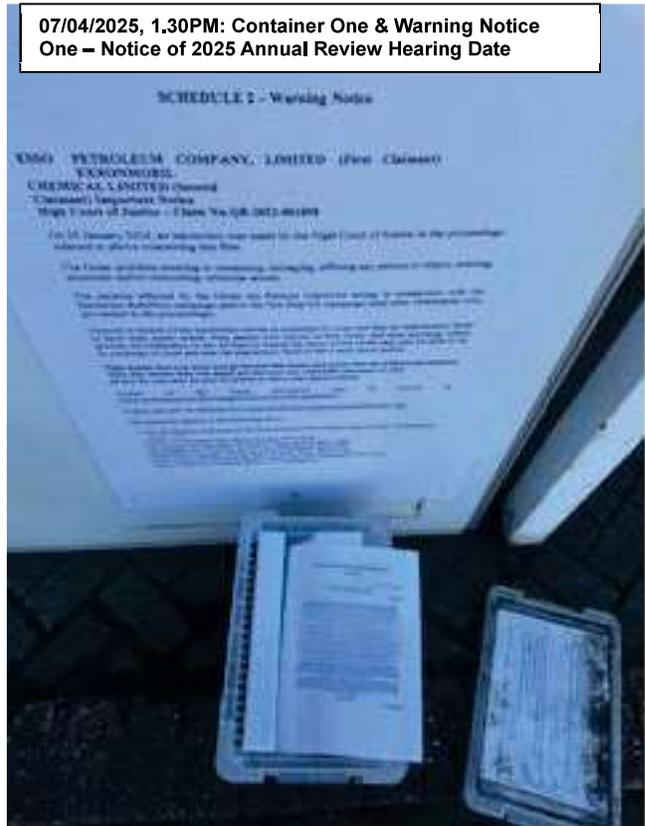
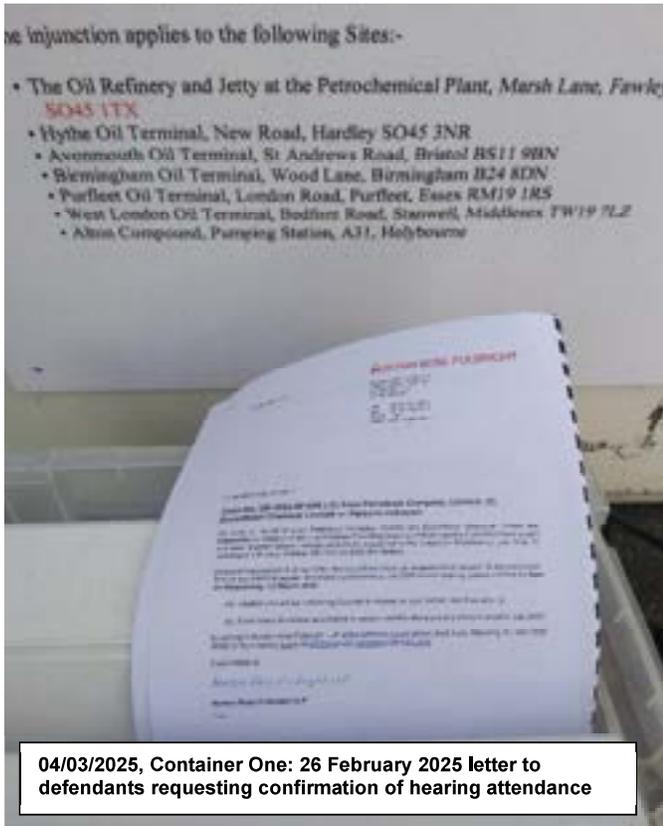


09/04/2025, 7.34 AM: Container Two - Notice of 2025 Annual Review Hearing Date

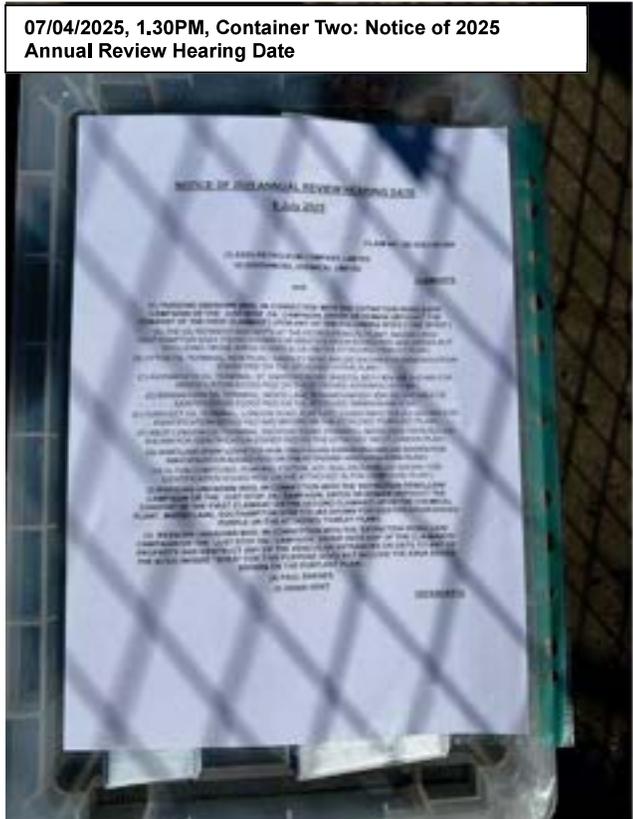


**Birmingham Oil Location**

**Birmingham Location 1 – Main pedestrian entrance for Esso building**

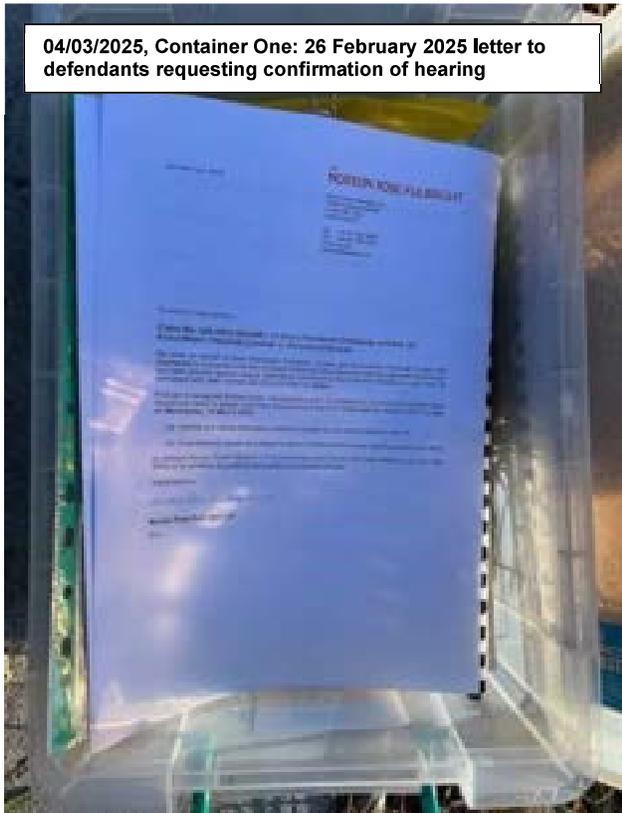


**Birmingham Location 2 – Next to driver pedestrian turnstile**

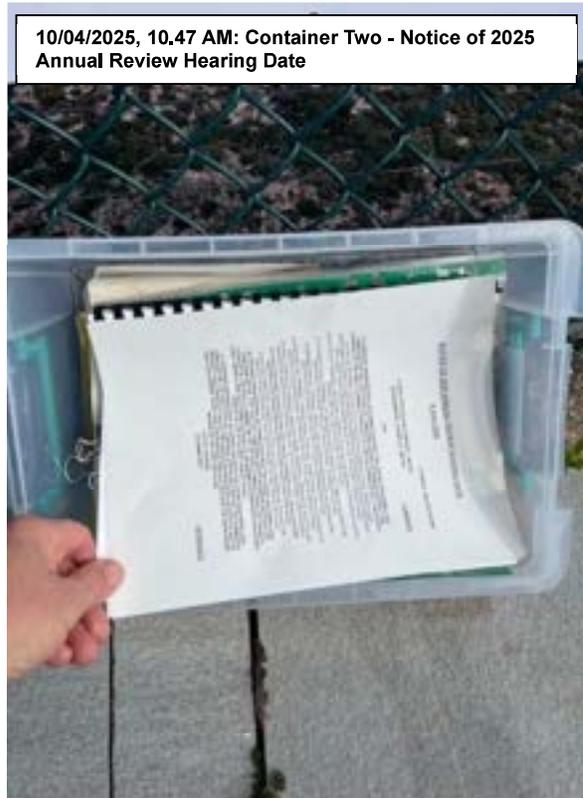
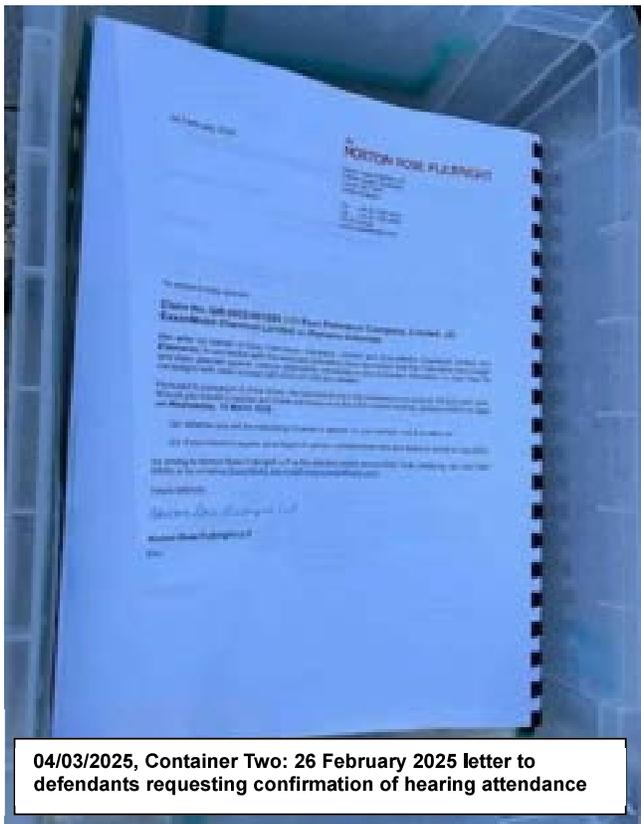


The Oil Refinery and Jetty at the Petrochemical Plant, Fawley

Fawley Location 1 – Left hand side of fence on land boundary between public highway (Cadland Road) and ExxonMobil property

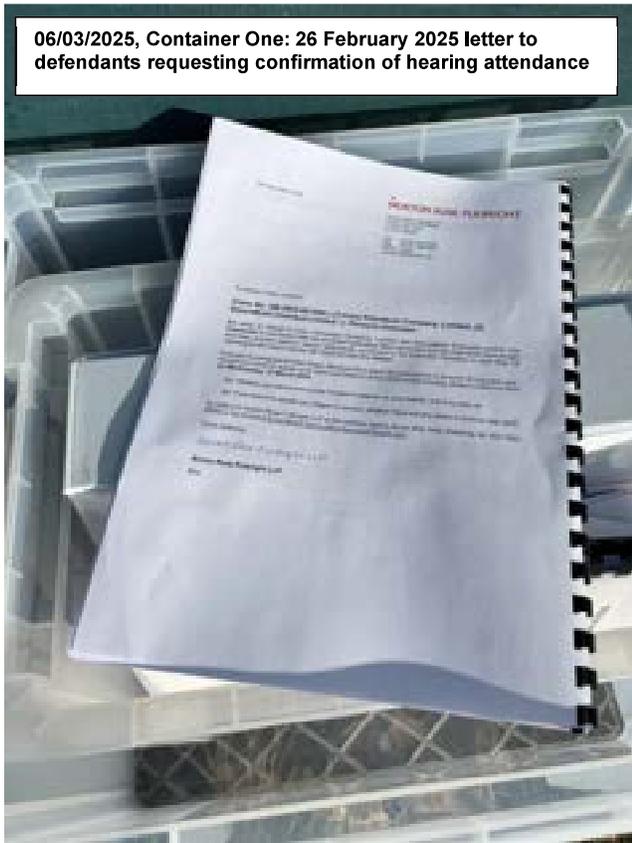


Fawley Location 2 – On left hand side perimeter fence at the end of Marsh Lane adjacent to gate 2 and admin entrance

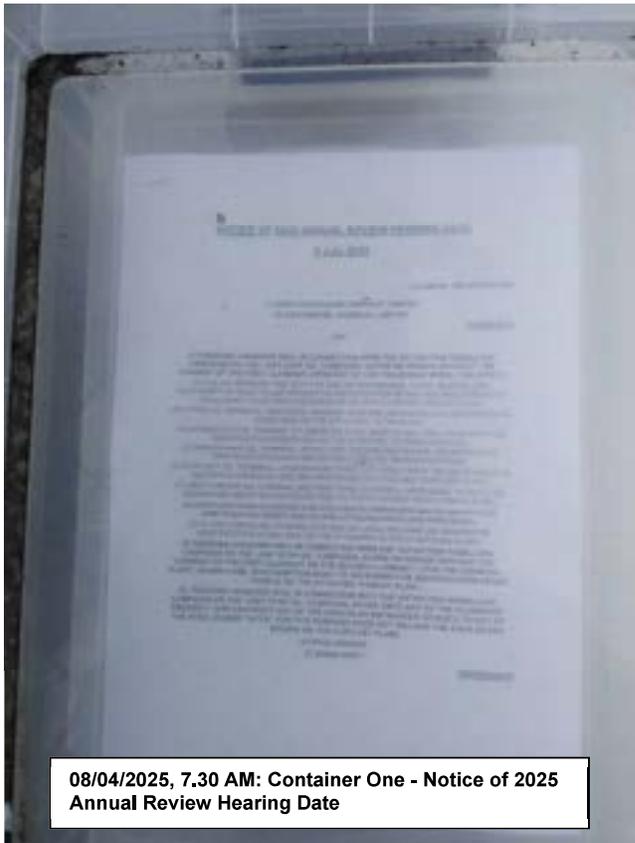


Hythe Oil Terminal

Hythe Location 1 – On outside of fence, next to footpath from lower carpark up towards terminal entrance



06/03/2025, Container One: 26 February 2025 letter to defendants requesting confirmation of hearing attendance



08/04/2025, 7:30 AM: Container One - Notice of 2025 Annual Review Hearing Date

Hythe Location 2 – On outside of fence in top carpark, next to south emergency access gate



06/03/2025, Container Two: 26 February 2025 letter to defendants requesting confirmation of hearing attendance

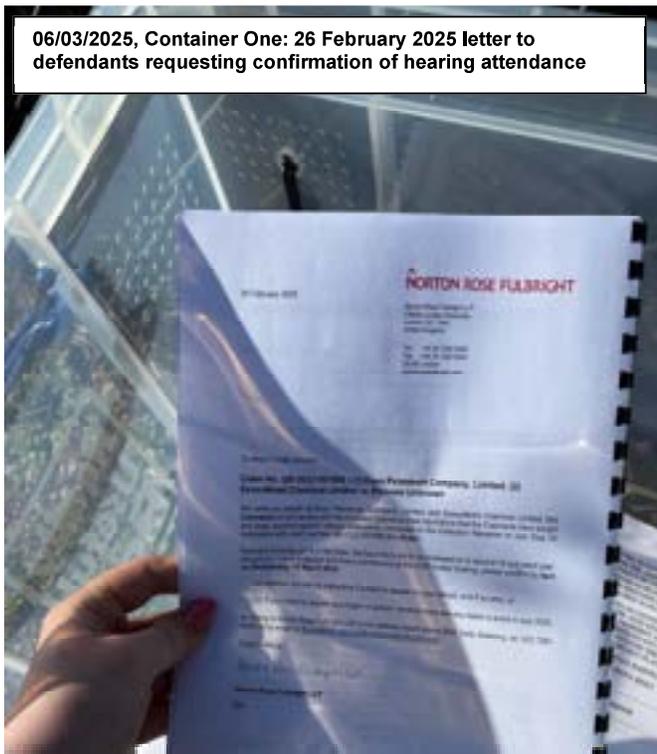


08/04/2025, 7:35 AM: Container Two - Notice of 2025 Annual Review Hearing Date

Purfleet Oil Terminal

Purfleet Location 1 – Attached to fence on exit from terminal

06/03/2025, Container One: 26 February 2025 letter to defendants requesting confirmation of hearing attendance

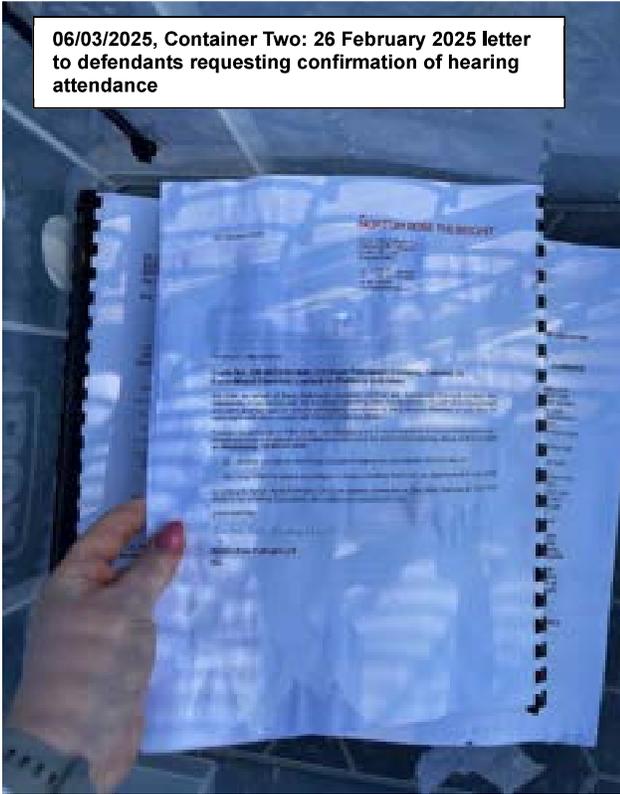


09/04/2025, 12:45 PM: Container One - Notice of 2025 Annual Review Hearing Date

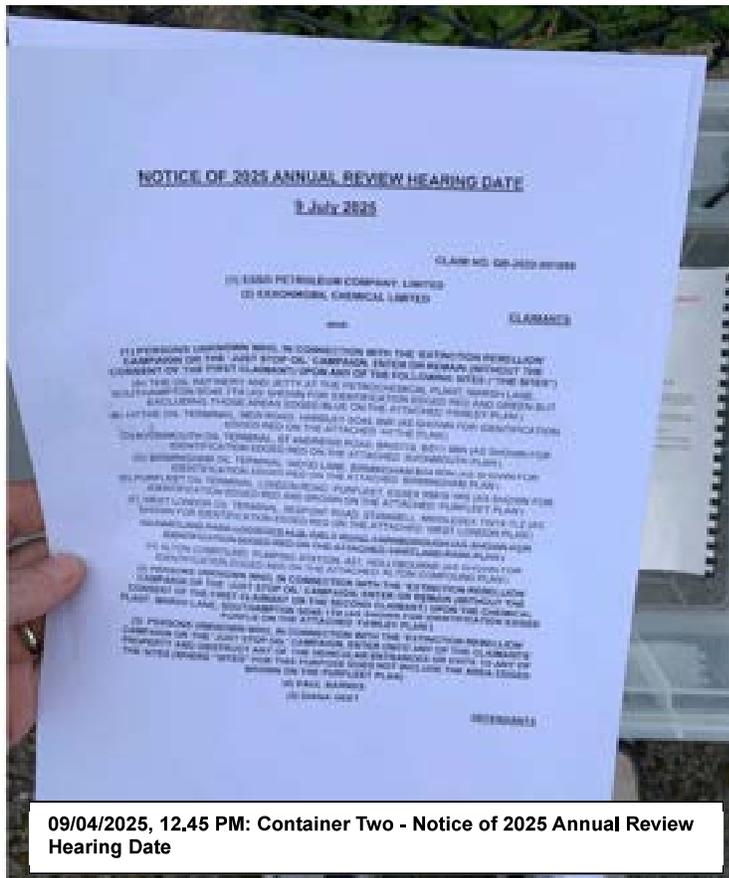
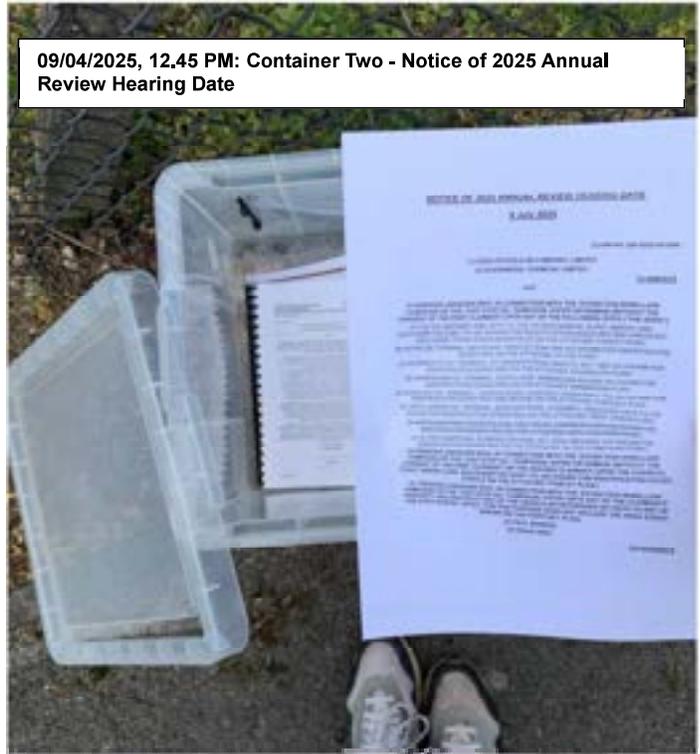


Purfleet Location 2 - Attached to fence on entrance to terminal

06/03/2025, Container Two: 26 February 2025 letter to defendants requesting confirmation of hearing attendance



09/04/2025, 12.45 PM: Container Two - Notice of 2025 Annual Review Hearing Date

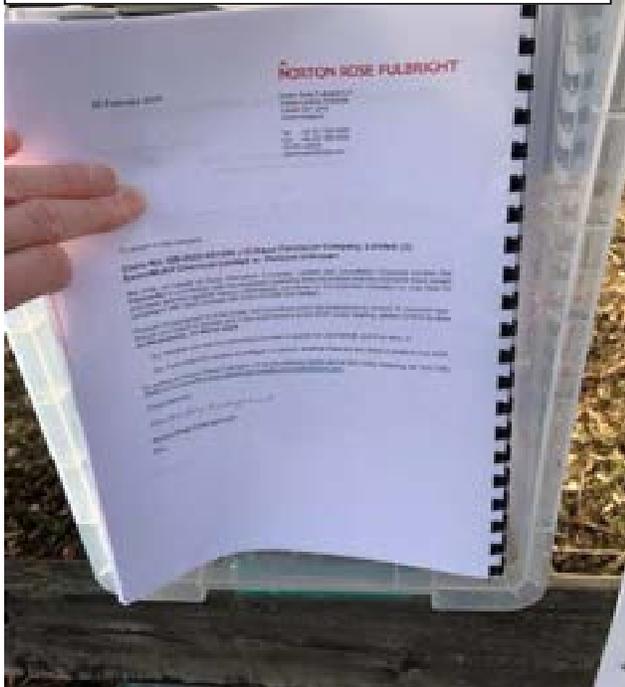


09/04/2025, 12.45 PM: Container Two - Notice of 2025 Annual Review Hearing Date

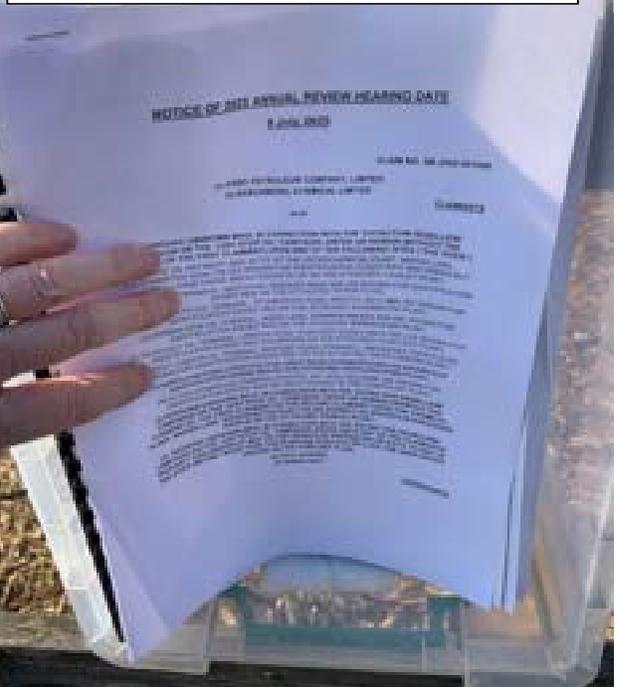
West London Oil Terminal

West London Location 1 – Attached to fence on the approach road to the terminal on the right-hand side of the entrance

03/03/2025: Container One - 26 February 2025 letter to defendants requesting confirmation of hearing attendance

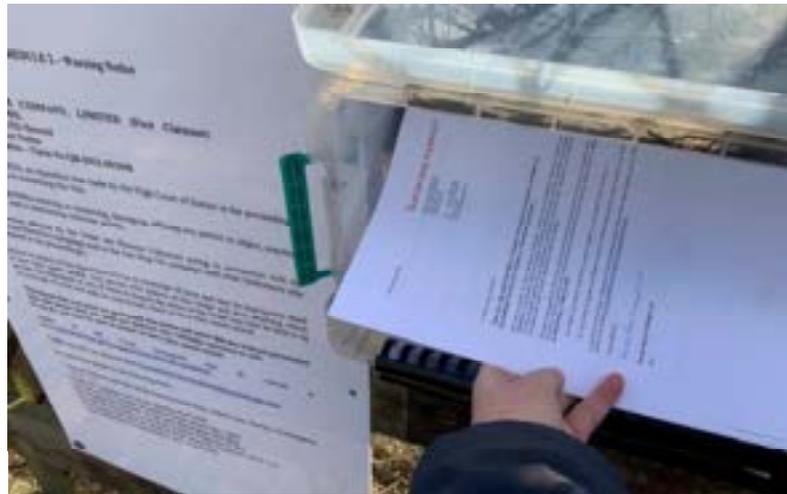


01/04/2025, 11.05 AM: Container One - Notice of 2025 Annual Review Hearing Date

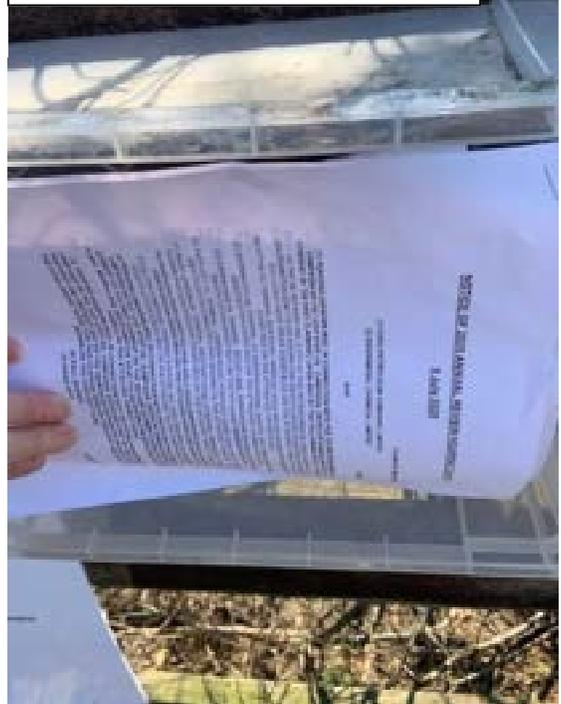


West London Location 2 – Attached to fence on the approach road to the terminal on the left-hand side of the entrance

01/04/2025, 11,10 AM: Container Two - Notice of 2025 Annual Review Hearing Date



03/03/2025: Container Two - 26 February 2025 letter to defendants requesting confirmation of hearing attendance



From: Scott Speirs  
Sent: 10 April 2025 10:29  
To: juststopoilpress@protonmail.com  
Cc: Holly Stebbing  
Subject: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 9 July 2025 [NRF\_EMEA-UK.FID3210555]  
Attachments: 2025.04.10 - Letter from NRF to Just Stop Oil re Annual Review Hearing 9 July 2025.pdf

---

To whom it may concern

**Re: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 9 July 2025**

Please see the attached correspondence.

Yours faithfully  
Norton Rose Fulbright

**Scott Speirs** | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com

**NORTON ROSE FULBRIGHT**

*Law around the world*

[nortonrosefulbright.com](https://www.nortonrosefulbright.com)

10 April 2025

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

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

Just Stop Oil

By email only: [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)

Your reference

Our reference

HMOR/1001267389

To whom it may concern

**Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors**

We refer to our letter dated 26 February 2025 in connection with the abovementioned proceedings in which we requested that you confirm by 4pm on Wednesday 12 March 2025 whether you intend to appear and make submissions at the 2025 hearing that will be held to review the injunctions pursuant to paragraph 8 of the Order in this claim dated 29 January 2024.

As we did not receive any response to our letter, we confirm that the Claimants have fixed this year's review hearing for **Wednesday, 9 July 2025** with a time estimate of half a day.

If you do intend to appear and make submissions at the review hearing, please confirm by 30 April 2025 whether (i) you will be instructing counsel to appear on your behalf and, if so, who has been instructed; or (ii) you intend to appear as a litigant in person.

A copy of this letter may be obtained from Norton Rose Fulbright LLP at the address stated above or by emailing [ExxonMobil.Service@nortonrosefulbright.com](mailto:ExxonMobil.Service@nortonrosefulbright.com). The hearing notice can also be viewed at <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>.

Yours faithfully



**Norton Rose Fulbright LLP**

From: Scott Speirs  
Sent: 10 April 2025 10:28  
To: Extinction Rebellion; xr-legal@riseup.net  
Cc: Holly Stebbing  
Subject: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 9 July 2025 [NRF\_EMEA-UK.FID3210555]  
Attachments: 2025.04.10 - Letter from NRF to Extinction Rebellion re Annual Review Hearing 9 July 2025.pdf

---

To whom it may concern

**Re: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 9 July 2025**

Please see the attached correspondence.

Yours faithfully  
Norton Rose Fulbright

**Scott Speirs** | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com

**NORTON ROSE FULBRIGHT**

*Law around the world*

[nortonrosefulbright.com](http://nortonrosefulbright.com)

10 April 2025

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

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

Extinction Rebellion

**By email only:** enquiries@extinctionrebellion.uk; xr-legal@riseup.net

**Your reference**

**Our reference**

HMOR/1001267389

To whom it may concern

**Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown & Ors**

We refer to our letter dated 26 February 2025 in connection with the abovementioned proceedings in which we requested that you confirm by 4pm on Wednesday 12 March 2025 whether you intend to appear and make submissions at the 2025 hearing that will be held to review the injunctions pursuant to paragraph 8 of the Order in this claim dated 29 January 2024.

As we did not receive any response to our letter, we confirm that the Claimants have fixed this year's review hearing for **Wednesday, 9 July 2025** with a time estimate of half a day.

If you do intend to appear and make submissions at the review hearing, please confirm by 30 April 2025 (i) if you will be instructing counsel to appear on your behalf and, if so, who has been instructed; or (ii) if you intend to appear as a litigant in person.

A copy of this letter may be obtained from Norton Rose Fulbright LLP at the address stated above or by emailing [ExxonMobil.Service@nortonrosefulbright.com](mailto:ExxonMobil.Service@nortonrosefulbright.com). The hearing notice can also be viewed at <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>.

Yours faithfully



**Norton Rose Fulbright LLP**

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From: Microsoft Outlook  
Sent: 10 April 2025 10:30  
To: juststopoilpress@protonmail.com  
Subject: Relayed: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 9 July 2025 [NRF\_EMEA-UK.FID3210555]  
Attachments: Claim No. QB-2022-001098 Notice of Annual Review Hearing – 9 July 2025 [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com) ([juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com))

Subject: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 9 July 2025 [NRF\_EMEA-UK.FID3210555]

From: Microsoft Outlook  
Sent: 10 April 2025 10:28  
To: Extinction Rebellion; xr-legal@riseup.net  
Subject: Relayed: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 9 July 2025 [NRF\_EMEA-UK.FID3210555]  
Attachments: Claim No. QB-2022-001098 Notice of Annual Review Hearing – 9 July 2025 [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Extinction Rebellion \(enquiries@extinctionrebellion.uk\)](mailto:enquiries@extinctionrebellion.uk)

[xr-legal@riseup.net \(xr-legal@riseup.net\)](mailto:xr-legal@riseup.net)

Subject: Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 9 July 2025 [NRF\_EMEA-UK.FID3210555]

From: Extinction Rebellion <enquiries@extinctionrebellion.uk>  
Sent: 10 April 2025 10:28  
To: Scott Speirs  
Subject: Message Received - Claim No. QB-2022-001098 | Notice of Annual Review Hearing – 9 July 2025 [NRF\_EMEA-UK.FID3210555]

---

**External Email - Use Caution**

Hello Scott Speirs,

This is an automated reply to let you know we received your message.

It'll be read - usually within 24 hours - and we'll send you a personal reply, or forward it to an appropriate person within Extinction Rebellion.

To view the status of the ticket or to add comments, you can visit <https://risingup.freshdesk.com/helpdesk/tickets/47900>

Thank you for contacting us,  
With Love & Kindness from

The XR Public Engagement Working Group

[Extinction Rebellion UK - General Enquiries powered by Freshworks](#) ..

From: xr-legal@riseup.net  
Sent: 10 April 2025 10:28  
To: Scott Speirs  
Subject: Autoreply for XR Legal Support

---

External Email - Use Caution

Hi there,

Thanks for getting in touch with the XR Legal Support Team.

We have received your email and are working on getting a response to you ASAP! We are currently quite low in capacity and so our response to your email(s) might be delayed.

If you don't hear from us within two weeks, please email back and we will do our best to get to you sooner.

In the meantime, please have a look at our website (<https://www.informeddissent.info>), as this may have information to answer your questions.

If your email is related to an upcoming court appearance, we will prioritise your email and get a response to you ASAP. Please also email the XR Arrest Welfare Team ([XR-ArrestWelfare@protonmail.com](mailto:XR-ArrestWelfare@protonmail.com)) with the details of your court date.

If your email is related to trainings run by our team, see our Trainings Calendar for details about upcoming Trainings. This can be accessed at this link: <https://teamup.com/ksqtxh86ftomucpgu>

During Rebellions, where you need an urgent response or if someone has been arrested at an action you are at, please call the XR Legal Back Office on 07749 335574 and we will deal with your query that way.

In Solidarity,  
XR Legal Support Team

From: Scott Speirs  
Sent: 10 April 2025 10:33  
To: PBHPXR@protonmail.com  
Cc: Holly Stebbing  
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
2025.02.20 - Letter from NRF to Mr Paul Barnes re Annual Review Hearing.pdf; 20240726 - Paul Barnes signed undertaking.pdf; 2025.04.09 - Esso injunction - D4 2025 Undertaking (unsigned).pdf

---

Dear Mr Barnes

**QB-2022-001098 Esso Petroleum and another v Persons Unknown and others**

Review Hearing

Further to our letter of 20 February 2025 (**attached**), we write to inform you that the Court has confirmed the annual review hearing for this case will be held on **Wednesday 9 July 2025** with a time estimate of half a day. The hearing date has been confirmed, and can be viewed at: <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>.

Undertakings

We refer to the undertaking you provided to the Court on this matter on 25 July 2024 (**attached**).

The undertaking will expire on 30 June 2025. We, therefore, invite you provide a new undertaking on the same terms to the Court, that will expire on 31 July 2026 or the date of the next review hearing, whichever comes later.

Please find **attached** a draft undertaking in the identical form to your previous undertaking. Should you agree to the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email.

Yours faithfully  
Norton Rose Fulbright

**Scott Speirs** | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com

**NORTON ROSE FULBRIGHT**

*Law around the world*  
[nortonrosefulbright.com](https://www.nortonrosefulbright.com)

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

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

- (4) PAUL BARNES  
(5) DIANA HEKT

Defendants

---

DRAFT ORDER

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**PENAL NOTICE**

**If you the within named Fourth Defendant disobey the undertakings  
set out in this order or instruct (which includes training, coaching,**

teaching or educating) others to do the acts which you have undertaken not to do, you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

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

### **IMPORTANT NOTICE TO THE FOURTH DEFENDANT**

**This order prohibits you from doing the acts set out in paragraphs 3, 4 and 5 below.**

**You should read it very carefully.**

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

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

**AND UPON** the Order of Ellenbogen J dated 29 January 2024;

#### **IT IS ORDERED THAT:**

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

### **UNDERTAKINGS TO THE COURT**

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

3. Not to:

- (a) enter or remain on any part of the Sites (as defined above) without the Consent of the First Claimant.
- (b) damage any part of any of the Sites;
- (c) affix themselves or any person or object to any part of any of the Sites;
- (d) erect any structures on any part of any of the Sites.

4. Not to:

- (a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH (the "Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');
- (b) damage any part of the Chemical Plant;
- (c) affix themselves or any person or object at the Chemical Plant;

5. Not to enter onto the Claimants' property and obstruct any of the vehicular entrances or exits to any of the Sites (where "Sites" for this purpose does not include the area edged brown on the Purfleet Plan) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

**AND TO BE BOUND BY THESE PROMISES UNTIL THE LATER OF 31 July 2026 OR THE DATE OF THE NEXT ANNUAL REVIEW HEARING**

**STATEMENT**

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

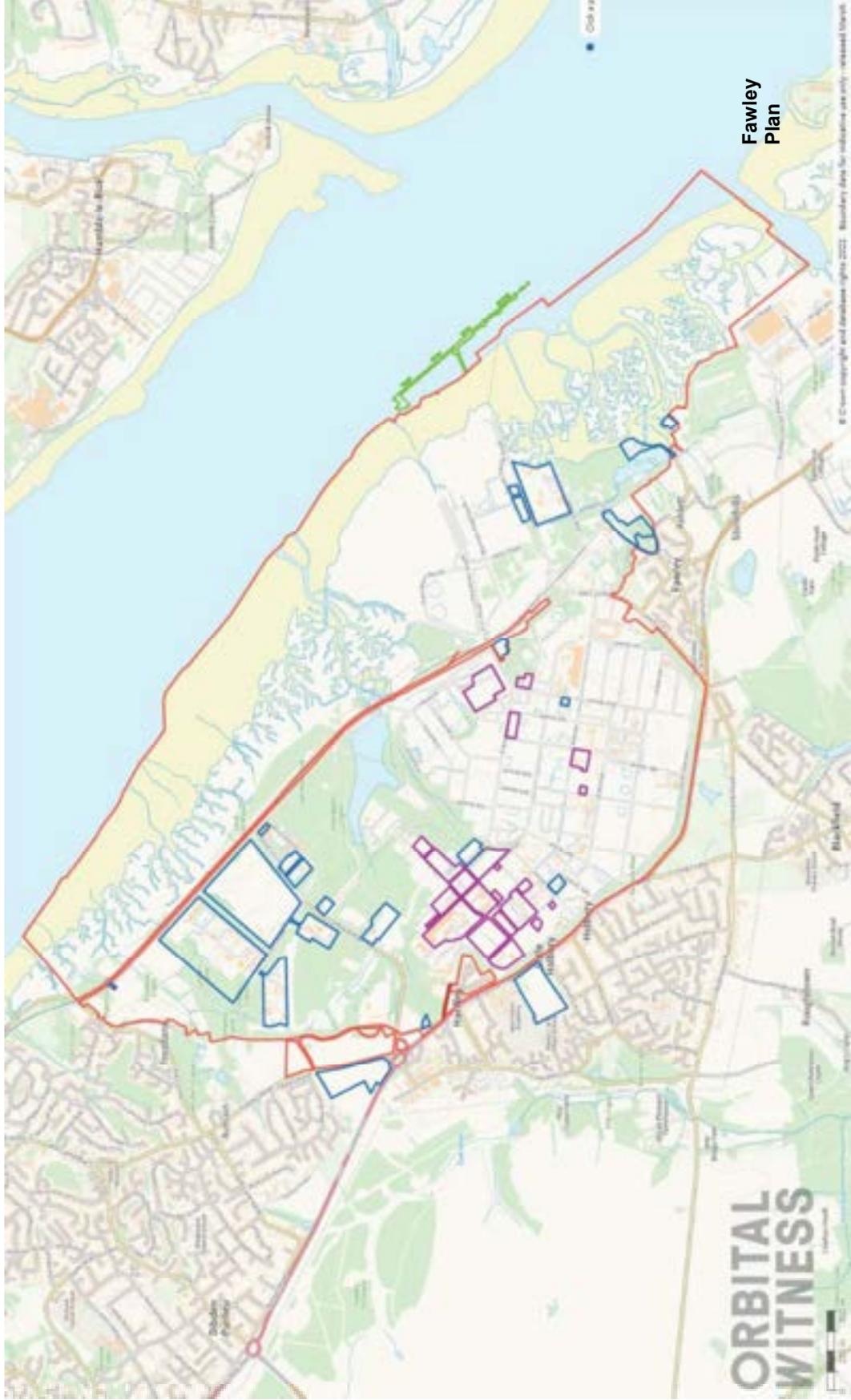
\_\_\_\_\_  
Paul Barnes  
Fourth Defendant  
\_\_\_\_\_2025

We consent to an order in these terms

\_\_\_\_\_  
Norton Rose Fulbright LLP  
Solicitors for the Claimants  
\_\_\_\_\_2025

QB-2022-001098

Fawley Plan



UK-#75797720v1

20 February 2025

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

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

Mr Paul Barnes

**By email only:** PBHPXR@protonmail.com

**Your reference**

**Our reference**

HMOR/1001267389

Dear Mr Barnes

**Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown**

We write on behalf of Esso Petroleum Company, Limited and ExxonMobil Chemical Limited (the **Claimants**) in connection with the enclosed Operating Sites injunctions that the Claimants have sought and been granted against various defendants connected to the Extinction Rebellion or Just Stop Oil campaigns with claim number QB-2022-001098 (the **Order**).

Pursuant to paragraph 8 of the Order, the injunctions are to be reviewed on or around 18 July each year. Should you intend to appear and make submissions at the 2025 review hearing, please confirm (i) whether you will be instructing Counsel to appear on your behalf, and if so who; or (ii) if you intend to appear as a litigant in person, whether there are any dates to avoid in July 2025.

Please provide your response to the above questions by **4pm on Thursday, 6 March 2025** by writing to Norton Rose Fulbright LLP at the address stated above (Ref: Holly Stebbing, tel: 020 7283 6000) or by emailing [ExxonMobil.Service@nortonrosefulbright.com](mailto:ExxonMobil.Service@nortonrosefulbright.com), so that the Claimants can take steps to fix this year's annual review hearing. If you do not intend to appear and make submissions, there is no need to respond to this letter.

Yours faithfully



**Norton Rose Fulbright LLP**

Enc.

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From: Scott Speirs  
Sent: 10 April 2025 10:35  
To: Diana Hekt  
Cc: Holly Stebbing  
Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: 2025.02.20 - Letter from NRF to Ms Diana Hekt re Annual Review Hearing.pdf; 2024.06.10 - Diana Hekt undertaking.pdf; 2025.04.09 - Esso injunction - D5 2025 Undertaking (unsigned).pdf

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Dear Ms Hekt

**QB-2022-001098 Esso Petroleum and another v Persons Unknown and others**

Review Hearing

Further to our letter of 20 February 2025 (**attached**), we write to inform you that the Court has confirmed the annual review hearing for this case will be held on **Wednesday 9 July 2025** with a time estimate of half a day. The hearing date has been confirmed and can be viewed at: <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>.

Undertakings

We refer to the assurance you provided to the Court on this matter on 10 July 2024 (**attached**).

The assurance will expire on 30 June 2025. We, therefore, invite you to provide an undertaking to the Court, that will expire on 31 July 2026 or the date of the next review hearing, whichever comes later.

Please find **attached** a draft undertaking in materially identical form to your previous undertaking. Should you agree the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email.

Yours faithfully

Norton Rose Fulbright

**Scott Speirs** | Senior Associate

Norton Rose Fulbright LLP

Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom

Tel +44 20 7444 2441 | Mob +44 75111 76603

scott.speirs@nortonrosefulbright.com

**NORTON ROSE FULBRIGHT**

*Law around the world*

[nortonrosefulbright.com](https://www.nortonrosefulbright.com)

B E T W E E N:

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

Claimants

-and-

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

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

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

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

- (4) PAUL BARNES  
(5) DIANA HEKT

Defendants

---

DRAFT ORDER

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**PENAL NOTICE**

**If you the within named Fifth Defendant disobey the undertakings set  
out in this order or instruct (which includes training, coaching,**

teaching or educating) others to do the acts which you have undertaken not to do, you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

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

### **IMPORTANT NOTICE TO THE FIFTH DEFENDANT**

**This order prohibits you from doing the acts set out in paragraphs 3, 4 and 5 below.**

**You should read it very carefully.**

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

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

**AND UPON** the Order of Ellenbogen J dated 29 January 2024;

#### **IT IS ORDERED THAT:**

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

### **UNDERTAKINGS TO THE COURT**

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

3. Not to:

- (a) enter or remain on any part of the Sites (as defined above) without the Consent of the First Claimant.
- (b) damage any part of any of the Sites;
- (c) affix themselves or any person or object to any part of any of the Sites;
- (d) erect any structures on any part of any of the Sites.

4. Not to:

- (a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH (the "Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');
- (b) damage any part of the Chemical Plant;
- (c) affix themselves or any person or object at the Chemical Plant;

5. Not to enter onto the Claimants' property and obstruct any of the vehicular entrances or exits to any of the Sites (where "Sites" for this purpose does not include the area edged brown on the Purfleet Plan) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

**AND TO BE BOUND BY THESE PROMISES UNTIL THE LATER OF 31 July 2026 OR THE DATE OF THE NEXT ANNUAL REVIEW HEARING**

**STATEMENT**

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

\_\_\_\_\_

Diana Hekt  
Fifth Defendant

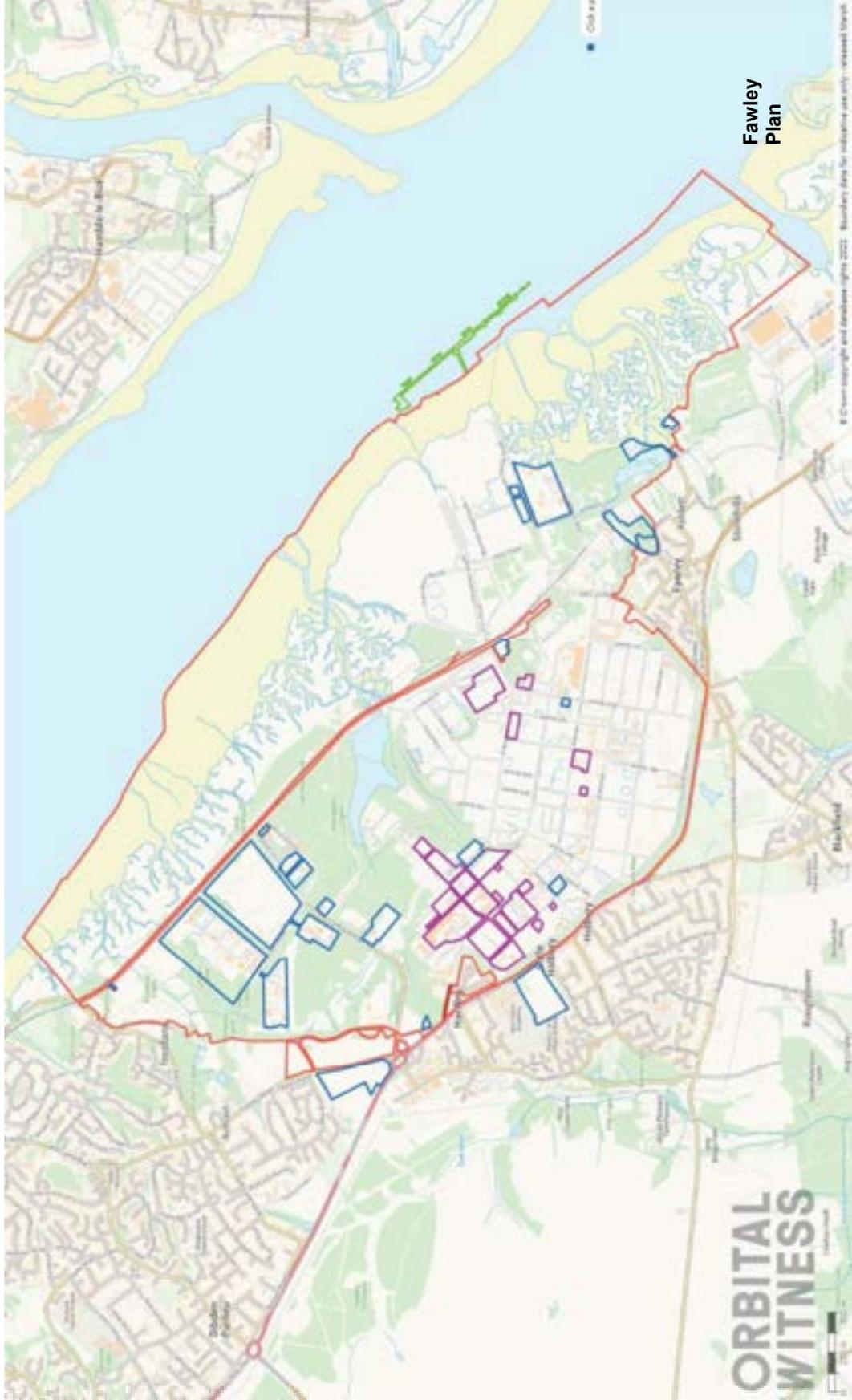
\_\_\_\_\_ 2025

We consent to an order in these terms

\_\_\_\_\_

Norton Rose Fulbright LLP  
Solicitors for the Claimants

\_\_\_\_\_ 2025



20 February 2025

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

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

Ms Diana Hekt

**By email only:** hekt@outlook.com

**Your reference**

**Our reference**

HMOR/1001267389

Dear Ms Hekt

**Claim No. QB-2022-001098 | (1) Esso Petroleum Company, Limited, (2) ExxonMobil Chemical Limited -v- Persons Unknown**

We write on behalf of Esso Petroleum Company, Limited and ExxonMobil Chemical Limited (the **Claimants**) in connection with the enclosed Operating Sites injunctions that the Claimants have sought and been granted against various defendants connected to the Extinction Rebellion or Just Stop Oil campaigns with claim number QB-2022-001098 (the **Order**).

Pursuant to paragraph 8 of the Order, the injunctions are to be reviewed on or around 18 July each year. Should you intend to appear and make submissions at the 2025 review hearing, please confirm (i) whether you will be instructing Counsel to appear on your behalf, and if so who; or (ii) if you intend to appear as a litigant in person, whether there are any dates to avoid in July 2025.

Please provide your response to the above questions by **4pm on Thursday, 6 March 2025** by writing to Norton Rose Fulbright LLP at the address stated above (Ref: Holly Stebbing, tel: 020 7283 6000) or by emailing [ExxonMobil.Service@nortonrosefulbright.com](mailto:ExxonMobil.Service@nortonrosefulbright.com), so that the Claimants can take steps to fix this year's annual review hearing. If you do not intend to appear and make submissions, there is no need to respond to this letter.

Yours faithfully



**Norton Rose Fulbright LLP**

Enc.

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From: Microsoft Outlook  
Sent: 10 April 2025 10:33  
To: PBHPXR@protonmail.com  
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[PBHPXR@protonmail.com \(PBHPXR@protonmail.com\)](mailto:PBHPXR@protonmail.com)

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

From: Microsoft Outlook  
Sent: 10 April 2025 10:36  
To: Diana Hekt  
Subject: Relayed: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Diana Hekt \(hekt@outlook.com\)](mailto:hekt@outlook.com)

Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

From: Scott Speirs  
Sent: 07 May 2025 16:50  
To: PBHPXR@protonmail.com  
Cc: Holly Stebbing  
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: 2025.04.09 - Esso injunction - D4 2025 Undertaking (unsigned).pdf; 20240726 - Paul Barnes signed undertaking.pdf

---

Dear Mr Barnes

**RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others**

We refer to our email sent on 10 April 2025 concerning the upcoming review hearing on this matter on 9 July 2025 and the undertaking you provided to the Court on 25 July 2024.

We would be grateful if you would confirm if you agree to renew the undertaking in the form attached. Should you agree to the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email.

Yours faithfully  
Norton Rose Fulbright

**Scott Speirs** | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com

**NORTON ROSE FULBRIGHT**

*Law around the world*  
[nortonrosefulbright.com](https://www.nortonrosefulbright.com)

---

**From:** Scott Speirs  
**Sent:** 10 April 2025 10:33  
**To:** PBHPXR@protonmail.com  
**Cc:** Holly Stebbing  
**Subject:** QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

Dear Mr Barnes

**QB-2022-001098 Esso Petroleum and another v Persons Unknown and others**

Review Hearing

Further to our letter of 20 February 2025 (**attached**), we write to inform you that the Court has confirmed the annual review hearing for this case will be held on **Wednesday 9 July 2025** with a time estimate of half a day. The hearing date has been confirmed, and can be viewed at: <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>.

Undertakings

We refer to the undertaking you provided to the Court on this matter on 25 July 2024 (**attached**).

The undertaking will expire on 30 June 2025. We, therefore, invite you provide a new undertaking on the same terms to the Court, that will expire on 31 July 2026 or the date of the next review hearing, whichever comes later.

Please find **attached** a draft undertaking in the identical form to your previous undertaking. Should you agree to the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your

undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email.

Yours faithfully  
Norton Rose Fulbright

**Scott Speirs** | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603

[scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

*Law around the world*

[nortonrosefulbright.com](http://nortonrosefulbright.com)

From: Scott Speirs  
Sent: 07 May 2025 16:55  
To: Diana Hekt  
Cc: Holly Stebbing  
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: 2024.06.10 - Diana Hekt undertaking.pdf; 2025.04.09 - Esso injunction - D5 2025 Undertaking (unsigned).pdf

---

Dear Ms Hekt

**RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others**

We refer to our email sent on 10 April 2025 concerning the upcoming review hearing on this matter on 9 July 2025 and the undertaking you provided to the Court on 10 July 2024.

We would be grateful if you would confirm if you agree to renew the undertaking in the form attached. Should you agree the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email.

Yours faithfully  
Norton Rose Fulbright

**Scott Speirs** | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com

**NORTON ROSE FULBRIGHT**

*Law around the world*

[nortonrosefulbright.com](https://www.nortonrosefulbright.com)

---

**From:** Scott Speirs  
**Sent:** 10 April 2025 10:35  
**To:** Diana Hekt  
**Cc:** Holly Stebbing  
**Subject:** QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

Dear Ms Hekt

**QB-2022-001098 Esso Petroleum and another v Persons Unknown and others**

Review Hearing

Further to our letter of 20 February 2025 (**attached**), we write to inform you that the Court has confirmed the annual review hearing for this case will be held on **Wednesday 9 July 2025** with a time estimate of half a day. The hearing date has been confirmed and can be viewed at: <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>.

Undertakings

We refer to the assurance you provided to the Court on this matter on 10 July 2024 (**attached**).

The assurance will expire on 30 June 2025. We, therefore, invite you to provide an undertaking to the Court, that will expire on 31 July 2026 or the date of the next review hearing, whichever comes later.

Please find **attached** a draft undertaking in materially identical form to your previous undertaking. Should you agree the attached, please provided a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your

HS5/201

undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email.

Yours faithfully  
Norton Rose Fulbright  
**Scott Speirs** | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603

[scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

*Law around the world*

[nortonrosefulbright.com](http://nortonrosefulbright.com)

From: Microsoft Outlook  
Sent: 07 May 2025 16:50  
To: PBHPXR@protonmail.com  
Subject: Relayed: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: RE QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[PBHPXR@protonmail.com](mailto:PBHPXR@protonmail.com) (PBHPXR@protonmail.com)

Subject: RE: ~~Q~~B-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

From: Microsoft Outlook  
Sent: 07 May 2025 16:55  
To: Diana Hekt  
Subject: Relayed: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: RE QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Diana Hekt \(hekt@outlook.com\)](mailto:hekt@outlook.com)

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

7<sup>th</sup> May 2025

Dear Norton Rose Fulbright

Thank you for your email. As a named defendant on the above injunction I would very much like to opt for the documents you are apparently obliged to send me to be referenced at [https://www.exxonmobil.co.uk/company/overview/uk-](https://www.exxonmobil.co.uk/company/overview/uk-operations)

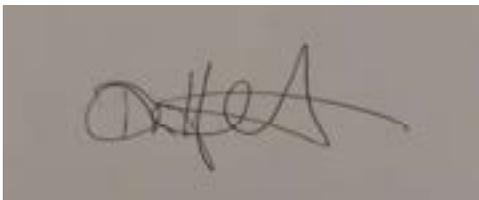
[operations](https://www.exxonmobil.co.uk/company/overview/uk-operations)<<https://www.exxonmobil.co.uk/company/overview/uk-operations>>

or to be emailed to me (at [hekt@outlook.com](mailto:hekt@outlook.com)<<mailto:hekt@outlook.com>>) rather than continuing to have hard copies sent through the post.

Better still I would like to request at tomorrow's court hearing that my name be removed from the injunction altogether. I have no intention of breaching this injunction or any other.

I hope to hear your response soon.

With thanks

A rectangular box containing a handwritten signature in dark ink. The signature is stylized and appears to read 'Diana Hekt'.

Diana Hekt

From: Scott Speirs  
Sent: 13 May 2025 15:14  
To: Diana Hekt  
Cc: Holly Stebbing  
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: 2025.04.09 - Esso injunction - D5 2025 Undertaking (unsigned).pdf

---

Dear Diana

Thank you for your email and attached letter.

Please note, as noted in our previous email, the hearing for this matter is on 9 July 2025. The court has not yet announced a listing time or court room number, but we will provide once we have it, should you wish to attend.

The undertaking you previously provided expires on 30 June 2025. The court may order at the upcoming hearing you will be subject to the injunction again. If you wish to continue to be subject to your undertaking and not the injunction then we ask you sign the attached which is in the form the court will expect.

Yours faithfully  
Norton Rose Fulbright

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com  
NORTON ROSE FULBRIGHT  
Law around the world  
nortonrosefulbright.com

-----Original Message-----

From: Diana Hekt  
Sent: 08 May 2025 00:48  
To: Scott Speirs  
Subject: Re: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

Dear Scott Spiers

Thank you for your email albeit allowing little time for me to respond.

Please find attached my latest signed undertaking as advised. I trust it will be in time to be included in the court hearing.

With best wishes

Diana Hekt

---

From: Scott Speirs  
Sent: Wednesday, May 07, 2025 16:55  
To: Diana Hekt  
Cc: Holly Stebbing  
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

HS5/206

Dear Ms Hekt RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others We refer to our email sent on 10 April 2025 concerning the upcoming review hearing on this matter on 9 July 2025 and the undertaking you provided to the Court on 10 July 2024. We would be grateful if you would confirm if you agree to renew the undertaking in the form attached. Should you agree the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email. Yours faithfully Norton Rose Fulbright Scott Speirs | Senior Associate Norton Rose Fulbright LLP Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom Tel +44 20 7444 2441 | Mob +44 75111 76603 [scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com) NORTON ROSE FULBRIGHT Law around the world [nortonrosefulbright.com](http://nortonrosefulbright.com) From: Scott Speirs Sent: 10 April 2025 10:35 To: Diana Hekt <[hekt@outlook.com](mailto:hekt@outlook.com)> Cc: Holly Stebbing <[Holly.Stebbing@nortonrosefulbright.com](mailto:Holly.Stebbing@nortonrosefulbright.com)> Subject: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555] Dear Ms Hekt QB-2022-001098 Esso Petroleum and another v Persons Unknown and others Review Hearing Further to our letter of 20 February 2025 (attached), we write to inform you that the Court has confirmed the annual review hearing for this case will be held on Wednesday 9 July 2025 with a time estimate of half a day. The hearing date has been confirmed and can be viewed at: <https://www.exxonmobil.co.uk/Company/Overview/UK-operations>. Undertakings We refer to the assurance you provided to the Court on this matter on 10 July 2024 (attached). The assurance will expire on 30 June 2025. We, therefore, invite you to provide an undertaking to the Court, that will expire on 31 July 2026 or the date of the next review hearing, whichever comes later. Please find attached a draft undertaking in materially identical form to your previous undertaking. Should you agree the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email. Yours faithfully Norton Rose Fulbright Scott Speirs | Senior Associate Norton Rose Fulbright LLP Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom Tel +44 20 7444 2441 | Mob +44 75111 76603 [scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com) NORTON ROSE FULBRIGHT Law around the world [nortonrosefulbright.com](http://nortonrosefulbright.com) CONFIDENTIALITY NOTICE: This email, including any attachments, is confidential and may be privileged. If you are not the intended recipient please notify the sender immediately, and please delete it; you should not copy it or use it for any purpose or disclose its contents to any other person. Norton Rose Fulbright LLP and its affiliates reserve the right to monitor all email communications through their networks. Norton Rose Fulbright LLP is a limited liability partnership registered in England and Wales with number OC328697, and is authorised and regulated by the Solicitors Regulation Authority. A list of its members and of the other partners is available at its registered office, 3 More London Riverside, London SE1 2AQ; reference to a partner is to a member or to an employee or consultant with equivalent standing and qualification employed or engaged by Norton Rose Fulbright LLP or any of its affiliates. Norton Rose Fulbright LLP, Norton Rose Fulbright Australia, Norton Rose Fulbright Canada LLP, Norton Rose Fulbright South Africa Inc and Norton Rose Fulbright US LLP are separate legal entities and all of them are members of Norton Rose Fulbright Verein, a Swiss verein. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself provide legal services to clients. Details of each entity, with certain regulatory information, are available at [nortonrosefulbright.com](http://nortonrosefulbright.com).

From: Microsoft Outlook  
Sent: 13 May 2025 15:14  
To: Diana Hekt  
Subject: Relayed: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: RE QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Diana Hekt \(hekt@outlook.com\)](mailto:hekt@outlook.com)

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

From: Scott Speirs  
Sent: 15 May 2025 10:18  
To: Diana Hekt  
Cc: Holly Stebbing  
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: 2025.04.09 - Esso injunction - D5 2025 Undertaking (unsigned).pdf

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Dear Diana

There appears to be some confusion. The word document you have provided and signed (called "Dear Norton Rose Fulbright dated") is a different document to the PDF document (called "2025.04.09 – Esso injunction – D5 2025 Undertaking (unsigned).pdf") we have attached to our previous emails.

Further to our previous email, the **attached** document is the undertaking I referred to. It is intended to replace the previous undertaking you provided, which expires on 30 June 2025. As previously noted, this contains a penal notice meaning if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

I am not aware that we did ask for the undertaking to be returned immediately. As previously noted, the court hearing is on 9 July 2025. If you sign the **attached** undertaking (called "2025.04.09 – Esso injunction – D5 2025 Undertaking (unsigned).pdf") we will provide it to the court ahead of the hearing. You should be able to copy and paste the signature from your letter onto this document if you choose to sign it.

Yours faithfully  
Norton Rose Fulbright

**Scott Speirs** | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com  
**NORTON ROSE FULBRIGHT**  
*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

-----Original Message-----

From: Diana Hekt  
Sent: 14 May 2025 14:50  
To: Scott Speirs  
Cc: Holly Stebbing  
Subject: Re: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

Dear Scott Spiers

I find your emails very opaque!

I have already signed the letter you attach, and though you have changed the wording I see no reason why my signature can't be applied to this version.

I don't understand why you have sent the letter twice nor why you asked me to email it immediately the first time. I'll be grateful if you can answer my concerns.

Looking forward to hearing from you.

HS5/209

Diana

---

From: Scott Speirs <[Scott.Speirs@nortonrosefulbright.com](mailto:Scott.Speirs@nortonrosefulbright.com)>

Sent: 13 May 2025 15:13

To: Diana Hekt

Cc: Holly Stebbing

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

Dear Diana

Thank you for your email and attached letter.

Please note, as noted in our previous email, the hearing for this matter is on 9 July 2025. The court has not yet announced a listing time or court room number, but we will provide once we have it, should you wish to attend.

The undertaking you previously provided expires on 30 June 2025. The court may order at the upcoming hearing you will be subject to the injunction again. If you wish to continue to be subject to your undertaking and not the injunction then we ask you sign the attached which is in the form the court will expect.

Yours faithfully

Norton Rose Fulbright

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP

Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom

Tel +44 20 7444 2441 | Mob +44 75111 76603

[scott.speirs@nortonrosefulbright.com](mailto:scott.speirs@nortonrosefulbright.com)

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[nortonrosefulbright.com](http://nortonrosefulbright.com)

-----Original Message-----

HS5/210

From: Microsoft Outlook  
Sent: 15 May 2025 10:18  
To: Diana Hekt  
Subject: Relayed: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: RE QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Diana Hekt \(hekt@outlook.com\)](mailto:hekt@outlook.com)

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

From: Scott Speirs  
Sent: 12 June 2025 10:32  
To: PBHPXR@protonmail.com  
Cc: Holly Stebbing  
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: 2025.04.09 - Esso injunction - D4 2025 Undertaking (unsigned).pdf; 20240726 - Paul Barnes signed undertaking.pdf

---

Dear Mr Barnes

**RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others**

We refer to our emails sent on 10 April and 7 May 2025 concerning the upcoming review hearing on this matter on 9 July 2025 and the undertaking you provided to the Court on 25 July 2024.

We would be grateful if you would confirm if you agree to renew the undertaking in the form attached. Should you agree to the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email.

Yours faithfully  
Norton Rose Fulbright

**Scott Speirs** | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com  
**NORTON ROSE FULBRIGHT**  
*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

---

**From:** Scott Speirs  
**Sent:** 07 May 2025 16:50  
**To:** PBHPXR@protonmail.com  
**Cc:** Holly Stebbing  
**Subject:** RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

Dear Mr Barnes

**RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others**

We refer to our email sent on 10 April 2025 concerning the upcoming review hearing on this matter on 9 July 2025 and the undertaking you provided to the Court on 25 July 2024.

We would be grateful if you would confirm if you agree to renew the undertaking in the form attached. Should you agree to the attached, please provide a signed copy by return and we will provide it to the Court for approval and sealing. If you do so, you will be in the same position as before – i.e. you will not be bound by the injunction but you will be bound by your undertaking such that if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized and you continue to agree that documents can be served by email.

Yours faithfully  
Norton Rose Fulbright

**Scott Speirs** | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom

HS5/212

From: Microsoft Outlook  
Sent: 12 June 2025 10:32  
To: PBHPXR@protonmail.com  
Subject: Relayed: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: RE QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

---

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[PBHPXR@protonmail.com](mailto:PBHPXR@protonmail.com) ([PBHPXR@protonmail.com](mailto:PBHPXR@protonmail.com))

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

From: Postmaster  
Sent: 12 June 2025 10:33  
To: Scott Speirs  
Subject: [Postmaster] Email Delivery Failure  
Attachments: ATT00001

---

This is a delivery failure notification message indicating that an email you addressed to email address :  
-- [pbhpxr@protonmail.com](mailto:pbhpxr@protonmail.com)

could not be delivered. The problem appears to be :  
-- Recipient mailbox is full

Additional information follows :  
-- 5.2.2 : Recipient address rejected: Mailbox quota exceeded

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

From: Scott Speirs  
Sent: 12 June 2025 10:58  
To: Diana Hekt  
Cc: Holly Stebbing  
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: 2025.04.09 - Esso injunction - D5 2025 Undertaking (unsigned).pdf

---

Dear Diana

I hope you have had time to consider the below email.

As explained in the below email, the **attached** document is the undertaking I referred to. It is intended to replace the previous undertaking you provided, which expires on 30 June 2025. As previously noted, this contains a penal notice meaning if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

If you sign the **attached** undertaking (called "2025.04.09 – Esso injunction – D5 2025 Undertaking (unsigned).pdf") we will provide it to the court ahead of the hearing. You should be able to copy and paste the signature from your letter onto this document if you choose to sign it.

Yours faithfully  
Norton Rose Fulbright

**Scott Speirs** | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com  
**NORTON ROSE FULBRIGHT**  
*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

---

**From:** Scott Speirs  
**Sent:** 15 May 2025 10:18  
**To:** Diana Hekt  
**Cc:** Holly Stebbing  
**Subject:** RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

Dear Diana

There appears to be some confusion. The word document you have provided and signed (called "Dear Norton Rose Fulbright dated") is a different document to the PDF document (called "2025.04.09 – Esso injunction – D5 2025 Undertaking (unsigned).pdf") we have attached to our previous emails.

Further to our previous email, the **attached** document is the undertaking I referred to. It is intended to replace the previous undertaking you provided, which expires on 30 June 2025. As previously noted, this contains a penal notice meaning if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

I am not aware that we did ask for the undertaking to be returned immediately. As previously noted, the court hearing is on 9 July 2025. If you sign the **attached** undertaking (called "2025.04.09 – Esso injunction – D5 2025 Undertaking (unsigned).pdf") we will provide it to the court ahead of the hearing. You should be able to copy and paste the signature from your letter onto this document if you choose to sign it.

Yours faithfully  
Norton Rose Fulbright

HS5/215

From: Microsoft Outlook  
Sent: 12 June 2025 10:58  
To: Diana Hekt  
Subject: Relayed: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: RE QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

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**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Diana Hekt \(hekt@outlook.com\)](mailto:hekt@outlook.com)

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

B E T W E E N:

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

Claimants

-and-

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

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

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

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

- (4) PAUL BARNES  
(5) DIANA HEKT

Defendants

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DRAFT ORDER

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**PENAL NOTICE**

**If you the within named Fifth Defendant disobey the undertakings set  
out in this order or instruct (which includes training, coaching,**

teaching or educating) others to do the acts which you have undertaken not to do, you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

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

### **IMPORTANT NOTICE TO THE FIFTH DEFENDANT**

**This order prohibits you from doing the acts set out in paragraphs 3, 4 and 5 below.**

**You should read it very carefully.**

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

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

**AND UPON** the Order of Ellenbogen J dated 29 January 2024;

#### **IT IS ORDERED THAT:**

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

### **UNDERTAKINGS TO THE COURT**

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

3. Not to:

- (a) enter or remain on any part of the Sites (as defined above) without the Consent of the First Claimant.
- (b) damage any part of any of the Sites;
- (c) affix themselves or any person or object to any part of any of the Sites;
- (d) erect any structures on any part of any of the Sites.

4. Not to:

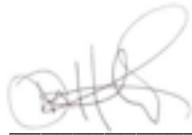
- (a) enter or remain upon any part of the Second Claimant's property at the Chemical Plant, Marsh Lane, Southampton SO45 1TH (the "Chemical Plant") (as shown for identification edged purple on the attached 'Fawley Plan');
- (b) damage any part of the Chemical Plant;
- (c) affix themselves or any person or object at the Chemical Plant;

5. Not to enter onto the Claimants' property and obstruct any of the vehicular entrances or exits to any of the Sites (where "Sites" for this purpose does not include the area edged brown on the Purfleet Plan) so as to restrict or prevent or endanger the use of such entrances or exits for the Claimants, their contractors, servants, agents, employees or licensees.

**AND TO BE BOUND BY THESE PROMISES UNTIL THE LATER OF 31 July 2026 OR THE DATE OF THE NEXT ANNUAL REVIEW HEARING**

**STATEMENT**

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



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Diana Hekt  
Fifth Defendant

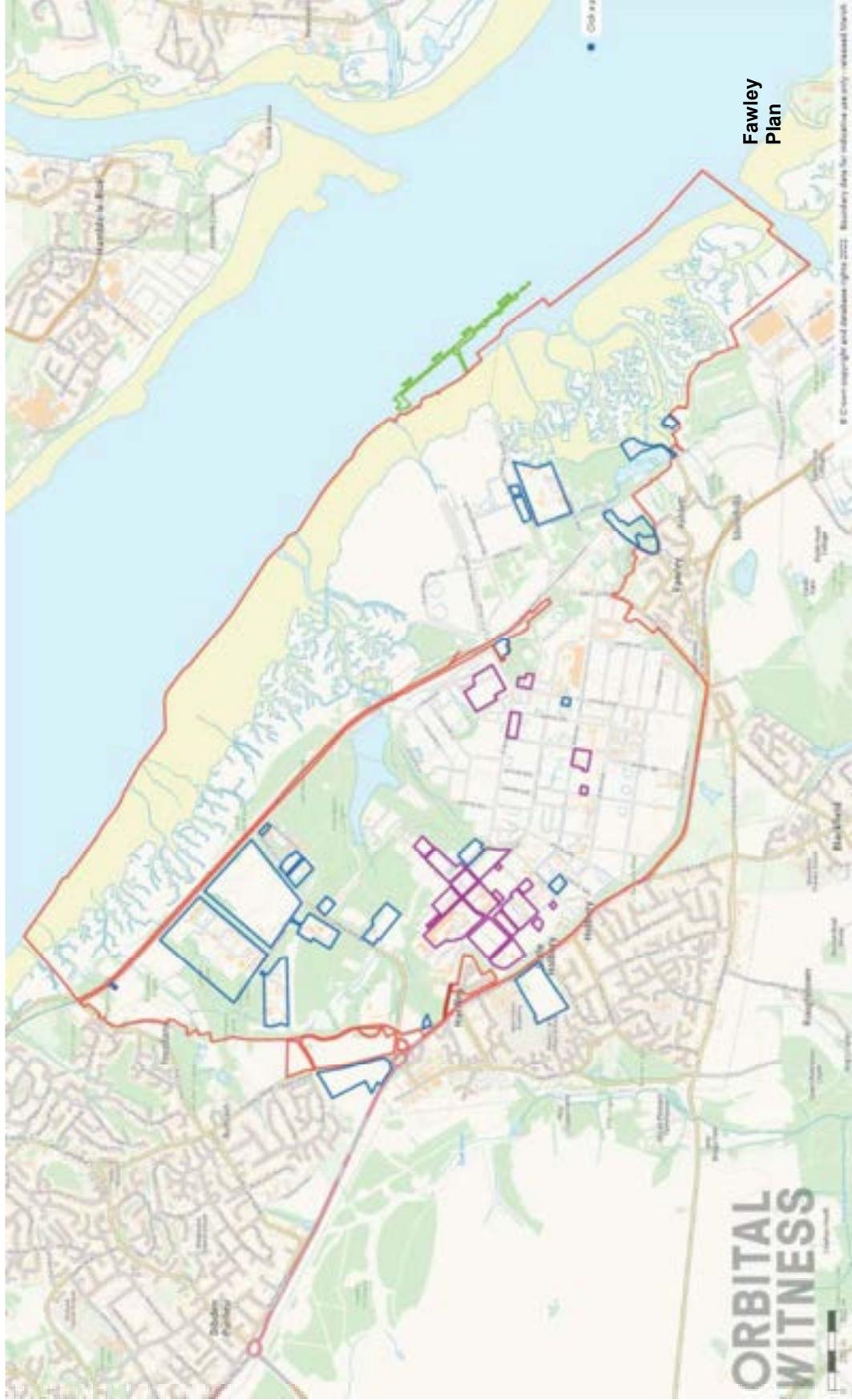
15/06/2025

We consent to an order in these terms



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Norton Rose Fulbright LLP  
Solicitors for the Claimants  
16 June 2025



From: Scott Speirs  
Sent: 16 June 2025 14:36  
To: Diana Hekt  
Cc: Holly Stebbing  
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

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Dear Diana

We confirm this has been received and we will inform the Court accordingly.

Yours faithfully  
Norton Rose Fulbright

Scott Speirs | Senior Associate

Norton Rose Fulbright LLP  
Quayside House, 110 Quayside, Newcastle upon Tyne, NE1 3DX, United Kingdom  
Tel +44 20 7444 2441 | Mob +44 75111 76603  
scott.speirs@nortonrosefulbright.com  
NORTON ROSE FULBRIGHT  
Law around the world  
nortonrosefulbright.com

-----Original Message-----

From: Diana Hekt <hekt@outlook.com>  
Sent: 15 June 2025 23:39  
To: Scott Speirs <Scott.Speirs@nortonrosefulbright.com>  
Cc: Holly Stebbing <Holly.Stebbing@nortonrosefulbright.com>  
Subject: Re: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

Dear Norton Rose Fulbright

Thanks for your email.

Please find the attached undertaking signed as requested.

With thanks

Diana Hekt

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From: Scott Speirs <Scott.Speirs@nortonrosefulbright.com>  
Sent: 12 June 2025 10:58  
To: Diana Hekt  
Cc: Holly Stebbing  
Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

Dear Diana

I hope you have had time to consider the below email.

As explained in the below email, the attached document is the undertaking I referred to. It is intended to replace the previous undertaking you provided, which expires on 30 June 2025. As previously noted, this contains a penal notice meaning if you breach your undertaking you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

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HS5/222

From: Microsoft Outlook  
Sent: 16 June 2025 14:36  
To: Diana Hekt  
Subject: Relayed: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]  
Attachments: RE QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555].msg

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[Diana Hekt \(hekt@outlook.com\)](mailto:hekt@outlook.com)

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

## Olukoyinsola Onakomaiya

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**From:** Microsoft Outlook  
**To:** PBHPXR  
**Sent:** 15 August 2024 16:17  
**Subject:** Relayed: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[PBHPXR \(PBHPXR@protonmail.com\)](mailto:PBHPXR@protonmail.com)

Subject: RE: QB-2022-001098 Esso Petroleum and another v Persons Unknown and others [NRF\_EMEA-UK.FID3210555]