

**IN THE HIGH COURT OF JUSTICE**  
**KING'S BENCH DIVISION**

**BEFORE: THE HONOURABLE MR/S JUSTICE [     ] ]**  
**ON: 30 June 2026**

**B E T W E E N : -**

- (1) LEEDS BRADFORD AIRPORT LIMITED**
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED**
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMIED**
- (4) NIAL SERVICES LIMITED**

**Claimants**

**-and-**

**(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)**

**(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)**

**(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT NEWCASTLE AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)**

**Defendants**

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**ORDER**

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**PENAL NOTICE**

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

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

**IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**UPON** the injunctions made by Order dated 19 July 2024 by Ritchie J (“**the Ritchie J Orders**”)

**AND UPON** the review of the Ritchie J Order on 24 June 2025 by Mr Justice Bourne and the order of 24 June 2025 (“**the Bourne J Order**”)

**AND UPON** the Claimants’ application dated 2 June 2026

**AND UPON** the Claimants’ application dated 18 June 2026 to re-amend the claim form and re-amend the particulars of claim

**AND UPON** the review hearings in each of the following claims having been listed on 30 June 2026 to be heard together KB-2024-1765, KB-2024-002132, KB-2024-002317, and KB-2024-002473 (“**the Claims**”)

**AND UPON** reading the application and the witness evidence in support

**AND UPON** hearing Mr Morshead K.C. and Miss Barden, counsel for the Claimants and there being no other attendance

**AND UPON** the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the relief granted by the Ritchie J Order

**IT IS ORDERED that:**

1. The Ritchie J Orders shall remain in full force and effect subject to review, as provided for in paragraph 2 of the Ritchie J Orders, subject to the amendments shown in Annexes 1 to 3 to this Order (which includes the variation as ordered by paragraph 2 of the Bourne J Order).
  
2. The Claimants have permission to re-amend the claim form and particulars of claim to:
  - a. Re-amend the description of the Defendants.
  - b. Substitute Plan 2, Plan 2A and Plan 2B with the plans annexed to the application dated 18 June 2026 marked Plan 2, Plan 2A and Plan 2b.
  - c. Re-amend paragraph 14 of the amended particulars of claim to refer to the London Luton Airport Byelaws 2025 and the correct byelaws therein and otherwise in the form annexed to the application notice dated 18 June 2026.
  
3. The court will provide sealed copies of this order to the Claimants' solicitors for service or notification in accordance with paragraph 9 of the Ritchie J Orders and by affixing this order at the locations marked "X" on the applicable Ritchie J Order (Plan 1, Plan 2 and Plan 3).

Annex 1

Amended by the order of The Hon. Dated [ ]

Schedule 1 3 Plan Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE

KINGS BENCH DIVISION

ROYAL COURTS OF JUSTICE

BETWEEN:-

(1) LEEDS BRADFORD AIRPORT LIMITED

AND THREE OTHERS

Claimants

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

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ORDER

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**PENAL NOTICE**

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

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

**IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**BEFORE** The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 18 July 2024

**UPON** the Claimants' claim by the Claim Form issued on 16 July 2024

**AND UPON** the Claimants' ex-parte application for an injunction issued on 16 July 2024 ("**the Application**")

**AND UPON READING** the Application and the first witness statements: of Alexander James Wright dated 16 July 2024, 17 July 2024, (another) 17 July 2024; and 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

**AND UPON** hearing Mr Morshead K.C. and Miss Barden, Counsel for the Claimants and no one attending for the Defendants.

**AND UPON** the First Claimant giving and the Court accepting the undertakings set out in Schedule 2 to this Order.

**AND UPON** the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to [protestrequest@lba.co.uk](mailto:protestrequest@lba.co.uk).

## **DEFINITIONS**

“**Leeds Bradford Airport**” means the land shown in red outlined in red on Plan 1 to the Claim Form, appended to this Order in Schedule 1 (“**Plan 1**”).

“**Amended Warning Notice**” means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address <https://www.leedsbradfordairport.co.uk/injunction>. at which copies of this Order may be viewed and downloaded).

## **NOW IT IS ORDERED THAT:**

### **INJUNCTION**

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.
2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

### **SERVICE**

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the First Defendant:
  - a. Uploading a copy onto the following website:  
<https://www.leedsbradfordairport.co.uk/injunction>.
  - b. Sending an email to each of the email addresses listed in Schedule 3 to this Order (1) stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and (2) attaching this Order.
  - c. Affixing a notice at those locations marked with an “X” on Plan 1 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form of Schedule 4 and, in the case of any further applications or documents served pursuant to paragraph 9 of this Order, affixing a notice at

the locations marked with an “X” on Plan 1 setting out where the relevant application(s) or document(s) can be found and obtained in hard copy.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraph 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.
6. The Court will provide sealed copies of this Order to the First Claimant’s solicitors for service (whose details are set out below).
7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.
8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3 and 4. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

#### **FURTHER DIRECTIONS**

9. Service on the First Defendant of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the First Claimant’s solicitors 72 hours’ notice of such application by email to [StuartWortleyalexwright@eversheds-sutherland.com](mailto:StuartWortleyalexwright@eversheds-sutherland.com). If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant’s solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant’s solicitors.
13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.

15. Costs are reserved.

**Ritchie J**

**Made 19 July 2024**

**NOTES**

**COMMUNICATIONS WITH THE FIRST CLAIMANT**

The First Claimant's solicitors and their contact details are:

~~(1) Stuart Wortley  
Eversheds Sutherland (International) LLP  
[StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@eversheds-sutherland.com)  
07712 881 393~~

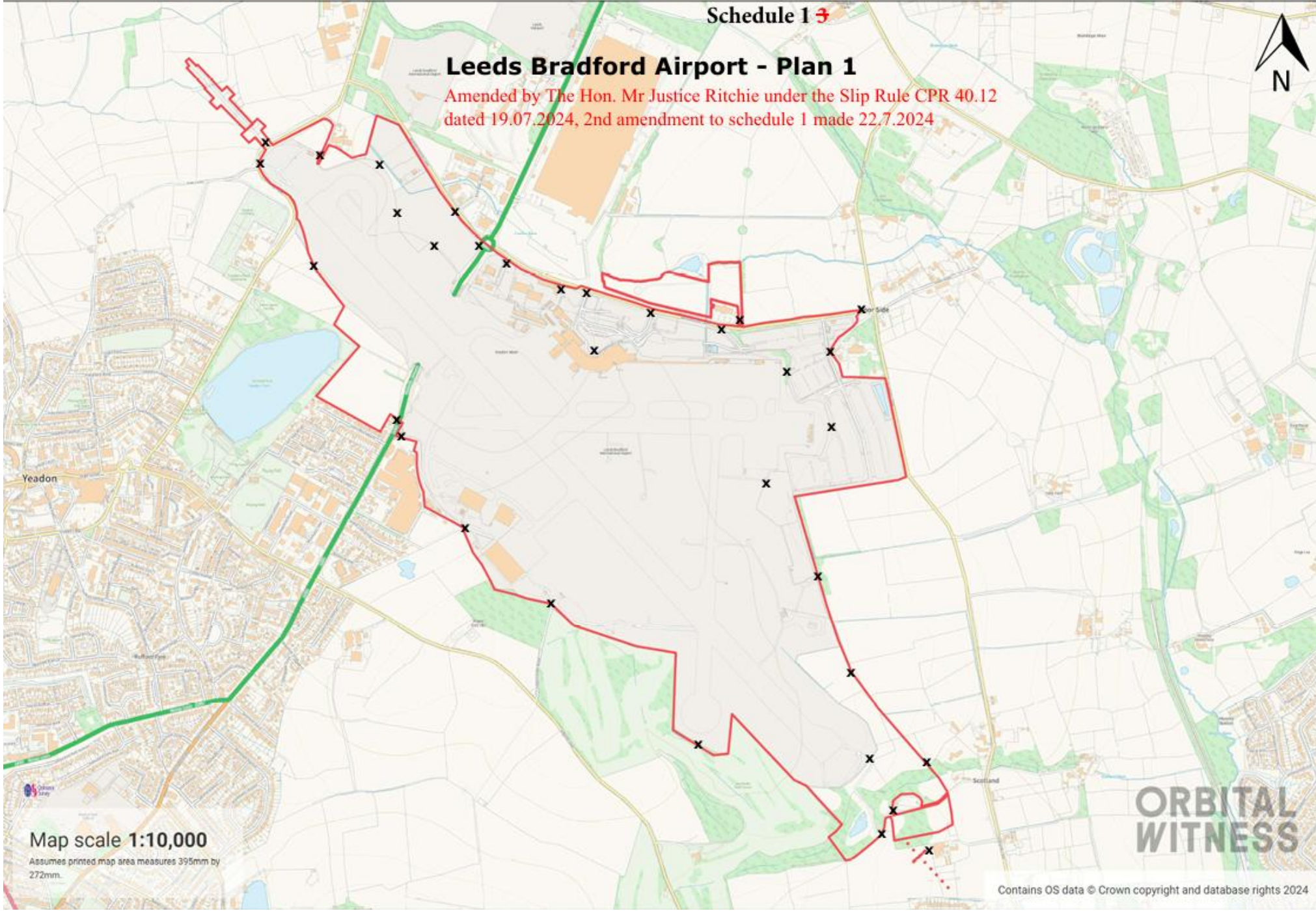
~~(2) Nawaaz Allybokus  
Eversheds Sutherland (International) LLP  
[NawaazAllybokus@eversheds-sutherland.com](mailto:NawaazAllybokus@eversheds-sutherland.com)  
07920 590 944~~

(3) Alexander Wright  
Eversheds Sutherland (International) LLP  
[alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)  
07500 578620

Schedule 1 ↻

# Leeds Bradford Airport - Plan 1

Amended by The Hon. Mr Justice Ritchie under the Slip Rule CPR 40.12 dated 19.07.2024, 2nd amendment to schedule 1 made 22.7.2024



Map scale 1:10,000  
Assumes printed map area measures 395mm by 272mm.

**ORBITAL  
WITNESS**

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## **SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT**

- (1) The First Claimant will take steps to serve the First Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
- (2) The First Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

### SCHEDULE 3 – EMAIL ADDRESSES

- [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
- [info@juststopoil.org](mailto:info@juststopoil.org)
- ~~[enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk)~~
- [info@takebackpower.net](mailto:info@takebackpower.net)
- [press@takebackpower.net](mailto:press@takebackpower.net)
- [shut the system info@proton.me](mailto:shut_the_system_info@proton.me)
- [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org)
- [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org)
- [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com)
- [youthdemand@proton.me](mailto:youthdemand@proton.me)
- [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

## SCHEDULE 4 – AMENDED WARNING NOTICE

### High Court Injunction in Force

#### NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 (“the Order”)

**TO:** PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

**FROM:** Leeds Bradford Airport Limited (the “**First Claimant**”)

This notice relates to the land known as Leeds Bradford Airport which is shown edged red on the Plan below (the “**Airport**”)

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the First Claimant.

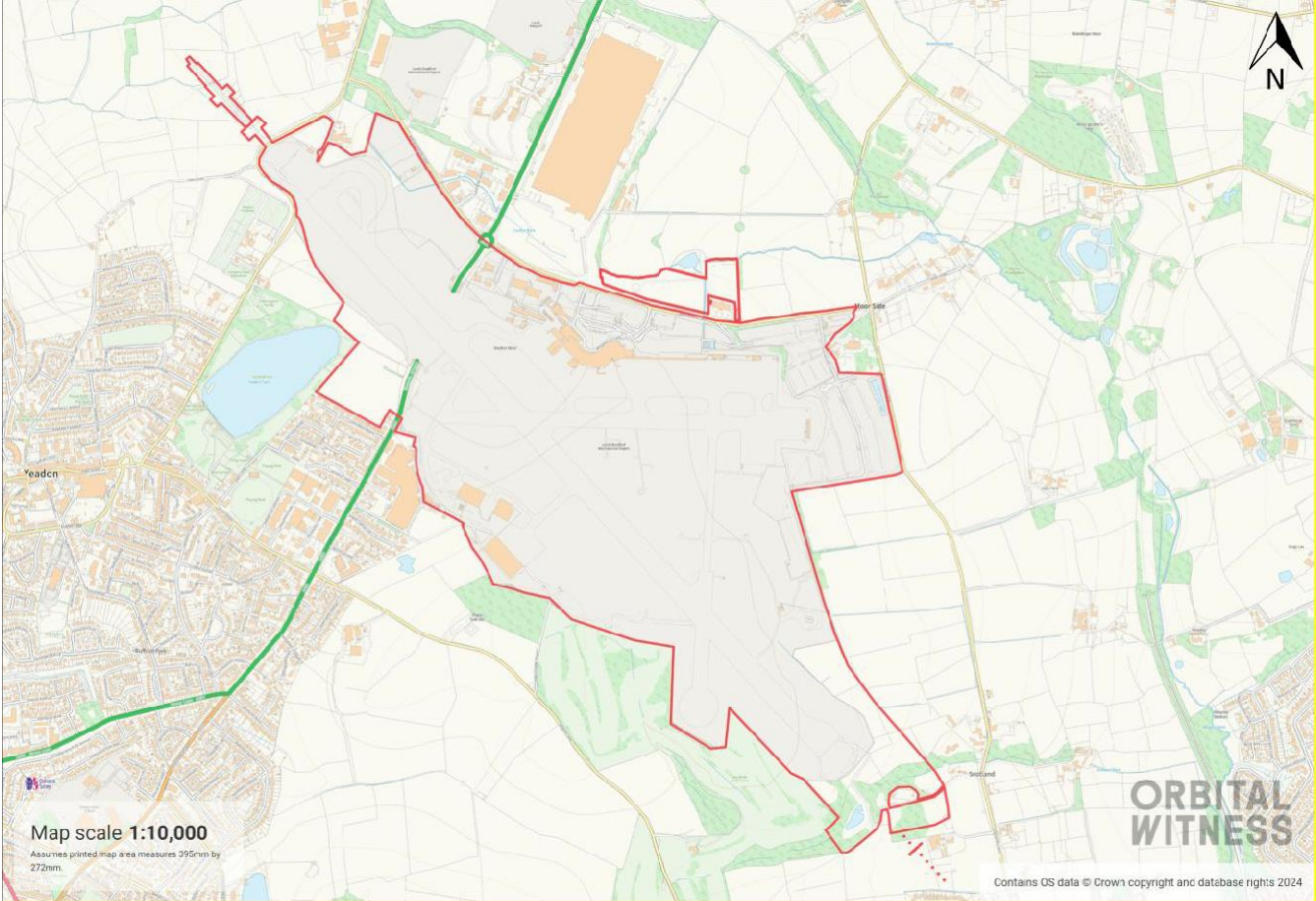
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

**You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized**

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant’s solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: <https://www.leedsbradfordairport.co.uk/injunction>

Copies may also be obtained from the Information Desk or by contacting Alexander Wright Stuart Wortley of Eversheds Sutherland on 0771 288 1393 07500578620 or by email [alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com) [stuartwortley@eversheds-sutherland.com](mailto:stuartwortley@eversheds-sutherland.com).



Annex 2

Amended by the order of The Hon.

Dated [ ]

**CLAIM NO: KB-2024-002317**

**IN THE HIGH COURT OF JUSTICE**  
**KINGS BENCH DIVISION**  
**ROYAL COURTS OF JUSTICE**

**BETWEEN:-**

**(2) LONDON LUTON AIRPORT OPERATIONS LIMITED**

**AND THREE OTHERS**

**Claimants**

- v -

**(2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)**

**AND TWO OTHERS**

**Defendants**

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**ORDER**

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## **PENAL NOTICE**

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

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

## **IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**BEFORE** The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 19 July 2024.

**UPON** the Claimants' claim by the Claim Form issued on 16 July 2024.

**AND UPON** the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

**AND UPON READING** the Application and the witness statements of: Alexander James Wright dated 16 July 2024, dated 17 July 2024, (and another) 17 July 2024 and dated 18 July 2024; Vincent Hodder dated 15 July 2024; Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

**AND UPON** hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants.

**AND UPON** the Second Claimant giving and the Court accepting the undertakings set out in Schedule 2 to this Order.

**AND UPON** the Second Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London Luton Airport, as defined by this Order, should be made by email to [protestrequest@ltn.aero](mailto:protestrequest@ltn.aero).

## **DEFINITIONS**

**"London Luton Airport"** means the land shown in red outlined in red on Plan 2 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

“**Amended Warning Notice**” means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address <https://www.london-luton.co.uk/corporate/lla-publications/injunction> at which copies of this Order may be viewed and downloaded.

**NOW IT IS ORDERED THAT:**

### **INJUNCTION**

1. With immediate effect, unless varied, discharged or extended by further order, the Second Defendant and each of them are forbidden from entering, occupying or remaining on any part of London Luton Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Second Claimant.
2. This Order is subject to periodic review by the Court on application by the Second Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

### **SERVICE**

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Second Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the Second Defendant:
  - a. Uploading a copy onto the following website: <https://www.london-luton.co.uk/corporate/lla-publications/injunction>.
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and attaching this Order.
  - c. Affixing a notice at those locations marked with an “X” on Plan 2 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form in Schedule 4 and, in the case of any further applications or documents served pursuant to paragraph 9 of this Order, affixing a notice at the locations marked with an “X” on Plan 2 setting out where the relevant application(s) or document(s) can be found and obtained in hard copy.
4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.

5. The taking of such steps set out at paragraphs 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the Second Defendant and each of them.
6. The Court will provide sealed copies of this Order to the Second Claimant's solicitors for service (whose details are set out below).
7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.
8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

### **FURTHER DIRECTIONS**

9. Service on the Second Defendant of any further applications or documents in the proceedings by the Second Claimant shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Second Claimant's solicitors 72 hours' notice of such application by email to [StuartWortleyalexwright@eversheds-sutherland.com](mailto:StuartWortleyalexwright@eversheds-sutherland.com). If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by writing to the Second Claimant's solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Second Claimant's solicitors.
13. The Second Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

**Ritchie J**

**Made 19 July 2024**

## NOTES

### COMMUNICATIONS WITH THE SECOND CLAIMANT

The Second Claimant's solicitors and their contact details are:

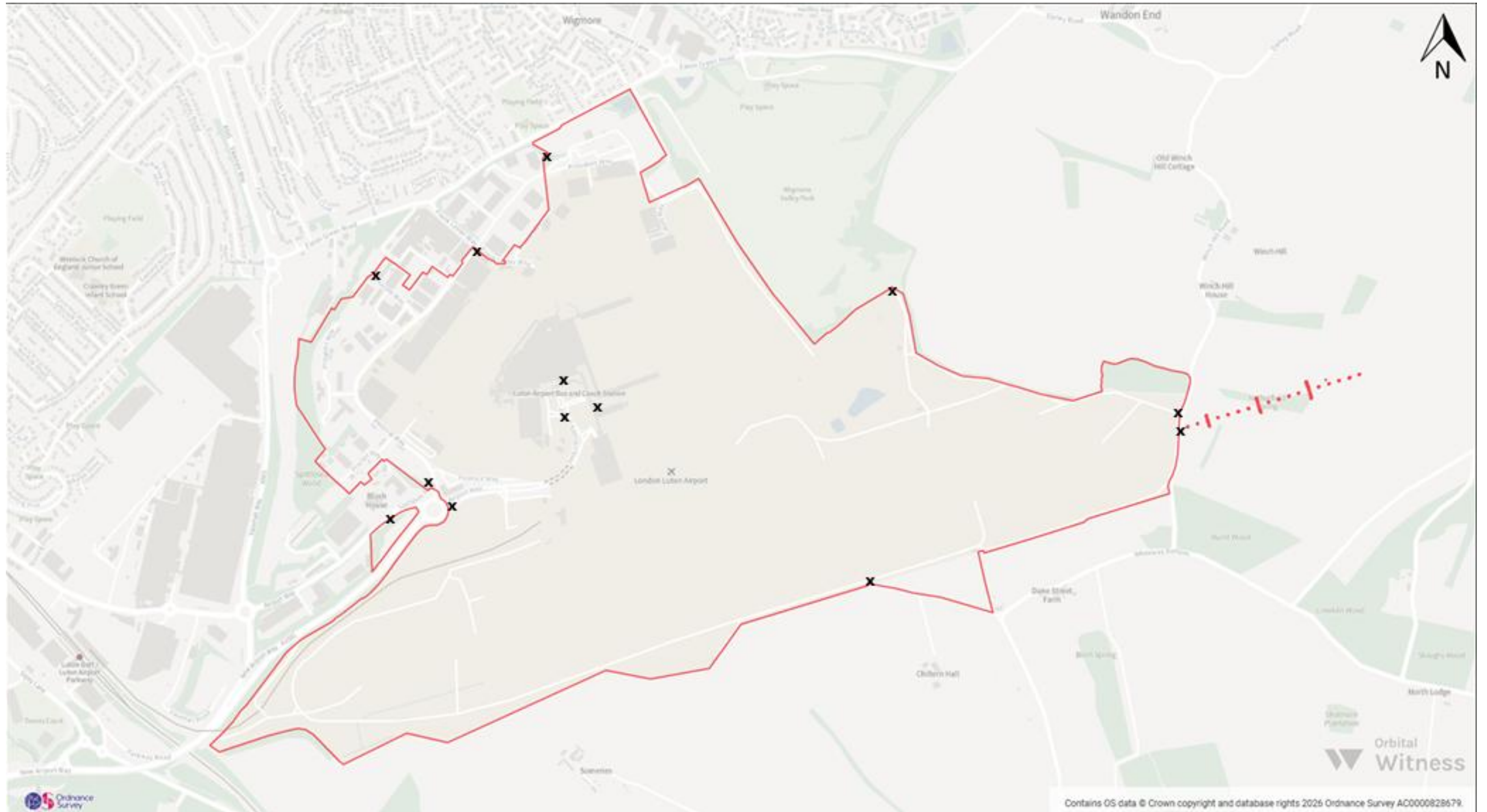
~~(1) Stuart Wortley  
Eversheds Sutherland (International) LLP  
[StuartWortley@eversheds-sutherland.com](mailto:StuartWortley@eversheds-sutherland.com)  
07712 881 393~~

~~(2) Nawaaz Allybokus  
Eversheds Sutherland (International) LLP  
[NawaazAllybokus@eversheds-sutherland.com](mailto:NawaazAllybokus@eversheds-sutherland.com)  
07920 590 944~~

(3) Alexander Wright  
Eversheds Sutherland (International) LLP  
[alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)  
07500 578620

## **SCHEDULE 1**

# LONDON LUTON AIRPORT PLAN 2



## **SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE SECOND CLAIMANT**

- (1) The Second Claimant will take steps to serve the Second Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
  
- (2) The Second Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

### SCHEDULE 3 – EMAIL ADDRESSES

- [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
- [info@juststopoil.org](mailto:info@juststopoil.org)
- ~~[enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk)~~
- [info@takebackpower.net](mailto:info@takebackpower.net)
- [press@takebackpower.net](mailto:press@takebackpower.net)
- [shut\\_the\\_system\\_info@proton.me](mailto:shut_the_system_info@proton.me)
- [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org)
- [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org)
- [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com)
- [youthdemand@proton.me](mailto:youthdemand@proton.me)
- [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

## SCHEDULE 4 – AMENDED WARNING NOTICE

### High Court Injunction in Force

#### NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 (“the Order”)

**TO:** PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

**FROM:** London Luton Airport Operations Limited (the “**Second Claimant**”)

This notice relates to the land known as London Luton Airport which is shown edged red on the Plan below (the “**Airport**”)

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the Second Claimant.

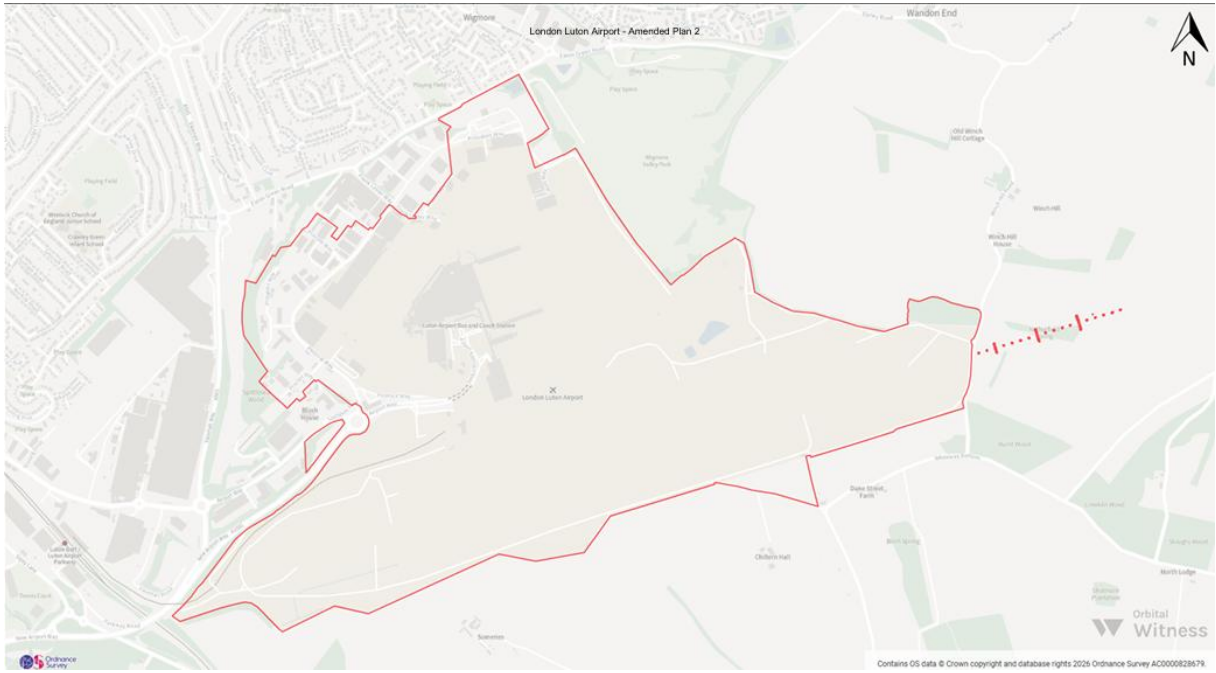
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

**You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized**

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Second Claimant’s solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: <https://www.london-luton.co.uk/corporate/lla-publications/injunction>

Copies may also be obtained from the Information Desk or by contacting Alexander Wright Stuart Wortley of Eversheds Sutherland ~~on 0771 288 1393~~ on 07500578620 or by email [alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com) [stuartwortley@eversheds-sutherland.com](mailto:stuartwortley@eversheds-sutherland.com).



Amended by the order of The Hon. Dated [ ]

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE  
KINGS BENCH DIVISION  
ROYAL COURTS OF JUSTICE

BETWEEN:-

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED  
(4) NIAL SERVICES LIMITED

AND TWO OTHERS

Claimants

- v -

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

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ORDER

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PENAL NOTICE

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

**ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO**

**BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.**

### **IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).**

**BEFORE The Honourable Mr Justice Ritchie on 18 July 2024**

**UPON** the Claimants' claim by the Claim Form issued on 16 July 2024

**AND UPON** the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

**AND UPON READING** the Application and the witness statements of: Alexander James Wright dated 16 July 2024, 17 July 2024, (and another) 17 July 2024, dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**")

**AND UPON** hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants

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

**AND UPON** the Third and Fourth Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Newcastle International Airport, as defined by this Order, should be made by email to [protestrequest@newcastleinternational.co.uk](mailto:protestrequest@newcastleinternational.co.uk)

### **DEFINITIONS**

**"Newcastle International Airport"** means the land shown in red outlined in red on Plan 3 to

the Claim Form, appended to this Order in Schedule 1 (“**Plan 3**”).

“**Amended Warning Notice**” means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address <https://www.newcastleairport.com/about-your-airport/airport-company/injunction/> at which copies of this Order may be viewed and downloaded).

## **IT IS ORDERED THAT:**

### **INJUNCTION**

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Newcastle International Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants (or either of them).
2. This Order is subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order. If such review takes place, it shall be heard with the review of any injunctions made in all or any of the Claims, with a time estimate of 1 day.

### **SERVICE**

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Third and Fourth Claimants shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the Third Defendant:
  - a. Uploading a copy onto the following website:  
<https://www.newcastleairport.com/about-your-airport/airport-company/injunction/>
  - b. Sending an email with this Order attached to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
  - c. Affixing a notice at those locations marked with an “X” on Plan 3 setting out where these documents can be found and obtained in hard copy in the form of Schedule 4 and, in the case of any further applications or documents served pursuant to paragraph 9 of this Order, affixing a notice at the locations

marked with an “X” on Plan 1 setting out where the relevant application(s) or document(s) can be found and obtained in hard copy.

4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraph 3 shall be good and sufficient service of this Order and of the Claim Documents upon the Third Defendant and each of them.
6. The Court will provide sealed copies of this Order to the Third and Fourth Claimants’ solicitors for service (whose details are set out below).
7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.
8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraphs 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

#### **FURTHER DIRECTIONS**

9. Service on the Third Defendant of any further applications or documents in the proceedings by the Third and Fourth Claimants shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Third and Fourth Claimants’ solicitors 72 hours’ notice of such application by email to [StuartWortley-alexwright@eversheds-sutherland.com](mailto:StuartWortley-alexwright@eversheds-sutherland.com). If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Third and Fourth Claimants’ solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Third and Fourth Claimants’ solicitors.
13. The Third and Fourth Claimants (or either of them) have liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.

15. Costs are reserved.

**Ritchie J**

**Made 19.7.2024**

**COMMUNICATIONS WITH THE THIRD AND FOURTH CLAIMANTS**

The Third and Fourth Claimants' solicitors and their contact details are:

~~(1) Stuart Wortley  
Eversheds Sutherland (International) LLP  
StuartWortley@eversheds-sutherland.com  
07712 881 393~~

~~(2) Nawaaz Allybokus  
Eversheds Sutherland (International) LLP  
NawaazAllybokus@eversheds-sutherland.com  
07920 590 944~~

(3) Alexander Wright  
Eversheds Sutherland (International) LLP  
[alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com)  
07500 578620

## **SCHEDULE 1**

# Newcastle International Airport - Plan 3



**ORBITAL  
WITNESS**

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**SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE THIRD AND FOURTH  
CLAIMANTS**

- (1) The Third and Fourth Claimants will take steps to serve the Third Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
- (2) The Third and Fourth Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

### SCHEDULE 3 – EMAIL ADDRESSES

- [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
- [info@juststopoil.org](mailto:info@juststopoil.org)
- ~~[enquiries@extinctionrebellion.co.uk](mailto:enquiries@extinctionrebellion.co.uk)~~
- [info@takebackpower.net](mailto:info@takebackpower.net)
- [press@takebackpower.net](mailto:press@takebackpower.net)
- [shut\\_the\\_system\\_info@proton.me](mailto:shut_the_system_info@proton.me)
- [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org)
- [operations@fossilfreelondon.org](mailto:operations@fossilfreelondon.org)
- [YouthDemandPress@protonmail.com](mailto:YouthDemandPress@protonmail.com)
- [youthdemand@proton.me](mailto:youthdemand@proton.me)
- [enquiries@extinctionrebellion.uk](mailto:enquiries@extinctionrebellion.uk)

**SCHEDULE 4 – AMENDED WARNING NOTICE**

**HIGH COURT CLAIM NO: KB-2024-002317**

**High Court Injunction in Force**

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**FROM:** Newcastle International Airport Limited and NIAL Services Limited (the “**Third and Fourth Claimants**”)

This notice relates to the land known as Newcastle International Airport which is shown edged red on the Plan below (the “**Airport**”)

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment or wealth inequality without the prior consent of the Third and Fourth Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

**You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized**

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Third and Fourth Claimants’ solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at:

<https://www.newcastleairport.com/about-your-airport/airport-company/injunction/>

Copies may also be obtained from the Information Desk or by contacting Alexander Wright ~~Stuart Wortley~~ of Eversheds Sutherland on ~~0771 288 1393~~ 07500578620 or by email [alexwright@eversheds-sutherland.com](mailto:alexwright@eversheds-sutherland.com) ~~stuartwortley@eversheds-sutherland.com~~

