

Party: Claimants
Name: Alexander James Wright
Number: Third
Date: 17.07.2024

CLAIM NO: KB-2024-002317

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

B E T W E E N

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

Claimants

- v -

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)**
- (2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)**
- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)**

Defendants

**THIRD WITNESS STATEMENT OF
ALEXANDER JAMES WRIGHT**

I ALEXANDER JAMES WRIGHT of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a Principal Associate in the firm of Eversheds Sutherland (International) LLP and assisting Stuart Wortley (Partner) who has conduct of these proceedings on behalf of the Claimants.
2. I make this witness statement in support of the Claimants' application for an injunction. I make it further to my first witness statement of 16 July 2024 and my second witness statement of 17 July 2024.
3. This witness statement has been produced by me with the assistance of my colleagues Nawaaz Allybokus and Emma Payne.
4. The statements in this witness statement are from my own knowledge, save where I state otherwise. Where statements are matters of information or belief, I provide the source of that information or belief.
5. I refer to exhibits marked "**AW1**" in this statement. They have been produced to me and I verify that the documents in those exhibits are true copies of the documents.

FURTHER DEVELOPMENTS

6. On 17 July 2024, I was informed by a colleague that Just Stop Oil had published on their website a letter which they had written to Keir Starmer, the prime minister of the United Kingdom. The letter stated:

"Dear Prime Minister,

We write to congratulate you on becoming Prime Minister and to acknowledge that one of the first steps of your new government has been to reaffirm your commitment to end new UK oil and gas licensing. This is an essential first step towards what is required to end the UK's contribution to the climate crisis. However, we all know that it is not enough.

We also need to rapidly phase out our existing oil and gas projects and to end the use of fossil fuels across our economy. This is not only the view of Just Stop Oil; the call for a rapid phase out of fossil fuels is backed by climate science, by global equity considerations, by international law and by global public opinion.

We last wrote to you in your role as leader of the Labour Party on 24 June to demand that, should you become our next Prime Minister, you immediately commit the UK government to **working with other nations to establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fair and just transition.**

We indicated that unless such assurances were provided by 12 July, we would be forced to take action to protect our communities by engaging in a campaign of noncooperation against fossil fuel use, at airports across the country.

We are writing now to let you know that since no such assurances have been received we remain in civil resistance and are preparing to take action, but that, as ever, we remain open to dialogue.

The era of fossil fuels is over. It's time to stop waging war on humanity.

Yours sincerely,

Just Stop Oil. (emphasis added by underlining)"

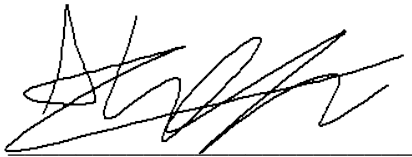
7. The URL is: <https://juststopoil.org/2024/07/16/just-stop-oil-letter-to-prime-minister-starmer/>. A copy of the letter is at Exhibit "**AW1**".

Statement of truth

I believe that the facts stated in this Witness Statement and Exhibits 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.

I am duly authorised to make this statement on the Claimants' behalf.

A handwritten signature in black ink, appearing to be 'AJW', written over a horizontal line.

Alexander James Wright

17 July 2024

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Defendants

AW1

This is the exhibit marked "AW1" in the Third Witness Statement of Alexander James Wright.



Just Stop Oil Letter to Prime Minister Starmer

Press / July 16, 2024

Dear Prime Minister,

We write to congratulate you on becoming Prime Minister and to acknowledge that one of the first steps of your new government has been to reaffirm your commitment to end new UK oil and gas licensing. This is an essential first step towards what is required to end the UK's contribution to the climate crisis. However, we all know that it is not enough.

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We are writing now to let you know that since no such assurances have been received we remain in civil resistance and are preparing to take action, but that, as ever, we remain open to dialogue.

The era of fossil fuels is over. It's time to stop waging war on humanity.

Yours sincerely,

Just Stop Oil.

ENDS

Press contact: 07762 987334

Press email: 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

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

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

Notes to Editors

[1] Just Stop Oil is working with an international network of groups to demand our governments establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fast, fair, and just transition. This can be accomplished by endorsing the Fossil Fuel Non-Proliferation Treaty Initiative and seeking a negotiating mandate to establish the treaty.

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

Critical seed funding for Just Stop Oil was provided by Climate Emergency Fund and Adam McKay in 2022

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.

← Previous Post

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First Name *

Mobile Number *, 07400 123456

☐ I'm happy to get occasional texts and calls about specific actions or about events I've signed up to.

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SUBMIT

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Follow us on social media.

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.**

Our new demand: That the UK Government sign up to a Fossil Fuel Treaty to Just Stop Oil by 2030.

Our governments must work together to establish a legally binding treaty to stop extracting and burning oil, gas and coal by 2030 as well as supporting and financing other countries to make a fast, fair, and just transition.

This can be accomplished by endorsing the **Fossil Fuel Non-Proliferation Treaty Initiative** and seeking a negotiating mandate to establish the treaty.

[FAQs](#) | [The Campaign](#) | [Research](#)

Contact us

Press enquiries: juststopoilpress@protonmail.com

General enquiries: info@juststopoil.org

Donation enquiries: juststopoilgiving@protonmail.com

Volunteer enquiries: jsovolunteers@gmail.com

Book a speaker: contact@juststopoil.org

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REGION (TO ADD YOU TO THE CORRECT
REGIONAL MAILING LIST) *

ARE YOU A STUDENT? (IF YES, WE CAN ADD
YOU TO OUR STUDENTS SPECIFIC EMAILING
LIST)

☐ Yes

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