

CLAIM NO: KB-2024-1765
CLAIM NO: KB-2024-2132
CLAIM NO: KB-2024-2317
CLAIM NO: KB-2024-2473

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
B E T W E E N**

**(1) LONDON CITY AIRPORT LIMITED
(2) DOCKLANDS AVIATION GROUP LIMITED**

Claimants (KB-2024-1765)

**(1) MANCHESTER AIRPORT PLC
(2) AIRPORT CITY (MANCHESTER) LTD
(3) MANCHESTER AIRPORT CAR PARK (1) LTD
(4) STANSTED AIRPORT LTD
(5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD**

Claimants (KB-2024-2132)

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

Claimants (KB-2024-2317)

**(1) BIRMINGHAM AIRPORT LIMITED
(2) LIVERPOOL AIRPORT LIMITED
(3) PEEL L&P INVESTMENTS (NORTH) LIMITED
(4) BRISTOL AIRPORT LIMITED
(5) SOUTH WEST AIRPORTS LIMITED
(6) BRISTOL AIRPORT DEVELOPMENTS LIMITED**

Claimants (KB-2024-2473)

and

**PERSONS UNKNOWN
AS MORE PARTICULARLY DESCRIBED IN THE (AMENDED) CLAIM FORMS**

**Defendants
(KB-2024-1765/KB-2024-2132/
KB-2024-2317/KB-2024-2473)**

WITNESS STATEMENT OF ALEXANDER JAMES WRIGHT

I **ALEXANDER JAMES WRIGHT** of Two New Bailey, 6 Stanley Street, Salford M3 5GX WILL SAY as follows:

1. INTRODUCTION

- 1.1 I am a Legal Director in the firm of Eversheds Sutherland (International) LLP and have conduct of these proceedings on behalf of the Claimants. I am duly authorised to make this statement on the various Claimants' behalf.
- 1.2 Save where otherwise stated, the facts contained in this statement are within my own knowledge and belief and, where they are not, I refer to the source of that information.
- 1.3 The documents to which I shall refer in the course of this statement are to be found in the exhibits marked "**AJW1 – AJW16**".

- 1.4 The background to these proceedings is set out in my witness statement of 11 June 2026 in each of the subject proceedings, which concern injunctions that were sought and obtained in 2024 to protect various airports against the threat of direct/unlawful protest activity in four separate actions - being:

	Airport(s)	Action Number	Judge / Date of Order
1	London City Airport	KB-2024-001765	Mr Justice Julian Knowles 20 June 2024 (" the Knowles J Order ")
2	Manchester Airport, Stansted Airport and East Midlands Airport	KB-2024-002132	HHJ Rosalind Coe 5 July 2024 (" the HHJ Coe KC Order ")
4	Leeds Bradford Airport, London Luton Airport and Newcastle International Airport	KB-2024-002317	Mr Justice Ritchie 18 July 2024 (amended by the slip rule on 19 July 2024) (" the Ritchie J Order ")
6	Birmingham Airport, Bristol Airport and Liverpool Airport	KB-2024-002473	Mr Justice Jacobs 6 August 2024 (" the Jacobs J Order ")

(together "**the Claims**")

(the Knowles J Order, the HHJ Coe KC Order, Ritchie J Order and Jacobs J Order together "**the 2024 Orders**", a copy of which are exhibited at **Exhibit AJW1**).

- 1.5 So as to make better use of the Court's time, the various Claimants in the Claims agreed in 2025 to join together and to ask the Court to undertake the first annual review of the injunctions granted in them at the same hearing. The first annual review was heard on 24 June 2025 ("**the First Review Hearing**") and the injunctions granted pursuant to the 2024 Orders were continued for a further 12 months by Orders dated 24 June 2025 of Bourne J ("**the 2025 Orders**"), a copy of which are exhibited at **Exhibit AJW2**.
- 1.6 The second annual review of the injunctions granted pursuant to the 2024 Orders has been listed to take place at hearing on 30 June 2026 ("**the Second Review Hearing**").
- 1.7 This witness statement follows my witness statement of 11 June 2026 in each of the subject proceedings and is made in support of the second annual review of the injunctions granted pursuant to the 2024 Orders and to:
- 1.7.1 confirm the steps taken to serve / provide notice of the Second Review Hearing and relevant documents in each of the Claims in respect of it;
- 1.7.2 provide further information in respect of two matters dealt with in my witness statement of 11 June 2026 in action KB-2024-001765 (London City Airport) only - concerning the updated Warning Notices affixed at this airport following the First Review Hearing and the formatting issue identified with the plan attached to the 2025 Order in this action.

2. **NOTICE OF THE SECOND REVIEW HEARING**

Uploading Notice of the Second Review Hearing to each airport's relevant injunction website

- 2.1 The following representatives of each of the subject airports has confirmed to me that a notice, providing notice of the Second Review Hearing and stating where relevant and applicable documents to it can be found, was uploaded to their airport's relevant injunction website by the date specified in the following table.

Airport	Relevant Date	Representative
London City Airport	10 June 2026	Claire Hortop, Head of Legal
Manchester Airport	10 June 2026	Rebecca Bainbridge, Senior Legal Counsel (Airports)
Stansted Airport	10 June 2026	
East Midlands Airport	10 June 2026	
Leeds Bradford Airport	12 June 2026	Claire Acklam, Senior Legal Counsel
London Luton Airport	12 June 2026	David Morris, Head of Legal
Newcastle International Airport	10 June 2026	Mark Hunt, Chief Financial Officer
Birmingham Airport	10 June 2026	Kristin Garrett, General Counsel
Liverpool John Lennon Airport	12 June 2026	John Irving, Chief Executive Officer
Bristol Airport	12 June 2026	Graeme Gamble, Chief Operating Officer

2.2 I can confirm that I reviewed each of the relevant injunction websites on 15 June 2026 and exhibit screenshots, taken by me that day, of the relevant injunction websites at **Exhibit AJW3**, which shows that a notice of hearing is uploaded to each.

Sending Notice of the Second Review Hearing by email

2.3 I can confirm that I sent emails on 11 and 12 June 2026, in respect of each of the four actions, giving notice of the Second Review Hearing, to each of the email addresses referred to in Schedule 3 to each of the 2024 Orders, as well as to the following additional email addresses:

2.3.1 info@takebackpower.net and press@takebackpower.net which are understood to be linked to Take Back Power;

2.3.2 shut_the_system_info@proton.me, which is understood to be linked to Shut the System;

2.3.3 campaigner@fossilfreelondon.org and operations@fossilfreelondon.org which are understood to be linked to Fossil Free London;

2.3.4 YouthDemandPress@protonmail.com and youthdemand@proton.me, which are understood to be linked to Youth Demand;

2.3.5 enquiries@extinctionrebellion.co.uk; and

2.3.6 enquiries@extinctionrebellion.uk for the reasons explained below at paragraph 2.6.

A copy of the relevant emails is exhibited at **Exhibit AJW4**

- 2.4 I sent such email to the above additional email addresses in the interests of taking reasonable steps to bring the Second Annual Review Hearing to the attention of those potentially affected by it, having reviewed and obtained details of such email addresses from the Take Back Power website, the Shut the System Instagram page (there being no website for Shut the System), the Fossil Free London website and the Youth Demand website.
- 2.5 I can further confirm that 10 automatic responses were received in response to the above emails sent on 11 and 12 June 2026. Having reviewed the timings of the automated responses, I can confirm that:
- 2.5.1 5 automatic responses were received from shut_the_system_info@proton.me, noting that the "Recipient mailbox is full". I understand from previous discussions with this firm's IT team, in respect of separate, similar proceedings and following receipt of equivalent email automatic responses, that these emails were properly sent but will not have been delivered to or received by the recipient mailbox as the mailbox was full; and
- 2.5.2 5 further automatic response were received from enquiries@extinctionrebellion.co.uk which advised that the email could not be delivered as the "recipient's email address is possibly incorrect".

Copies of the relevant emails are exhibited at **Exhibit AJW5**.

- 2.6 On receiving the first automatic response from the email address enquiries@extinctionrebellion.co.uk, being in response to the email which I sent in respect of action KB-2024-002132 (Manchester Airport, Stansted Airport and East Midlands Airport), I reviewed the Extinction Rebellion Website and noticed that it listed a similar, albeit slightly different address, enquiries@extinctionrebellion.uk. On noting this, I can confirm that I sent a copy of my initial email to this email account, the same day (11 June 2026) (a copy of which is also exhibited at **Exhibit AJW4**), and thereafter included this email address as an initial recipient to each of the emails subsequently sent.
- 2.7 No other responses (automatic or otherwise) were received to the emails sent. Save as set out above, I have no reason to believe that any emails were not delivered and/or received and therefore consider that they were delivered.

Affixing of Notice of the Second Review Hearing

- 2.8 The Claimants affixed notice of the Second Review Hearing (stating where relevant and applicable documents to it can be found) at each of the relevant airport injunction warning notice locations (identified by an "X" on each of the relevant airport injunction plans appended to the 2024 Orders (as applicable)). A copy of the applicable notices are exhibited at **Exhibit AJW6**.
- 2.9 The following representatives of each of the subject airports has confirmed to me that such notices were, save with respect to East Midlands Airport, affixed by the date specified in the following table:

Airport	Relevant Date	Representative
London City Airport	11 June 2026	Claire Hortop, Head of Legal
Manchester Airport	12 June 2026	Rebecca Bainbridge, Senior Legal Counsel (Airports)
Stansted Airport	15 June 2026	
East Midlands Airport*	15 June 2026	
Leeds Bradford Airport	15 June 2026	Claire Acklam, Senior Legal Counsel
London Luton Airport	12 June 2026	David Morris, Head of Legal
Newcastle International Airport	15 June 2026	Mark Hunt, Chief Financial Officer
Birmingham Airport	15 June 2026	Kristin Garrett, General Counsel
Liverpool John Lennon Airport	15 June 2026	John Irving, Chief Executive Officer
Bristol Airport	15 June 2026	Graeme Gamble, Chief Operating Officer

2.10 In respect of East Midlands Airport, I have been advised by Rebecca Bainbridge, Senior Legal Counsel (Airports) that it was not possible to access one of the warning notice locations on or before 15 June 2026 due to road closures put in place for the annual 'Download Festival' at the neighbouring Donington Park. Ms Bainbridge has confirmed to me that a notice was affixed at the relevant location on 19 June 2026.

2.11 Taking the above steps together, I confirm that sufficient notice of the Second Review Hearing has been provided in accordance with the provisions of the 2024 Orders and 2025 Orders.

Informing Third Party Occupiers of the Second Review Hearing

2.12 I previously advised, in my witness statement of 11 June 2026 in action:

2.12.1 KB-2024-002473 (Birmingham Airport, Bristol Airport and Liverpool Airport), that third party occupiers within the 'red line' of the injunction order boundary at Birmingham Airport would be informed ahead of the Second Review Hearing that an application has been made to continue the injunction in respect of Birmingham Airport for a further 12 months. I can confirm that Kristin Garrett (General Counsel for Birmingham Airport) informed me on 15 June 2026 that third party occupiers had been notified as such; and

2.12.2 KB-2024-002132 (Manchester Airport, Stansted Airport and East Midlands Airport) that third party occupiers within the 'red line' of the injunction order boundary at Manchester Airport, Stansted Airport and East Midlands Airport would be informed ahead of the Second Review Hearing that an application has been made to continue the injunction in respect of these airports for a further 12 months. I can confirm that David McBride (Head of Legal at Manchester Airport Group) has informed me that this process is ongoing and that third party occupiers were previously advised of the initial application for an injunction in 2024 and that no issue or objection has been raised by any third parties to date.

Providing a copy of the Formal Listing Notice

2.13 The Court issued a Formal Listing Notice in each of the Claims on 19 June 2026, listing the Second Review Hearing for 30 June 2026. I explain below, at paragraph 5.4, that a copy of this was sent on 19 June 2026 to each of the email addresses referred to in Schedule 3 to each of the 2024 Orders, as well as to the additional email addresses set out at paragraph 2.3. In addition, the following representatives of each of the subject airports has confirmed to me that a copy of the applicable Formal Listing Notice was uploaded to their airport's relevant injunction website by the date specified in the following table.

Airport	Relevant Date	Representative
London City Airport	19 June 2026	Claire Hortop, Head of Legal
Manchester Airport	22 June 2026	Rebecca Bainbridge, Senior Legal Counsel (Airports)
Stansted Airport	22 June 2026	
East Midlands Airport	22 June 2026	
Leeds Bradford Airport	19 June 2026	Claire Acklam, Senior Legal Counsel
London Luton Airport	22 June 2026	David Morris, Head of Legal
Newcastle International Airport	22 June 2026	Mark Hunt, Chief Financial Officer
Birmingham Airport	19 June 2026	Kristin Garrett, General Counsel
Liverpool John Lennon Airport	23 June 2026	John Irving, Chief Executive Officer
Bristol Airport	22 June 2026	Graeme Gamble, Chief Operating Officer

3. THE CLAIMANTS' APPLICATIONS DATED 2 JUNE 2026

3.1 I detail here the steps taken to serve (a) the Claimants' applications dated 2 June 2026, which sought the listing of the Second Review Hearing; and (b) the court orders granted pursuant to such applications.

3.2 I can confirm that I served a copy of the relevant sealed applications and court orders in each of the subject proceedings under cover of emails sent on the dates detailed in the below table to each of the email addresses referred to in Schedule 3 to each of the 2024 Orders, as well as to the additional email addresses set out at paragraph 2.3.

Airport	Date Application Sealed	Date Court Order Received	Date Email Sent
London City Airport	11 June 2026	11 June 2026	11 June 2026
Manchester Airport	16 June 2026	15 June 2026	16 June 2026
Stansted Airport			
East Midlands Airport			

Leeds Bradford Airport	16 June 2026	16 June 2026	16 June 2026
London Luton Airport			
Newcastle International Airport			
Birmingham Airport	16 June 2026	16 June 2026	16 June 2026
Liverpool John Lennon Airport			
Bristol Airport			

A copy of the relevant emails are exhibited at **Exhibit AJW7**.

3.3 I can further confirm that 8 automatic responses were received in response to the above emails sent above. Having reviewed the timings of the automated responses, I can confirm that:

3.3.1 4 automatic responses were received from shut_the_system_info@proton.me, noting that the "Recipient mailbox is full". I understand from previous discussions with this firm's IT team, in respect of separate, similar proceedings and following receipt of equivalent email automatic responses, that these emails were properly sent but will not have been delivered to or received by the recipient mailbox as the mailbox was full; and

3.3.2 4 further automatic response were received from enquiries@extinctionrebellion.co.uk which advised that the email could not be delivered as the "recipient's email address is possibly incorrect".

Copies of the relevant emails are exhibited at **Exhibit AJW8**.

3.4 The following representatives of each of the subject airports has confirmed to me that a copy of the applicable sealed application and court order was uploaded to their airport's relevant injunction website by the date specified in the following table.

Airport	Relevant Date	Representative
London City Airport	12 June 2026	Claire Hortop, Head of Legal
Manchester Airport	16 June 2026	Rebecca Bainbridge, Senior Legal Counsel (Airports)
Stansted Airport	16 June 2026	
East Midlands Airport	16 June 2026	
Leeds Bradford Airport	16 June 2026	Claire Acklam, Senior Legal Counsel
London Luton Airport	17 June 2026	David Morris, Head of Legal
Newcastle International Airport	16 June 2026	Mark Hunt, Chief Financial Officer
Birmingham Airport	16 June 2026	Kristin Garrett, General Counsel

Liverpool John Lennon Airport	18 June 2026	John Irving, Chief Executive Officer
Bristol Airport	16 June 2026	Graeme Gamble, Chief Operating Officer

4. **FILING AND SERVING OF THE EVIDENCE IN SUPPORT OF THE SECOND REVIEW HEARING**

Filing

4.1 The Claimants' evidence in support of the Second Review Hearing is my witness statement of 11 June 2026, together with accompanying exhibits, in each of the subject proceedings.

4.2 I can confirm that my witness statement of 11 June 2026, together with accompanying exhibits, was filed in each of the subject proceedings with the Court by CE-File on 11 June 2026.

4.3 It came to my attention on 12 June 2026 that an incorrect plan was included within one of the exhibits to my witness statement in action KB-2024-001765 (London City Airport). This mistake was rectified and a replacement copy of these exhibits was filed with the Court by CE-File that same day.

Serving

4.4 I can confirm that I served a copy of my witness statement of 11 June 2026, together with accompanying exhibits, in each of the subject proceedings under cover of the emails that I sent on 11 and 12 June 2026, being the same emails I refer to and deal with above at paragraphs 2.3 to 2.7 and which are exhibited at **Exhibit AJW4**. The email of 12 June 2026 was sent to serve the replacement copy of my exhibits in action KB-2024-001765 (London City Airport) – the reason for which is explained at paragraph 4.3.

4.5 The following representatives of each of the subject airports has confirmed to me that a copy of the applicable sealed application and court order was uploaded to their airport's relevant injunction website by the date specified in the following table.

Airport	Relevant Date	Representative
London City Airport	12 June 2026, with replacement copy of my exhibit uploaded 15 June 2026	Claire Hortop, Head of Legal
Manchester Airport	12 June 2026	Rebecca Bainbridge, Senior Legal Counsel (Airports)
Stansted Airport	12 June 2026	
East Midlands Airport	12 June 2026	
Leeds Bradford Airport	12 June 2026	Claire Acklam, Senior Legal Counsel
London Luton Airport	12 June 2026	David Morris, Head of Legal
Newcastle International Airport	12 June 2026	Mark Hunt, Chief Financial Officer
Birmingham Airport	12 June 2026	Kristin Garrett, General Counsel

Liverpool John Lennon Airport	12 June 2026	John Irving, Chief Executive Officer
Bristol Airport	15 June 2026	Graeme Gamble, Chief Operating Officer

4.6 Taking the above steps together, I confirm that the evidence in support of the Second Review Hearing has been filed and served in accordance with the provisions of the 2024 Orders and 2025 Orders.

5. FILING AND SERVING OF THE CLAIMANTS' APPLICATIONS DATED 18 JUNE 2026

5.1 The relevant Claimants in each of the Claims made an application dated 18 June 2026 to, in short, amend the Claim Form and/or the Particulars of Claim in each of the proceedings.

5.2 Save in respect of actions KB-2024-001765 (London City Airport), KB-2024-002132 (Manchester Airport, Stansted Airport and East Midlands Airport) and KB-2024-002317 (Leeds Bradford Airport, London Luton Airport and Newcastle International Airport), which requires an additional step to be taken, the 2024 Orders require such application to be served by:

5.2.1.1 uploading a copy to each individual airport's relevant injunction website; and

5.2.1.2 sending a copy to the email addresses referred to in Schedule 3 to each of the 2024 Orders.

5.3 The following representatives of each of the subject airports has confirmed to me that a copy of the applicable application was uploaded to their airport's relevant injunction website by the date specified in the following table.

Airport	Relevant Date	Representative
London City Airport	19 June 2026	Phoebe Moore-Martin, Trainee Solicitor
Manchester Airport	19 June 2026	Rebecca Bainbridge, Senior Legal Counsel (Airports)
Stansted Airport	22 June 2026	
East Midlands Airport	19 June 2026	
Leeds Bradford Airport	19 June 2026	Claire Acklam, Senior Legal Counsel
London Luton Airport	22 June 2026	David Morris, Head of Legal
Newcastle International Airport	19 June 2026	Mark Hunt, Chief Financial Officer
Birmingham Airport	19 June 2026	Ruchi Sharma, Senior Legal Counsel
Liverpool John Lennon Airport	22 June 2026	John Irving, Chief Executive Officer
Bristol Airport	22 June 2026	Graeme Gamble, Chief Operating Officer

5.4 I can confirm that I sent emails on 19 June 2026, in respect of each of the four Claims, serving a sealed copy of the relevant applications dated 18 June 2026 and a copy of the applicable Formal Listing Notice issued by the Court on 19 June 2026, listing the Second Review Hearing for 30 June 2026, to each of the email addresses referred to in Schedule 3 to each of the 2024 Orders, as well as to the additional email addresses set out at paragraph 2.3. A copy of these are exhibited at **Exhibit AJW9**.

5.5 I can further confirm that 8 automatic responses were received in response to the above emails sent. Having reviewed the timings of the automated responses, I can confirm that:

5.5.1 4 automatic responses were received from shut_the_system_info@proton.me, noting that the "Recipient mailbox is full". I understand from previous discussions with this firm's IT team, in respect of separate, similar proceedings and following receipt of equivalent email automatic responses, that these emails were properly sent but will not have been delivered to or received by the recipient mailbox as the mailbox was full; and

5.5.2 4 further automatic response were received from enquiries@extinctionrebellion.co.uk which advised that the email could not be delivered as the "recipient's email address is possibly incorrect".

Copies of the relevant emails are exhibited at **Exhibit AJW10**.

5.6 No other responses (automatic or otherwise) were received to the emails sent. Save as set out above, I have no reason to believe that any emails were not delivered and/or received and therefore consider that they were delivered.

5.7 In respect of actions KB-2024-001765 (London City Airport), KB-2024-002132 (Manchester Airport, Stansted Airport and East Midlands Airport) and KB-2024-002317 (Leeds Bradford Airport, London Luton Airport and Newcastle International Airport) the additional step required is for a notice to be affixed at those locations marked with an "X" on the relevant airport's injunction plan appended to the 2024 Orders (as applicable) stating that the application has been made and where it can be accessed in hard copy and online. I can confirm that I have been informed by:

5.7.1 Phoebe Moore-Martin, Trainee Solicitor for London City Airport that a copy of the relevant notice was affixed at the relevant locations at London City Airport by 19 June 2026;

5.7.2 David McBride (Head of Legal at Manchester Airport Group) that a copy of the relevant notices was affixed at the relevant locations at Manchester Airport, Stansted Airport and East Midlands Airport by 24 June 2026;

5.7.3 Harriet Baylis, Legal Counsel for London Luton Airport, that a copy of the relevant notice was affixed at the relevant locations at London Luton Airport by 24 June 2026;

5.7.4 Claire Acklam, Senior Legal Counsel for Leeds Bradford Airport that a copy of the relevant notice was affixed at the relevant locations at Leeds Bradford Airport by 22 June 2026; and

5.7.5 Mark Hunt, Chief Financial Officer for Newcastle International Airport, that a copy of the relevant notice was affixed at the relevant locations at Newcastle International Airport by 22 June 2026.

A copy of the applicable notices affixed are exhibited at **Exhibit AJW11**.

5.8 Taking the above steps together, I confirm that the Claimants' applications dated 18 June 2026 have been served in accordance with the provisions of the 2024 Orders and 2025 Orders.

6. **LONDON CITY AIRPORT ORDER PLAN AND AMENDED CLAIM FORM**

6.1 As I explain at paragraph 4.6 of my witness statement of 11 June 2026 in action KB-2024-001765 (London City Airport), it came to my attention during the course of preparing that witness statement that there was a formatting issue, as it appeared to me, with the copy of the 2025 Order available on the London City Airport injunction website – in that part of plan 1 was not visible.

6.2 My earlier witness statement explains that, having reviewed this firm's file for these proceedings, I can confirm that the uploaded copy was the sealed copy of the 2025 Order issued by the Court following the First Review Hearing.

6.3 To explain the position further: at the First Review Hearing, permission to amend was sought to substitute Plan 1 to the Claim Form (a copy of which is exhibited at **Exhibit AJW12**). That was because, in the case of London City Airport, the Claimants' claim was based solely on trespass, so they had taken the approach of excluding all areas to which they did not have an immediate right of possession. As a result, certain areas within the red line plan representing the airport were 'carved out'. Following the grant of the original injunction by the 2024 Order, third party rights were granted over a further area so it was decided that, in the interests of taking a consistent approach, that should also become a 'carved out' area. A revised plan 1 was then to be annexed to the Claim Form and also needed to be substituted for plan 1 to the Knowles J Order. The original version of the plan 1 is at **Exhibit AJW13** and the revised version of the plan is at **Exhibit AJW14**.

6.4 Mr Justice Bourne gave permission to amend the Claim Form in that claim and also varied the Knowles J Order, including by substituting the plan at Plan 1 for the revised plan. The Claimants' counsel were asked by the Court to draw up minutes of order in each claim for the Court to approve and then seal.

6.5 Having reviewed matters further with junior counsel who attended the First Review Hearing, Evie Barden, I can confirm that the copy of the order submitted to the Court for sealing following such hearing did not contain this formatting issue – a copy of the relevant email from Ms Barden to Mr Justice Bourne's clerk and the attachment which is the minute of order for sealing are exhibited at **Exhibit AJW15**. Taking the above together, it appears to me that the formatting issue arose during the course of this order being sealed by the Court and then returned to Eversheds Sutherland (International) LLP. It is regrettable that this was not identified at the time.

6.6 After finalising my witness statement of 11 June 2026, it came to my attention that steps had not been taken following the First Review Hearing to file an amended Claim Form for sealing by the Court, further to the permission granted by Mr Justice Bourne to do so at that hearing - to substitute the plan at Plan 1 for the revised plan. I do not know why this was not dealt with at the time by Stuart Wortley, who had conduct of these proceedings on behalf of the Claimants at the time of the First Review Hearing but who has since left my firm. On becoming aware of this, I instructed colleagues to do so and can confirm that an amended Claim Form was provided to the Court for sealing on 15 June 2026 and that provision of this is awaited as at the time that I sign this witness statement. I will arrange for a copy of the amended Claim Form to be served promptly following receipt of a sealed copy from the Court.

6.7 **LONDON CITY AIRPORT – UPDATED WARNING NOTICES**

6.8 As I explain at paragraph 4.4 of my witness statement of 11 June 2026 in action KB-2024-001765 (London City Airport), updated Warning Notices were affixed at relevant locations at this airport following the First Review Hearing. My witness statement omitted to exhibit a copy of such updated Warning Notice, a copy of which is exhibited at **Exhibit AJW16** for completeness.

6.9 Those updated Warning Notices have the complete plan of London City Airport (i.e. they do not have the plan with the formatting error in the sealed 2025 Order but reflect Plan 1 which was put before Mr Justice Bourne at the hearing on 24 June 2025).

7. **ADDITIONAL MATTERS**

7.1 In the interests of completeness, I can also confirm:

7.1.1 that, whilst not necessary pursuant to the terms of the 2025 Orders, the Claimants uploaded:


7.1.1.1 a copy of the judgment of Bourne J from the First Review Hearing was uploaded to each of their respective injunction websites during the course of August 2025 (which I can confirm having reviewed this firm's file for the subject proceedings); and

7.1.1.2 a note of the First Review Hearing during the course of the week commencing 15 June 2026 (having reviewed the relevant injunction websites myself prior to signing this witness statement).

7.1.2 having been informed, respectively, by Claire Acklam (Senior Legal Counsel for Leeds Bradford Airport) and Mark Hunt (Chief Financial Officer for Newcastle International Airport), that a copy of the 2025 Orders (as applicable) was affixed by 15 June 2026 at Leeds Bradford Airport and Newcastle Airport at each of the relevant airport's injunction warning notice locations (identified by an "X" on each of the relevant airport injunction plans appended to the 2024 Orders (as applicable)).

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 behalf of the Claimants.


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Alexander James Wright

Legal Director, Eversheds Sutherland (International) LLP

24 June 2026