

Amended pursuant to the order of [_____] dated [_____]

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

Claim No: KB-2024-002210

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

-and-

(1) PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT’S CONSENT) UPON ‘LONDON HEATHROW AIRPORT’ AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE PARTICULARS OF CLAIM

(2) – (27) THE NAMED DEFENDANTS JOINED BY ORDER OF [_____] DATED [_____] AND WHOSE NAMES ARE SET OUT IN SUPPLEMENTAL PARTICULARS OF CLAIM IN SCHEDULE 2

Defendants

AMENDED PARTICULARS OF CLAIM

THE CLAIMANT

1. The Claimant is the operator of the ‘London Heathrow Airport’, Hounslow, Middlesex (“the Airport”), as shown edged purple on Plan A annexed to the Particulars of Claim (“Plan A”).
2. As the operator of the Airport:
 - 2.1 The Claimant holds a certificate for operation of the Airport issued by the UK Civil Aviation Authority (“CAA”) dated 6 April 2016, with reference number UK: EGLL – 00;
 - 2.2 The Claimant has the benefit of an Economic Licence granted by the CAA under Part 1 of the Civil Aviation Act 2012; and

2.3 The Claimant has made the ‘Heathrow Airport – London Byelaws 2014’ (“the Byelaws”) pursuant to section 63 and 64 of the Airports Act 1986 regulating the use and operation of the Airport and the conduct of all persons while within the Airport, which came into force on 13 April 2014.

THE LAND TO WHICH THE CLAIM RELATES

3. The land and property to which the Claim relates is the Airport. It does not include residential property.
4. The Claimant is the owner of the Airport pursuant to the titles listed in Schedule 1 to the Particulars of Claim.
5. The Claimant has granted various leases and licences in respect of certain parts of the Airport. The areas in respect of which the Claimant has a right to immediate possession, pursuant either to the Claimant’s freehold ownership or immediate leasehold interests are shown shaded yellow on Plan A (excluding the areas hatched blue and shaded orange) (“the Yellow Land”).
6. As the operator of the Airport, as set out in Paragraphs 1 and 2 above, the Claimants still retains sufficient control over those parts of the Airport in respect of which it has granted leases and licences, to entitle it to exercise control over the Airport in relation to any persons trespassing thereon.

THE DEFENDANTS

7. The Defendants are environmental activists associated with the Just Stop Oil campaign (or other environmental campaigns) who have committed to engaging in campaign of disruptive direct action at airports across the United Kingdom, including, in the case of the 2nd to 27th Defendants (“the Named Defendants”), at the Airport. Save for the Named Defendants, the Claimant does not know the names of the Defendants.
8. At a meeting in Birmingham in early March 2024, the environmental campaigners associated with the ‘Just Stop Oil’ campaign discussed the taking of direct action at airports across the UK in the summer of 2024.


9. The homepage of the website of Just Stop Oil emphasises the plans to target action on airports during the summer of 2024 and a video was published on 5 May 2024 at <https://www.youtube.com/watch?v=tbvYQFGAY48> which discloses an intention to disrupt airports in the UK in the summer months of 2024. In particular, the said video evidences that the Airport is a specific target of disruption by showing a screen shot of a road sign on the highway immediately adjacent to the perimeter of the Airport (with directions to Terminal 5 and Terminals 2, 3 and 4).

10. Furthermore, multiple messages sent from the official Instagram account of Just Stop Oil demonstrate how campaigners associated with Just Stop Oil intend to target airports by direct action activities.

11. In support of their aim to disrupt airports in the summer months, two Just Stop Oil fundraising pages have been set up, namely:

11.1 “Fund Radical Climate Action — Just Stop Oil | Chuffed | Non-profit charity and social enterprise fundraising” (which has raised £149,000 as of 1 July 2024) and states:

“We're escalating our campaign this summer to take action at airports.”

11.2 “Cat’s out the bag. Just Stop Oil will take action at airports  | Chuffed | Non-profit charity and social enterprise fundraising” (which has raised £24,000 as of 1 July 2024) states:

“Cat’s out the bag. Just Stop Oil will take action at airports

The secret is out — and our new actions are going to be big.

We’re going so big that we can’t even tell you the full plan, but know this — Just Stop Oil will be taking our most radical action yet this summer. We’ll be taking action at sites of key importance to the fossil fuel industry; super-polluting airports.”

12. There has also been extensive media coverage of the Just Stop Oil plans and the danger they pose. A Daily Mail online article entitled ‘*Exclusive Revealed: The eco mob plot to ruin the summer holidays with activists planning to disrupt flights by gluing themselves to major airport runways*’ states that Just Stop Oil have advocated the following means of protest:

- “Cutting through fences and gluing themselves to runway tarmac;

- *Cycling in circles on runways*
- *Climbing on to planes to prevent them from taking off*
- *Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports."*

12A. On 24 July 2024, 27 July 2024, 30 July 2024 or 1 August 2024 each of the Named Defendants entered onto the Airport without the consent of the Claimant in order to carry out acts of disruptive direct action in connection with the Just Stop Oil campaign. Further particulars of those incidents are set out in Supplemental Particulars of Claim at Schedule 2.

THE POTENTIAL EFFECTS OF THE THREATENED DIRECT ACTION

13. In summary, the potential risks and/or effects of the activities carried out by the Named Defendants and further the apprehended activities of any Defendant have or may would include the following:

- 13.1 A real risk to life and limb;
- 13.2 Significant disruption to passengers;
- 13.3 Significant disruption to airlines;
- 13.4 Significant impact on businesses and the wider economy;
- 13.5 Consequential effects on the infrastructure network around the Airport;
- 13.6 The need for deployment of additional Police resources at the Airport;
- 13.7 Substantial economic losses to the Claimant.

THE THREATENED ACTS OF TRESPASS AND/OR NUISANCE

14. By reason of the foregoing, the Claimant apprehends that unless restrained by this Honourable Court, there is a serious and imminent risk that the Defendants will commit further acts of trespass and nuisance by way of 'direct action' activities, for which they have no permission or licence to enter upon the Airport.

15. Members of the public have an implied consent to enter the Airport for air-travel and directly related purposes. All persons entering the Airport are subject to the Byelaws which regulate the use and operation of the Airport and the conduct of all persons while within the airport
16. By Byelaw 3.19 of the Byelaws, no person shall organise or take part in any demonstration, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the safety of passengers or persons using the Airport.
17. By Byelaw 3.21 of the Byelaws, no person shall intentionally obstruct or interfere with the proper use of the Airport or with any person acting in the execution of his duty in relation to the operation of the Airport.
18. Accordingly, although members of the public have an implied consent to enter the Airport for the purpose of travelling by air and for directly related purposes, they do not have permission to enter or remain or occupy any land thereon for the purposes of:
 - 18.1 Organising or taking part in any demonstration, procession or public assembly likely to obstruct or interfere with the proper use of the Airport or obstruct or interfere with the safety of passengers or persons using the Airport (Byelaw 3.19).
 - 18.2 Intentionally obstructing or interfering with the proper use of the Airport (Byelaw 3.21).
19. Further and/or alternatively, the threatened acts referred to above would amount to a nuisance, in that they would give rise to an unreasonable interference with the use and operation of the Airport.
20. Further and/or alternatively, the nuisance referred to at Paragraph 19 above would also constitute a public nuisance in that the acts referred to above would substantially affect members of the public, including, but not limited, to persons wishing to use the Airport for the purpose of air travel as well as the Claimant. As such, the nuisance would 'materially affect the reasonable comfort and convenience of a class of His Majesty's subjects' and the Claimant would suffer 'special damage' in respect thereof given the

loss and damage referred to in Paragraph 13 above would constitute foreseeable and substantial damage over and above that suffered by the public at large.

21. Accordingly, as the operator of the Airport and by reason of the matters set out in Paragraph 6 above, the Claimant seeks injunctive relief restraining the apprehended acts of trespass and/or nuisance in respect of the Airport.

HUMAN RIGHTS

22. Reliance by the Defendants on rights of freedom of expression and/or assembly within Articles 10 and/or 11 of the European Convention of Human Rights would not provide a defence in the particular circumstances of this claim.

AND THE CLAIMANT CLAIMS

- (1) An order that the Defendants must not, without the consent of the Claimant, enter, occupy or remain upon any part of the Airport;
- (2) Further or other relief as the Court thinks fit;
- (3) Costs.

KATHARINE HOLLAND KC
JACQUELINE LEAN
Landmark Chambers

TOM ROSCOE
Wilberforce Chambers

Statement of Truth

The Claimant believes that the facts stated in this amended particulars of claim are true. The Claimant understands 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 by the Claimant to sign this statement.

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Philip Keith Spencer

Senior Associate, Bryan Cave Leighton Paisner LLP

[•] 2024

SCHEDULE 1

FREEHOLD TITLES OWNED BY THE CLAIMANT

Title	Description
AGL101701	Land on the north side of Wessex Road, Hillingdon
AGL105601	land and buildings on and lying to the east of Western Perimeter road, London Heathrow Airport
AGL118218	Land at Southern Perimeter Road, Stanwell, Staines
AGL119941	Land on the North West side of Southern Perimeter Road, Stanwell, Staines
AGL125841	Land lying to the east of Western Perimeter Road, London Heathrow Airport
AGL138033	The Duke of Northumberland's River, West Drayton
AGL139852	Part of World Business Centre Phase, 2 Newall Road, London Heathrow Airport, Hounslow
AGL142943	Land and buildings lying to the south of Perry Oaks Drive, West Drayton
AGL153197	land at London Heathrow Airport, London
AGL159358	Land at Perry Oaks Drive, West Drayton
AGL159912	land at London Heathrow Airport, London
AGL166776	Land lying to the south west of 576 Bath Road, West Drayton
AGL166778	Land lying to the East of Spout Lane North, Staines
AGL166779	Land lying to the North East of Spout Lane North, Staines
AGL166780	Land lying to the East of Spout Lane North, Staines
AGL166781	Land lying to the south east of Spout Lane North, Staines
AGL167758	Land on the North side of Stanwell Road, Feltham
AGL187778	subsoil beneath the Duke of Northumberland's river London Heathrow Airport, London
AGL187782	part of the former course of the Duke of Northumberland's River, London Heathrow Airport, London
AGL188780	Land on the south side of Southern Perimeter Road, London Heathrow Airport, Hounslow
AGL196517	subsoil beneath the Duke of Northumberland's River, Heathrow Airport, London
AGL204428	Land at London Heathrow Airport, London
AGL204430	Land at London Heathrow Airport, London

AGL3033	land lying to the West of Hatton Road, Feltham
AGL31061	Heathrow Hotel, Terminal 4, Heathrow Airport
AGL32323	land on the south side of Bath Road, Harlington
AGL41684	Land and buildings on the south side of Bath Road and on the South West side of Hatton Road, Heathrow Airport
AGL41685	Land and buildings on the west side of Cranford Lane, Heathrow Airport
AGL41686	Land and buildings on the West side of Sheffield Way, Heathrow Airport
AGL47788	Land on the east side of Airport Way, South East side of Spout Lane, Stanwell
AGL49922	Land on the south side of Bath Road, Hillingdon
AGL53628	Land on the north side of Bedfont Road, Bedfont, Stanwell
AGL55260	Part of Heathrow Airport, London
AGL57950	World Business Centre, Newall Road, Heathrow Airport
AGL58193	Building 1071, London Heathrow Airport, Hounslow (TW6 3AQ)
AGL58194	The Compass Centre, Nelson Road, London Heathrow Airport, TW6 2QQ
AGL58197	Renaissance London Heathrow Hotel, Bath Road, Heathrow, Hounslow (TW6 2AQ)
AGL58200	B521 Southampton House, Southampton Road, World Cargo Centre, Heathrow Airport
AGL58829	Building 717, Southern Perimeter Road, London Heathrow Airport, Hounslow (TW6 3SY)
AGL66857	9 North Hatton Road
AGL66862	United House Building, 451 Southern Perimeter Road, London Heathrow Airport, Hounslow (TW6 3LP)
AGL66864	World Business Centre Phase II, Newall Road, London Heathrow Airport, Hounslow (TW6 2RQ)
AGL69297	the Visitor Centre, Bath Road, Heathrow Airport, Hounslow (TW6 2AP)
AGL71479	Contractor's Compound, Sanctuary Road, Stanwell
AGL75860	Land at The Police Station, Northside
AGL7637	2 Perry Oaks Drive, West Drayton (UB7 0EP)
AGL86703	3 Burrow Hill Close, Heathrow, Hounslow (TW6 2ND)
AGL89018	4 Burrow Hill Close, Heathrow, Hounslow (TW6 2ND)
AGL92309	Land on the South side of Bath Road, London
AGL92311	Land and Building on the South side of Bath Road, London

MX102958	Land forming part of Heathrow Airport
MX102959	Heathrow Airport, London
MX118060	land lying to the north of Stanwell Road
MX121799	Land forming part of Heathrow Airport
MX122309	Land forming part of Heathrow Airport
MX124923	Land forming part of Heathrow Airport
MX129648	The Cyclists Rest, Hatton Road
MX131029	Land at Heathrow Airport
MX131030	Land forming part of Heathrow Airport
MX131532	land on the south side of Bath Road, forming part of Heathrow Airport
MX132446	part of London (Heathrow) Airport
MX133485	West Ramp Coach Park, London Heathrow Airport, Hounslow, TW6 2QU
MX134218	land forming part of London Heathrow Airport, Hounslow
MX134561	Part of Heathrow Airport
MX13479	Land on the North side of the Southern Perimeter Road, London Heathrow Airport, Hounslow
MX135107	land forming part of London Heathrow Airport, Hounslow
MX135983	Land on the south of Bath Road, Harmondsworth
MX136678	Land forming part of London Heathrow Airport, Stanwell
MX137020	Land on the north side of Stanwell Road, East Bedfont
MX138008	situate on the south side of Bath Road
MX138125	Land on the South side of Bath Road
MX138184	land forming part of London (Heathrow) Airport
MX138476	Land forming part of Heathrow Airport
MX140009	Land at Heathrow Airport
MX140064	land on the south side of Bath Road, Hayes
MX140158	Land forming part of Heathrow Airport
MX141558	447 Hatton Road, Feltham (TW14 9QP)
MX143545	Land forming part of Heathrow Airport
MX148884	part of Heathrow Airport
MX149634	Land forming part of Heathrow Airport
MX154289	land lying to the north of Stanwell Road

MX154382	part of London Heathrow Airport
MX155712	Land lying to the south of Northern Perimeter Road, Heathrow, Hounslow
MX156037	Land lying to the south of Northern Perimeter Road, Heathrow, Hounslow
MX156056	Land forming part of Heathrow Airport
MX156057	Land lying to the south of Northern Perimeter Road, Heathrow, Hounslow
MX156230	Land forming part of Heathrow Airport
MX156982	Land and building on the south side of Bath Road and south west side of Hatton Road
MX160406	Land forming part of Heathrow Airport
MX160655	land at Heathrow Airport
MX160662	Land at Heathrow Airport
MX160771	land forming part of Heathrow Airport
MX162010	Land forming part of Heathrow airport
MX163122	land adjoining White's Stores, Hatton Road, Hatton Cross
MX163524	land forming part of Heathrow Airport
MX164507	Magpie Place and Magpie Cottages, Bath Road
MX164508	Land at Heathrow Airport
MX164815	Long stay car park eastern perimeter road, London Heathrow Airport, Hounslow (TW6 2SB)
MX168921	land on the North-West side of Great South-West Road forming part of London (Heathrow) Airport, Hounslow
MX173710	part of Heathrow Airport, London
MX175692	Land forming part of Heathrow Airport
MX179450	land forming part of Heathrow Airport
MX180695	land forming part of Heathrow Airport, London
MX180748	land lying to the West of Hatton Road
MX186386	Heathrow Airport, London
MX193394	Land forming part of Heathrow Airport
MX194062	Land forming part of Heathrow Airport
MX203143	LAND ON THE NORTH SIDE OF Southern Perimeter Road, Heathrow, Hounslow
MX207871	Site Offices, Wessex Road, London Heathrow Airport, Hounslow (TW6 2QX)

MX2168	land and buildings on the north side of Spout Lane and south-west side of Longford River, Stanwell
MX217949	land lying between Longford River and Duke of Northumberland's River, Harmondsworth
MX224711	Land forming part of Heathrow Airport
MX224983	Land at Viscount Way, London Heathrow Airport, Hounslow
MX228536	known as Mayfield House lying to the north of Stanwell Road
MX230168	Land and buildings at Hatton
MX230476	land on the West side of Spout Lane, Staines
MX230979	land forming part of Heathrow Airport
MX231190	Land forming part of Heathrow Airport
MX232436	land at the junction of Bath Road and Hatton Road, Hounslow
MX235083	Land forming part of Heathrow Airport
MX235182	LAND ON THE NORTH EAST SIDE OF Ensign Close, London Heathrow Airport, Hounslow
MX236213	land at Heathrow Airport (formerly Oddfellows Cottages, Bath Road)
MX237577	Land at Heathrow Airport
MX237801	forms part of London Heathrow Airport
MX238906	land lying to the south of Bath Road, Harmondsworth
MX239071	Part of London (Heathrow) Airport, Harlington
MX243750	Land forming part of Heathrow Airport
MX243751	Land forming part of Heathrow Airport
MX244292	Land forming part of Heathrow Airport
MX244632	1 to 4 Oak Cottages and 1 to 4 Oaks Common Cottages, Heathrow Road, Harmondsworth
MX245592	Land forming part of Heathrow Airport
MX246727	Land forming part of Heathrow Airport
MX248915	Land forming part of Heathrow Airport
MX248916	land forming part of Heathrow Airport-London
MX249443	Land forming part of Heathrow Airport
MX250939	Land on the east side of Whitemead Lane and on the West side of Long Lane Harmondsworth
MX252007	Land forming part of Heathrow Airport

MX255590	Land forming part of Heathrow Airport
MX255892	Land forming part of Heathrow Airport
MX257835	the Site of 1, 2 and 3 Wells Cottages, Hatton Road
MX260728	Land forming part of Heathrow Airport
MX266089	Land forming part of Heathrow Airport
MX266090	land at Heathrow Airport
MX266394	LAND ON THE NORTH WEST SIDE OF Great South West Road, Bedfont, Feltham
MX269198	building 478, London Heathrow Airport, Hounslow (TW6 2EB)
MX276514	land at Heathrow Airport, Stanwell Road
MX278681	Land forming part of Heathrow Airport
MX303848	Land forming part of Heathrow Airport
MX304585	Land forming part of Heathrow Airport
MX306324	northside staff car park Northwood Road, London Heathrow Airport, Hounslow (TW6 2QW)
MX315988	Part of Heathrow Airport, London
MX320053	Land forming part of Heathrow Airport
MX320054	Land forming part of Heathrow Airport
MX321518	LAND ON THE NORTH SIDE OF Spout Lane, Staines
MX324155	LAND LYING TO THE WEST OF Great South West Road, London
MX328832	Land on the South side of Bath Road, Hayes
MX332258	Land part of Heathrow Airport
MX335978	445 Hatton Road, Feltham (TW14 9QP)
MX347243	land forming part of Heathrow Airport - London
MX349378	on the North West Side of Great South-West Road, Harmondsworth
MX352105	car park World Business Centre, Newall Road, London Heathrow Airport, Hounslow
MX356761	Fuel Depot, Ensign Close, London Heathrow Airport, Hounslow TW6 2PL
MX398707	Land lying to the South of Bath Road, Hounslow
MX401217	part of London Heathrow Airport
MX404168	Land at Heathrow Airport
MX441141	Land forming part of Heathrow Airport

MX75444	Land forming part of Heathrow Airport
MX79662	land forming part of Heathrow Airport, London
MX82957	LAND ON THE NORTH SIDE OF Spout Lane, Staines
MX86544	Land forming part of Heathrow Airport
MX94106	Land forming part of Heathrow Airport
NGL111084	land on the south side of Bath Road, Harmondsworth
NGL134306	land lying to the north of Perry Oaks Drive, West Drayton
NGL162048	Land forming part of Heathrow Airport
NGL21439	the Control Tower at London (Heathrow) Airport
NGL219053	60 and 62 The Gardens and being land lying to the south east of Great South-West Road
NGL22718	BEING LAND ON THE NORTH-WEST SIDE OF Great South West Road, Bedfont, Feltham
NGL235431	Hatton Road, Harlington
NGL24166	land lying to the south of Bath Road, Hounslow
NGL309951	land lying on the South side of the Southern Perimeter Road, Heathrow Airport
NGL332589	Perry Oaks Sewage Works
NGL35047	Land on the south side of Bath Road, West Drayton
NGL352644	Unit 1, 1 Bath Road, Heathrow, Hounslow (TW6 2AA)
NGL36628	Land forming part of Heathrow Airport
NGL369608	Land and buildings on the south side of Bath Road, West Drayton
NGL386170	3 Perry Oaks Drive, West Drayton
NGL392895	1 Perry Oaks Drive, Stanwell Moor Road, Longford, West Drayton
NGL526360	4 Perry Oaks Drive, West Drayton (UB7 0EP)
NGL94380	Land on the West side of Whitemead Lane, Longford
NGL97189	land lying to the South East of Bath Road and on the East side of Whitemead Lane, Longford
SY347180	part of the site of the Duke of Northumberland's River
SY348507	Land on the South side of Southern Perimeter Road, Stanwell, Staines
SY367470	Land forming part of Heathrow Airport
SY367471	land forming part of London Heathrow Airport, Stanwell
SY383943	Land on the north side of Stanwell Road and part of the site of Stanwell Road

SY397637	part of London Heathrow Airport, Stanwell
SY397639	forming part of London (Heathrow) Airport
SY397640	Land forming part of Heathrow Airport
SY397641	Land forming part of Heathrow Airport
SY397642	Land forming part of Heathrow Airport
SY397643	part of London (Heathrow) Airport, Stanwell
SY397644	Land forming part of Heathrow Airport
SY397645	being part of London Heathrow Airport
SY397646	land forming part of Heathrow Airport
SY397647	Land forming part of Heathrow Airport
SY433510	land lying to the south of Western Perimeter Road
SY508277	land lying to the south of The Western Perimeter Road, Heathrow Airport, London
SY606410	land and buildings lying on the North side of Stanwell Road, Stanwell
SY611949	5 Burrow Hill Close, Heathrow, Hounslow (TW6 2ND)
SY723927	LAND ON THE EAST SIDE OF Stanwell Moor Road, Staines

LEASEHOLD TITLES OWNED BY THE CLAIMANT

Title	Description
AGL139838	The Compass Centre, Nelson Road, London Heathrow Airport, TW6 2QQ
AGL190191	East Point, The Compass Centre, Nelson Road, London Heathrow Airport, Hounslow, TW6 2QQ
AGL190192	West Point, The Compass Centre, Nelson Road, London Heathrow Airport, Hounslow, TW6 2QQ
AGL190193	Meridian, The Compass Centre, Nelson Road, London Heathrow Airport, Hounslow, TW6 2QQ
AGL192576	Car Park, T5 Hotel, Wentworth Drive, London Heathrow Airport, Hounslow
AGL193608	pipelines lying on the south side of Southern Perimeter Road, Heathrow Airport, London
AGL193610	Land on the east side of Northern Perimeter Road, London Heathrow Airport, Hounslow
AGL41690	Substation 59 (which includes HV Switchgear and Transformer 1) and High Voltage Cables
AGL41692	An Electricity Sub Station, Newall Road, London Heathrow Airport, Hounslow
AGL46927	Car park to the south of Trident House, Bath Road, Heathrow
AGL478117	Fleet Support Unit, London Heathrow Airport, Hounslow
AGL54954	British Midland Maintenance Hangar, Exeter Way, London Heathrow Airport, Hounslow (TW6 2SY)
AGL554065	Pionair Centre Car Park, Northern Perimeter Road, London Heathrow Airport, Hounslow (TW6 2RG)

SCHEDULE 2

**SUPPLEMENTAL PARTICULARS OF CLAIM
AGAINST THE NAMED DEFENDANTS**

1 By order of [_____] dated [_____] the following Named Defendants were joined as defendants to these proceedings:

<u>Def #</u>	<u>Name</u>	<u>Address</u>
<i><u>Alleged to have been involved in activities at the Airport on 24 July 2024</u></i>		
<u>2</u>	<u>Rory Wilson</u>	
<u>3</u>	<u>Adam Beard</u>	
<u>4</u>	<u>Sean O'Callaghan</u>	
<u>5</u>	<u>Sally Davidson</u>	
<u>6</u>	<u>Hannah Schafer</u>	
<u>7</u>	<u>Luke Elson</u>	
<u>8</u>	<u>Luke Watson</u>	
<i><u>Alleged to have been involved in activities at the Airport on 27 July 2024</u></i>		
<u>9</u>	<u>Monday Rosenfeld</u>	
<i><u>Alleged to have been involved in activities at the Airport on 30 July 2024</u></i>		
<u>10</u>	<u>Phoebe Plummer</u>	
<u>11</u>	<u>Jane Touil</u>	
<i><u>Alleged to have been involved in activities at the Airport on 1 August 2024</u></i>		
<i><u>Groups 1 & 2</u></i>		
<u>12</u>	<u>Barbara Lund</u>	
<u>13</u>	<u>Rhiannon Wood</u>	
<u>14</u>	<u>Diane Bligh</u>	

<u>15</u>	<u>Ruth Cook</u>	
<u>16</u>	<u>Malcolm Allister</u>	
<u>17</u>	<u>Susanne Brown</u>	
<u>18</u>	<u>Christina Jenkins</u>	
<u>19</u>	<u>Jack Williams</u>	
<u>20</u>	<u>Paul Raithby</u>	
<u>Group 3</u>		
<u>21</u>	<u>Melanie Griffith</u>	
<u>22</u>	<u>Virginia Barrett</u>	
<u>23</u>	<u>Pauline Hazel Smith</u>	
<u>24</u>	<u>Rosemary Robinson</u>	
<u>25</u>	<u>Irfan Mamun</u>	
<u>26</u>	<u>Callum Cronin</u>	
<u>27</u>	<u>Joe Magowan</u>	

2 Each of the Named Defendants is a member of and/or associates themselves with the campaign(s) of Just Stop Oil.

24 July 2024

3 At around or shortly before 9am on 24 July 2024, the 2nd to 8th Named Defendants entered onto the Airport in the vicinity of the Northern Perimeter Road West. They each did so:

- 3.2 without the express consent of the Claimant;
 - 3.3 acting in concert with one another, for the purposes of carrying out disruptive direct action in the name of “Just Stop Oil”, and in any case for the purposes of environmental campaign;
 - 3.4 equipped for the purposes of, and with the intention of, cutting through the perimeter fence or otherwise gaining access to the operational areas of the Airport;
 - 3.5 with the intention thereby of disrupting the operations at the Airport, or with full knowledge that their actions would cause such disruption;
 - 3.6 in those circumstances, otherwise than in accordance with the implied licence and the Bye-Laws pleaded at paragraphs 14 to 18 of the Amended Particulars of Claim (“APoC”);
 - 3.7 in the circumstances, as a trespasser;
 - 3.8 with the intention of carrying out activities which would have amounted to a nuisance, as pleaded at paragraphs 19 to 20 of the APoC
- 4 The said intentions of the 2nd to 8th Defendants were prevented from being seen through to completion because each of those Defendants was arrested by the Police before breaching the perimeter fence.

27 July 2024

- 5 Before 10.43am on 27 July 2024, the 9th Named Defendant entered the Airport and was, by that time, in the Terminal 5 departures area. She did so and was so present:
- 5.2 without the express consent of the Claimant;
 - 5.3 for the purposes of carrying out disruptive direct action in the name of “Just Stop Oil”; further or alternatively, in connection with or in support of the “Just Stop Oil” campaign; and in any case acting for the purposes of environmental campaign;
 - 5.4 in possession and displaying an orange “Oil Kills” sign for the purposes of, and with the intention of, demonstrating opposition to the activities of the Airport and/or persons using the Airport;
 - 5.5 in those circumstances, otherwise than in accordance with the implied licence and the Bye-Laws pleaded at paragraphs 14 to 18 of the APoC;

5.6 in the circumstances, as a trespasser.

6 The 9th Defendant left the Airport upon request, under police supervision.

30 July 2024

7 At or around 8.30am on 30 July 2024, the 10th and 11th Named Defendants entered the Terminal 5 departures hall of the Airport. They each did so:

7.2 without the express consent of the Claimant;

7.3 acting in concert with one another, for the purposes of carrying out disruptive direct-action in the name of “Just Stop Oil”, and in any case for the purposes of environmental campaign;

7.4 equipped for the purposes of, and with the intention of, opposing and/or obstructing the operations of the Airport and/or damaging equipment at the Airport;

7.5 which intention they then demonstrated by each spraying the ceiling, wall and floors of the terminal, and the electronic departure screen, with orange paint dispensed from fire extinguishers bearing the words “Just Stop Oil”;

7.6 in those circumstances, otherwise than in accordance with the implied licence and the Bye-Laws pleaded at paragraphs 14 to 18 of the APoC;

7.7 in the circumstances, as a trespasser;

7.8 so as to carry out activities which amounted to a nuisance, as pleaded at paragraphs 19 to 20 of the APoC.

8 The said intentions of the 10th and 11th Named Defendants were not further realised, because each of those Defendants was arrested by the Police before causing further damage or disruption.

1 August 2024

9 Between approximately 7am and 7.40am on 1 August 2024, the 12th to 20th Named Defendants (‘Groups 1 & 2’ in the table at Paragraph 1 of this Schedule 2) entered the Airport in the vicinity of the Terminal 5 London Underground Station. Each of them was then promptly arrested by the Police and removed from the Airport.

10 By around 8.50am on 1 August 2024, the 21st to 27th Named Defendants (‘Group 3’ in the table referenced above) had also entered the Airport and, by this time, had positioned themselves so as

to block access to or egress from the Terminal 5 South departure gates via the electronic gates for the checking of boarding passes. They were arrested and removed by the Police by approximately 9.13am.

11 The 12th to 27th Named Defendants each so entered the Airport and, in the case of the 21st to 27th Named Defendants so blocked access to or egress from the said departure gates:

11.1 without the express consent of the Claimant;

11.2 acting in concert with one another, for the purposes of carrying out disruptive direct action in the name of “Just Stop Oil”; further or alternatively, in connection with or in support of the “Just Stop Oil” campaign; and in any case, for the purposes of environmental campaign;

11.3 equipped with orange clothing and banners for the purposes of advertising their connection with “Just Stop Oil” and/or their environmental causes;

11.4 with the intention of disrupting the operations at the Airport, or with full knowledge that their actions would cause such disruption;

11.5 in those circumstances, otherwise than in accordance with the implied licence and the Bye-Laws pleaded at paragraphs 14 to 18 of the APoC;

11.6 in the circumstances, as a trespasser;

11.7 with the intention of carrying out activities which would have amounted to a nuisance, as pleaded at paragraphs 19 to 20 of the APoC

12 The said intentions of the 12th to 27th Named Defendants were not or not further realised, because each of those Defendants was, as aforesaid, arrested by the Police before causing any or any further disruption.