

**IN THE HIGH COURT OF JUSTICE**

**Claim No: KB-2024-002210**

**KINGS BENCH DIVISION**

**Before The Honourable Mr Justice Julian Knowles**

**BETWEEN:**

**HEATHROW AIRPORT LIMITED**

**-and-**

**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**



**Defendants**

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**ORDER**

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**PENAL NOTICE**

**IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU 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 PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.**

**IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN**

**This Order prohibits you from doing the acts set out in this Order. You should read it carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.**

**UPON** the Claimant having issued this Claim by a Claim Form dated 7 July 2024

**AND UPON** hearing the Claimant's application for an interim injunction by Application Notice dated 7 July 2024

**AND UPON READING** the Witness Statements of Akhil Markanday dated 6 July 2024 and Jonathan Daniel Coen dated 7 July 2024

**AND UPON HEARING** Leading Counsel and Junior Counsel for the Claimant

**AND UPON** the Claimant giving and the Court accepting the undertakings set out in Schedule 1 to this Order

**IT IS ORDERED THAT:**

**INJUNCTION**

1. Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 ("Plan A").
2. In respect of paragraph 1, the Defendants must not (a) do it himself/herself/themselves in any other way (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
3. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing.

**VARIATION**

4. Anyone served with or notified of this Order 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 Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.
5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimant has liberty to apply to vary this Order.

#### **SERVICE AND NOTIFICATION**

7. Service of the Claim Form, the Application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024 will be notified to the Defendants by the Claimant carrying out each of the following steps:
  - 8.1 Uploading a copy on to the following website: [www.heathrow.com/injunction](http://www.heathrow.com/injunction)
  - 8.2 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.
  - 8.3 Either affixing a notice at the locations shown marked with a red dot on the second plan attached to this Order at Schedule 4 ("Plan B") setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9.4 below.

9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to the Defendants by the Claimant carrying out each of the following steps:
  - 9.1 Uploading a copy of the Order on to the following website:  
[www.heathrow.com/injunction](http://www.heathrow.com/injunction)
  - 9.2 Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
  - 9.3 Affixing a copy of the Order in A4 size in a clear plastic envelope at each of the locations shown with a red dot on Plan B.
  - 9.4 Affixing warning notices of A2 size at those locations marked with a red dot on Plan B, substantially in the form of the notice at Schedule 5.
  
10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to the Defendants of any further applications shall be effected by the Claimant carrying out each of the following steps:
  - 10.1 Uploading a copy of the application on to the following website:  
[www.heathrow.com/injunction](http://www.heathrow.com/injunction)
  - 10.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
  - 10.3 Affixing a notice at these locations marked with a red dot on Plan B stating that the application has been made and where it can be accessed in hard copy and online.
  
11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to the Defendants may be effected by carrying out the steps set out in paragraphs 10.1 and 10.2 only.

12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8.3, 9.3 and 10.3, effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

#### **FURTHER DIRECTIONS**

14. Liberty to apply.

#### **COSTS**

15. Costs reserved.

#### **COMMUNICATIONS WITH THE CLAIMANT**

16. The Claimant's solicitors and their contact details are:

- (1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,  
London EC4R 0BR [akhil.markanday@bclplaw.com](mailto:akhil.markanday@bclplaw.com) / +44 20 3400 4344

- (2) Phil Spencer

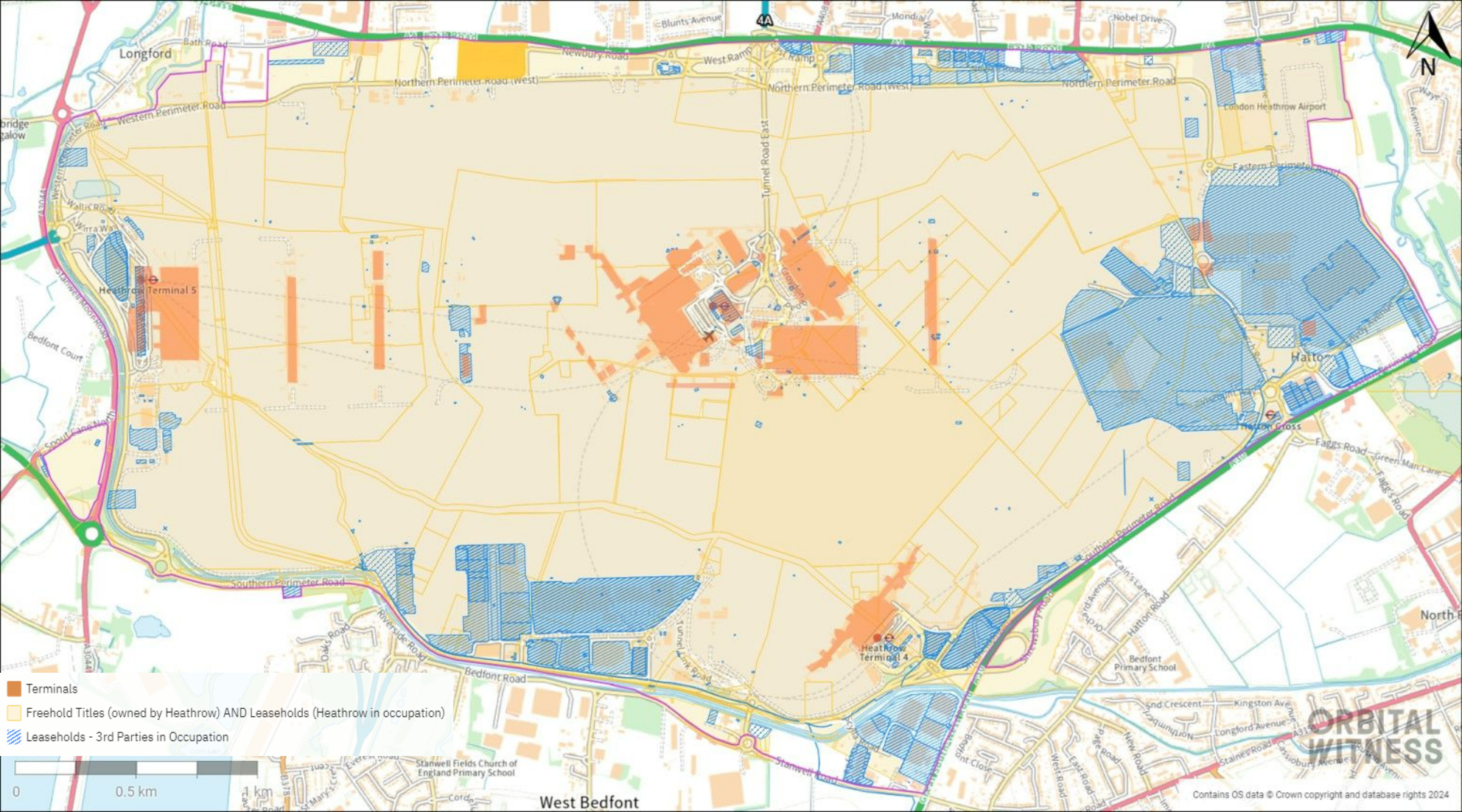
Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,  
London EC4R 0BR [phil.spencer@bclplaw.com](mailto:phil.spencer@bclplaw.com) / +44 20 3400 3119

**Dated: 9 July 2024**

## **SCHEDULE 1 – UNDERTAKINGS**

1. The Claimant will take steps to notify Defendants of the Claim Form, Application Notice, evidence in support, the Order and a Note of the Hearing on 9 July 2024 as soon as practicable and no later than 5pm on 15 July 2024.
2. The 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 future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

**SCHEDULE 2 – PLAN A**



- Terminals
- Freehold Titles (owned by Heathrow) AND Leaseholds (Heathrow in occupation)
- Leaseholds - 3rd Parties in Occupation



West Bedfont

**ORBITAL WITNESS**

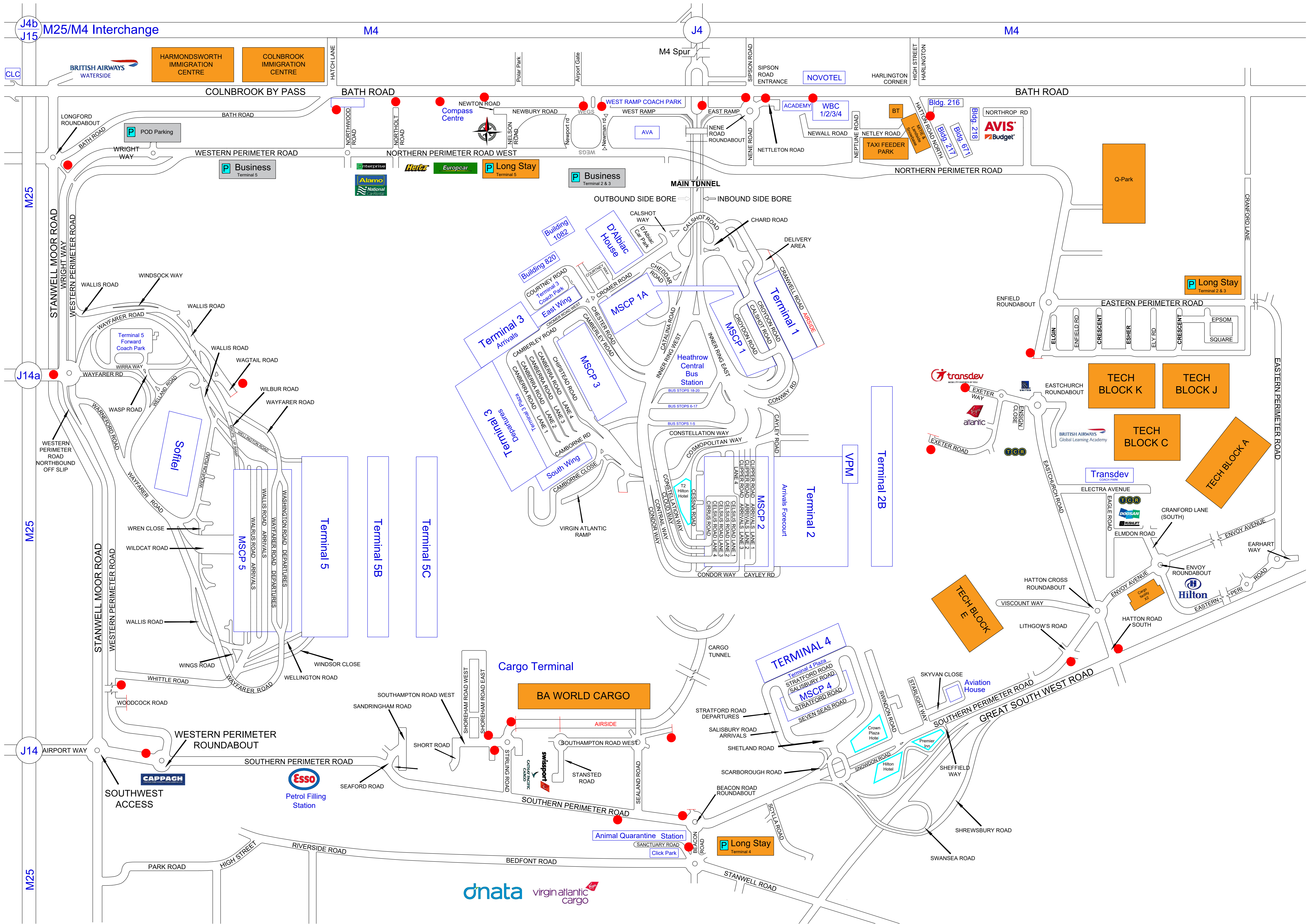
Contains OS data © Crown copyright and database rights 2024



### **SCHEDULE 3 – EMAIL ADDRESSES**

1. [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
2. [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
3. [info@juststopoil.org](mailto:info@juststopoil.org)

**SCHEDULE 4 – PLAN B**

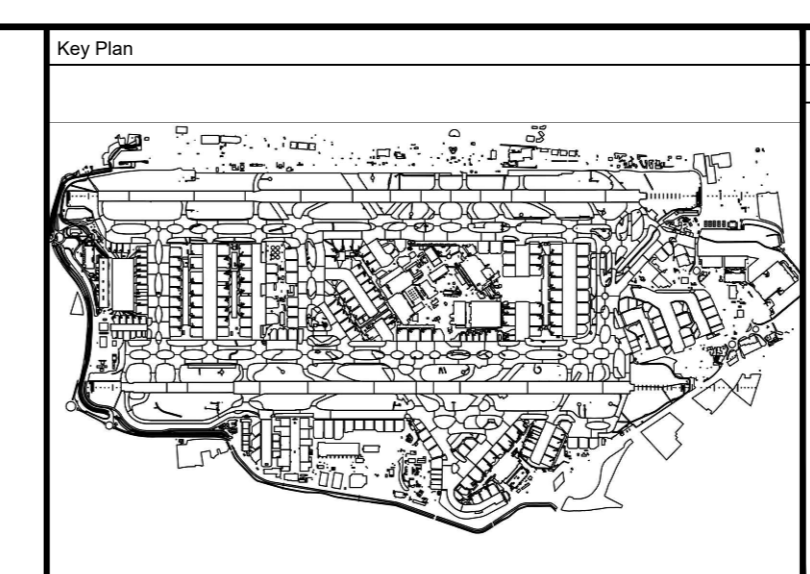


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**HEATHROW MASTER DRAWING**  
 This master drawing is maintained to reflect the current installation at all times. Please notify errors or omissions to the Heathrow Airport LTD Asset Information Team. e-mail: [Assetinformation@heathrow.com](mailto:Assetinformation@heathrow.com)

Model / Content References List - Name, Version & Status.

This area is for Drawing Originator's Company Logo and Company Details appropriate for the BAA Project.  
 CAD User to insert the block within this space.



Ver	Date	Description of Change	Drn	App
1.0	05/07/24	RELEASED FOR INFORMATION	ATC	ATC

HEATHROW PUBLIC  
 LANDSIDE ROADS  
 SCHEMATIC

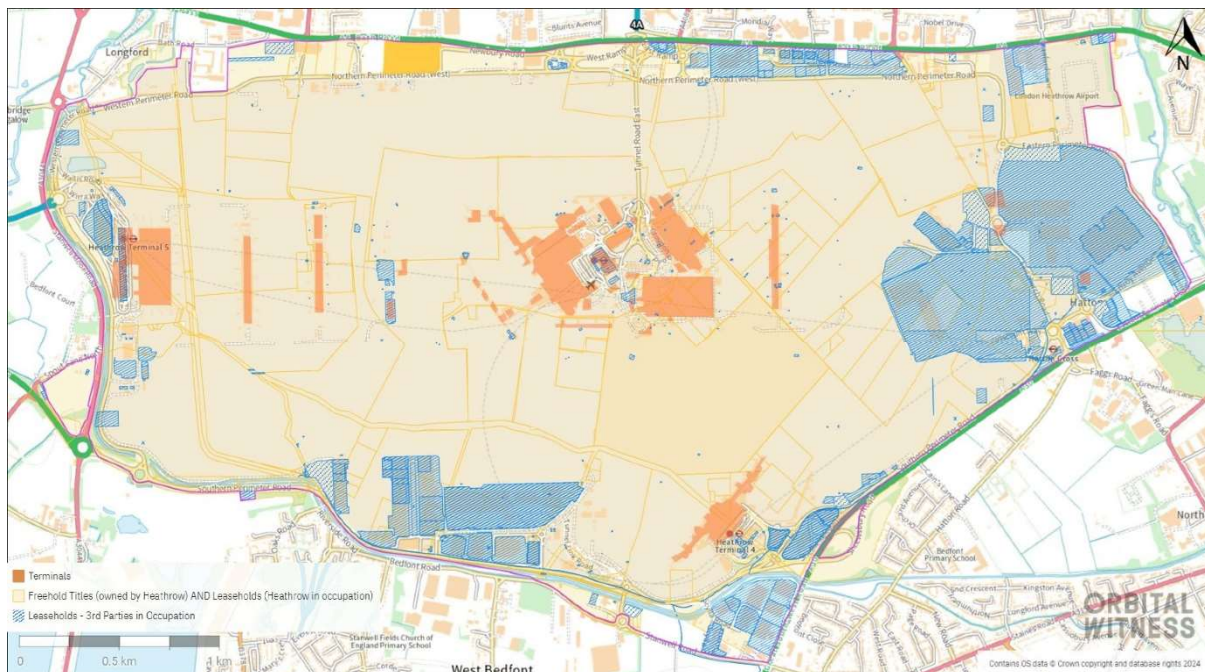
**Heathrow**

Project Name	Heathrow Project No.	© Heathrow Airport Limited 2023
Programme Name	Originator Project No.	10000-XX-SC-736-000002
Company	Drawn By	CHK/Approval
HEATHROW	ATC	ATC
Location-Level-Sub-Series/System Identifier	Draw Date	Status
10000-XX-SC-736-000002	05/07/24	PG
		Version
		1.0

**SCHEDULE 5 – NOTICE**  
**WARNING – NOTICE OF COURT INJUNCTION**

**A HIGH COURT INJUNCTION granted in Claim No KB-2024-002210 granted on 9 July 2024 until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, now exists in relation to Heathrow Airport. The injunction means you may NOT without the express consent of HEATHROW AIRPORT LIMITED:**

**IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN ENTER, OCCUPY OR REMAIN UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE PLAN BELOW:**



**ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED, OR HAVE THEIR ASSETS SEIZED.**

A copy of the legal proceedings (including the Order, Claim Form, Application Notice, evidence in support and a note of the hearing on 9 July 2024) can be viewed at [www.heathrow.com/injunction](http://www.heathrow.com/injunction) or obtained from:

- (1) Compass Centre, Heathrow Airport, Nelson Road, Hounslow TW6 2GW, which is open between 9am-5pm Monday-Friday; or
- (2) Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR (Reference: AMRK/PSPE/20H0904.000140; Telephone: 020 3400 3119).

Anyone notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. The address of the Court is the Royal Courts of Justice, Strand, London WC2A 2LL.