

Made on behalf of the Claimant
Witness: Robert Hodgson
Number of Statement: First
Exhibit: RH1

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

- 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

EXHIBIT RH1

Date: 21 August 2024
Our Ref.: AMRK/RHOD/2034073.000047
Your Ref.:
Direct Dial: +44 20 3400 3711
Email: robert.hodgson@bclplaw.com

BRYAN CAVE LEIGHTON PAISNER LLP
Governor's House
5 Laurence Pountney Hill
London EC4R 0BR
United Kingdom
T: +44 (0)20 3400 1000
F: +44 (0)20 3400 1111
DX92 London
bclplaw.com

Prisoner Location Service
PO Box 17594
Birmingham
B2 2QP

By email only to findaprisoner@justice.gov.uk

URGENT REQUEST

Dear Sirs

Heathrow Airport Limited v Persons Unknown (as defined in the Claim Form) High Court Claim Number: KB-2024-002210

- 1 We act for Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 We are instructed to issue a joinder application to join specific individuals as named Defendants in the above proceedings. This instruction requires us to serve a Claim Form at the current or last known residence of these specific individuals. Since they are, to the best of our knowledge, currently on remand in prisons within England and Wales, we must serve them at those prisons.
- 3 We therefore request the use of the 'Find a Prisoner' service to find the prison or prisons in which these specific individuals are currently being held, so that we may serve the Claim Form on them in accordance with the relevant Civil Procedure Rules.
- 4 The details of the individuals against whom we submit this search (their name, date of birth and last known address) are given at Schedule 1, annexed to this letter.
- 5 If you require any further information or have any questions regarding this request, please contact Robert Hodgson of this firm using the details given above.
- 6 Please confirm receipt of this request.

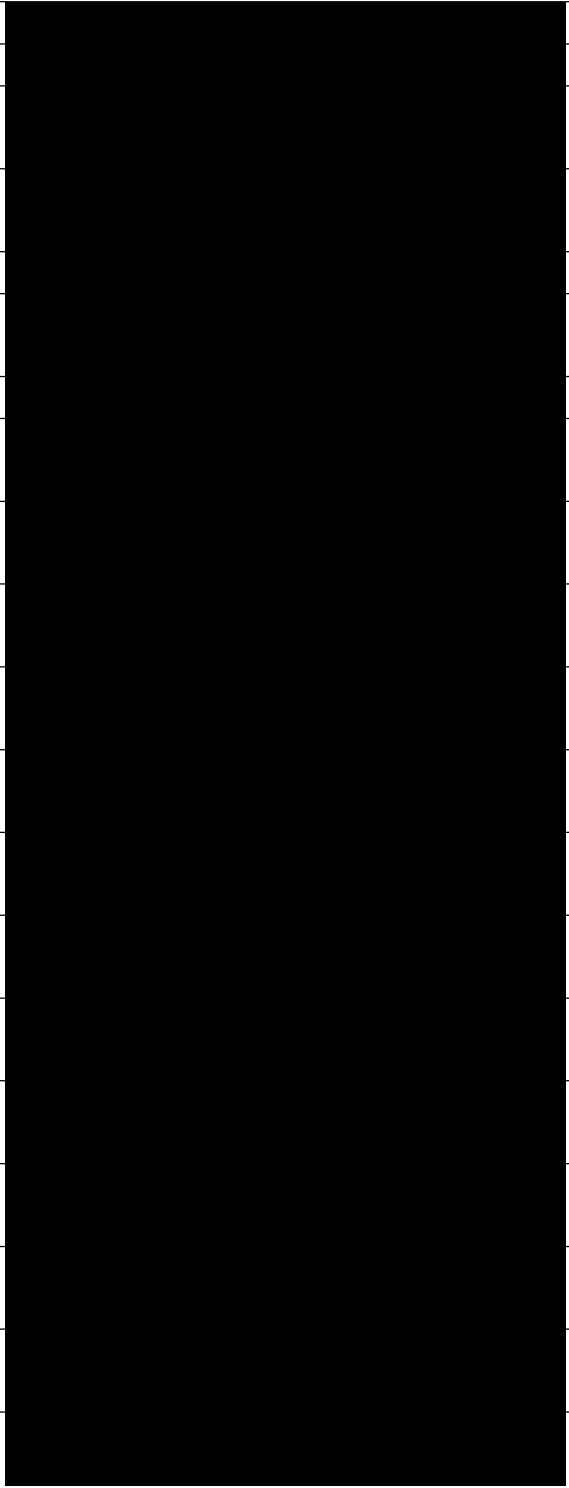
Yours faithfully




Bryan Cave Leighton Paisner LLP

Date: 21 August 2024
Page: 2

Schedule 1

Name	Date of Birth	Last Known Address
Rory Wilson	22/05/1998	
Adam Beard	20/04/1969	
Sean O'Callaghan	24/09/1994	
Sally Davidson	27/08/1987	
Hannah Schafer	23/08/1963	
Luke Elson	17/02/1993	
Luke Watson	13/09/1989	
Pheobe Plummer	Unknown	
Jane Touil	Unknown	
Barbara Lund	05/01/1953	
Rhiannon Wood	02/07/1994	
Diane Bligh	04/02/1947	
Ruth Cook	02/03/1952	
Malcolm Allister	16/07/1970	
Susanne Brown	30/07/1995	
Christina Jenkins	20/05/1993	
Jack Williams	28/11/2001	
Paul Raithby	04/10/1964	
Melanie Griffith	10/04/1963	
Virginia Barrett	27/04/1968	

Date: 21 August 2024
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Pauline Hazel Smith	13/11/1950	
Rosemary Robinson	11/06/1954	
Irfan Mamun	19/09/1996	
Callum Cronin	24/11/1997	
Joe Magowan	26/08/1991	
Monday Rosenfeld	Unknown	

From: Find a Prisoner [NOMS] <FindaPrisoner@justice.gov.uk>
Sent: 30 October 2024 12:39
To: Robert Hodgson
Subject: RE: Find a Prisoner Our Ref: 2108/Phoebe Plummer (N) [_BCLP-LEGAL.20H0904.000140]

Hi

Details have been added regarding Ms Phoebe Plummer below in our initial response below.

Kind regards,



W.A.Jahangir
Find a Prisoner Service
Family Services
Directorate of Central Operational Services
HM Prison and Probation Service
FindaPrisoner@justice.gov.uk

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From: Robert Hodgson <Robert.Hodgson@bclplaw.com>
Sent: 28 October 2024 10:22
To: Find a Prisoner [NOMS] <FindaPrisoner@justice.gov.uk>
Subject: RE: Find a Prisoner Our Ref: 2108/Phoebe Plummer (N) [_BCLP-LEGAL.20H0904.000140]

Dear Ioana

Thank you for your response.

According to Ms Plummer's Wikipedia page her date of birth is 26 September 2001.

Many thanks

Rob



Robert Hodgson
Associate
Bryan Cave Leighton Paisner LLP - London, UK
robert.hodgson@bclplaw.com
T: +44 20 3400 3711 M: +44 7568 129029

From: Find a Prisoner [NOMS] <FindaPrisoner@justice.gov.uk>
Sent: Friday, October 25, 2024 2:25 PM
To: Robert Hodgson <Robert.Hodgson@bclplaw.com>
Subject: RE: Find a Prisoner Our Ref: 2108/Phoebe Plummer (N) [_BCLP-LEGAL.20H0904.000140]

Good afternoon,

Thank you for your recent enquiry.

Are you able to provide Phoebe Plummer's date of birth, please?

Kind regards,



Ioana P
Find a Prisoner Service
Family Services
HM Prison & Probation Service , HQ - National Operations
Rehabilitation Strategy and Interventions
Rehabilitation Directorate
FindaPrisoner@justice.gov.uk

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From: Robert Hodgson <Robert.Hodgson@bclplaw.com>
Sent: 24 October 2024 11:50
To: Find a Prisoner [NOMS] <FindaPrisoner@justice.gov.uk>
Subject: RE: Find a Prisoner Our Ref: 2108/Persons Unknown (N) [_BCLP-LEGAL.20H0904.000140]

Dear Ioana

Thank you very much for providing the below.

We have noticed that 'PHEOBE PLUMMER' has been spelt incorrectly – it should be 'PHOEBE PLUMMER'.

Please can you redo the search for Phoebe Plummer?

Many thanks

Rob



Robert Hodgson
Associate
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robert.hodgson@bclplaw.com
T: +44 20 3400 3711 M: +44 7568 129029

From: Find a Prisoner [NOMS] <FindaPrisoner@justice.gov.uk>
Sent: Monday, October 21, 2024 10:25 AM
To: Robert Hodgson <Robert.Hodgson@bclplaw.com>
Subject: Find a Prisoner Our Ref: 2108/Persons Unknown (N) [_BCLP-LEGAL.20H0904.000140]

Hi,

Name: RORY WILSON
Prison Number: [REDACTED]
Prison: [REDACTED]

Name: ADAM BEARD
Prison Number: [REDACTED]
Prison: [REDACTED]

Name: Sean O'Callaghan - NO MATCH

Name: Sally Davidson
Prison Number: [REDACTED]
Prison: [REDACTED]

Name: HANNAH SCHAFER
Prison Number: [REDACTED]
Prison: [REDACTED]

Name: LUKE ELSON
Prison Number: [REDACTED]
Prison: [REDACTED]

Name: LUKE WATSON
Prison Number: [REDACTED]
Prison: [REDACTED]

Name: PHEOBE PLUMMER
Prison Number: [REDACTED]
Prison: [REDACTED]

Name: JANE TOUIL
Prison Number: [REDACTED]
Prison: [REDACTED]

Name: JANE TOUIL
Prison Number: [REDACTED]
Prison: [REDACTED]

Name: Barbara Lund – NO MATCH

Name: Rhiannon Wood – NO MATCH

Name: Diane Bligh – NO MATCH

Name: Ruth Cook– NO MATCH

Name: Malcolm Allister – NO MATCH

Name: Susanne Brown – NO MATCH

Name: Christina Jenkins– NO MATCH

Name: Jack Williams – NO MATCH

Name: Paul Raithby– NO MATCH

Name: Melanie Griffith– NO MATCH

Name: Virginia Barrett– NO MATCH

Name: Pauline Hazel Smith – NO MATCH

Name: Rosemary Robinson– NO MATCH

Name: Irfan Mamun– NO MATCH

Name: Callum Cronin– NO MATCH

Name: Joe Magowan – NO MATCH

Name: Monday Rosenfeld – NO MATCH

Kind regards,



Ioana P
Find a Prisoner Service
Family Services
HM Prison & Probation Service , HQ - National Operations
Rehabilitation Strategy and Interventions
Rehabilitation Directorate
FindaPrisoner@justice.gov.uk

Information Privacy Policy - The Ministry of Justice uses and retains the personal data of enquirers for the purposes of the safe and secure provision of Prison Services. You have the right to request details of the personal information we hold about you; and subsequently request that we correct any personal information if it is found to be inaccurate or out of date. We will not share your information with other organisations unless it is required for the purposes of prevention and detection of crime; apprehension, prosecution, and management of prisoners; prevention of terrorism; National Security; or if required to do so by law. For more information please contact the Information Access Representative at the Prison or department where your personal information was collected or see our Privacy Policy on our website www.justice.gov.uk

From: Robert Hodgson <Robert.Hodgson@bclplaw.com>

Sent: Monday, October 14, 2024 3:38 PM

To: Find a Prisoner [NOMS] <FindaPrisoner@justice.gov.uk>

Subject: RE: Find a Prisoner Our Ref: 2108/Persons Unknown (N) [_BCLP-LEGAL.20H0904.000140]

Dear Sirs

Please can you provide us with a response/ update on the below?

Many thanks

Rob



Robert Hodgson
Associate
Bryan Cave Leighton Paisner LLP - London, UK
robert.hodgson@bclplaw.com
T: +44 20 3400 3711 M: +44 7568 129029

From: Robert Hodgson
Sent: Monday, September 23, 2024 6:21 PM
To: 'Find a Prisoner [NOMS]' <FindaPrisoner@justice.gov.uk>
Subject: RE: Find a Prisoner Our Ref: 2108/Persons Unknown (N) [_BCLP-LEGAL.3012774.000001]

Dear Harj

Thank you for your email below.

Please do request consent from those listed in Schedule 1 of our letter (reattached).

We do not consider that consent or a court order is required before you can provide us with the requested information. The requested information can be disclosed pursuant to Schedule 2, Part 5, Paragraph 3a of The Data Protection Act 2018, which is copied below as follows:

- (3) The listed GDPR provisions do not apply to personal data where disclosure of the data —
- (a) is necessary for the purpose of, or in connection with, legal proceedings (including prospective legal proceedings),
 - (b) is necessary for the purpose of obtaining legal advice, or
 - (c) is otherwise necessary for the purposes of establishing, exercising or defending legal rights,
- to the extent that the application of those provisions would prevent the controller from making the disclosure.

As explained this information is required in connection with legal proceedings.

We therefore invite you to reconsider our request and to please provide us with the information. However, in the interests of time, and without prejudice to our position above, if you do still consider you require consent please do request it as soon as possible.

If you can confirm your position as a matter of urgency that would be much appreciated.

Do call me on +44 7568 129029 if you would like to discuss.

Many thanks

Rob



Robert Hodgson
Associate
Bryan Cave Leighton Paisner LLP - London, UK
robert.hodgson@bclplaw.com
T: +44 20 3400 3711 M: +44 7568 129029

From: Find a Prisoner [NOMS] <FindaPrisoner@justice.gov.uk>
Sent: Friday, September 20, 2024 11:10 AM
To: Robert Hodgson <Robert.Hodgson@bclplaw.com>
Subject: Find a Prisoner Our Ref: 2108/Persons Unknown (N)
Importance: High

Dear Sir/Madam,

Re: Persons Unknown

Thank you for your email below.

Unfortunately, the exemption provided is not sufficient.

Please confirm if you wish for consent to be sought.

Consent is always sought unless we are supplied with a copy of a court order bearing the court seal confirming HMPPS must provide the prisoner location/number.

Please advise via email as to the course of action you wish to take in view of our above-mentioned procedures.

Kind regards,



Harj
Family Services Contact Centre Agent
Health and Wellbeing Group
Rehabilitation Directorate
FindaPrisoner@justice.gov.uk

Preventing victims by changing lives

Information Privacy Policy - The Ministry of Justice uses and retains the personal data of enquirers for the purposes of the safe and secure provision of Prison Services. You have the right to request details of the personal information we hold about you; and subsequently request that we correct any personal information if it is found to be inaccurate or out of date. We will not share your information with other organisations unless it is required for the purposes of prevention and detection of crime; apprehension, prosecution, and management of offenders; prevention of terrorism; National Security; or if required to do so by law. For more information please contact the Information Access Representative at the Prison or department where your personal information was collected or see our Privacy Policy on our website www.justice.gov.uk

From: Robert Hodgson <Robert.Hodgson@bclplaw.com>

Sent: Monday, September 2, 2024 10:31 AM

To: Find a Prisoner [NOMS] <FindaPrisoner@justice.gov.uk>

Cc: Akhil Markanday <Akhil.Markanday@bclplaw.com>; Phil Spencer <Phil.Spencer@bclplaw.com>; Sanjay Lohano <Sanjay.Lohano@bclplaw.com>

Subject: RE: Urgent request for Find a Prisoner service [_BCLP-LEGAL.3012774.000001]

Importance: High

Dear Sirs

Please can the attached request be processed as soon as possible.

We need this information urgently.

Kind regards



Robert Hodgson
Associate
Bryan Cave Leighton Paisner LLP - London, UK
robert.hodgson@bclplaw.com
T: +44 20 3400 3711 M: +44 7568 129029

From: Robert Hodgson

Sent: Wednesday, August 21, 2024 3:48 PM

To: 'findaprisoner@justice.gov.uk' <findaprisoner@justice.gov.uk>

Cc: Akhil Markanday <Akhil.Markanday@bclplaw.com>; Phil Spencer <Phil.Spencer@bclplaw.com>

Subject: Urgent request for Find a Prisoner service [_BCLP-LEGAL.3012774.000001]

Importance: High

Dear Sirs

Please see the attached letter.

Please kindly acknowledge receipt.

Yours faithfully

Bryan Cave Leighton Paisner LLP



Robert Hodgson
Associate
robert.hodgson@bclplaw.com
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Date: 5 November 2024
Our ref: AMRK/PSPE/RHOD/20H0904.000140
DDI: +44 20 3400 3711
e-mail: robert.hodgson@bclplaw.com

BRYAN CAVE LEIGHTON PAISNER LLP
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DX92 London
bclplaw.com

Adam Beard



By First Class Post

Dear Adam Beard

KB-2024-002210 - HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
- 4 We hereby enclose copies of:
 - (a) the Sealed Claim Form;
 - (b) the Particulars of Claim; and
 - (c) the Injunction Order.
- 5 The Claimant has reason to believe that you have taken part in an incident at Heathrow Airport in breach of the Injunction Order, which:
 - (a) justifies the joinder of you as a party to the Injunction Order; and
 - (b) may lead to Contempt of Court proceedings against you.

- 6 We recommend that you seek urgent independent legal advice and, although a matter for your own legal counsel, we notify you that you do have a right against self-incrimination which may become material in your response to the Claimant's joinder application in light of the potential Contempt of Court proceedings against you.
- 7 In order to seek joinder of you as a party to the Injunction Order, our client has issued the following documents at the High Court, which we enclose, to the extent applicable, by way of service:
- (a) Sealed Application Notice;
 - (b) Draft Joinder Order;
 - (c) Second Witness Statement of Akhil Markanday;
 - (d) Exhibit AM2; and
 - (e) Notice of Listing.
- 8 The Notice of Listing contains the details of the upcoming hearing which has been listed for **2 hours on 11 December 2024** before a High Court Judge, to determine our client's application. The hearing will be in person and most likely in the King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL. As set out in the Notice of Listing, the Judge and exact time of the hearing will be confirmed the working day before on the Daily Cause List (this can be accessed here: <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list>).
- 9 You are free to attend the hearing should you wish to make any representations in respect of the relief the Claimant seeks.
- 10 We also give you notice that the Claimant will be seeking the Court's permission to amend the Particulars of Claim at the upcoming hearing to include the Claimant's claim against you. We have also enclosed a copy of the Claimant's draft Amended Particulars of Claim.
- 11 A bundle for the hearing will be available before the hearing by way of electronic download. If you wish to receive an electronic copy of the hearing bundle please email Robert Hodgson (robert.hodgson@bclplaw.com).
- 12 To keep costs reasonable, we have provided black and white copies of the documents appended to this letter. Should you wish to access colour copies of the documents, they have been uploaded here: <https://www.heathrow.com/company/local-community/injunction>
- 13 Please acknowledge receipt of this letter. We are also happy to answer any questions you may have with regards to the contents of this letter, although as noted above you should seek your own independent legal advice as we cannot advise you.

Yours faithfully



Bryan Cave Leighton Paisner LLP

Encs.

1. Sealed Claim Form
2. Particulars of Claim
3. Injunction Order
4. Sealed Application Notice
5. Draft Joinder Order
6. Second Witness Statement of Akhil Markanday
7. Exhibit AM2
8. Notice of Listing
9. Draft Amended Particulars of Claim

Date: 5 November 2024
Our ref: AMRK/PSPE/RHOD/20H0904.000140
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Barbara Lund



By First Class Post

Dear Barbara Lund

KB-2024-002210 - HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
- 4 We hereby enclose copies of:
 - (a) the Sealed Claim Form;
 - (b) the Particulars of Claim; and
 - (c) the Injunction Order.
- 5 The Claimant has reason to believe that you have taken part in an incident at Heathrow Airport in breach of the Injunction Order, which:
 - (a) justifies the joinder of you as a party to the Injunction Order; and
 - (b) may lead to Contempt of Court proceedings against you.

- 6 We recommend that you seek urgent independent legal advice and, although a matter for your own legal counsel, we notify you that you do have a right against self-incrimination which may become material in your response to the Claimant's joinder application in light of the potential Contempt of Court proceedings against you.
- 7 In order to seek joinder of you as a party to the Injunction Order, our client has issued the following documents at the High Court, which we enclose, to the extent applicable, by way of service:
- (a) Sealed Application Notice;
 - (b) Draft Joinder Order;
 - (c) Second Witness Statement of Akhil Markanday;
 - (d) Exhibit AM2; and
 - (e) Notice of Listing.
- 8 The Notice of Listing contains the details of the upcoming hearing which has been listed for **2 hours on 11 December 2024** before a High Court Judge, to determine our client's application. The hearing will be in person and most likely in the King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL. As set out in the Notice of Listing, the Judge and exact time of the hearing will be confirmed the working day before on the Daily Cause List (this can be accessed here: <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list>).
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- 11 A bundle for the hearing will be available before the hearing by way of electronic download. If you wish to receive an electronic copy of the hearing bundle please email Robert Hodgson (robert.hodgson@bclplaw.com).
- 12 To keep costs reasonable, we have provided black and white copies of the documents appended to this letter. Should you wish to access colour copies of the documents, they have been uploaded here: <https://www.heathrow.com/company/local-community/injunction>
- 13 Please acknowledge receipt of this letter. We are also happy to answer any questions you may have with regards to the contents of this letter, although as noted above you should seek your own independent legal advice as we cannot advise you.

Yours faithfully



Bryan Cave Leighton Paisner LLP

Encs.

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2. Particulars of Claim
3. Injunction Order
4. Sealed Application Notice
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9. Draft Amended Particulars of Claim

Date: 5 November 2024
Our ref: AMRK/PSPE/RHOD/20H0904.000140
DDI: +44 20 3400 3711
e-mail: robert.hodgson@bclplaw.com

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Callum Cronin



By First Class Post

Dear Callum Cronin

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Christina Jenkins



By First Class Post

Dear Christina Jenkins

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Diane Bligh



BA11 6PL

By First Class Post

Dear Diane Bligh

KB-2024-002210 - HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

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Hannah Schafer



By First Class Post

Dear Hannah Schafer

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Irfan Mamun



By First Class Post

Dear Irfan Mamun

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Jack Williams



By First Class Post

Dear Jack Williams

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- 8 The Notice of Listing contains the details of the upcoming hearing which has been listed for **2 hours on 11 December 2024** before a High Court Judge, to determine our client's application. The hearing will be in person and most likely in the King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL. As set out in the Notice of Listing, the Judge and exact time of the hearing will be confirmed the working day before on the Daily Cause List (this can be accessed here: <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list>).
- 9 You are free to attend the hearing should you wish to make any representations in respect of the relief the Claimant seeks.
- 10 We also give you notice that the Claimant will be seeking the Court's permission to amend the Particulars of Claim at the upcoming hearing to include the Claimant's claim against you. We have also enclosed a copy of the Claimant's draft Amended Particulars of Claim.
- 11 A bundle for the hearing will be available before the hearing by way of electronic download. If you wish to receive an electronic copy of the hearing bundle please email Robert Hodgson (robert.hodgson@bclplaw.com).
- 12 To keep costs reasonable, we have provided black and white copies of the documents appended to this letter. Should you wish to access colour copies of the documents, they have been uploaded here: <https://www.heathrow.com/company/local-community/injunction>
- 13 Please acknowledge receipt of this letter. We are also happy to answer any questions you may have with regards to the contents of this letter, although as noted above you should seek your own independent legal advice as we cannot advise you.

Yours faithfully



Bryan Cave Leighton Paisner LLP

Encs.

1. Sealed Claim Form
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3. Injunction Order
4. Sealed Application Notice
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6. Second Witness Statement of Akhil Markanday
7. Exhibit AM2
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9. Draft Amended Particulars of Claim

Date: 5 November 2024
Our ref: AMRK/PSPE/RHOD/20H0904.000140
DDI: +44 20 3400 3711
e-mail: robert.hodgson@bclplaw.com

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F: +44 (0)20 3400 1111
DX92 London
bclplaw.com

Jane Touil



By First Class Post

Dear Jane Touil

KB-2024-002210 - HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
- 4 We hereby enclose copies of:
 - (a) the Sealed Claim Form;
 - (b) the Particulars of Claim; and
 - (c) the Injunction Order.
- 5 The Claimant has reason to believe that you have taken part in an incident at Heathrow Airport in breach of the Injunction Order, which:
 - (a) justifies the joinder of you as a party to the Injunction Order; and
 - (b) may lead to Contempt of Court proceedings against you.
- 6 We recommend that you seek urgent independent legal advice and, although a matter for your own legal counsel, we notify you that you do have a right against self-incrimination

which may become material in your response to the Claimant's joinder application in light of the potential Contempt of Court proceedings against you.

- 7 In order to seek joinder of you as a party to the Injunction Order, our client has issued the following documents at the High Court, which we enclose, to the extent applicable, by way of service:
- (a) Sealed Application Notice;
 - (b) Draft Joinder Order;
 - (c) Second Witness Statement of Akhil Markanday;
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 - (e) Notice of Listing.
- 8 The Notice of Listing contains the details of the upcoming hearing which has been listed for **2 hours on 11 December 2024** before a High Court Judge, to determine our client's application. The hearing will be in person and most likely in the King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL. As set out in the Notice of Listing, the Judge and exact time of the hearing will be confirmed the working day before on the Daily Cause List (this can be accessed here: <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list>).
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Bryan Cave Leighton Paisner LLP

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Date: 5 November 2024
Our Ref.: AMRK/PSPE/RHOD/20H0904.000140
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Joe Magowan


By First Class Post

Dear Joe Magowan

KB-2024-002210 – HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
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- 5 The Claimant has reason to believe that you have taken part in an incident at Heathrow Airport in breach of the Injunction Order, which:
 - (a) justifies the joinder of you as a party to the Injunction Order; and
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- 6 We recommend that you seek urgent independent legal advice and, although a matter for your own legal counsel, we notify you that you do have a right against self-incrimination which may become material in your response to the Claimant's joinder application in light of the potential Contempt of Court proceedings against you.

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Luke Elson


By First Class Post

Dear Luke Elson

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- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
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Luke Watson



By First Class Post

Dear Luke Watson

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- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
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Bryan Cave Leighton Paisner LLP

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Malcolm Allister


By First Class Post

Dear Malcolm Allister

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- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
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Bryan Cave Leighton Paisner LLP

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Melanie Griffith



By First Class Post

Dear Melanie Griffith

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- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
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Yours faithfully



Bryan Cave Leighton Paisner LLP

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Monday Rosenfeld


By First Class Post

Dear Monday Rosenfeld

KB-2024-002210 - HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
- 4 We hereby enclose copies of:
 - (a) the Sealed Claim Form;
 - (b) the Particulars of Claim; and
 - (c) the Injunction Order.
- 5 The Claimant has reason to believe that you have taken part in an incident at Heathrow Airport in breach of the Injunction Order, which:
 - (a) justifies the joinder of you as a party to the Injunction Order; and
 - (b) may lead to Contempt of Court proceedings against you.
- 6 We recommend that you seek urgent independent legal advice and, although a matter for your own legal counsel, we notify you that you do have a right against self-incrimination

which may become material in your response to the Claimant's joinder application in light of the potential Contempt of Court proceedings against you.

- 7 In order to seek joinder of you as a party to the Injunction Order, our client has issued the following documents at the High Court, which we enclose, to the extent applicable, by way of service:
- (a) Sealed Application Notice;
 - (b) Draft Joinder Order;
 - (c) Second Witness Statement of Akhil Markanday;
 - (d) Exhibit AM2; and
 - (e) Notice of Listing.
- 8 The Notice of Listing contains the details of the upcoming hearing which has been listed for **2 hours on 11 December 2024** before a High Court Judge, to determine our client's application. The hearing will be in person and most likely in the King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL. As set out in the Notice of Listing, the Judge and exact time of the hearing will be confirmed the working day before on the Daily Cause List (this can be accessed here: <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list>).
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- 12 To keep costs reasonable, we have provided black and white copies of the documents appended to this letter. Should you wish to access colour copies of the documents, they have been uploaded here: <https://www.heathrow.com/company/local-community/injunction>
- 13 Please acknowledge receipt of this letter. We are also happy to answer any questions you may have with regards to the contents of this letter, although as noted above you should seek your own independent legal advice as we cannot advise you.

Yours faithfully



Bryan Cave Leighton Paisner LLP

Encs.

1. Sealed Claim Form
2. Particulars of Claim

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4. Sealed Application Notice
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9. Draft Amended Particulars of Claim

Date: 5 November 2024
Our ref: AMRK/PSPE/RHOD/20H0904.000140
DDI: +44 20 3400 3711
e-mail: robert.hodgson@bclplaw.com

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DX92 London
bclplaw.com

Paul Raithby



By First Class Post

Dear Paul Raithby

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- 6 We recommend that you seek urgent independent legal advice and, although a matter for your own legal counsel, we notify you that you do have a right against self-incrimination

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Pauline Hazel Smith



By First Class Post

Dear Pauline Hazel Smith

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Phoebe Plummer



By First Class Post

Dear Phoebe Plummer

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- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
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Bryan Cave Leighton Paisner LLP

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Rhiannon Wood



By First Class Post

Dear Rhiannon Wood

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Rory Wilson


By First Class Post

Dear Rory Wilson

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Rosemary Robinson



By First Class Post

Dear Rosemary Robinson

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- 8 The Notice of Listing contains the details of the upcoming hearing which has been listed for **2 hours on 11 December 2024** before a High Court Judge, to determine our client's application. The hearing will be in person and most likely in the King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL. As set out in the Notice of Listing, the Judge and exact time of the hearing will be confirmed the working day before on the Daily Cause List (this can be accessed here: <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list>).
- 9 You are free to attend the hearing should you wish to make any representations in respect of the relief the Claimant seeks.
- 10 We also give you notice that the Claimant will be seeking the Court's permission to amend the Particulars of Claim at the upcoming hearing to include the Claimant's claim against you. We have also enclosed a copy of the Claimant's draft Amended Particulars of Claim.
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- 12 To keep costs reasonable, we have provided black and white copies of the documents appended to this letter. Should you wish to access colour copies of the documents, they have been uploaded here: <https://www.heathrow.com/company/local-community/injunction>
- 13 Please acknowledge receipt of this letter. We are also happy to answer any questions you may have with regards to the contents of this letter, although as noted above you should seek your own independent legal advice as we cannot advise you.

Yours faithfully



Bryan Cave Leighton Paisner LLP

Encs.

1. Sealed Claim Form
2. Particulars of Claim

3. Injunction Order
4. Sealed Application Notice
5. Draft Joinder Order
6. Second Witness Statement of Akhil Markanday
7. Exhibit AM2
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9. Draft Amended Particulars of Claim

Date: 5 November 2024
Our ref: AMRK/PSPE/RHOD/20H0904.000140
DDI: +44 20 3400 3711
e-mail: robert.hodgson@bclplaw.com

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F: +44 (0)20 3400 1111
DX92 London
bclplaw.com

Ruth Cook



By First Class Post

Dear Ruth Cook

KB-2024-002210 - HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
- 4 We hereby enclose copies of:
 - (a) the Sealed Claim Form;
 - (b) the Particulars of Claim; and
 - (c) the Injunction Order.
- 5 The Claimant has reason to believe that you have taken part in an incident at Heathrow Airport in breach of the Injunction Order, which:
 - (a) justifies the joinder of you as a party to the Injunction Order; and
 - (b) may lead to Contempt of Court proceedings against you.

- 6 We recommend that you seek urgent independent legal advice and, although a matter for your own legal counsel, we notify you that you do have a right against self-incrimination which may become material in your response to the Claimant's joinder application in light of the potential Contempt of Court proceedings against you.
- 7 In order to seek joinder of you as a party to the Injunction Order, our client has issued the following documents at the High Court, which we enclose, to the extent applicable, by way of service:
- (a) Sealed Application Notice;
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Sally Davidson



By First Class Post

Dear Sally Davidson

KB-2024-002210 - HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
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- 5 The Claimant has reason to believe that you have taken part in an incident at Heathrow Airport in breach of the Injunction Order, which:
 - (a) justifies the joinder of you as a party to the Injunction Order; and
 - (b) may lead to Contempt of Court proceedings against you.

- 6 We recommend that you seek urgent independent legal advice and, although a matter for your own legal counsel, we notify you that you do have a right against self-incrimination which may become material in your response to the Claimant's joinder application in light of the potential Contempt of Court proceedings against you.
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Yours faithfully



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Sean O'Callaghan



By First Class Post

Dear Sean O'Callaghan

KB-2024-002210 - HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
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 - (a) the Sealed Claim Form;
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- 5 The Claimant has reason to believe that you have taken part in an incident at Heathrow Airport in breach of the Injunction Order, which:
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- 6 We recommend that you seek urgent independent legal advice and, although a matter for your own legal counsel, we notify you that you do have a right against self-incrimination which may become material in your response to the Claimant's joinder application in light of the potential Contempt of Court proceedings against you.
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Bryan Cave Leighton Paisner LLP

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Susanne Brown



By First Class Post

Dear Susanne Brown

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- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
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- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
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Yours faithfully



Bryan Cave Leighton Paisner LLP

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Virginia Barrett



By First Class Post

Dear Virginia Barrett

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- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
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Bryan Cave Leighton Paisner LLP

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FAO: Luke Elson



By First Class Post

Dear Luke Elson

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Bryan Cave Leighton Paisner LLP

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FAO: Luke Watson



By First Class Post

Dear Luke Watson

KB-2024-002210 - HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
- 4 We hereby enclose copies of:
 - (a) the Sealed Claim Form;
 - (b) the Particulars of Claim; and
 - (c) the Injunction Order.
- 5 The Claimant has reason to believe that you have taken part in an incident at Heathrow Airport in breach of the Injunction Order, which:
 - (a) justifies the joinder of you as a party to the Injunction Order; and
 - (b) may lead to Contempt of Court proceedings against you.
- 6 We recommend that you seek urgent independent legal advice and, although a matter for your own legal counsel, we notify you that you do have a right against self-incrimination

which may become material in your response to the Claimant's joinder application in light of the potential Contempt of Court proceedings against you.

- 7 In order to seek joinder of you as a party to the Injunction Order, our client has issued the following documents at the High Court, which we enclose, to the extent applicable, by way of service:
- (a) Sealed Application Notice;
 - (b) Draft Joinder Order;
 - (c) Second Witness Statement of Akhil Markanday;
 - (d) Exhibit AM2; and
 - (e) Notice of Listing.
- 8 The Notice of Listing contains the details of the upcoming hearing which has been listed for **2 hours on 11 December 2024** before a High Court Judge, to determine our client's application. The hearing will be in person and most likely in the King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL. As set out in the Notice of Listing, the Judge and exact time of the hearing will be confirmed the working day before on the Daily Cause List (this can be accessed here: <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list>).
- 9 You are free to attend the hearing should you wish to make any representations in respect of the relief the Claimant seeks.
- 10 We also give you notice that the Claimant will be seeking the Court's permission to amend the Particulars of Claim at the upcoming hearing to include the Claimant's claim against you. We have also enclosed a copy of the Claimant's draft Amended Particulars of Claim.
- 11 A bundle for the hearing will be available before the hearing by way of electronic download. If you wish to receive an electronic copy of the hearing bundle please email Robert Hodgson (robert.hodgson@bclplaw.com).
- 12 To keep costs reasonable, we have provided black and white copies of the documents appended to this letter. Should you wish to access colour copies of the documents, they have been uploaded here: <https://www.heathrow.com/company/local-community/injunction>
- 13 Please acknowledge receipt of this letter. We are also happy to answer any questions you may have with regards to the contents of this letter, although as noted above you should seek your own independent legal advice as we cannot advise you.

Yours faithfully



Bryan Cave Leighton Paisner LLP

Encs.

1. Sealed Claim Form
2. Particulars of Claim

3. Injunction Order
4. Sealed Application Notice
5. Draft Joinder Order
6. Second Witness Statement of Akhil Markanday
7. Exhibit AM2
8. Notice of Listing
9. Draft Amended Particulars of Claim

Date: 5 November 2024
Our ref: AMRK/PSPE/RHOD/20H0904.000140
DDI: +44 20 3400 3711
e-mail: robert.hodgson@bclplaw.com

BRYAN CAVE LEIGHTON PAISNER LLP
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5 Laurence Pountney Hill
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United Kingdom
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F: +44 (0)20 3400 1111
DX92 London
bclplaw.com

FAO: Phoebe Plummer



By First Class Post

Dear Phoebe Plummer

KB-2024-002210 - HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
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 - (a) the Sealed Claim Form;
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 - (c) the Injunction Order.
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 - (a) justifies the joinder of you as a party to the Injunction Order; and
 - (b) may lead to Contempt of Court proceedings against you.
- 6 We recommend that you seek urgent independent legal advice and, although a matter for your own legal counsel, we notify you that you do have a right against self-incrimination

which may become material in your response to the Claimant's joinder application in light of the potential Contempt of Court proceedings against you.

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- 11 A bundle for the hearing will be available before the hearing by way of electronic download. If you wish to receive an electronic copy of the hearing bundle please email Robert Hodgson (robert.hodgson@bclplaw.com).
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Yours faithfully



Bryan Cave Leighton Paisner LLP

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Date: 5 November 2024
Our ref: AMRK/PSPE/RHOD/20H0904.000140
DDI: +44 20 3400 3711
e-mail: robert.hodgson@bclplaw.com

BRYAN CAVE LEIGHTON PAISNER LLP
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5 Laurence Pountney Hill
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United Kingdom
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F: +44 (0)20 3400 1111
DX92 London
bclplaw.com

FOA: Adam Beard



By First Class Post

Dear Adam Beard

KB-2024-002210 - HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
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Date: 5 November 2024
Our ref: AMRK/PSPE/RHOD/20H0904.000140
DDI: +44 20 3400 3711
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bclplaw.com

FAO: Rory Wilson



By First Class Post

Dear Rory Wilson

KB-2024-002210 - HEATHROW AIRPORT LIMITED v 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 DATED 7 JULY 2024

- 1 We act on behalf of Heathrow Airport Limited, the Claimant in the above proceedings.
- 2 On 7 July 2024, the Claimant commenced proceedings by way of Claim Form and Particulars of Claim against 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.
- 3 On 9 July 2024, the High Court granted Heathrow Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on London Heathrow Airport (as shown edged purple on Plan A attached to the Injunction Order) in connection with Just Stop Oil (or other environmental campaign) without the consent of Heathrow Airport Limited (the "**Injunction Order**").
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Yours faithfully



Bryan Cave Leighton Paisner LLP

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7. Exhibit AM2
8. Notice of Listing
9. Draft Amended Particulars of Claim

From: Phil Spencer
Sent: 07 November 2024 16:50
To: juststopoil@protonmail.com; juststopoilpress@protonmail.com;
info@juststopoil.org
Cc: Robert Hodgson
Subject: RE: NOTICE AND SERVICE OF HIGH COURT INJUNCTION AT LONDON HEATHROW
AIRPORT (Claim Number KB-2024-002210) [_BCLP-LEGAL.20H0904.000140]
Attachments: Notice of Listing.pdf

HIGH COURT CLAIM NUMBER KB-2024-002210

HEATHROW AIRPORT LIMITED v 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

Further to the email below, please take note that a new application has been made in relation to this claim. A copy of the listing notice is attached. The application will be heard on 11 December 2024 at a time to be confirmed by the Court. We draw your attention to the documents relating to this application, which are available at: www.heathrow.com/injunction.

Yours faithfully

Bryan Cave Leighton Paisner LLP



Phil Spencer
Senior Associate
Bryan Cave Leighton Paisner LLP - London, UK
phil.spencer@bcplaw.com
T: +44 20 3400 3119 M: +44 7738 037271

From: Phil Spencer
Sent: Thursday, July 11, 2024 10:57 AM
To: 'juststopoil@protonmail.com' <juststopoil@protonmail.com>; 'juststopoilpress@protonmail.com' <juststopoilpress@protonmail.com>; 'info@juststopoil.org' <info@juststopoil.org>
Subject: NOTICE AND SERVICE OF HIGH COURT INJUNCTION AT LONDON HEATHROW AIRPORT (Claim Number KB-2024-002210) [_BCLP-LEGAL.20H0904.000140]

HEATHROW AIRPORT LIMITED v 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

Please take note that a Claim (KB-2024-002210) has been brought, and an application made, in the High Court in relation to the above. The documents relating to this Claim (including the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024) are available at: www.heathrow.com/injunction.

A copy of the Order granted is attached to this email.

Yours faithfully

Bryan Cave Leighton Paisner LLP



Phil Spencer
Senior Associate
phil.spencer@bcplaw.com
T: +44 20 3400 3119 M: +44 7738 037271

Bryan Cave Leighton Paisner LLP
Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, United Kingdom

bcplaw.com

From: Sally Davidson [REDACTED]
Sent: 10 November 2024 09:34
To: Robert Hodgson
Subject: Re: Heathrow injunction

Dear Robert

I have recently received some paperwork from yourself relating to the Heathrow injunction.

Can I ask that you promptly share the paperwork in a digital form with myself in order that I can get legal advice?

My details are

[REDACTED]

Yours faithfully

Sally Davidson

From: Phil Spencer
Sent: 11 November 2024 11:06
To: [REDACTED]
Cc: Robert Hodgson
Subject: Heathrow Injunction [_BCLP-LEGAL.20H0904.000140]

Dear Sally

Further to your email to my colleague Robert, who is currently out of the office, electronic copies of the documents relating to the injunction and the joinder application are available at <https://www.heathrow.com/company/local-community/injunction>

Kind regards

Phil



Phil Spencer
Senior Associate
phil.spencer@bcplaw.com
T: +44 20 3400 3119 M: +44 7738 037271

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[bcplaw.com](https://www.bcplaw.com)