

Made on behalf of the Claimant
Witness: Jonathan Daniel Coen
Number of Statement: Second
Exhibit: JDC2
Dated: 29 November 2024

IN THE HIGH COURT OF JUSTICE

Claim No.: KB-2024-002210

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

SECOND WITNESS STATEMENT OF JONATHAN DANIEL COEN

I, **JONATHAN DANIEL COEN**, of The Compass Centre, Nelson Road, Hounslow, Middlesex, TW6 2GW, **will say as follows:**

1. I am making this statement to provide factual evidence of the steps taken by the Claimant to notify the Defendants of the Claim Form, Application Notice, evidence in support, Note of the Hearing on 9 July 2024 and the injunction order (the "Documents") related to an injunction order granted by the Court on 9 July 2024 prohibiting "Persons Unknown" from trespassing on Heathrow Airport ("**Heathrow**")

in connection with the “Just Stop Oil” (“**JSO**”) campaign (or other environmental campaign) (the “**Order**”). This is my second witness statement in these proceedings.

2. I am currently employed as Customer Director by the Claimant. I took on this role on 1 August 2024. Prior to this and as set out in my first witness statement [**JDC2/3-16**], I was employed by the Claimant as the Director of Security at Heathrow. As Director of Security, I had overall responsibility for managing the implementation of the Order and delegated individual tasks to specialist areas within the Claimant’s organisation.
3. The facts and matters set out in this witness statement are within my own knowledge, unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, I identify the source of the information. Facts and matters derived from other sources are true to the best of my knowledge and belief.
4. I refer to a paginated bundle of documents, attached as Exhibit “**JDC2**”; where it is necessary to refer to a document, I shall refer to the document by its page number within Exhibit “**JDC2**”.
5. I am duly authorised to make this statement on behalf of the Claimant.
6. More generally, in preparing this witness statement, I have had sight of information from Bryan Cave Leighton Paisner LLP (“**BCLP**”) which confirms the actions they took to assist us in completing the steps required of the Claimant by the Order.

Background

7. Paragraph 8 of the Order [**JDC2/17-28**] requires the Claimant to take steps to notify the Defendants of the Claim Form [**JDC2/29-33**], Application Notice [**JDC2/51-55**] and evidence in support [**JDC2/56-74**] and Note of the Hearing on 9 July 2024 [**JDC2/75-83**] in connection with the Order.
8. Paragraph 9 of the Order requires the Claimant to take steps to notify the Defendants of the Order itself.

Service and notification

9. Pursuant to paragraph 8.1 of the Order, the Claimant was required to upload a copy of the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024 to www.heathrow.com/injunction.
10. Pursuant to paragraph 9.1 of the Order, the Claimant was required to upload a copy of the Order to www.heathrow.com/injunction.
11. The Claimant took the above steps together at 10:24 on 11 July 2024, as evidenced by an email from Helen Stokes of the Claimant to Phil Spencer of BCLP at 10:31 on 11 July 2024 [JDC2/84-86]. In this email, Helen Stokes confirms that the URL and its contents went live at 10:24 on 11 July 2024. In her email from 10 July 2024 [JDC2/87-91], Helen Stokes confirms that the main injunction page <https://www.heathrow.com/company/local-community/injunction> (to which the short URL in the Order, www.heathrow.com/injunction, redirects) was published at 13:07 on 10 July 2024, but the shortened URL was live from 10:24 on 11 July 2024. The Bundle for Hearing (which contained the Claim Form, Application Notice and evidence in support), Note of Hearing and the Order were part of the published contents. This is confirmed by the PDF screenshot of the live contents of website which is attached to Helen Stokes' email. Helen Stokes was the Head of Legal, Regulation and Operations of the Claimant on 11 July 2024 and authorised to take these actions on the Claimant's behalf.
12. Pursuant to paragraph 8.2 of the Order, the Claimant was required to send an email to the email addresses listed in Schedule 3 to the Order, stating that a claim has been brought and an application made and that the documents can be found at www.heathrow.com/injunction.
13. Pursuant to paragraph 9.2 of the Order, the Claimant was required to send an email to the email addresses listed in Schedule 3 to the Order, notifying them of the Order.
14. The Claimant took the above steps at 10:57 on 11 July 2024 by way of an email from Phil Spencer of BCLP acting on behalf of the Claimants sent to 'juststopoil@protonmail.com', 'juststopoilpress@protonmail.com', and 'info@juststopoil.org' (each as set out in Schedule 3 to the Order) [JDC2/92]. In this

email, Phil Spencer informs the recipients that a claim (KB-2024-002210) has been brought, an application to the High Court has been made and that 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. Phil Spencer notified the recipients of the Order by attaching it to the email and drawing the recipients' attention to the attachment.

15. Pursuant to paragraph 8.3 of the Order, the Claimant was required to affix a notice at the locations marked with a red dot in the plan of Heathrow contained at Schedule 4 of the Order (the "**Plan**") setting out where the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024 can be found and obtained in hard copy or include this information in the warning notices referred to at paragraph 9.4 of the Order.
16. Pursuant to paragraph 9.3 of the Order, the Claimant was required to affix a copy of the Order in A4 size in a clear plastic envelope at each location shown with a red dot in the Plan.
17. Pursuant to paragraph 9.4 of the Order, the Claimant must affix warning notices of A2 size, substantially in the form of the notice at Schedule 5 of the Order, at each location shown with a red dot in the Plan.
18. As Director of Security, I coordinated taking the above steps on behalf of the Claimant, delegating the notification steps to my security team. The steps were completed on 19:12 on 11 July 2024 as evidenced by an email from Helen Stokes to Akhil Markanday and Phil Spencer of BCLP at 15:15 on 12 July 2024 [**JDC2/93-95**]. The email attaches a picture of a warning notice, substantially in the form of the notice at Schedule 5 of the Order, to which a clear plastic envelope containing a copy of the Order has been stapled. The notice clearly states that the Order, Claim Form, Application Notice and evidence in support and a note of the hearing on 9 July 2024 can be viewed at <https://www.heathrow.com/company/local-community/injunction> or obtained from the Compass Centre, Heathrow Airport, Nelson Road, Hounslow TW6 2GW or from BCLP. The email also attaches a table with the 'approximate locations' at which the warning notices and the copies of the Order were affixed and the times at which they were affixed by members of my team. It is my understanding that each of these

'approximate locations' matches the approximate position of a red dot in the Plan. The picture Helen Stokes attached to her email is time stamped at 14:48 on 11 July 2024. Pursuant to the table, this time at which the warning notice and copy of the Order were affixed at "Longford Roundabout", which is the approximate location of the left-most, top-most red dot on the Plan. Helen Stokes' email to Phil Spencer at 16:42 on 11 July 2024 [JDC2/96] confirms that a hard copy folder of the relevant documents was placed at the reception of Compass Centre at 11:30 on 11 July 2024.

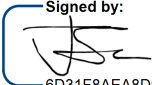
19. In addition to the steps required in the Order to bring the injunction to the notice of the Defendants, the Claimant has also voluntarily:
 - (a) Placed printed copies of the original hearing bundle and the Order in Landside locations in each of the terminals available on request; and
 - (b) Affixed approximately 85 warning notices of the type referred to in paragraph 18 above at the pedestrian entrances to the train and bus stations at Heathrow and at the pedestrian entrances to each of the terminals.

Conclusion

20. Given the above, I believe the terms of the Order have been complied with and service of the Order was perfected by completing the final required step, which was posting the final warning notice as set out in paragraph 18 above. Accordingly, the injunction came into full effect from 19:12 on 11 July 2024.

Statement of Truth

I believe that the facts stated in this Witness Statement and Exhibit are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed by:

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Jonathan Daniel Coen

29 November 2024