N244

Application notice

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Name of court	**Claim no.**
High Court of Justice Business and Property Court Property Trusts and Probate List	PT-2022-000326

Fee account no. (if applicable)	**Help with Fees – Ref. no.** (if applicable)
	H W F - -
Warrant no. (if applicable)	

Claimant's name (including ref.)
(1) Essar Oil (UK) Limited; (2) Stanlow Terminals Limited; (3) Infranorth Limited

Defendant's name (including ref.)
See Continuation Sheet

Date	5 May 2023

1. What is your name or, if you are a legal representative, the name of your firm?

Squire Patton Boggs (UK) LLP

2. Are you a ☐ Claimant ☐ Defendant ☑ Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?

The Claimants request that the Court:

(1) Makes an order to continue the interim injunction granted by Mrs Justice Bacon by order dated 21 April 2022 and continued by Mr Justice Adam Johnson by order dated 11 May 2022 for a further 12 month period to 11 May 2024; and

(2)If required, makes an order pursuant to CPR 23.7(4) that sufficient notice has been given to the Defendants of the hearing date, notwithstanding the fact that the period between the date of service and the date of the hearing is less than 3 clear days

in the form of the draft Order provided herewith.

4. Have you attached a draft of the order you are applying for? ☑ Yes ☐ No

5. How do you want to have this application dealt with? ☑ at a hearing ☐ without a hearing

☐ at a remote hearing

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6. How long do you think the hearing will last? 2 Hours 0 Minutes

Is this time estimate agreed by all parties? ☐ Yes ☑ No

7. Give details of any fixed trial date or period: N/A

8. What level of Judge does your hearing need? Deputy Judge or High Court Judge

9. Who should be served with this application? See draft order

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

☑ the attached witness statement

☐ the statement of case

☐ the evidence set out in the box below

If necessary, please continue on a separate sheet.

We will be relying on the attached Witness Statement of Jonathan Peter Barden dated 19 April 2022 and the Second Witness Statement of Jonathan Peter Barden dated 4 May 2023.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

☑ No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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 believe** that the facts stated in section 10 (and any continuation sheets) are true.

☑ **The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

Signature

☐ Applicant

☐ Litigation friend (where applicant is a child or a Protected Party)

☑ Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
05	05	2023

Full name

David Christopher Holland

Name of applicant's legal representative's firm

Squire Patton Boggs (UK) LLP

If signing on behalf of firm or company give position or office held

Partner

Applicant's address to which documents should be sent.

Building and street

6 Wellington Place

Second line of address

Town or city

Leeds

County (optional)

Postcode

L S 1 4 A P

If applicable

Phone number

0113 284 7000

Fax phone number

DX number

Your Ref.

DH4/ESS.036-0023

Email

david.holland@squirepb.com

IN THE HIGH COURT OF JUSTICE **Claim No: PT-2022-000326**

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

PROPERTY TRUSTS AND PROBATE LIST

BETWEEN:

(1) ESSAR OIL (UK) LIMITED
(2) STANLOW TERMINALS LIMITED
(3) INFRANORTH LIMITED

Claimants

- and –

(1) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN ENTER OR REMAIN, WITHOUT THE FIRST CLAIMANT'S CONSENT, ON THE FIRST CLAIMANT'S LAND AT STANLOW MANUFACTURING COMPLEX, ELLESMERE PORT, CH65 4HB SHOWN EDGED RED (SAVE FOR THE AREAS HATCHED BLUE AND ORANGE) ON THE ATTACHED 'STANLOW PLAN'

(2) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN OBSTRUCT OR OTHERWISE INTERFERE WITH THE FIRST CLAIMANT'S ACCESS OVER AND ALONG THE ROAD SECTION SHOWN SHADED YELLOW ON THE ATTACHED 'STANLOW PLAN'

(3) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION CAMPAIGN' OR THE 'JUST STOP OIL CAMPAIGN' OBSTRUCT THE VEHICULAR ENTRANCE AND EXIT TO STANLOW MANUFACTURING COMPLEX, ELLESMERE PORT, CH65 4HB, WHICH ARE SHOWN MARKED "A", "B" AND "C" ON THE ATTACHED 'STANLOW PLAN'

(4) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN ENTER OR REMAIN, WITHOUT THE SECOND CLAIMANT'S CONSENT, ON THE SECOND CLAIMANT'S LAND AT (A) STANLOW MANUFACTURING COMPLEX, ELLESMERE PORT, CH65 4HB SHOWN HATCHED BLUE ON THE ATTACHED 'STANLOW PLAN' (B) TRANMERE OIL TERMINAL, ST PAUL'S ROAD, BIRKENHEAD SHOWN EDGED BLUE ON THE ATTACHED 'TRANMERE PLAN'

(5) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION CAMPAIGN' OR THE 'JUST STOP OIL CAMPAIGN' OBSTRUCT THE VEHICULAR ENTRANCE AND EXIT TO TRANMERE OIL TERMINAL, ST

PAUL'S ROAD, BIRKENHEAD WHICH IS SHOWN MARKED "A" ON THE 'TRANMERE PLAN'

(6) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN ENTER OR REMAIN, WITHOUT THE THIRD CLAIMANT'S CONSENT, ON THE THIRD CLAIMANT'S LAND AT NORTHAMPTON OIL TERMINAL, 25 ST JAMES MILL ROAD, NORTHAMPTON NN5 5JN SHOWN EDGED RED (SAVE FOR THE AREAS EDGED BLUE) ON THE ATTACHED 'NORTHAMPTON PLAN'

(7) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION REBELLION CAMPAIGN' OR THE 'JUST STOP OIL CAMPAIGN' OBSTRUCT THE VEHICULAR ENTRANCES OR EXITS TO NORTHAMPTON OIL TERMINAL, 25 ST JAMES MILL ROAD, NORTHAMPTON NN5 5JN SHOWN MARKED WITH AN "A" ON THE ATTACHED 'NORTHAMPTON PLAN'

Defendants

CONTINUATION SHEET