

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

(223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

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(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

Defendants

WITNESS STATEMENT OF ADEWALE ADESINA

I, **Adewale Adesina**, of Thurrock Council, Civic Offices, New Road, Grays, Essex RM17 6SL, will say as follows –

1. I am an officer of the First Claimant, Thurrock Council, in the role of ‘Senior Emergency Planning & Resilience Officer’. My role and responsibilities at the Council include co-ordinating the Council’s response to major and emergency incidents that occur with Thurrock Council’s administrative area.
2. I make this witness statement in support of the Claimants’ application to add further named Defendants to the Claim for injunctive relief. I am authorised by both the First and Second Claimants to make this statement on their behalf. I understand from the Claimants’ legal

representatives that this application is made ahead of a case management hearing listed to be heard on 19 April 2024.

3. The facts and matters set out by me in this witness statement are either known by me directly and are true, or are known by me indirectly and are believed to the best of my knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief. This statement was prepared through email correspondence with the Claimants' legal representatives.
4. There is exhibited to this statement a bundle of documents marked 'AA2'. Where I refer to documents contained in that bundle I do so in the format [**AA2/exhibit number**].
5. In this witness statement, I shall address:
 - i. Introduction and background;
 - ii. The proposed named Defendants;
 - iii. Update;
 - iv. Proposed directions.

Introduction and background

6. The Claimants bring this Claim pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5). Thurrock Council ('**Thurrock**') is the Local Highway Authority for the Borough. Essex County Council ('**ECC**') is the Local Highway Authority for the County.
7. On 24 April 2022, the Claimants made an out of hours and without notice application for interim injunctive relief against (i) the 222 named Defendants set out at Schedule 1 to the Claim Form, and (ii) the seven categories of persons unknown. The Application was heard by Ritchie J, who made the Order at **AA2/1**.
8. In summary, the injunction order:

- i. restrains acts of public nuisance (that being the obstruction of the highway) in the administrative area of Thurrock (the ‘**Borough**’);
 - ii. restrains acts of trespass (and particularly the act of tunnelling under or adjacent to the highway) in the Borough; and
 - iii. restrains apprehended acts of public nuisance (that being the obstruction of the highway) and trespass in the administrative area of Essex County Council (the ‘**County**’).
2. Following the return date hearing, HHJ Simon (sitting as a Judge of the High Court) continued the injunction by way of the Order dated 27 May 2022, exhibited at **AA2/2**.
3. The final hearing of the Claim was adjourned by way of the Order of Foster J dated 26 January 2023, exhibited at **AA2/3**. That adjournment was ordered on the application of the Claimants given the imminent hearing of the appeal to the Supreme Court in *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors*, the outcome of which would almost certainly impact upon these proceedings.
4. The Supreme Court handed down judgment in the *Wolverhampton* appeal on 29 November 2023, upon which the Claimants wrote to the Court in accordance with the Order of Foster J. By way of the Order of Jefford J dated 20 December 2023, exhibited at **AA2/4** the Claimants were directed to make all additional applications (if any) required to enable the trial to take place by 27 March 2024. A case management hearing was listed for 19 April 2024 to hear any extant applications and set directions to the final hearing.
5. Accordingly, the Claimants make the application to add 33 named Defendants to the Claim, and seek directions to final hearing.

The proposed named Defendants

6. The Claimants apply to add 33 named Defendants to the Claim for injunctive relief. I understand that Essex Police will provide a witness statement explaining how these persons have come to be identified.

7. The persons who the Claimants now seek to add as Defendants were all arrested between 23 August and 4 September 2022 for alleged unlawful acts in connection with Just Stop Oil protests. I realise that it is now March 2024. However, the Supreme Court were clear in *Wolverhampton* that the Claimants must name those persons that they are able to, and this application is being made accordingly.
8. I understand from T/Detective Inspector Harriet Ware, who was involved in policing the August 2022 protests, that Warwickshire experienced similar protests from the Just Stop Oil group (there being an oil terminal in their administrative area also) in August 2022 also. I understand from T/Detective Inspector Harriet Ware that Essex Police observed that Just Stop Oil were operating in cells that they rotated between Thurrock and Warwickshire, such that protestors would not be caught by an injunction on which they were already named during the course of the August 2022 protests. Therefore, it is unsurprising that the August 2022 protests caused the Claimants to identify further named Defendants.

Update

9. Following the first wave of Just Sop Oil protests in April 2022, the Claimants experienced a second wave between 23 August and 4 September 2022. The conduct of the protestors in that period mirrored the tactics of the first wave, and included acts such as protestors obstructing the highways (including by gluing themselves to the road) and, perhaps more seriously, tunnelling under the highway.
10. In this regard, two tunnels were excavated and occupied by protestors at Stoneness Road and St Clements Way. These roads are the access roads to the oil terminals and adjacent industrial area.
11. Stoneness Road was closed because of the tunnelling, because the ground penetrating radar survey suggested that the tunnel was much bigger than it in fact was.
12. The road at St Clements way is a bridge, and the three protestors that occupied the tunnel between 23 August and 4 September had dug a hole in the embankment and into the bridge. The protestors had also then penetrated the surface of the road to ensure that the road would

need to be closed. St Clements Way is a single carriageway road. At the time, the ground penetrating radar survey suggested that the tunnel was not as big as it in fact was, and one lane of traffic remained open with the assistance of two-way traffic lights and restricted access, especially because Stoneness Road was closed and St Clements Way was the only remaining access road to the oil terminals and the industrial area.

13. I understand from Peter Wright, who is the Head of Highways Infrastructure at Thurrock, that the concrete backfill and reinstatement of St Clements Way cost Thurrock the sum of £8282. The whole incident at St Clements Way (including the backfill and reinstatement) cost the sum of £20,520.81.
14. On 24 August 2022, several protestors were arrested at the Esso Petrol station at the Thurrock motorway services as they were sitting in the access road to the forecourt, and the all of the petrol pumps were damaged with a hammer and spray paint. Five of those arrested were named Defendants on the injunction (D48, D51, D86, D102, D150), and they were subsequently arrested in custody under the power of arrest provided for in the injunction. Committal proceedings were then pursued and in November 2022, all five were sanctioned for admitted breaches of the injunction order (all five admitted obstructing the access to the forecourt, with one (D86) also admitting damaging the petrol pumps with a hammer and spray paint). All received suspended custodial sentences, with D86 also receiving a fine. A costs award in the sum of £21,500 was made in favour of the Claimants.
15. Since August 2022, and following the committals of the five protestors, there have been no major protest incidents in Thurrock. It would appear that the injunction, and the enforcement of the injunction (especially with the power of arrest), is effective in this regard.
16. Finally, I observe from Just Stop Oil's website that they are still active (and they in any event engaged in the disruption of several high-profile events in recent months). However, most worryingly for the Claimants, the group are now threatening to target airports with their protest (see: <https://juststopoil.org>). The county of Essex is home to London Stanstead airport, Southend airport and several smaller private airfields. Southend airport in particular is not that far from the oil terminals in the Borough and County, such that there is the threat of overspill of these protests.

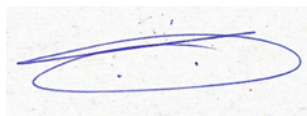
Proposed directions

17. I understand from the Claimants' legal representatives that a draft directions Order will be provided to the Court.
18. When setting directions to final hearing, I respectfully ask the Court to be mindful that 262 named Defendants is an extraordinary number of Defendants, who the Claimants have had no choice but to name. Litigation of this size by the Claimants, who bring this Claim in the discharge of their public functions, is an enormous use of resource. Further, no Defendant has acknowledged service of or defended the Claim (although counsel for the Sixty-Third Defendant did attend the return date hearing in May 2022).
19. With the above in mind, the Claimants respectfully seek a timetable that affords the Claimants the opportunity to prepare the evidence for final hearing in an orderly fashion, whilst also facilitating the exploration of undertakings with the Defendants (if so advised).
20. Finally, the Claimants understand that the Seventy-Fifth Defendant, Xavier Gonzalez Trimmer, has sadly passed away. The Claimants are conscious that there is still technically an injunction granted against the late Mr Trimmer and, in so far as it is necessary to do so, the Claimants seek to discontinue the Claim and discharge the injunction against Mr Trimmer accordingly.

Statement of Truth

I believe that the facts stated in this witness statement 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



Adewale Adesina

Date: 20th March 2024

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(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

**(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE
CLAIM FORM**

(223)-(229) PERSONS UNKNOWN

Defendants

EXHIBIT AA2/1

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

24 April 2022
Before Mr Justice Ritchie

B E T W E E N :

- (1) THURROCK COUNCIL
(2) ESSEX COUNTY COUNCIL



QB-2022-001317
Claimants

-and-

- (1) MADELINE ADAMS
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Defendants

ORDER

PENAL NOTICE

IF YOU, THE ABOVE NAMED 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 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

POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST ATTACHED AT SCHEDULE 3 OF THIS ORDER FOR BREACH OF PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006. ANY

**PERSON CAUGHT BREACHING PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER
MAY BE ARRESTED AND BROUGHT BEFORE THE COURT**

BEFORE the Honourable Mr Justice Ritchie sitting out of hours on 24 April 2022 in London.

UPON the Claimants making an application on the 24 April 2022 for an injunction, without notice to the Defendants and out of hours.

AND UPON hearing Counsel for the Claimants Miss Caroline Bolton and Miss Natalie Pratt, without attendance by the Defendants.

AND UPON the Court reading the application and the witness statements listed in Schedule B.

AND UPON the Court being satisfied that pursuant to s.12(2)(b) Human Rights Act 1998 that the Claimants had compelling reasons why the Defendants should not be notified of the application for the interim injunction prior to the Court hearing the application.

AND UPON the Court having particular regard to the importance of the Defendants' Article 10 and Article 11 Convention rights to freedom of expression and freedom of lawful assembly.

AND UPON the Court being satisfied that the order sought does not prohibit peaceful protest.

AND UPON the Court considering its discretion to grant injunctive relief pursuant to s.37(1) Senior Courts Act 1981 and considering it just and convenient to do so.

AND UPON the Court being satisfied for the purposes of s.27(3) Police and Justice Act 2006, that there is a significant risk of harm to a person or persons from the conduct prohibited by this Order and that a power of arrest should be attached to some of the prohibitions contained in this Order.

AND UPON the Court accepting the undertakings given in Schedule A of this Order.

NOW IT IS ORDERED THAT:

Definitions

1. For the purpose of this Order, the:
 - 1.1 "The Roads" shall mean the Roads identified in Annexe 1 to this Order and to the Claim Form as marked in red on the maps at Annexes 2 and 3 to this Order and to the Claim Form.
 - 1.2 "The Administrative Area of Thurrock" shall mean the administrative area as marked with the purple line on the map at Annexe 2 to this Order and to the Claim Form.
 - 1.3 "The Administrative Area of Essex" shall mean the administrative area as marked with the pink line on the map at Annexe 3 to this Order and to the Claim Form.

- 1.4 “The Administrative areas of Thurrock and Essex” shall mean those areas in 1.2 and 1.3 above.
- 1.5 “The Fuel Terminals” shall refer to the following four sites collectively:
 - 1.5.1 The Navigator Fuel Terminal, Oliver Road, West Thurrock RM20 3ED;
 - 1.5.2 The Esso Fuel Terminal, London Road, Purfleet RM19 1RS;
 - 1.5.3 Exolum Storage Ltd, off Askews Farm Lane, London Road, Grays RM17 5YZ; and
 - 1.5.4 Oikos Storage Limited, Haven Road, Hole Haven Wharf, Canvey Island, Essex SS8 0NR.

Prohibitions

2. The Defendants and each of them (whether by themselves or by instructing, encouraging or allowing any other person) are forbidden from:
 - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off **the Roads** for the purpose of protesting.
 - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with **access to or from the Roads**, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
 - 2.3 Entering, climbing onto, climbing into, climbing under **any vehicle** travelling on to, off or along **the Roads** or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
 - 2.4 Entering, climbing onto, climbing into, climbing under **any vehicle** on any **adjacent roads, slip roads or roundabouts to the Roads**, whether or not those roads are vested in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
 - 2.5 **Affixing themselves** (“locking on”) to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.
 - 2.6 Affixing themselves (“locking on”) to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the “locking on” is for the purpose of protesting.
 - 2.7 Affixing themselves (“locking on”) or any other items to any of the Roads or any other person or object on, under or over the Roads.
 - 2.8 Affixing themselves (“locking on”) or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the “locking on” is for the purpose of protesting.

- 2.9 **Erecting any structure** on the Roads.
- 2.10 **Tunnelling**, excavating, drilling or digging under or adjacent to the Roads.
- 2.11 **Occupying** existing tunnels under the Roads for the purpose of protesting.
- 2.12 **Causing damage** to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.
- 2.13 **Abandoning any vehicle** or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.
- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to **any petrol station** in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any **petrol station forecourt or access road**, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by **delivery tankers of fuel supplies** and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.
- 2.17 **Refusing to leave** the Roads when asked to do so by a police officer.
- 2.18 **Causing, assisting** or encouraging any other person to do any act prohibited by paragraphs 2.1 to 2.16 above.
- 2.19 **Continuing any acts** prohibited by paragraphs 2.1 to 2.16 above.

Power of arrest

3. Pursuant to s.27 Police and Justice Act 2006, a power of arrest shall apply to paragraphs 2.1 to 2.16 above in the form attached at schedule 3 of this Order.

Return Date

4. This Order shall be reconsidered at a further hearing at 10.30am on 10th and 11th May 2022 at the Royal Courts of Justice, Strand, London, WC2A 2LL, with a time estimate of 2 days, including ½ day judicial pre-reading.

Alternative Service

5. Pursuant to CPR rules 6.15 and 6.27, the Claimants are permitted, in addition to personal service, or in the alternative to personal service, to serve the **1st to 222nd Defendants** and any further named Defendants with the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest by the following methods:

- 5.1 **Websites:** placing a copy of the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest on the Claimants' websites and Facebook page/s; and
- 5.2 **email:** sending a copy of this Order to Just Stop Oil, Youth Climate Swarm, Extinction Rebellion and Insulate Britain at the following email addresses: juststopoilpress@protonmail.com; youthclimateswarm@protonmail.com; press@extinctionrebellion.uk; insulatebritainpress@protonmail.com and providing a web link at which they can access the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order; and
- 5.3 **Post:** where an address of a named Defendant is known to the Claimants, by posting a copy of this Order together with a covering letter through the letterbox of the named Defendant's address (or by leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact that the package contains a court order. If the premises do not have a letterbox, or mailbox, or the package will not fit through the letterbox, a package may be left next to the front door and a notice containing this Order may be affixed to the front door marked with a notice drawing the recipient's attention to the fact that the package contains a court order and Claim Form and should be read urgently. The notices shall be given in the form set out in Schedule 2 to this Order; and
- 5.4 **Text messages:** sending a text message to any named Defendant for whom the Claimants have a mobile telephone number, notifying them that an injunction order has been granted against them with a power of arrest, and providing a web link at which the Defendant can access the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order. The notice shall be given in the form set out in Schedule 2 to this Order; and
- 5.5 **Placing signs** on A-Road entry points and exit points to the administrative area of Thurrock, and within 50 metres of The Fuel Terminals and on the A130 and B1014 between the entrance to Canvey Island and the roundabout known as the Waterside Road roundabout on Canvey Island, stating that there is a High Court Injunction in place prohibiting protest on the highway and providing a web link and QR code at which the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest can be accessed; or
- 5.6 **Where requested:** the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest may be served by email where the Defendant has requested that they be served by email and by sending the email to the address provided by the Defendant; or

- 5.7 **Lawyers:** By serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
6. The **deemed date of service** of any documents referred to in paragraph 5 above shall be the day on which service of the document or documents is completed in accordance with paragraph 5 above.
7. The Claimants are permitted to serve the **223rd to the 229th Defendants** with the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest by the methods in paragraphs 5.1, 5.2 or 5.5 above.
8. The **deemed date of service** of any of the documents referred to in paragraph 7 above shall be the day on which service of the document or documents is completed in accordance with paragraph 7 above.

Further Directions

9. The Defendants or any other person affected by this order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants solicitors at the same time as the application is filed at court (and in any event not less than 48 hours before the hearing of any such application, not to include weekends or public holidays).
10. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time (to the extent they are not already so named).
11. The Claimant has permission to apply to extend or vary this Order or for further directions.

Ritchie J

Date this order is made [CPR r.40.7(1)]: **24 April 2022 at 23.00 hours**

GUIDANCE NOTES

Effect of this Order – the Defendants

12. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

Interpretation of this Order

13. In this Order references to ‘the Defendant’ means any or all of them (unless expressly stated otherwise).
14. A requirement to serve on ‘Defendant’ means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
15. An Order requiring ‘the Defendant’ not to do anything applies to all Defendants.
16. This Order contains the following schedules and annexes

- (i) Schedule A-Undertakings;
- (ii) Schedule B-Witness Statements;
- (iii) Schedule 1-List of Named Defendants;
- (iv) Schedule 2-Notices;
- (v) Schedule 3-The Power of Arrest;
- (vi) Annexe 1-The List of “The Roads” in Thurrock;
- (vii) Annex 2-The map of the Administrative Area of Thurrock; and
- (viii) Annexe 3-The map of the Administrative Area of Essex.

Communications with the Court

17. All communications with the Court about this Order should be sent to Room WG08, The Royal Courts of Justice, Strand, London, WC2A 2LL. The telephone number is 020 7947 6010. The offices are open between 10am and 4.30pm Monday to Friday.

SCHEDULE A-UNDERTAKINGS

1. The Claimants undertake to use reasonable endeavours to personally serve the named Defendants with a copy of this Order.
2. The Claimants undertake to identify and name Defendants and apply to add them as named Defendants to this Order and the Claim as soon as reasonably practicable.
3. The Claimants undertake to pay the application fee for this application on Monday 25th April 2022 and to issue the Claim Form by 4pm on Tuesday 26th April 2022 and to serve the same within 7 working days on the currently named Defendants.

SCHEDULE B-WITNESS STATEMENTS

1. The Court read the following witness statements filed on behalf of the Claimants:
 - (a) The witness statement of Adewale Adesina 23.4.2022;
 - (b) The witness statement of Morgan Cronin 23.4.2022;
 - (c) The witness statement of Paul Crick 23.4.2022;
 - (d) The witness statement of Adam Rulewski 24.4.2022;

SCHEDULE 1-NAMED DEFENDANTS

1. Madeline Adams
2. Mary Adams
3. David Addy
4. Amber Alexandar
5. Mina-Mae Alexander
6. Eric Anderson
7. Christine Aslett
8. Nicholas Aslett
9. Lachlan Ayles
10. Stephanie Aylett
11. Pete Bailey
12. William Bajwa
13. Jeremy Banks
14. Colin Barrington
15. Kai Bartlett
16. Joshua Bates
17. Christopher Bennett
18. Gillian Bird
19. John Blanco
20. John Blewett
21. Poppy Bliss
22. Hilary Bond
23. Trevor Boulden
24. Geoffroy Bowman
25. Simon Bramwell
26. Joseph Bream
27. Scott Breen
28. Stephen Brett
29. Emily Brocklebank
30. Claire Brook
31. Emma Brooker
32. Michael Brown
33. Judith Bruce
34. Madeleine Budd
35. Tes Burns
36. Benjamin Buse
37. Catherine Cannon
38. Rebecca Cassar
39. Jessica Causby
40. Susan Chamberlayne
41. Sally Chapman
42. Vishal Chauhan
43. Katherine Chesterman
44. Phillipa Clarke
45. Oliver Clegg
46. Orla Coghlan
47. John Coghlan
48. Ruth Cook

49. Heather Cooper
50. Jasmine Corkhill Harris
51. Joy Susan Corrigan
52. Richard Crane
53. David Crawford
54. Rosemary Croft
55. Joseph Daldorph
56. Beverley Ann Daniel
57. Ben Delap
58. Gaie Delap
59. Gabriella Ditton
60. Igors Djomins
61. Laura Doehlei
62. Marguerite Doubleday
63. Ella Eason
64. Christine Essex
65. Janet Flynn
66. Michael Forton
67. Phoebe Frewer
68. Amy Friel
69. Robin Gardner
70. Cressida Gething
71. Alasdair Gibson
72. Hugo Glashier
73. Stephanie Golder
74. William Goldring
75. Xavier Gonzalez Trimmer
76. Alfie Goodland
77. Emma-Rose Goodwin
78. Sophie Greenland
79. Aaron Gunning
80. Louisa Hadden
81. Catherine Hallett
82. Finn Halsall
83. Jake Handling
84. Gareth Harper
85. Louise Harris
86. Patrick Hart
87. Yvonne Hayward
88. Selma Heimedinger
89. Jonathan Herbert
90. Noah Herfort
91. Suzanne Hetherington
92. Sarah Hirons
93. Rupert Horlick
94. Adrian Howlett
95. Eric Hoyland
96. Abigail Hubbucks
97. Hannah Hunt
98. Emma Ireland

99. Pavel Ivanov
100. Rik Jansen
101. Ruth Jarman
102. Stephen Jarvis
103. Russell Jarvis
104. John Johnson
105. Hannah Johnston
106. Timothy Jones
107. Pascale Kann
108. Hallum Kelly
109. Linda Latter
110. Charles Laurie
111. Peter Lay
112. Eben Lazarus
113. Isobel Lewis
114. Elanor Lewis-Holmes
115. Joseph Linheart
116. El Litten
117. Rebecca Lockyer
118. Felix Lozano
119. Barbara Lund
120. Jacqueline Macey
121. Catharine Maclean
122. Jacob Main
123. Elizabeth McCormack
124. Eilidh McFadden
125. Nathan McGovern
126. Louis McKechnie
127. Lilah McKim
128. Grace McMeekin
129. Adalaide Meaney
130. Anna Middleton
131. Hannah Miles
132. Benjamin Mitchell
133. Darcy Mitchell
134. Deborah Mitchell
135. Teddy Monroe
136. Fiona Moore
137. Stefania Morosi
138. Paul Morozzo
139. Virgenia Morris
140. Paul Morrison
141. Zak Mullen
142. Alexandra Mulvey
143. Reuben Mychaleckyj
144. Richard Newell-Price
145. Ben Newman
146. Alexander Newnham
147. Jessica Norgard
148. Rachel Norris

149. Rose Norris
150. George Oakenfold
151. Nicholas Onley
152. Jakub Pabiniak
153. Ella-Rose Paez
154. Sophie Page-Hall
155. Susan Parfitt
156. Dillon Parsons
157. Rose Patterson
158. Ethan Paul
159. Rosalind Pears
160. Abigail Percy-Ratcliff
161. Ursula Pethick
162. Jacqueline Phillips
163. Mitchel Phillips-White
164. Robert Possnett
165. Matthew Powell
166. Emily Price
167. Robert Price
168. Amy Pritchard
169. Felix Reeves-Whymark
170. Anna Retallack
171. Anne Richards
172. Bethan Roberts
173. Jasmin Robertson
174. Sebastian Roblyn
175. Isabel Rock
176. Elizabeth Rosser
177. Christian Rowe
178. Finn Roweth
179. Adelheid Russenberger
180. Isla Sandford
181. Daniel Sargison
182. James Sargison
183. Cat Scothorne
184. James Sebley
185. Rosa Sharkey
186. Sophie Sharples
187. Susan Sidey
188. James Skeet
189. Hannah Skwarska
190. Jacqueline Slade
191. Oliver Slaughter
192. David Smartknight
193. Heather Smith
194. Joshua Smyth
195. David Squire
196. Katherine Steer
197. Oliver Stevens
198. Madeleine Stewart

199. Ferdi Suleyman
200. Vivien Talbot
201. Ben Taylor
202. Jacqueline Teggin
203. Zachary Tenquist
204. David Thorneywork
205. Hannah Torrance-Bright
206. Lucy Trinder
207. Morgan Trowland
208. Jan Van Der Knapp
209. Rik Venhoutteghem
210. Sally Webber
211. Leonard Weber
212. Miranda Whelehan
213. Philip White
214. Edred Whittingham
215. Alexander Wilcox
216. Clare Wilson
217. Thomas Winter
218. Carol-Ann Wood
219. Lizia Woolf
220. Amorel Kennedy
221. Grace Lally
222. Morien Morgan

SCHEDULE 2-NOTICES

On the package containing this Order:

“VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWNLOAD IT FROM <https://www.thurrock.gov.uk/protest-injunction> OR CALL 020 7405 4600”

to affix to the front door when the package has been posted through the letterbox or placed in a mailbox:

“VERY URGENT: A PACKAGE HAS BEEN LEFT THAT CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWLOAD IT FROM <https://www.thurrock.gov.uk/protest-injunction> OR CALL 020 7405 4600”

For service by text message:

“VERY URGENT: A HIGH COURT INJUNCTION ORDER HAS BEEN MADE AGAINST YOU, THE LINK PROVIDED IN THIS TEXT MESSAGE CONTAINS AN ORDER OF THE HIGH COURT AND THE SUPPORTING DOCUMENTS RELIED UPON BY THE CLAIMANTS. YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL 020 7405 4600”

SCHEDULE 3-POWER OF ARREST

Power of arrest

| | |
|--|--|
| Name of court High Court of Justice Queen's Bench Division | Claim No. QB-2022- 001317 |
| Claimant's name (including ref.) (1) Thurrock Council (2) Essex County Council | |
| Defendant's name (including ref.) (1) Madeline Adams(2)-(222) Other Named Defendants | |

Name of defendant

(1) Madeline Adams, (2)-(222) Other Named Defendants,
(223)-(229) Persons Unknown (see continuation sheet)

Defendant's address

See attached continuation sheet

Date order made 24/04/2022

Name of judge Mr Justice Ritchie

**Order made under** (insert statutory provision)

Local Government Act 1972, s222 and Highways Act 1980, s130(5)

This order includes a power of arrest under (insert statutory provision)

Police and Justice Act 2006, s27

The relevant paragraphs of the order to which a power of arrest has been attached are:

(set out those paragraphs of the order to which the power of arrest is attached, if necessary continue on a separate sheet)

Paragraphs 2.1 to 2.16 of the Order of Mr Justice Ritchie dated 24 April 2022 (see attached continuation sheet)

This power of arrest was ordered on 24/04/2022 **and expires on the** 24/10/2022

Note to Arresting Officer

Where the defendant is arrested under the power given by section 155 of the Housing Act 1996, or section 27 of the Police and Justice Act 2006; or section 43 of the Policing and Crime Act 2009; or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014:-

- the defendant shall be brought before the judge within the period of 24 hours beginning at the time of their arrest;
- a constable shall inform the person on whose application the injunction was granted, forthwith where the defendant is arrested under the power given by section 155 of the Housing Act 1996 or as soon as reasonably practicable where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014.

Nothing in section 155 of the Housing Act 1996 or section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014, shall authorise the detention of the respondent after the expiry of the period of 24 hours beginning at the time of their arrest.

In calculating any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Name of Claimant

(1) Thurrock Council
(2) Essex Council

Claimant's address

Sharpe Pritchard LLP
Elm Yard
10-16 Elm Street
London
WC1X 0BJ

Claimant's phone number

020 7405 4600

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim No.

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

24 April 2022
Before Mr Justice Ritchie

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

(223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

Defendants

POWER OF ARREST: CONTINUATION SHEET

NAMES AND ADDRESSES OF DEFENDANTS

| Surname | Forename | Address | Defendant Number |
|----------------|-----------------|--|-------------------------|
| ADAMS | MARY |  | 2 |
| ADAMS | MADLINE | | 1 |
| ADDY | DAVID | | 3 |
| ALEXANDER | AMBER | | 4 |
| ALEXANDER | MINA-MAE | | 5 |
| ANDERSON | ERIC | | 6 |
| ASLETT | NICHOLAS | | 8 |
| ASLETT | CHRISTINE | | 7 |

| | | | |
|-------------|-------------|--|----|
| AYLES | LACHLAN | | 9 |
| AYLETT | STEPHANIE | | 10 |
| BAILEY | PETE | | 11 |
| BAJWA | WILLIAM | | 12 |
| BANKS | JEREMY | | 13 |
| BARRINGTON | COLIN | | 14 |
| BARTLETT | KAI | | 15 |
| BATES | JOSHUA | | 16 |
| BENNETT | CHRISTOPHER | | 17 |
| BIRD | GILLIAN | | 18 |
| BLANCO | JOHN | | 19 |
| BLEWETT | JOHN | | 20 |
| BLISS | POPPY | | 21 |
| BOND | HILARY | | 22 |
| BOULDEN | TREVOR | | 23 |
| BOWMAN | GEOFFREY | | 24 |
| BRAMWELL | SIMON | | 25 |
| BREAM | JOSEPH | | 26 |
| BREEN | SCOTT | | 27 |
| BRETT | STEPHEN | | 28 |
| BROCKLEBANK | EMILY | | 29 |
| BROOK | CLAIRE | | 30 |
| BROOKER | EMMA | | 31 |
| BROWN | MICHAEL | | 32 |

| | | | |
|-----------------|-----------|--|----|
| BRUCE | JUDITH | | 33 |
| BUDD | MADELEINE | | 34 |
| BURNS | TES | | 35 |
| BUSE | BENJAMIN | | 36 |
| CANNON | CATHERINE | | 37 |
| CASSAR | REBECCA | | 38 |
| CAUSBY | JESSICA | | 39 |
| CHAMBERLAYNE | SUSAN | | 40 |
| CHAPMAN | SALLY | | 41 |
| CHAUHAN | VISHAL | | 42 |
| CHESTERMAN | KATHERINE | | 43 |
| CLARKE | PHILIPPA | | 44 |
| CLEGG | OLIVER | | 45 |
| COGHLAN | ORLA | | 46 |
| COGHLAN | JOHN | | 47 |
| COOK | RUTH | | 48 |
| COOPER | HEATHER | | 49 |
| CORKHILL HARRIS | JASMINE | | 50 |
| CORRIGAN | JOY SUSAN | | 51 |
| CRANE | RICHARD | | 52 |
| CRAWFORD | DAVID | | 53 |

| | | | |
|---------------------|-----------------|--|----|
| CROFT | ROSEMARY | | 54 |
| DALDORPH | JOSEPH | | 55 |
| DANIEL | BEVERLEY ANN | | 56 |
| DELAP | BEN | | 57 |
| DELAP | GAIE | | 58 |
| DITTON | GABRIELLA | | 59 |
| DJOMINS | IGORS | | 60 |
| DOEHLEI | LAURA | | 61 |
| DOUBLEDAY | MARGUERITE | | 62 |
| EASON | ELLA | | 63 |
| ESSEX | CHRISTINE | | 64 |
| FLYNN | JANET | | 65 |
| FORTON | MICHAEL | | 66 |
| FREWER | PHOEBE | | 67 |
| FRIEL | AMY | | 68 |
| GARDNER | ROBIN | | 69 |
| GETHING | CRESSIDA | | 70 |
| GIBSON | ALASDAIR | | 71 |
| GLASHIER | HUGO | | 72 |
| GOLDER | STEPHANIE | | 73 |
| GOLDRING | WILLIAM | | 74 |
| GONZALEZ TRIMMER | XAVIER | | 75 |
| GOODLAND | ALFIE | | 76 |
| GOODWIN | EMMA-ROSE | | 77 |
| GREENLAND | SOPHIE | | 78 |

| | | | |
|--------------|-----------|--|-----|
| GUNNING | AARON | | 79 |
| HADDEN | LOUISA | | 80 |
| HALLETT | CATHERINE | | 81 |
| HALSALL | FINN | | 82 |
| HANDLING | JAKE | | 83 |
| HARPER | GARETH | | 84 |
| HARRIS | LOUISE | | 85 |
| HART | PATRICK | | 86 |
| HAYWARD | YVONNE | | 87 |
| HEIMEDINGER | SELMA | | 88 |
| HERBERT | JONATHAN | | 89 |
| HERFORT | NOAH | | 90 |
| HETHERINGTON | SUZANNE | | 91 |
| HIRONS | SARAH | | 92 |
| HORLICK | RUPERT | | 93 |
| HOWLETT | ADRIAN | | 94 |
| HOYLAND | ERIC | | 95 |
| HUBBUCKS | ABIGAIL | | 96 |
| HUNT | HANNAH | | 97 |
| IRELAND | EMMA | | 98 |
| IVANOV | PAVEL | | 99 |
| JANSEN | RIK | | 100 |
| JARMAN | RUTH | | 101 |

| | | | |
|--------------|------------|--|-----|
| JARVIS | STEPHEN | | 102 |
| JARVIS | RUSSELL | | 103 |
| JOHNSON | JOHN | | 104 |
| JOHNSTON | HANNAH | | 105 |
| JONES | TIMOTHY | | 106 |
| KANN | PASCALE | | 107 |
| KELLY | HALLUM | | 108 |
| LATTER | LINDA | | 109 |
| LAURIE | CHARLES | | 110 |
| LAY | PETER | | 111 |
| LAZARUS | EBEN | | 112 |
| LEWIS | ISOBEL | | 113 |
| LEWIS-HOLMES | ELANOR | | 114 |
| LINHART | JOSEPH | | 115 |
| LITTEN | EL | | 116 |
| LOCKYER | REBECCA | | 117 |
| LOZANO | FELIX | | 118 |
| LUND | BARBARA | | 119 |
| MACEY | JACQUELINE | | 120 |
| MACLEAN | CATHERINE | | 121 |
| MAIN | JACOB | | 122 |
| MCCORMACK | ELIZABETH | | 123 |
| MCFADDEN | EILIDH | | 124 |

| | | | |
|--------------|-----------|--|-----|
| MCGOVERN | NATHAN | | 125 |
| MCKECHNIE | LOUIS | | 126 |
| MCKIM | LILAH | | 127 |
| MCMEEKIN | GRACE | | 128 |
| MEANEY | ADALAIDE | | 129 |
| MIDDLETON | ANNA | | 130 |
| MILES | HANNAH | | 131 |
| MITCHELL | DARCY | | 133 |
| MITCHELL | BENJAMIN | | 132 |
| MITCHELL | DEBORAH | | 134 |
| MONROE | TEDDY | | 135 |
| MOORE | FIONA | | 136 |
| MOROSI | STEFANIA | | 137 |
| MOROZZO | PAUL | | 138 |
| MORRIS | VIRGENIA | | 139 |
| MORRISON | PAUL | | 140 |
| MULLEN | ZAK | | 141 |
| MULVEY | ALEXANDRA | | 142 |
| MYCHALECKYJ | REUBEN | | 143 |
| NEWELL-PRICE | RICHARD | | 144 |
| NEWMAN | BEN | | 145 |
| NEWNHAM | ALEXANDER | | 146 |
| NORGARD | JESSICA | | 147 |

| | | | |
|--------------------|------------|--|-----|
| NORRIS | RACHEL | | 148 |
| NORRIS | ROSE | | 149 |
| OAKENFOLD | GEORGE | | 150 |
| ONLEY | NICHOLAS | | 151 |
| PABINIAK | JAKUB | | 152 |
| PAEZ | ELLA-ROSE | | 153 |
| PAGE HALL | SOPHIE | | 154 |
| PARFITT | SUSAN | | 155 |
| PARSONS | DILLON | | 156 |
| PATTERSON | ROSE | | 157 |
| PAUL | ETHAN | | 158 |
| PEARS | ROSALIND | | 159 |
| PERCY-RATCLIFF | ABIGAIL | | 160 |
| PETHICK | URSULA | | 161 |
| PHILLIPS | JACQUELINE | | 162 |
| PHILLIPS-WHITE | MITCHEL | | 163 |
| POSSNETT | ROBERT | | 164 |
| POWELL | MATTHEW | | 165 |
| PRICE | ROBERT | | 167 |
| PRICE | EMILY | | 166 |
| PRITCHARD | AMY | | 168 |
| REEVES- WHYMARK | FELIX | | 169 |

| | | | |
|--------------|------------|--|-----|
| RETALLACK | ANNA | | 170 |
| RICHARDS | ANNE | | 171 |
| ROBERTS | BETHAN | | 172 |
| ROBERTSON | JASMIN | | 173 |
| ROBLYN | SEBASTIAN | | 174 |
| ROCK | ISABEL | | 175 |
| ROSSER | ELIZABETH | | 176 |
| ROWE | CHRISTIAN | | 177 |
| ROWETH | FINN | | 178 |
| RUSSENBERGER | ADELHEID | | 179 |
| SANDFORD | ISLA | | 180 |
| SARGISON | DANIEL | | 181 |
| SARGISON | JAMES | | 182 |
| SCOTHORNE | CAT | | 183 |
| SEBLEY | JAMES | | 184 |
| SHARKEY | ROSA | | 185 |
| SHARPLES | SOPHIE | | 186 |
| SIDEY | SUSAN | | 187 |
| SKEET | JAMES | | 188 |
| SKWARSKA | HANNAH | | 189 |
| SLADE | JACQUELINE | | 190 |
| SLAUGHTER | OLIVER | | 191 |

| | | | |
|---------------------|------------|--|-----|
| SMARTKNIGHT | DAVID | | 192 |
| SMITH | HEATHER | | 193 |
| SMYTH | JOSHUA | | 194 |
| SQUIRE | DAVID | | 195 |
| STEER | KATHERINE | | 196 |
| STEVENS | OLIVER | | 197 |
| STEWART | MADELEINE | | 198 |
| SULEYMAN | FERDI | | 199 |
| TALBOT | VIVIEN | | 200 |
| TAYLOR | BEN | | 201 |
| TEGGIN | JACQUELINE | | 202 |
| TENQUIST | ZACHARY | | 203 |
| THORNEYWORK | DAVID | | 204 |
| TORRANCE- BRIGHT | HANNAH | | 205 |
| TRINDER | LUCY | | 206 |
| TROWLAND | MORGAN | | 207 |
| VAN DER KNAAP | JAN | | 208 |
| VANHOUTTEGHEM | RIK | | 209 |
| WEBBER | SALLY | | 210 |
| WEBER | LEONARD | | 211 |
| WHELEHAN | MIRANDA | | 212 |

| | | | |
|--|-----------|--|-----|
| WHITE | PHILIP | | 213 |
| WHITTINGHAM | EDRED | | 214 |
| WILCOX | ALEXANDER | | 215 |
| WILSON | CLARE | | 216 |
| WINTER | THOMAS | | 217 |
| WOOD | CAROL-ANN | | 218 |
| WOOLF | LIZIA | | 219 |
| KENNEDY | AMOREL | | 220 |
| LALLY | GRACE | | 221 |
| MORGAN | MORIEN | | 222 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM | | | 223 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM | | | 224 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM) | | | 225 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM) | | | 226 |

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|--|-----|
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM) | 227 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM) | 228 |
| PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY | 229 |

THE RELEVANT PARAGRAPHS OF THE ORDER TO WHICH A POWER OF ARREST HAVE BEEN ATTACHED ARE:

Paragraphs 2.1 to 2.16 of the Order of Ritchie J dated 24 April 2022:

2. The Defendants and each of them (whether by themselves or by instructing, encouraging or allowing any other person) are forbidden from:
 - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
 - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
 - 2.3 Entering, climbing onto, climbing into, climbing under any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
 - 2.4 Entering, climbing onto, climbing into, climbing under any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
 - 2.5 Affixing themselves (“locking on”) to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.

- 2.6 Affixing themselves (“locking on”) to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the “locking on” is for the purpose of protesting.
- 2.7 Affixing themselves (“locking on”) or any other items to any of the Roads or any other person or object on, under or over the Roads.
- 2.8 Affixing themselves (“locking on”) or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the “locking on” is for the purpose of protesting.
- 2.9 Erecting any structure on the Roads.
- 2.10 Tunnelling, excavating, drilling or digging under or adjacent to the Roads.
- 2.11 Occupying existing tunnels under the Roads for the purpose of protesting.
- 2.12 Causing damage to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.
- 2.13 Abandoning any vehicle or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.
- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station forecourt or access road, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by delivery tankers of fuel supplies and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.

IN THE HIGH COURT OF JUSTICE

Claim No.

QUEEN'S BENCH DIVISION

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

24 April 2022

Before [Judge]

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

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(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS,

**DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE
RELEVANT HIGHWAY AUTHORITY**

Defendants

ANNEX 1 - ROADS

Thurrock Council Roads

| | |
|---|--------------|
| NORTH ROAD | B186 |
| SANDY LANE | B1335 |
| ROMFORD ROAD ROUNDABOUT | B1335 |
| MILL ROAD | C Class |
| PURFLEET ROAD | C Class |
| WEST ROAD | C Class |
| ARISDALE AVENUE | C Class |
| DAIGLEN DRIVE | C Class |
| STIFFORD ROAD | B1335 |
| LANCE CORPORAL NICKY MASON WAY | B1335 |
| STIFFORD ROAD | B1335 |
| ARTERIAL ROAD | A1306 |
| THURROCK SERVICES ROAD | Unclassified |
| POND ROAD ROUNDABOUT | Unclassified |
| LONDON ROAD ROUNDABOUT | A1306 |
| LONDON ROAD | A1306 |
| ENTRY ON SLIP WELLINGTON INTERCHANGE TO A13 EASTBOUND | A13 |
| EXIT OFF SLIP A13 TO WELLINGTON INTERCHANGE WESTBOUND | A13 |
| PURFLEET BYPASS | B1335 |
| LINK ROAD FROM A13 SOUTHBOUND TO A1306 | A1090 |
| CANTERBURY WAY SLIP ROAD ANTICLOCKWISE | A282 |
| LINK ROAD FROM A1306 TO A13 NORTHBOUND | A282 |
| CANTERBURY WAY SLIP ROAD CLOCKWISE | A282 |
| STONEHOUSE CORNER ROUNDABOUT | A1090 |
| ARTERIAL ROAD ROUNDABOUT | A1090 |
| STONEHOUSE LANE | A1090 |
| CYGNET VIEW | Unclassified |
| ARTERIAL ROAD ROUNDABOUT A1306 | A1306 |
| WEST THURROCK WAY RETAIL PARK ROUNDABOUT | B186 |
| ARTERIAL ROAD | A1306 |
| LAKE RISE | Unclassified |
| OLIVER CLOSE | A1090 |
| ST CLEMENTS WAY ROUNDABOUT | A1090 |
| ST CLEMENTS WAY | A1090 |
| LONDON ROAD | A1090 |
| WEST THURROCK WAY | A126 |
| Access road Cost Co | Unclassified |

| | |
|---|--------------|
| JUNCTION 30 M25 TO BOROUGH BOUNDARY WESTBOUND | A13 |
| BOROUGH BOUNDARY TO M25 JUNCTION 30 EASTBOUND | A13 |
| ACCESS ROAD FROM BURGHLEY ROAD TO SUPERSTORE | Private Road |
| BURGHLEY ROAD ROUNDABOUT | B146 |
| SEALLY ROAD | Unclassified |
| BURGHLEY ROAD | B146 |
| PILGRIMS LANE ROUNDABOUT | A1306 |
| ARTERIAL ROAD | A1306 |
| ENTRY ON SLIP NORTH SLIFFORD ROUNDABOUT TO A13 EASTBOUND | A13 |
| ENTRY ON SLIP NORTH STIFFORD ROUNDABOUT TO A13 WESTBOUND | A13 |
| EXIT OFF SLIP A13 TO NORTH STIFFORD ROUNDABOUT WESTBOUND | A13 |
| EXIT OFF SLIP A13 TO NORTH STIFFORD ROUNDABOUT EASTBOUND | A13 |
| STIFFORD ROUNDABOUT | A1012 |
| TREACLE MINE ROUNDABOUT | A1012 |
| LINK FROM A1012 ROUNDABOUT TO A1306 INTERCHANGE | A1012 |
| HOGG LANE | A1012 |
| ELIZABETH ROAD | A1012 |
| HOGG LANE ROUNDABOUT | A1012 |
| LONDON ROAD | A126 |
| HOGG LANE ROUNDABOUT | A1012 |
| EASTERN WAY | A126 |
| LAKESIDE INTERCHANGE TO NORTH STIFFORD ROUNDABOUT EASTBOUND | A13 |
| NORTH STIFFORD ROUNDABOUT TO LAKESIDE INTERCHANGE WESTBOUND | A13 |
| LAKESIDE INTERCHANGE TO M25 JUNCTION 30 WESTBOUND | A13 |
| JUNCTION 30 M25 TO LAKESIDE INTERCHANGE EASTBOUND | A13 |
| BRENTWOOD ROAD | A128 |
| STANFORD ROAD | A1013 |
| SOUTHEND ROAD | A1013 |
| CEMENT BLOCK COTTAGES | Unclassified |
| DOCK ROAD | A126 |
| ORSETT COCK ROUNDABOUT | A1013 |
| ENTRY ON SLIP ORSETT COCK ROUNDABOUT TO A13 WESTBOUND | A13 |
| EXIT OFF SLIP A13 EASTBOUND TO ORSETT COCK ROUNDABOUT | A13 |
| EXIT OFF SLIP A13 WESTBOUND TO ORSETT COCK ROUNDABOUT | A13 |
| DENEHOLES ROUNDABOUT | A1013 |
| WOOD VIEW | B149 |
| LODGE LANE | A1013 |
| CHADWELL HILL | C Class |
| EXIT OFF SLIP A1089 TO A126 SOUTHBOUND | A1089 |
| ENTRY ON SLIP A126 TO A1089 NORTHBOUND | A1089 |
| MARSHFOOT ROAD ROUNDABOUT | A126 |
| ST CHADS ROAD ROUNDABOUT | A126 |
| GATEWAY ACADEMY ROUNDABOUT MARSHFOOT ROAD | A126 |
| MARSHFOOT ROAD | A126 |
| MARSHFOOT ROAD | A126 |
| BROADWAY | A126 |
| THURROCK PARK WAY | Unclassified |
| ACCESS ROADS FOR ASDA SUPPERSTORE | Unclassified |

| | |
|--|---------|
| NORTH STIFFORD ROUNDABOUT TO A1089 EASTBOUND | A13 |
| A1089 TO NORTH STIFFORD ROUNDABOUT WESTBOUND | A13 |
| A1089 TO ORSETT COCK ROUNDABOUT EASTBOUND | A13 |
| ORSETT COCK ROUNDABOUT TO A1089 WESTBOUND | A13 |
| DOCK APPROACH ROAD | A1089 |
| DOCK APPROACH ROAD | A1089 |
| DOCK APPROACH ROAD | A1089 |
| THURROCK PARK WAY ROUNDABOUT | A1089 |
| SLIP ROAD FROM DOCK APPROACH ROAD TO A13 | A13 |
| SLIP ROAD FROM DOCK APPROACH ROAD TO A13 | A13 |
| STANFORD ROAD | A1013 |
| LONDON ROAD | C Class |
| ENTRY ON SLIP ORSETT COCK ROUNDABOUT TO A13 EASTBOUND | A13 |
| Orsett Cock FS West Slip Roads | A13 |
| Orsett Cock FS East Slip Roads | A13 |
| STANFORD ROAD | A1013 |
| STANFORD BYPASS INTERCHANGE | A1014 |
| ENTRY ON SLIP STANFORD INTERCHANGE TO A13 EASTBOUND | A13 |
| EXIT OFF SLIP A13 EASTBOUND TO STANFORD INTERCHANGE | A13 |
| EXIT OFF SLIP A13 WESTBOUND TO STANFORD INTERCHANGE | A13 |
| ENTRY ON SLIP STANFORD INTERCHANGE TO A13 WESTBOUND | A13 |
| SOUTHEND ROAD | B1420 |
| THE MANORWAY SOUTHEND ROAD LINK WESTBOUND | A1014 |
| THE MANORWAY SOUTHEND ROAD LINK EASTBOUND | A1014 |
| THE MANORWAY | A1014 |
| CORRINGHAM ROAD A1014 ROUNDABOUT | A1014 |
| ORSETT COCK ROUNDABOUT TO STANFORD INTERCHANGE EASTBOUND | A13 |
| STANFORD INTERCHANGE TO ORSETT COCK ROUNDABOUT WESTBOUND | A13 |
| STANFORD INTERCHANGE TO BOROUGH BOUNDARY AT FIVE BELLS EASTBOUND | A13 |
| BOROUGH BOUNDARY AT FIVE BELLS TO STANFORD INTERCHANGE WESTBOUND | A13 |
| BELLS CORNER PARADE SOUTHEND ROAD | A176 |
| BELLS CORNER ROUNDABOUT | A176 |
| SOUTHEND ROAD | B1420 |
| LINK ROAD FROM B1420 AND BELLS CORNER ROUNDABOUT TO BOUNDARY | B1420 |
| THE MANORWAY | A1014 |
| GIFFORDS CROSS ROAD | C Class |
| FOBBING ROAD | C Class |
| CHURCH ROAD | B1420 |
| LAMPITS HILL | B1420 |
| SOUTHEND ROAD | B1420 |
| ENTRY ON SLIP FIVE BELLS ROUNDABOUT TO A13 WESTBOUND | A13 |
| FIVE BELLS ROUNDABOUT SOUTH | A176 |
| FIVE BELLS ROUNDABOUT NORTH | A176 |
| EXIT OFF SLIP A13 EASTBOUND TO FIVE BELLS ROUNDABOUT | A13 |
| FIVE BELLS SLIP ROAD FROM SOUTHEND ROAD WESTBOUND | A13 |

| | |
|---|--------------|
| ASKEWS FARM LANE | Unclassified |
| WOULDHAM ROAD | Unclassified |
| LONDON ROAD | A126 |
| ST CLEMENTS WAY ROUNDABOUT | A1090 |
| BURNLEY ROAD | Unclassified |
| ST CLEMENTS WAY | A1090 |
| STONEHOUSE CORNER ROUNDABOUT | A1090 |
| SHIP LANE | C Class |
| ARTERIAL ROAD ROUNDABOUT | A1306 |
| STONEHOUSE LANE | A1090 |
| ARTERIAL ROAD | A1306 |
| LONDON ROAD | A1090 |
| LONDON ROAD | A1090 |
| OLIVER ROAD | A1090 |
| OLIVER CLOSE | A1090 |
| STANFORD BYPASS INTERCHANGE | A1014 |
| CORRINGHAM ROAD A1014 ROUNDABOUT | A1014 |
| THE MANORWAY | A1014 |
| THE MANORWAY | A1014 |
| THE MANORWAY | A1014 |
| ENTRY ON SLIP STANFORD INTERCHANGE TO A13 WESTBOUND | A13 |
| EXIT OFF SLIP A13 EASTBOUND TO STANFORD INTERCHANGE | A13 |
| ENTRY ON SLIP STANFORD INTERCHANGE TO A13 EASTBOUND | A13 |
| EXIT OFF SLIP A13 WESTBOUND TO STANFORD INTERCHANGE | A13 |
| CANTERBURY WAY SLIP ROAD ANTICLOCKWISE | A282 |
| CANTERBURY WAY SLIP ROAD CLOCKWISE | A282 |
| LINK ROAD FROM A13 SOUTHBOUND TO A1306 | A13 |
| LINK ROAD FROM A1306 TO A13 NORTHBOUND | A13 |

Essex County Council Roads

HAVEN ROAD, CANVEY ISLAND
 ROSCOMMON WAY, CANVEY ISLAND
 NORTHWICK ROAD, CANVEY ISLAND
 A130 FROM SADDLERS FARM ROUNDABOUT TO JUNCTION WITH HAVEN ROAD
 SADLERS FARM ROUNDABOUT
 SLIPROADS LEADING TO AND FROM A13 FROM SADLERS FARM ROUNDABOUT
 SLIPROADS LEADING TO AND FROM A130 FROM SADLERS FARM ROUNDABOUT
 B1014 CANVEY ROAD FROM WATERSIDE ROUNDABOUT TO ROUNDABOUT ON HIGH STREET BENFLEET
 CANVEY ISLAND PUBLIC FOOTPATH NUMBER 8
 A130 AND B1014 BETWEEN THE ENTRANCE TO THE ISLAND AND ROUNDABOUT KNOWN AS THE WATERSIDE ROAD ROUNDABOUT

IN THE HIGH COURT OF JUSTICE

Claim No.

QUEEN'S BENCH DIVISION

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

24 April 2022

Before [Judge]

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

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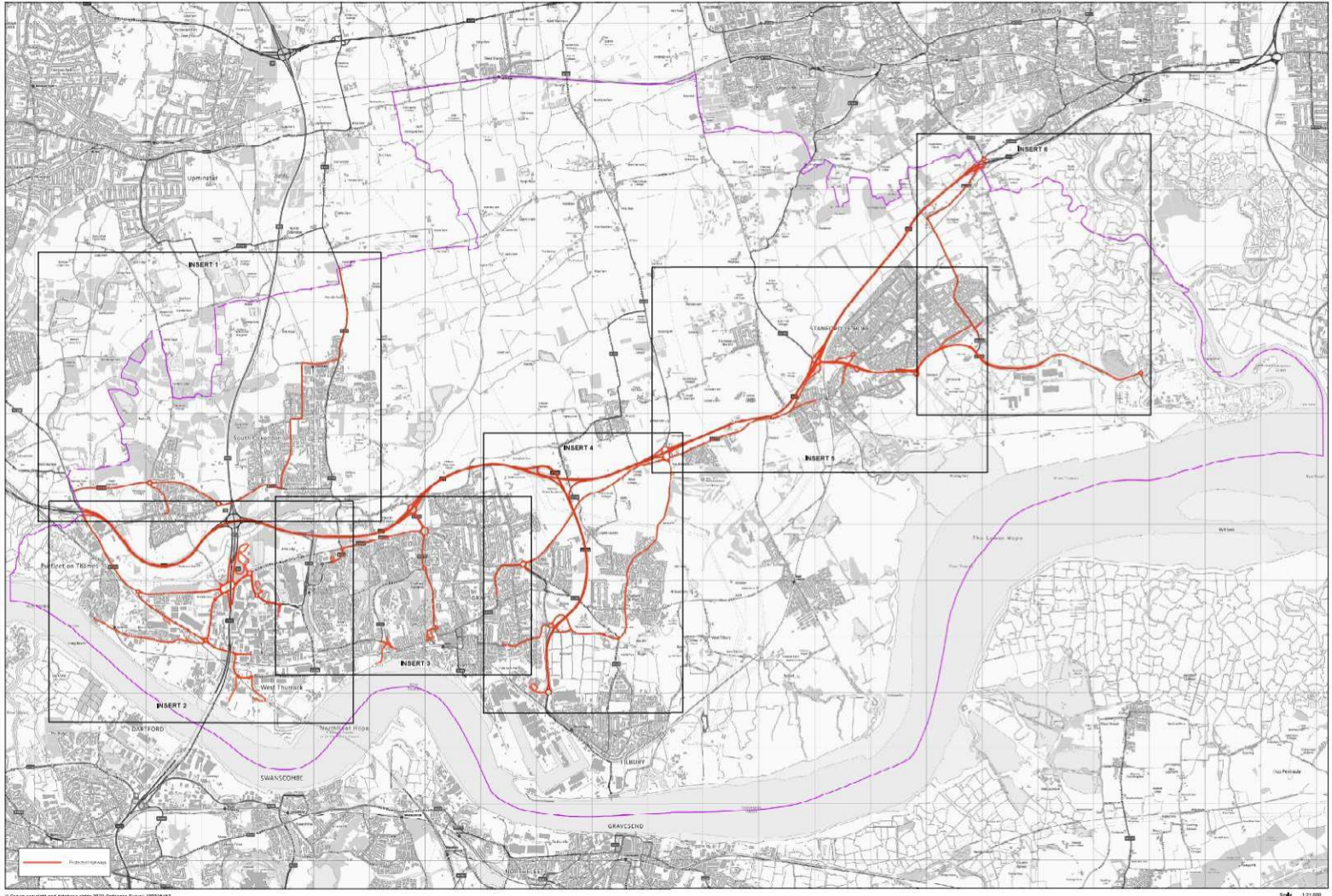
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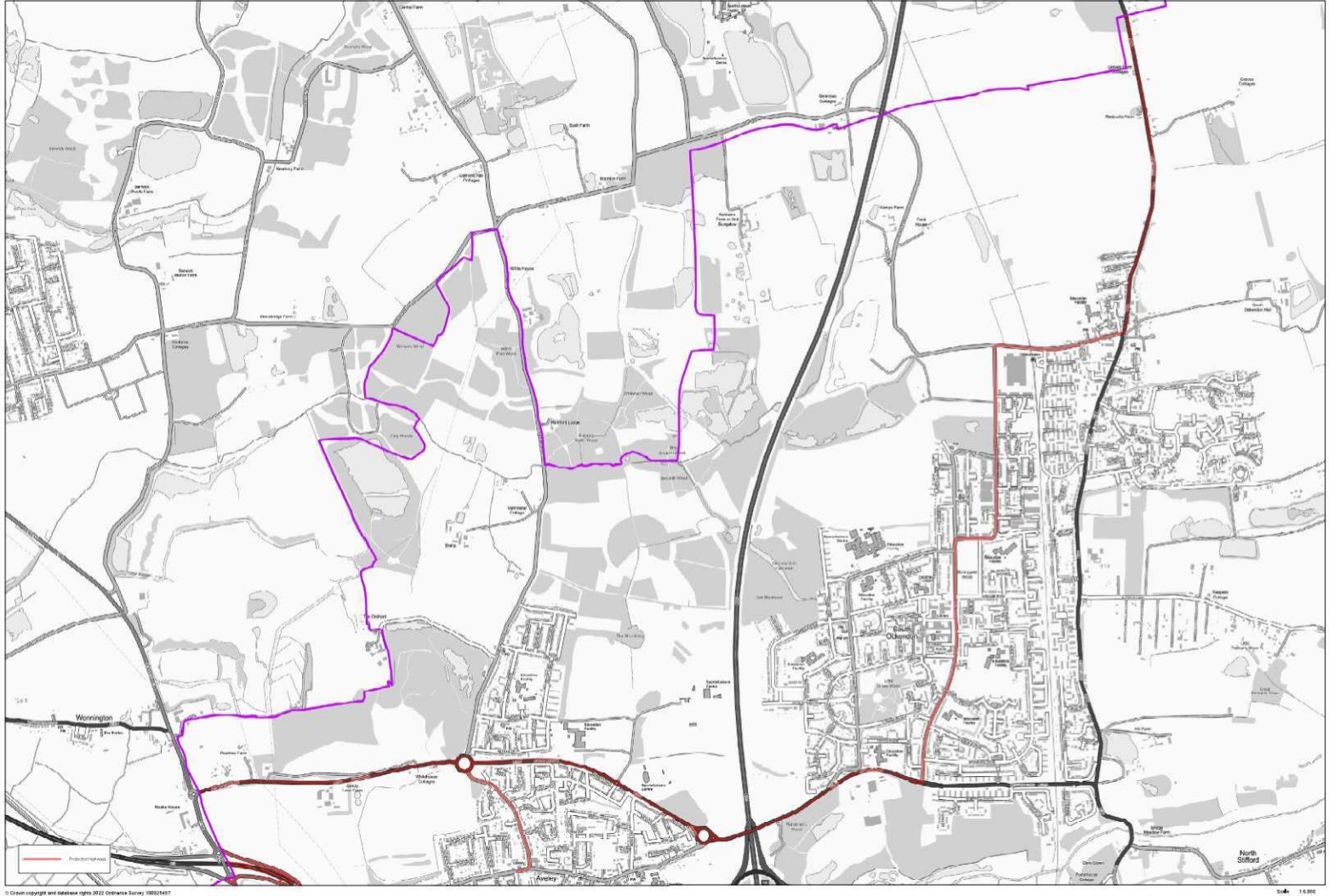
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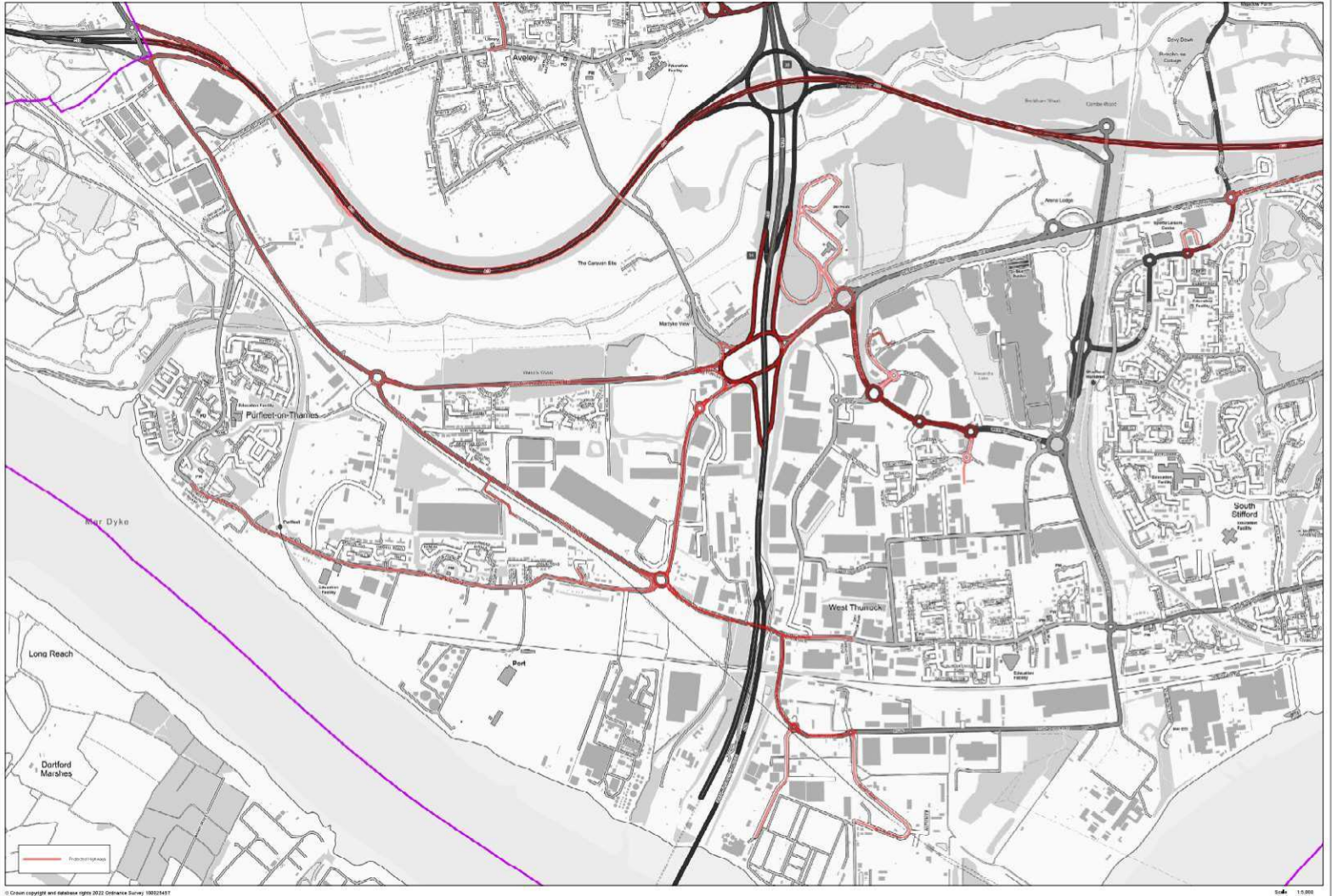
**DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE
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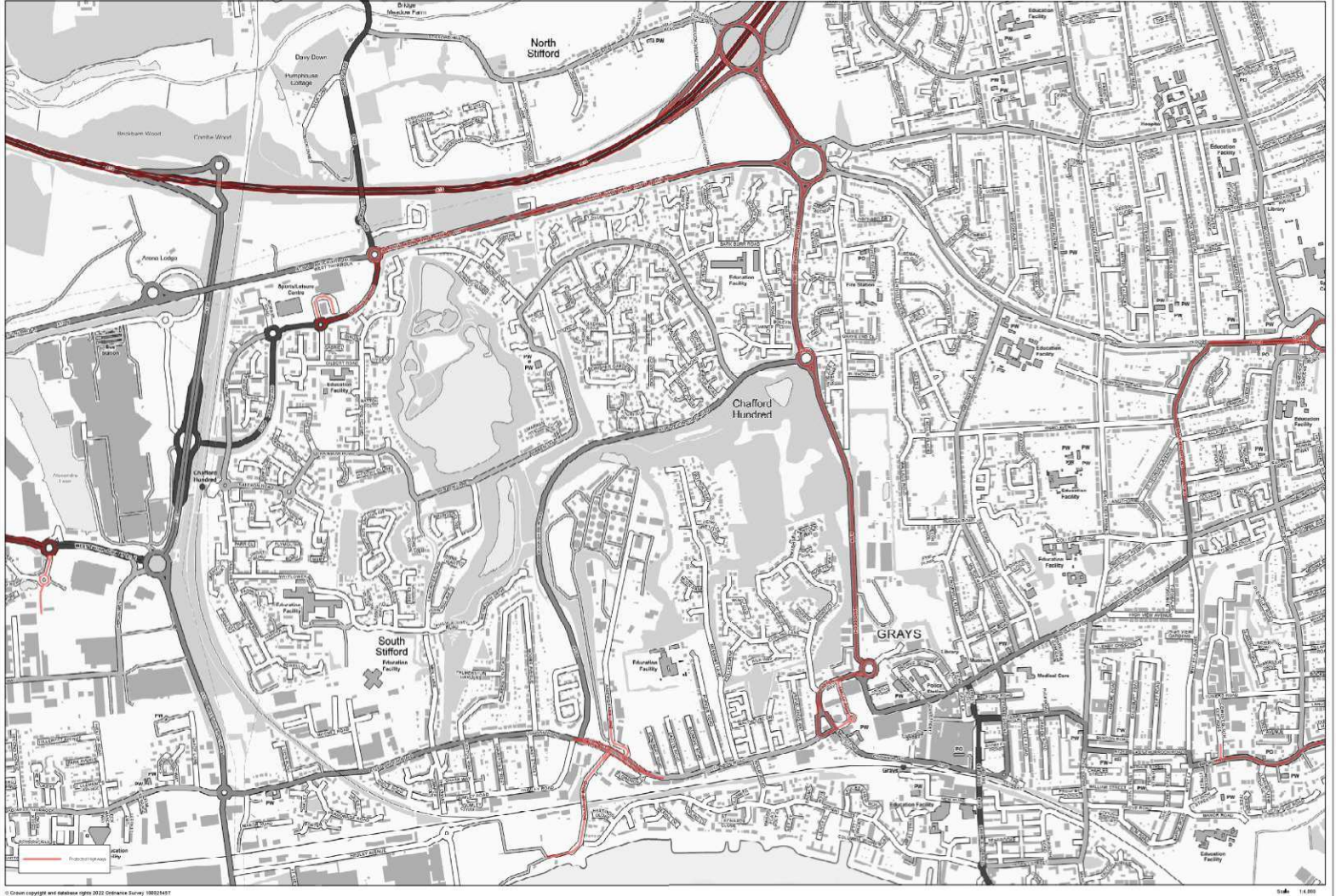
Defendants

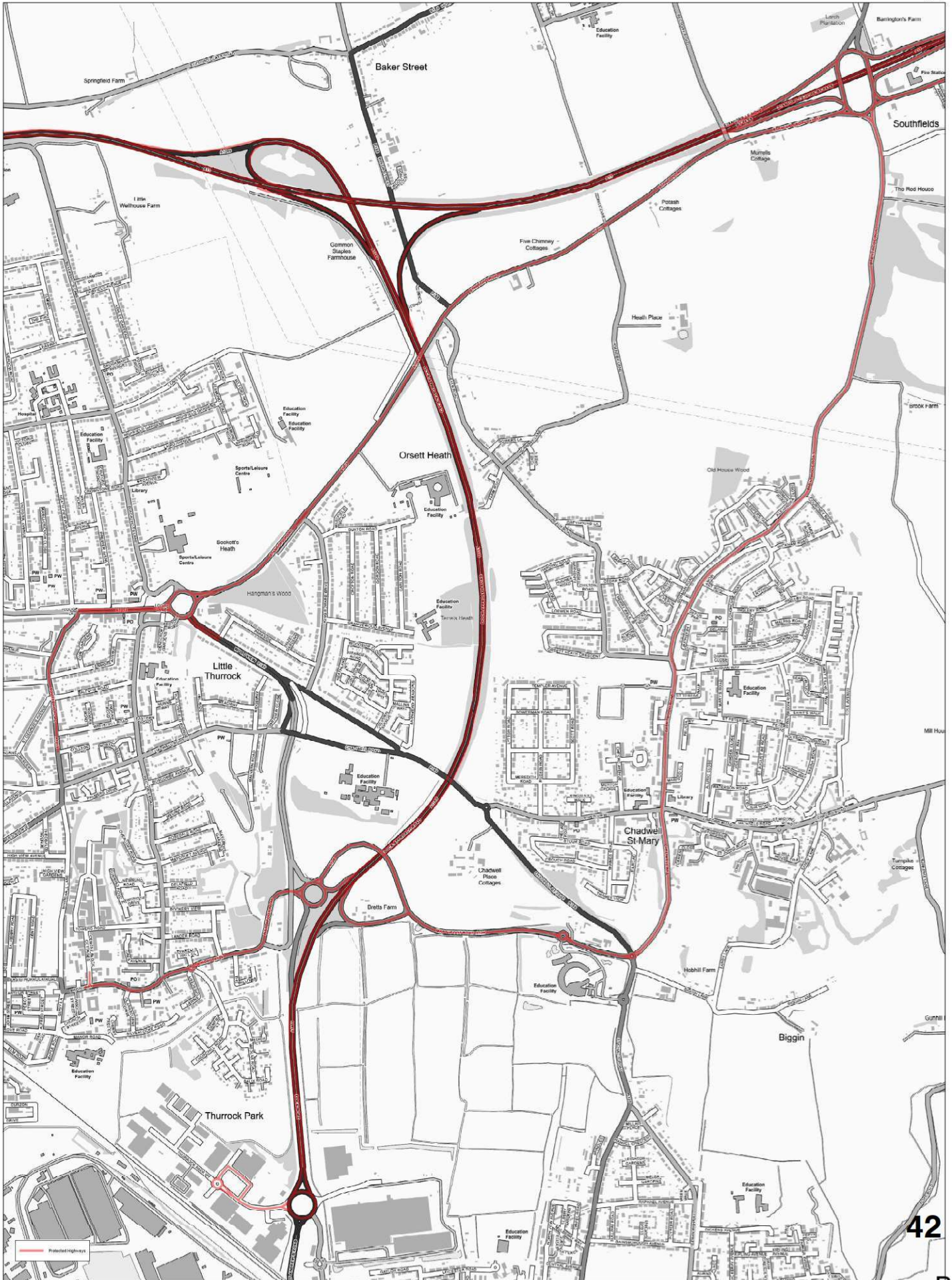
ANNEX 2 – THURROCK MAP





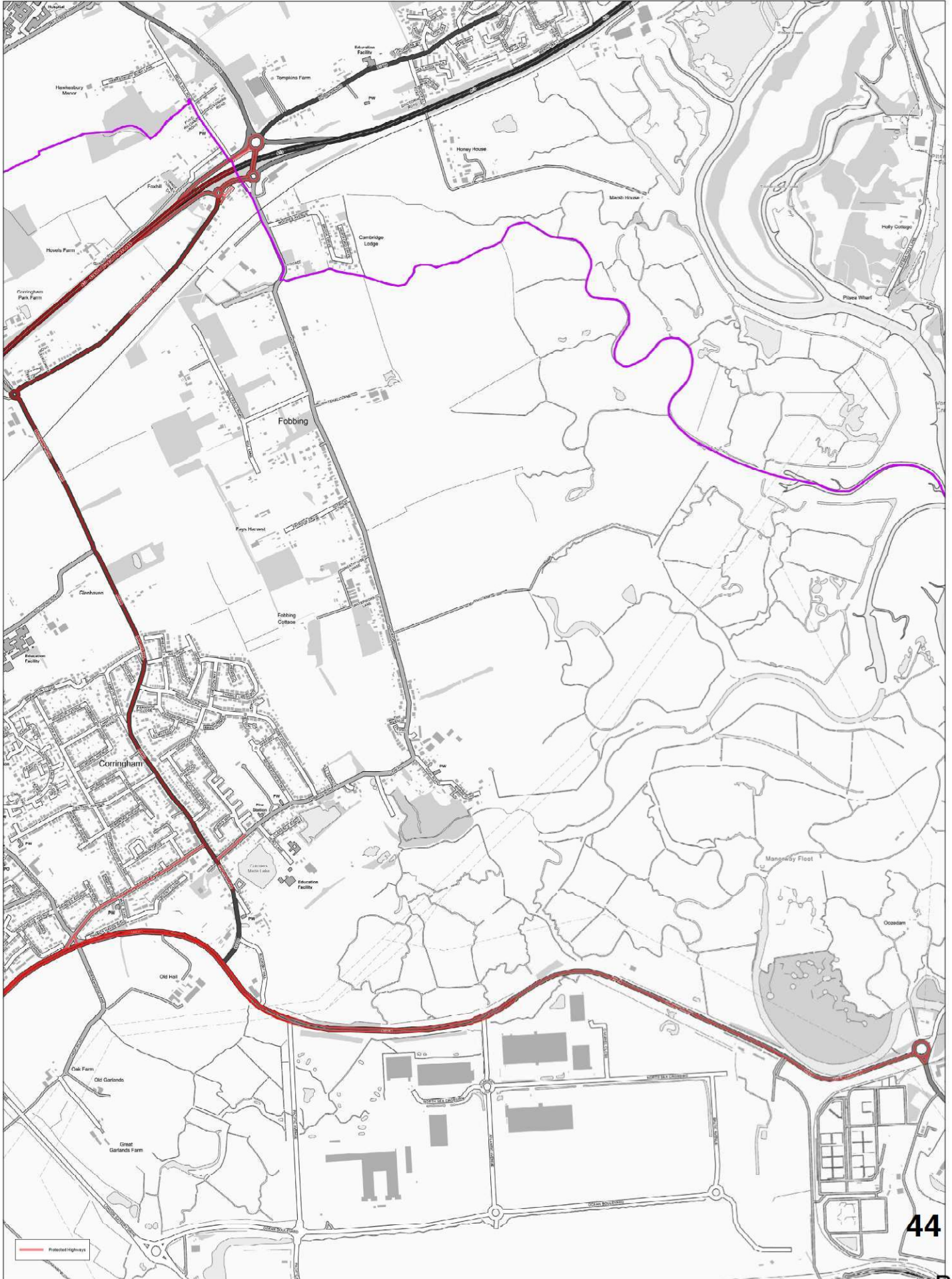








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IN THE HIGH COURT OF JUSTICE

Claim No.

QUEEN'S BENCH DIVISION

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

24 April 2022

Before [Judge]

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

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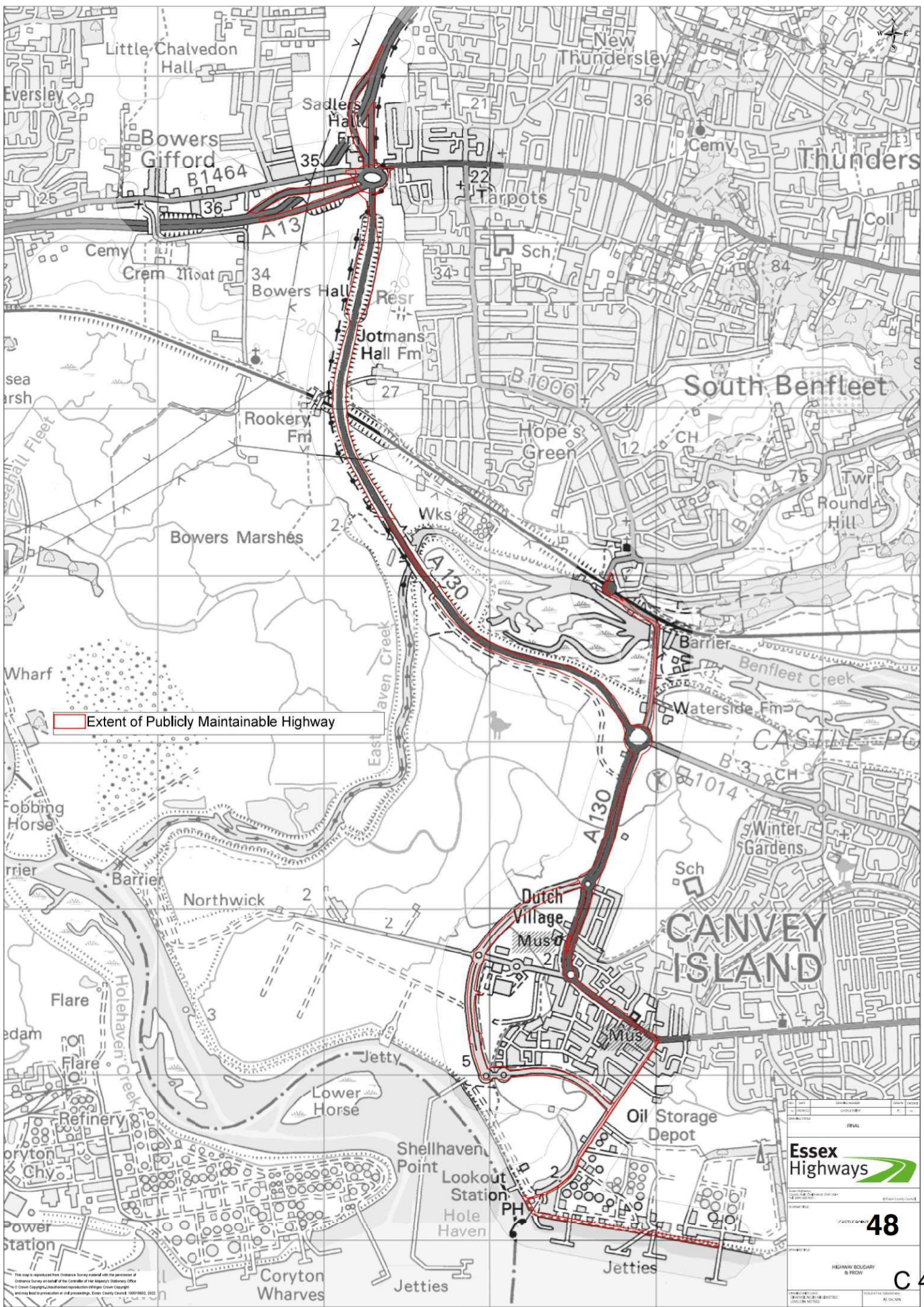
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
**DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE
RELEVANT HIGHWAY AUTHORITY**


Defendants

ANNEX 3 – ESSEX COUNTY COUNCIL MAP





 Extent of Publicly Maintainable Highway

| | | | |
|---|-------------|-------------|-----|
| DATE | DESCRIPTION | BY | FOR |
| | | | |
| FINAL | | | |
|  | | | |
| 48 | | | |
| HIGHWAY BOUNDARY & FROW | | | |
| PROJECT NO: | | DRAWING NO: | |
| C4 | | C4 | |

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**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

**(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE
CLAIM FORM**

(223)-(229) PERSONS UNKNOWN

Defendants

EXHIBIT AA2/2

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

27 May 2022

Before His Honour Judge Simon (sitting as a Judge of the High Court)



B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

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Defendants

ORDER

PENAL NOTICE

IF YOU, THE ABOVE NAMED 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 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

POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST ATTACHED AT SCHEDULE 3 OF THIS ORDER FOR BREACH OF PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006. ANY PERSON CAUGHT BREACHING PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER MAY BE ARRESTED AND BROUGHT BEFORE THE COURT

UPON the Claimants making an application on 3 May 2022 for the continuation of the injunction order made by Ritchie J out of hours and without notice to the Defendants on 24 April 2022 (the ‘Application’)

AND UPON hearing Counsel for the Claimants, Caroline Bolton and Natalie Pratt, and Counsel for the Sixty-Third Defendant (Ms Ella Eason), Stephen Simblet QC, and other Defendants neither appearing nor being represented

AND UPON the Court reading the application and the witness statements listed in Schedule B

AND UPON the Court having particular regard to the importance of the Defendants’ Article 10 and Article 11 Convention rights to freedom of expression and freedom of lawful assembly

AND UPON the Court being satisfied that the order sought does not prohibit peaceful protest

AND UPON the Court considering its discretion to grant injunctive relief pursuant to s.37(1) Senior Courts Act 1981 and considering it just and convenient to do so

AND UPON the Court being satisfied for the purposes of s.27(3) Police and Justice Act 2006, that there is a significant risk of harm to a person or persons from the conduct prohibited by this Order and that a power of arrest should be attached to some of the prohibitions contained in this Order

AND UPON the Court accepting the undertakings given in Schedule A of this Order

AND UPON the Sixty-Third Defendant making an oral application for permission to appeal

IT IS ORDERED THAT:

Definitions

1. For the purpose of this Order:

- 1.1 “The Roads” shall mean the Roads identified in Annexe 1 to this Order and to the Claim Form as marked in red on the maps at Annexes 2 and 3 to this Order and to the Claim Form.
- 1.2 “The Administrative Area of Thurrock” shall mean the administrative area as marked with the purple line on the map at Annexe 2 to this Order and to the Claim Form.
- 1.3 “The Administrative Area of Essex” shall mean the administrative area as marked with the pink line on the map at Annexe 3 to this Order and to the Claim Form.
- 1.4 “The Administrative areas of Thurrock and Essex” shall mean those areas in 1.2 and 1.3 above.
- 1.5 “The Fuel Terminals” shall refer to the following four sites collectively:
 - 1.5.1 The Navigator Fuel Terminal, Oliver Road, West Thurrock RM20 3ED;
 - 1.5.2 The Esso Fuel Terminal, London Road, Purfleet RM19 1RS;
 - 1.5.3 Exolum Storage Ltd, off Askews Farm Lane, London Road, Grays RM17 5YZ; and
 - 1.5.4 Oikos Storage Limited, Haven Road, Hole Haven Wharf, Canvey Island, Essex SS8 0NR.

INJUNCTION

Prohibitions

2. Until and subject to any further order of the Court, the Defendants and each of them (whether by themselves or by instructing, encouraging or allowing any other person) are forbidden from:
 - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off **the Roads** for the purpose of protesting.
 - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with **access to or from the Roads**, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
 - 2.3 Entering, climbing onto, climbing into, climbing under **any vehicle** travelling on to, off or along **the Roads** or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.

- 2.4 Entering, climbing onto, climbing into, climbing under **any vehicle** on any **adjacent roads, slip roads or roundabouts to the Roads**, whether or not those roads are vested in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
- 2.5 **Affixing themselves** (“locking on”) to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.
- 2.6 Affixing themselves (“locking on”) to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the “locking on” is for the purpose of protesting.
- 2.7 Affixing themselves (“locking on”) or any other items to any of the Roads or any other person or object on, under or over the Roads.
- 2.8 Affixing themselves (“locking on”) or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the “locking on” is for the purpose of protesting.
- 2.9 **Erecting any structure** on the Roads.
- 2.10 **Tunnelling**, excavating, drilling or digging under or adjacent to the Roads.
- 2.11 **Occupying** existing tunnels under the Roads for the purpose of protesting.
- 2.12 **Causing damage** to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.
- 2.13 **Abandoning any vehicle** or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.
- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to **any petrol station** in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any **petrol station forecourt or access road**, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by **delivery tankers of fuel supplies** and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.
- 2.17 **Causing, assisting** or encouraging any other person to do any act prohibited by paragraphs 2.1 to 2.16 above.

2.18 **Continuing any acts** prohibited by paragraphs 2.1 to 2.16 above.

Power of arrest

3. Pursuant to s.27 Police and Justice Act 2006, a power of arrest shall apply to paragraphs 2.1 to 2.16 above in the form attached at schedule 3 of this Order.

Alternative service

4. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission, in addition to personal service, or in the alternative to personal service, to serve the **1st to 222nd Defendants** and any further named Defendants with the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest by **all** of the following methods (4.1 – 4.5 to be treated conjunctively):
 - 4.1 **Websites:** placing a copy of the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest on the Claimants' websites and Facebook pages; and
 - 4.2 **Email:** sending a copy of this Order to Just Stop Oil, Youth Climate Swarm, Extinction Rebellion and Insulate Britain at the following email addresses: juststopoilpress@protonmail.com; youthclimateswarm@protonmail.com; press@extinctionrebellion.uk; insulatebritainpress@protonmail.com and providing a web link at which they can access the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order; and
 - 4.3 **Post:** where an address of a named Defendant is known to the Claimants, by posting a copy of this Order together with a covering letter through the letterbox of the named Defendant's address (or by leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact that the package contains a court order. If the premises do not have a letterbox, or mailbox, or the package will not fit through the letterbox, a package may be left next to the front door and a notice containing this Order may be affixed to the front door marked with a notice drawing the recipient's attention to the fact that the package contains a court order and Claim Form and should be read urgently. The notices shall be given in the form set out in Schedule 2 to this Order; and
 - 4.4 **Text messages:** sending a text message to any named Defendant for whom the Claimants have a mobile telephone number, notifying them that an injunction order has been granted against them with a power of arrest, and providing a web link at which the Defendant can access the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this

Order. The notice shall be given in the form set out in Schedule 2 to this Order; and

- 4.5 **Placing signs:** on A-Road entry points and exit points to the administrative area of Thurrock, and within 50 metres of The Fuel Terminals and on the A130 and B1014 between the entrance to Canvey Island and the roundabout known as the Waterside Road roundabout on Canvey Island, stating that there is a High Court Injunction in place prohibiting protest on the highway and providing a web link and QR code at which the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest can be accessed; or
 - 4.6 **Where requested:** the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest may be served by email where the Defendant has requested that they be served by email and by sending the email to the address provided by the Defendant; or
 - 4.7 **Lawyers:** By serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
5. The **deemed date of service** of any documents referred to in paragraph 4 above shall be the day on which service of the document or documents is completed in accordance with paragraph 4 above.
 6. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission to serve the **223rd to the 229th Defendants** with the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest by the methods in paragraphs 4.1, 4.2 and 4.5 above (to be read conjunctively).
 7. The **deemed date of service** of any of the documents referred to in paragraph 6 above shall be the day on which service of the document or documents is completed in accordance with paragraph 6 above.
 8. The Defendants shall acknowledge service of the Claim Form 21 days after the deemed date of service and file any written evidence in support of the Defence by the same date.

Further directions

9. The Defendants or any other person affected by this order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants' solicitors at the same time as the application is filed at court (and in any event not less than 48 hours before the hearing of any such application, not to include weekends or public holidays).

10. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time (to the extent they are not already so named).
11. The Claimant has permission to apply to extend or vary this Order or for further directions. The Claimant must serve any such application on those Defendants who have acknowledged service and provided an address for service.

Review hearing

12. The continued operation of this order shall be reviewed at a hearing. The Claimants shall apply by 4pm on 14 February 2023 to list that review hearing, which hearing shall be held no later than 22 May 2023. Any evidence in support or opposition to the continued operation of this order shall be filed by 4pm on 28 April 2023.

Permission to appeal

13. The Sixty-Third Defendant's Application for permission to appeal is refused.
14. If the Sixty-Third Defendant seeks permission to appeal from the Court of Appeal, then pursuant to CPR Rule 52.12(2)(a), she must do so by 8 July 2022.

Costs

15. The 1st to 222nd Defendants shall pay 50% of the Claimants' costs subject to detailed assessment if not agreed. Those costs shall be apportioned between the 1st to 222nd Defendants.

GUIDANCE NOTES

Effect of this Order – the Defendants

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

Interpretation of this Order

2. In this Order references to 'the Defendant' means any or all of them (unless expressly stated otherwise).
3. A requirement to serve on 'Defendant' means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.

4. An Order requiring ‘the Defendant’ not to do anything applies to all Defendants.
5. This Order contains the following schedules and annexes
 - (i) Schedule A-Undertakings;
 - (ii) Schedule B-Witness Statements;
 - (iii) Schedule 1-List of Named Defendants;
 - (iv) Schedule 2-Notices;
 - (v) Schedule 3-The Power of Arrest;
 - (vi) Annexe 1-The List of “The Roads” in Thurrock;
 - (vii) Annexe 2-The map of the Administrative Area of Thurrock; and (viii) Annexe 3-The map of the Administrative Area of Essex.

Communications with the Court

6. All communications with the Court about this Order should be sent to Room E03, The Royal Courts of Justice, Strand, London, WC2A 2LL. The telephone number is 020 3938957. The offices are open between 10am and 4pm Monday to Friday.

SCHEDULE A-UNDERTAKINGS

1. The Claimants undertake to use reasonable endeavours to personally serve the named Defendants with a copy of this Order. In the event of alternative service, with the exception of paragraph 4.5 above, such shall be effected within 28 days of the date of this order.
2. The Claimants undertake to identify and name Defendants and apply to add them as named Defendants to this Order and the Claim as soon as reasonably practicable.
3. The Claimants undertake to amend within 14 days of this Order the second substantive sentence of the signs referred to in paragraph 4.5 of the Injunction Order above to read “PROTESTING ON THE HIGHWAY IS SUBJECT TO RESTRICTIONS AND THERE ARE SITES PROTECTED BY THE INJUNCTION”.

SCHEDULE B-WITNESS STATEMENTS

1. The Court read the following witness statements filed on behalf of the Claimants:

- (a) The witness statement of Adewale Adesina 23.4.2022;
 - (b) The witness statement of Morgan Cronin 23.4.2022;
 - (c) The witness statement of Paul Crick 23.4.2022;
 - (d) The first witness statement of Adam Rulewski 24.4.2022; (e) The second witness statement of Adam Rulewski dated 11.5.2022; (f) The third witness statement of Adam Rulewski dated 16.5.2022.
2. The Court read the following witness statements filed on behalf of the Sixty-Third Defendant:
- (a) The first witness statement of Alice Hardy dated 9.5.2022;
 - (b) The witness statement of Ella Eason dated 9.5.2022;
 - (c) The witness statement of Jessica Branch dated 9.5.2022; (d) The second witness statement of Alice Hardy dated 13.5.2022; (e) The third witness statement of Alice Hardy dated 16.5.2022.

SCHEDULE 1-NAMED DEFENDANTS

- (1) Madeline Adams
- (2) Mary Adams
- (3) David Addy
- (4) Amber Alexandar
- (5) Mina-Mae Alexander
- (6) Eric Anderson
- (7) Christine Aslett
- (8) Nicholas Aslett
- (9) Lachlan Ayles
- (10) Stephanie Aylett
- (11) Pete Bailey
- (12) William Bajwa
- (13) Jeremy Banks
- (14) Colin Barrington
- (15) Kai Bartlett
- (16) Joshua Bates
- (17) Christopher Bennett
- (18) Gillian Bird
- (19) John Blanco
- (20) John Blewett
- (21) Poppy Bliss
- (22) Hilary Bond
- (23) Trevor Boulden
- (24) Geoffroy Bowman
- (25) Simon Bramwell
- (26) Joseph Bream

- (27) Scott Breen
- (28) Stephen Brett
- (29) Emily Brocklebank
- (30) Claire Brook
- (31) Emma Brooker
- (32) Michael Brown
- (33) Judith Bruce
- (34) Madeleine Budd
- (35) Tes Burns
- (36) Benjamin Buse
- (37) Catherine Cannon
- (38) Rebecca Cassar
- (39) Jessica Causby
- (40) Susan Chamberlayne
- (41) Sally Chapman
- (42) Vishal Chauhan
- (43) Katherine Chesterman
- (44) Phillipa Clarke
- (45) Oliver Clegg
- (46) Orla Coghlan
- (47) John Coghlan
- (48) Ruth Cook
- (49) Heather Cooper
- (50) Jasmine Corkhill Harris
- (51) Joy Susan Corrigan
- (52) Richard Crane
- (53) David Crawford
- (54) Rosemary Croft
- (55) Joseph Daldorph
- (56) Beverley Ann Daniel
- (57) Ben Delap
- (58) Gaie Delap
- (59) Gabriella Ditton
- (60) Igors Djomins
- (61) Laura Doehlei
- (62) Marguerite Doubleday
- (63) Ella Eason
- (64) Christine Essex
- (65) Janet Flynn
- (66) Michael Forton
- (67) Phoebe Frewer
- (68) Amy Friel
- (69) Robin Gardner
- (70) Cressida Gething
- (71) Alasdair Gibson
- (72) Hugo Glashier
- (73) Stephanie Golder

- (74) William Goldring
- (75) Xavier Gonzalez Trimmer
- (76) Alfie Goodland
- (77) Emma-Rose Goodwin
- (78) Sophie Greenland
- (79) Aaron Gunning
- (80) Louisa Hadden
- (81) Catherine Hallett
- (82) Finn Halsall
- (83) Jake Handling
- (84) Gareth Harper
- (85) Louise Harris
- (86) Patrick Hart
- (87) Yvonne Hayward
- (88) Selma Heimedinger
- (89) Jonathan Herbert
- (90) Noah Herfort
- (91) Suzanne Hetherington
- (92) Sarah Hirons
- (93) Rupert Horlick
- (94) Adrian Howlett
- (95) Eric Hoyland
- (96) Abigail Hubbucks
- (97) Hannah Hunt
- (98) Emma Ireland
- (99) Pavel Ivanov
- (100) Rik Jansen
- (101) Ruth Jarman
- (102) Stephen Jarvis
- (103) Russell Jarvis
- (104) John Johnson
- (105) Hannah Johnston
- (106) Timothy Jones
- (107) Pascale Kann
- (108) Hallum Kelly
- (109) Linda Latter
- (110) Charles Laurie
- (111) Peter Lay
- (112) Eben Lazarus
- (113) Isobel Lewis
- (114) Elanor Lewis-Holmes
- (115) Joseph Linheart
- (116) El Litten
- (117) Rebecca Lockyer
- (118) Felix Lozano
- (119) Barbara Lund
- (120) Jacqueline Macey

- (121) Catharine Maclean
- (122) Jacob Main
- (123) Elizabeth McCormack
- (124) Eilidh McFadden
- (125) Nathan McGovern
- (126) Louis McKechnie
- (127) Lilah McKim
- (128) Grace McMeekin
- (129) Adalaide Meaney
- (130) Anna Middleton
- (131) Hannah Miles
- (132) Benjamin Mitchell
- (133) Darcy Mitchell
- (134) Deborah Mitchell
- (135) Teddy Monroe
- (136) Fiona Moore
- (137) Stefania Morosi
- (138) Paul Morozzo
- (139) Virgenia Morris
- (140) Paul Morrison
- (141) Zak Mullen
- (142) Alexandra Mulvey
- (143) Reuben Mychalecky
- (144) Richard Newell-Price
- (145) Ben Newman
- (146) Alexander Newnham
- (147) Jessica Norgard
- (148) Rachel Norris
- (149) Rose Norris
- (150) George Oakenfold
- (151) Nicholas Onley
- (152) Jakub Pabiniak
- (153) Ella-Rose Paez
- (154) Sophie Page-Hall
- (155) Susan Parfitt
- (156) Dillon Parsons
- (157) Rose Patterson
- (158) Ethan Paul
- (159) Rosalind Pears
- (160) Abigail Percy-Ratcliff
- (161) Ursula Pethick
- (162) Jacqueline Phillips
- (163) Mitchel Phillips-White
- (164) Robert Possnett
- (165) Matthew Powell
- (166) Emily Price
- (167) Robert Price

- (168) Amy Pritchard
- (169) Felix Reeves-Whymark
- (170) Anna Retallack
- (171) Anne Richards
- (172) Bethan Roberts
- (173) Jasmin Robertson
- (174) Sebastian Roblyn
- (175) Isabel Rock
- (176) Elizabeth Rosser
- (177) Christian Rowe
- (178) Finn Roweth
- (179) Adelheid Russenberger
- (180) Isla Sandford
- (181) Daniel Sargison
- (182) James Sargison
- (183) Cat Scothorne
- (184) James Sebley
- (185) Rosa Sharkey
- (186) Sophie Sharples
- (187) Susan Sidey
- (188) James Skeet
- (189) Hannah Skwarska
- (190) Jacqueline Slade
- (191) Oliver Slaughter
- (192) David Smartknight
- (193) Heather Smith
- (194) Joshua Smyth
- (195) David Squire
- (196) Katherine Steer
- (197) Oliver Stevens
- (198) Madeleine Stewart
- (199) Ferdi Suleyman
- (200) Vivien Talbot
- (201) Ben Taylor
- (202) Jacqueline Teggins
- (203) Zachary Tenquist
- (204) David Thorneywork
- (205) Hannah Torrance-Bright
- (206) Lucy Trinder
- (207) Morgan Trowland
- (208) Jan Van Der Knapp
- (209) Rik Venhoutteghem
- (210) Sally Webber
- (211) Leonard Weber
- (212) Miranda Whelehan
- (213) Philip White
- (214) Edred Whittingham

- (215) Alexander Wilcox
- (216) Clare Wilson
- (217) Thomas Winter
- (218) Carol-Ann Wood
- (219) Lizia Woolf
- (220) Amorel Kennedy
- (221) Grace Lally
- (222) Morien Morgan

SCHEDULE 2-NOTICES

On the package containing this Order:

“VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWNLOAD IT FROM <https://www.thurrock.gov.uk/protest-injunction> OR CALL 020 7405 4600”

to affix to the front door when the package has been posted through the letterbox or placed in a mailbox:

“VERY URGENT: A PACKAGE HAS BEEN LEFT THAT CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWLOAD IT FROM <https://www.thurrock.gov.uk/protest-injunction> OR CALL 020 7405 4600”

For service by text message:

“VERY URGENT: A HIGH COURT INJUNCTION ORDER HAS BEEN MADE AGAINST YOU, THE LINK PROVIDED IN THIS TEXT MESSAGE CONTAINS AN ORDER OF THE HIGH COURT AND THE SUPPORTING DOCUMENTS RELIED UPON BY THE CLAIMANTS. YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL 020 7405 4600”

SCHEDULE 3-POWER OF ARREST

Power of arrest

Name of defendant

(1) Madeline Adams
 (2)-(222) Other Named Defendants
 (223)-(229) Persons Unknown (see continuation sheet)

Defendant's address

See attached continuation sheet

| | |
|---|------------------------------------|
| Name of court High Court of Justice Queen's Bench Division | Claim No. QB-2022-001317 |
|---|------------------------------------|

Claimant's name (including ref.)
 (1) Thurrock Council
 (2) Essex County Council

Defendant's name (including ref.)
 (1) Madeline Adams
 (2)-(222) Other Named Defendants
 (223)-(229) Persons Unknown



Date order made / / Name of judge

Order made under (insert statutory provision)

This order includes a power of arrest under (insert statutory provision)

The relevant paragraphs of the order to which a power of arrest has been attached are:
 (set out those paragraphs of the order to which the power of arrest is attached, if necessary continue on a separate sheet)

This power of arrest was ordered on / / **and expires on the** / /

Note to Arresting Officer

Where the defendant is arrested under the power given by section 155 of the Housing Act 1996, or section 27 of the Police and Justice Act 2006; or section 43 of the Policing and Crime Act 2009; or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014:-

- the defendant shall be brought before the judge within the period of 24 hours beginning at the time of their arrest;
- a constable shall inform the person on whose application the injunction was granted, forthwith where the defendant is arrested under the power given by section 155 of the Housing Act 1996 or as soon as reasonably practicable where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014.

Nothing in section 155 of the Housing Act 1996 or section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014, shall authorise the detention of the respondent after the expiry of the period of 24 hours beginning at the time of their arrest.

In calculating any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Name of Claimant

Claimant's address

Claimant's phone number

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

27 May 2022

Before HHJ Simon (sitting as a Judge of the High Court)

B E T W E E N :

220. THURROCK COUNCIL

221. ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

(223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

Defendants

POWER OF ARREST: CONTINUATION SHEET

NAMES AND ADDRESSES OF DEFENDANTS

| Surname | Forename | Address | Defendant Number |
|----------------|-----------------|--|-------------------------|
| ADAMS | MADELINE | ████████████████████ ████████████████ | 1 |
| ADAMS | MARY | ████████████████████ ████████████████ | 2 |
| ADDY | DAVID | ████████████████████ ████ | 3 |

| | | | |
|-----------|----------|------------|---|
| ALEXANDER | AMBER | [REDACTED] | 4 |
| ALEXANDER | MINA-MAE | [REDACTED] | 5 |
| ANDERSON | ERIC | [REDACTED] | 6 |

| | | | |
|------------|-------------|------------|----|
| ASLETT | NICHOLAS | [REDACTED] | 8 |
| ASLETT | CHRISTINE | [REDACTED] | 7 |
| AYLES | LACHLAN | [REDACTED] | 9 |
| AYLETT | STEPHANIE | [REDACTED] | 10 |
| BAILEY | PETE | [REDACTED] | 11 |
| BAJWA | WILLIAM | [REDACTED] | 12 |
| BANKS | JEREMY | [REDACTED] | 13 |
| BARRINGTON | COLIN | [REDACTED] | 14 |
| BARTLETT | KAI | [REDACTED] | 15 |
| BATES | JOSHUA | [REDACTED] | 16 |
| BENNETT | CHRISTOPHER | [REDACTED] | 17 |
| BIRD | GILLIAN | [REDACTED] | 18 |
| BLANCO | JOHN | [REDACTED] | 19 |
| BLEWETT | JOHN | [REDACTED] | 20 |
| BLISS | POPPY | [REDACTED] | 21 |
| BOND | HILARY | [REDACTED] | 22 |
| BOULDEN | TREVOR | [REDACTED] | 23 |
| BOWMAN | GEOFFREY | [REDACTED] | 24 |

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|-------------|---------|------------|----|
| BRAMWELL | SIMON | [REDACTED] | 25 |
| BREAM | JOSEPH | [REDACTED] | 26 |
| BREEN | SCOTT | [REDACTED] | 27 |
| BRETT | STEPHEN | [REDACTED] | 28 |
| BROCKLEBANK | EMILY | [REDACTED] | 29 |
| BROOK | CLAIRE | [REDACTED] | 30 |
| BROOKER | EMMA | [REDACTED] | 31 |

| | | | |
|--------------|-----------|------------|----|
| BROWN | MICHAEL | [REDACTED] | 32 |
| BRUCE | JUDITH | [REDACTED] | 33 |
| BUDD | MADELEINE | [REDACTED] | 34 |
| BURNS | TES | [REDACTED] | 35 |
| BUSE | BENJAMIN | [REDACTED] | 36 |
| CANNON | CATHERINE | [REDACTED] | 37 |
| CASSAR | REBECCA | [REDACTED] | 38 |
| CAUSBY | JESSICA | [REDACTED] | 39 |
| CHAMBERLAYNE | SUSAN | [REDACTED] | 40 |
| CHAPMAN | SALLY | [REDACTED] | 41 |
| CHAUHAN | VISHAL | [REDACTED] | 42 |
| CHESTERMAN | KATHERINE | [REDACTED] | 43 |
| CLARKE | PHILIPPA | [REDACTED] | 44 |
| CLEGG | OLIVER | [REDACTED] | 45 |

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| COGHLAN | ORLA | ████████████████████ ██████████████ | 46 |
| COGHLAN | JOHN | ████████████████████ ████████████████████ | 47 |
| COOK | RUTH | ████████████████████ ██████████████████ | 48 |
| COOPER | HEATHER | ████████████████████ ██████████ | 49 |
| CORKHILL HARRIS | JASMINE | ████████████████████ ██████████████ | 50 |
| CORRIGAN | JOY SUSAN | ████████████████████ ██████████████ | 51 |
| CRANE | RICHARD | ████████████████████ ██████████████ | 52 |
| CRAWFORD | DAVID | ████████████████████ ██ | 53 |
| CROFT | ROSEMARY | ████████████████████ ██████████ | 54 |

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|-----------|-----------------|--|----|
| DALDORPH | JOSEPH | ████████████████████ ██████████ | 55 |
| DANIEL | BEVERLEY ANN | ████████████████████ ██████████ | 56 |
| DELAP | BEN | ████████████████████ ██████████████ | 57 |
| DELAP | GAIE | ████████████████████ ██████████████ | 58 |
| DITTON | GABRIELLA | ████████████████████ ██ | 59 |
| DJOMINS | IGORS | ██████████████ | 60 |
| DOEHLEI | LAURA | ████████████████████ ██████████████ | 61 |
| DOUBLEDAY | MARGUERITE | ██████████████████ ██████████████ | 62 |
| EASON | ELLA | ████████████████████ ██████████████ | 63 |
| ESSEX | CHRISTINE | ████████████████████ ██████████████ | 64 |
| FLYNN | JANET | ████████████████████ ██████████████ | 65 |
| FORTON | MICHAEL | ██████████████ | 66 |

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|---------------------|-----------|------------|----|
| FREWER | PHOEBE | [REDACTED] | 67 |
| FRIEL | AMY | [REDACTED] | 68 |
| GARDNER | ROBIN | [REDACTED] | 69 |
| GETHING | CRESSIDA | [REDACTED] | 70 |
| GIBSON | ALASDAIR | [REDACTED] | 71 |
| GLASHIER | HUGO | [REDACTED] | 72 |
| GOLDER | STEPHANIE | [REDACTED] | 73 |
| GOLDRING | WILLIAM | [REDACTED] | 74 |
| GONZALEZ TRIMMER | XAVIER | [REDACTED] | 75 |
| GOODLAND | ALFIE | [REDACTED] | 76 |
| GOODWIN | EMMA-ROSE | [REDACTED] | 77 |
| GREENLAND | SOPHIE | [REDACTED] | 78 |
| GUNNING | AARON | [REDACTED] | 79 |
| HADDEN | LOUISA | [REDACTED] | 80 |

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|-------------|-----------|------------|----|
| HALLETT | CATHERINE | [REDACTED] | 81 |
| HALSALL | FINN | [REDACTED] | 82 |
| HANDLING | JAKE | [REDACTED] | 83 |
| HARPER | GARETH | [REDACTED] | 84 |
| HARRIS | LOUISE | [REDACTED] | 85 |
| HART | PATRICK | [REDACTED] | 86 |
| HAYWARD | YVONNE | [REDACTED] | 87 |
| HEIMEDINGER | SELMA | [REDACTED] | 88 |

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|--------------|----------|--|-----|
| HERBERT | JONATHAN | [REDACTED] [REDACTED] | 89 |
| HERFORD | NOAH | [REDACTED] [REDACTED] [REDACTED] | 90 |
| HETHERINGTON | SUZANNE | [REDACTED] [REDACTED] | 91 |
| HIRONS | SARAH | [REDACTED] [REDACTED] | 92 |
| HORLICK | RUPERT | [REDACTED] | 93 |
| HOWLETT | ADRIAN | [REDACTED] [REDACTED] | 94 |
| HOYLAND | ERIC | [REDACTED] [REDACTED] | 95 |
| HUBBUCKS | ABIGAIL | [REDACTED] [REDACTED] | 96 |
| HUNT | HANNAH | [REDACTED] [REDACTED] | 97 |
| IRELAND | EMMA | [REDACTED] [REDACTED] | 98 |
| IVANOV | PAVEL | [REDACTED] [REDACTED] | 99 |
| JANSEN | RIK | [REDACTED] [REDACTED] | 100 |
| JARMAN | RUTH | [REDACTED] [REDACTED] | 101 |
| JARVIS | STEPHEN | [REDACTED] [REDACTED] | 102 |
| JARVIS | RUSSELL | [REDACTED] [REDACTED] | 103 |
| JOHNSON | JOHN | [REDACTED] [REDACTED] [REDACTED] | 104 |

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|----------|---------|--------------------------|-----|
| JOHNSTON | HANNAH | [REDACTED] [REDACTED] | 105 |
| JONES | TIMOTHY | [REDACTED] [REDACTED] | 106 |
| KANN | PASCALE | [REDACTED] | 107 |
| KELLY | HALLUM | [REDACTED] [REDACTED] | 108 |
| LATTER | LINDA | [REDACTED] [REDACTED] | 109 |

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|--------------|------------|--|-----|
| LAURIE | CHARLES | [REDACTED] [REDACTED] | 110 |
| LAY | PETER | [REDACTED] [REDACTED] | 111 |
| LAZARUS | EBEN | [REDACTED] [REDACTED] | 112 |
| LEWIS | ISOBEL | [REDACTED] [REDACTED] | 113 |
| LEWIS-HOLMES | ELANOR | [REDACTED] [REDACTED] | 114 |
| LINHART | JOSEPH | [REDACTED] [REDACTED] | 115 |
| LITTEN | EL | [REDACTED] [REDACTED] | 116 |
| LOCKYER | REBECCA | [REDACTED] [REDACTED] | 117 |
| LOZANO | FELIX | [REDACTED] [REDACTED] | 118 |
| LUND | BARBARA | [REDACTED] [REDACTED] [REDACTED] | 119 |
| MACEY | JACQUELINE | [REDACTED] [REDACTED] | 120 |
| MACLEAN | CATHERINE | [REDACTED] [REDACTED] [REDACTED] | 121 |
| MAIN | JACOB | [REDACTED] | 122 |
| MCCORMACK | ELIZABETH | [REDACTED] [REDACTED] | 123 |
| MCFADDEN | EILIDH | [REDACTED] [REDACTED] | 124 |
| MCGOVERN | NATHAN | [REDACTED] [REDACTED] | 125 |
| MCKECHNIE | LOUIS | [REDACTED] [REDACTED] | 126 |
| MCKIM | LILAH | [REDACTED] [REDACTED] | 127 |
| MCMEEKIN | GRACE | [REDACTED] [REDACTED] | 128 |
| MEANEY | ADALAIDE | [REDACTED] | 129 |
| MIDDLETON | ANNA | [REDACTED] [REDACTED] | 130 |

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|--------------|-----------|------------|-----|
| MILES | HANNAH | [REDACTED] | 131 |
| MITCHELL | DARCY | [REDACTED] | 133 |
| MITCHELL | BENJAMIN | [REDACTED] | 132 |
| MITCHELL | DEBORAH | [REDACTED] | 134 |
| MONROE | TEDDY | [REDACTED] | 135 |
| MOORE | FIONA | [REDACTED] | 136 |
| MOROSI | STEFANIA | [REDACTED] | 137 |
| MOROZZO | PAUL | [REDACTED] | 138 |
| MORRIS | VIRGENIA | [REDACTED] | 139 |
| MORRISON | PAUL | [REDACTED] | 140 |
| MULLEN | ZAK | [REDACTED] | 141 |
| MULVEY | ALEXANDRA | [REDACTED] | 142 |
| MYCHALECKYJ | REUBEN | [REDACTED] | 143 |
| NEWELL-PRICE | RICHARD | [REDACTED] | 144 |
| NEWMAN | BEN | [REDACTED] | 145 |
| NEWNHAM | ALEXANDER | [REDACTED] | 146 |
| NORGARD | JESSICA | [REDACTED] | 147 |
| NORRIS | RACHEL | [REDACTED] | 148 |
| NORRIS | ROSE | [REDACTED] | 149 |
| OAKENFOLD | GEORGE | [REDACTED] | 150 |
| ONLEY | NICHOLAS | [REDACTED] | 151 |
| PABINIAK | JAKUB | [REDACTED] | 152 |

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|----------------|------------|--|-----|
| PAEZ | ELLA-ROSE | [REDACTED] [REDACTED] [REDACTED] | 153 |
| PAGE HALL | SOPHIE | [REDACTED] [REDACTED] | 154 |
| PARFITT | SUSAN | [REDACTED] [REDACTED] | 155 |
| PARSONS | DILLON | [REDACTED] [REDACTED] | 156 |
| PATTERSON | ROSE | [REDACTED] [REDACTED] | 157 |
| PAUL | ETHAN | [REDACTED] [REDACTED] | 158 |
| PEARS | ROSALIND | [REDACTED] [REDACTED] | 159 |
| PERCY-RATCLIFF | ABIGAIL | [REDACTED] [REDACTED] | 160 |
| PETHICK | URSULA | [REDACTED] [REDACTED] | 161 |
| PHILLIPS | JACQUELINE | [REDACTED] [REDACTED] | 162 |
| PHILLIPS-WHITE | MITCHEL | [REDACTED] [REDACTED] | 163 |
| POSSNETT | ROBERT | [REDACTED] [REDACTED] [REDACTED] | 164 |
| POWELL | MATTHEW | [REDACTED] [REDACTED] | 165 |
| PRICE | ROBERT | [REDACTED] [REDACTED] | 167 |
| PRICE | EMILY | [REDACTED] [REDACTED] | 166 |
| PRITCHARD | AMY | [REDACTED] [REDACTED] | 168 |
| REEVES-WHYMARK | FELIX | [REDACTED] [REDACTED] [REDACTED] | 169 |
| RETALLACK | ANNA | [REDACTED] [REDACTED] | 170 |
| RICHARDS | ANNE | [REDACTED] [REDACTED] | 171 |
| ROBERTS | BETHAN | [REDACTED] | 172 |

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|---------|-----------|------------|-----|
| SMITH | HEATHER | [REDACTED] | 193 |
| SMYTH | JOSHUA | [REDACTED] | 194 |
| SQUIRE | DAVID | [REDACTED] | 195 |
| STEER | KATHERINE | [REDACTED] | 196 |
| STEVENS | OLIVER | [REDACTED] | 197 |
| STEWART | MADELEINE | [REDACTED] | 198 |

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|----------------|------------|------------|-----|
| SULEYMAN | FERDI | [REDACTED] | 199 |
| TALBOT | VIVIEN | [REDACTED] | 200 |
| TAYLOR | BEN | [REDACTED] | 201 |
| TEGGIN | JACQUELINE | [REDACTED] | 202 |
| TENQUIST | ZACHARY | [REDACTED] | 203 |
| THORNEYWORK | DAVID | [REDACTED] | 204 |
| TORRANCEBRIGHT | HANNAH | [REDACTED] | 205 |
| TRINDER | LUCY | [REDACTED] | 206 |
| TROWLAND | MORGAN | [REDACTED] | 207 |
| VAN DER KNAAP | JAN | [REDACTED] | 208 |
| VANHOUTTEGHEM | RIK | [REDACTED] | 209 |
| WEBBER | SALLY | [REDACTED] | 210 |
| WEBER | LEONARD | [REDACTED] | 211 |
| WHELEHAN | MIRANDA | [REDACTED] | 212 |

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|---|-----|
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM) | 226 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM) | 227 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM) | 228 |
| PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY | 229 |

THE RELEVANT PARAGRAPHS OF THE ORDER TO WHICH A POWER OF ARREST HAVE BEEN ATTACHED ARE:

Paragraphs 2.1 to 2.16 of the Order of HHJ Simon (sitting as a Judge of the High Court) dated 27 May 2022:

2. The Defendants and each of them (whether by themselves or by instructing, encouraging or allowing any other person) are forbidden from:
 - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
 - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
 - 2.3 Entering, climbing onto, climbing into, climbing under any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.

- 2.4 Entering, climbing onto, climbing into, climbing under any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
- 2.5 Affixing themselves (“locking on”) to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.
- 2.6 Affixing themselves (“locking on”) to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the “locking on” is for the purpose of protesting.
- 2.7 Affixing themselves (“locking on”) or any other items to any of the Roads or any other person or object on, under or over the Roads.
- 2.8 Affixing themselves (“locking on”) or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the “locking on” is for the purpose of protesting.
- 2.9 Erecting any structure on the Roads.
- 2.10 Tunnelling, excavating, drilling or digging under or adjacent to the Roads.
- 2.11 Occupying existing tunnels under the Roads for the purpose of protesting.
- 2.12 Causing damage to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.
- 2.13 Abandoning any vehicle or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.
- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station forecourt or access road, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by delivery tankers of fuel supplies and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.

**For Annexes 1-3 please see pages 31 to 48 of
Exhibit AA2/1**

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

**(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE
CLAIM FORM**

(223)-(229) PERSONS UNKNOWN

Defendants

EXHIBIT AA2/3

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

26th January 2023
Before Mrs Justice Foster DBE

B E T W E E N :

- (1) THURROCK COUNCIL
(2) ESSEX COUNTY COUNCIL



QB-2022-001317
Claimants

-and-

- (1) MADELINE ADAMS
- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)
- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH

VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

Defendants

ORDER

PENAL NOTICE

IF YOU, THE ABOVE NAMED 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 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

POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST ATTACHED AT SCHEDULE 3 OF THIS ORDER FOR BREACH OF PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006. ANY

**PERSON CAUGHT BREACHING PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER
MAY BE ARRESTED AND BROUGHT BEFORE THE COURT**

UPON the Claimants' Application dated 26 January 2023 seeking (i) the adjournment of the final hearing of the Claimants' Claim for final injunctive relief against the Defendants, pending the outcome of the expedited appeal to the Supreme Court in *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* (UKSC 2022/0046), which appeal may dispose of part of these proceedings, (ii) the continuation of the Injunction Order dated 27 May 2022 granted by HHJ Simon (sitting as a Judge of the High Court) (the 'Injunction Order'), pending the outcome of the aforementioned appeal and the final hearing of the Claimants' Claim and (iii) a 12 month extension to the power of arrest contained within the Injunction Order

AND UPON the Application being made on notice to those Defendants who have acknowledged service of the Claim and provided an address for service, as per paragraph 11 of the Injunction Order, and with the Application having also been served on the solicitors for the Sixty-Third Defendant and by way of email on the Forty-Eighth, Fifty-First, Eighty-Sixth, One-Hundred and Second and the One-Hundred and Fiftieth Defendants

AND UPON the Court considering the terms of the Injunction Order and the recitals thereto

AND UPON the Court considering the Fourth witness statement of Adam Rulewski dated 25 January 2023

AND UPON the Court considering the Application on the papers and without a hearing

IT IS ORDERED THAT:

Definitions

1. For the purpose of this Order:

- 1.1 "The Roads" shall mean the Roads identified in Annexe 1 to this Order and to the Claim Form as marked in red on the maps at Annexes 2 and 3 to this Order and to the Claim Form.
- 1.2 "The Administrative Area of Thurrock" shall mean the administrative area as marked with the purple line on the map at Annexe 2 to this Order and to the Claim Form.
- 1.3 "The Administrative Area of Essex" shall mean the administrative area as marked with the pink line on the map at Annexe 3 to this Order and to the Claim Form.
- 1.4 "The Administrative areas of Thurrock and Essex" shall mean those areas in 1.2 and 1.3 above.
- 1.5 "The Fuel Terminals" shall refer to the following four sites collectively:

- 1.5.1 The Navigator Fuel Terminal, Oliver Road, West Thurrock RM20 3ED;
- 1.5.2 The Esso Fuel Terminal, London Road, Purfleet RM19 1RS;
- 1.5.3 Exolum Storage Ltd, off Askews Farm Lane, London Road, Grays RM17 5YZ; and
- 1.5.4 Oikos Storage Limited, Haven Road, Hole Haven Wharf, Canvey Island, Essex SS8 0NR.

INJUNCTION

Prohibitions

2. Until and subject to any further order of the Court, the Defendants and each of them (whether by themselves or by instructing, encouraging or allowing any other person) are forbidden from:
 - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off **the Roads** for the purpose of protesting.
 - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with **access to or from the Roads**, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
 - 2.3 Entering, climbing onto, climbing into, climbing under **any vehicle** travelling on to, off or along **the Roads** or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
 - 2.4 Entering, climbing onto, climbing into, climbing under **any vehicle** on any **adjacent roads, slip roads or roundabouts to the Roads**, whether or not those roads are vested in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
 - 2.5 **Affixing themselves** (“locking on”) to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.
 - 2.6 Affixing themselves (“locking on”) to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the “locking on” is for the purpose of protesting.
 - 2.7 Affixing themselves (“locking on”) or any other items to any of the Roads or any other person or object on, under or over the Roads.
 - 2.8 Affixing themselves (“locking on”) or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the “locking on” is for the purpose of protesting.

- 2.9 **Erecting any structure** on the Roads.
- 2.10 **Tunnelling**, excavating, drilling or digging under or adjacent to the Roads.
- 2.11 **Occupying** existing tunnels under the Roads for the purpose of protesting.
- 2.12 **Causing damage** to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.
- 2.13 **Abandoning any vehicle** or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.
- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to **any petrol station** in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any **petrol station forecourt or access road**, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by **delivery tankers of fuel supplies** and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.
- 2.17 **Causing, assisting** or encouraging any other person to do any act prohibited by paragraphs 2.1 to 2.16 above.
- 2.18 **Continuing any acts** prohibited by paragraphs 2.1 to 2.16 above.

Power of arrest

3. Pursuant to s.27 Police and Justice Act 2006, a power of arrest shall apply to paragraphs 2.1 to 2.16 above in the form attached at schedule 3 of this Order.

Alternative service

4. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission, in addition to personal service, or in the alternative to personal service, to serve the **1st to 222nd Defendants** and any further named Defendants with the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest by **all** of the following methods (4.1 – 4.5 to be treated conjunctively):

- 4.1 **Websites:** placing a copy of the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest on the Claimants' websites and Facebook pages; and

- 4.2 **Email:** sending a copy of this Order to Just Stop Oil, Youth Climate Swarm, Extinction Rebellion and Insulate Britain at the following email addresses: juststopoilpress@protonmail.com; youthclimateswarm@protonmail.com; press@extinctionrebellion.uk; insulatebritainpress@protonmail.com and providing a web link at which they can access the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order; and
- 4.3 **Post:** where an address of a named Defendant is known to the Claimants, by posting a copy of this Order together with a covering letter through the letterbox of the named Defendant's address (or by leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact that the package contains a court order. If the premises do not have a letterbox, or mailbox, or the package will not fit through the letterbox, a package may be left next to the front door and a notice containing this Order may be affixed to the front door marked with a notice drawing the recipient's attention to the fact that the package contains a court order and Claim Form and should be read urgently. The notices shall be given in the form set out in Schedule 2 to this Order; and
- 4.4 **Text messages:** sending a text message to any named Defendant for whom the Claimants have a mobile telephone number, notifying them that an injunction order has been granted against them with a power of arrest, and providing a web link at which the Defendant can access the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order. The notice shall be given in the form set out in Schedule 2 to this Order; and
- 4.5 **Placing signs:** on A-Road entry points and exit points to the administrative area of Thurrock, and within 50 metres of The Fuel Terminals and on the A130 and B1014 between the entrance to Canvey Island and the roundabout known as the Waterside Road roundabout on Canvey Island, stating that there is a High Court Injunction in place prohibiting protest on the highway and providing a web link and QR code at which the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest can be accessed; or
- 4.6 **Where requested:** the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest may be served by email where the Defendant has requested that they be served by email and by sending the email to the address provided by the Defendant; or
- 4.7 **Lawyers:** By serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.

5. The **deemed date of service** of any documents referred to in paragraph 4 above shall be the day on which service of the document or documents is completed in accordance with paragraph 4 above.
6. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission to serve the **223rd to the 229th Defendants** with the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order and the power of arrest by the methods in paragraphs 4.1, 4.2 and 4.5 above (to be read conjunctively).
7. The **deemed date of service** of any of the documents referred to in paragraph 6 above shall be the day on which service of the document or documents is completed in accordance with paragraph 6 above.
8. The Defendants shall acknowledge service of the Claim Form 21 days after the deemed date of service and file any written evidence in support of the Defence by the same date.

Further directions

9. The Defendants or any other person affected by this order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants' solicitors at the same time as the application is filed at court (and in any event not less than 48 hours before the hearing of any such application, not to include weekends or public holidays).
10. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time (to the extent they are not already so named).
11. The Claimant has permission to apply to extend or vary this Order or for further directions. The Claimant must serve any such application on those Defendants who have acknowledged service and provided an address for service.

Final hearing

12. The Claimants shall write to the Court within 28 days of judgment in the appeal of *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* (UKSC 2022/0046) being handed down (i) to inform the Court that judgment has been handed down and (ii) proposing directions to bring this Claim to final hearing. The Claimants shall copy that correspondence and the proposed directions to any Defendant who has acknowledged service of the Claim and provided an address for service.

Costs

13. Costs in the case.

GUIDANCE NOTES

Effect of this Order – the Defendants

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

Interpretation of this Order

2. In this Order references to ‘the Defendant’ means any or all of them (unless expressly stated otherwise).
3. A requirement to serve on ‘Defendant’ means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
4. An Order requiring ‘the Defendant’ not to do anything applies to all Defendants.
5. This Order contains the following schedules and annexes
 - (i) Schedule A-Undertakings;
 - (ii) Schedule B-Witness Statements;
 - (iii) Schedule 1-List of Named Defendants;
 - (iv) Schedule 2-Notices;
 - (v) Schedule 3-The Power of Arrest;
 - (vi) Annexe 1-The List of “The Roads” in Thurrock;
 - (vii) Annexe 2-The map of the Administrative Area of Thurrock; and
 - (viii) Annexe 3-The map of the Administrative Area of Essex.

Communications with the Court

6. All communications with the Court about this Order should be sent to Room E03, The Royal Courts of Justice, Strand, London, WC2A 2LL. The telephone number is 020 3938957. The offices are open between 10am and 4pm Monday to Friday.

SCHEDULE A-UNDERTAKINGS

1. The Claimants undertake to use reasonable endeavours to personally serve the named Defendants with a copy of this Order. In the event of alternative service, with the exception of paragraph 4.5 above, such shall be effected within 28 days of the date of this order.
2. The Claimants undertake to identify and name Defendants and apply to add them as named Defendants to this Order and the Claim as soon as reasonably practicable.

3. The Claimants undertake to amend within 14 days of this Order the second substantive sentence of the signs referred to in paragraph 4.5 of the Injunction Order above to read “PROTESTING ON THE HIGHWAY IS SUBJECT TO RESTRICTIONS AND THERE ARE SITES PROTECTED BY THE INJUNCTION”.

SCHEDULE B-WITNESS STATEMENTS

1. The Court read the following witness statements filed on behalf of the Claimants:
 - (a) The witness statement of Adewale Adesina 23.4.2022;
 - (b) The witness statement of Morgan Cronin 23.4.2022;
 - (c) The witness statement of Paul Crick 23.4.2022;
 - (d) The first witness statement of Adam Rulewski 24.4.2022;
 - (e) The second witness statement of Adam Rulewski dated 11.5.2022;
 - (f) The third witness statement of Adam Rulewski dated 16.5.2022;
 - (g) The fourth witness statement of Adam Rulewski dated 25.1.2023.

2. The Court read the following witness statements filed on behalf of the Sixty-Third Defendant:
 - (a) The first witness statement of Alice Hardy dated 9.5.2022;
 - (b) The witness statement of Ella Eason dated 9.5.2022;
 - (c) The witness statement of Jessica Branch dated 9.5.2022;
 - (d) The second witness statement of Alice Hardy dated 13.5.2022;
 - (e) The third witness statement of Alice Hardy dated 16.5.2022.

SCHEDULE 1-NAMED DEFENDANTS

1. Madeline Adams
2. Mary Adams
3. David Addy
4. Amber Alexandar
5. Mina-Mae Alexander
6. Eric Anderson
7. Christine Aslett
8. Nicholas Aslett
9. Lachlan Ayles
10. Stephanie Aylett
11. Pete Bailey
12. William Bajwa
13. Jeremy Banks
14. Colin Barrington
15. Kai Bartlett
16. Joshua Bates
17. Christopher Bennett
18. Gillian Bird
19. John Blanco
20. John Blewett
21. Poppy Bliss
22. Hilary Bond
23. Trevor Boulden
24. Geoffroy Bowman
25. Simon Bramwell
26. Joseph Bream
27. Scott Breen
28. Stephen Brett
29. Emily Brocklebank
30. Claire Brook
31. Emma Brooker
32. Michael Brown
33. Judith Bruce
34. Madeleine Budd
35. Tes Burns
36. Benjamin Buse
37. Catherine Cannon
38. Rebecca Cassar
39. Jessica Causby
40. Susan Chamberlayne
41. Sally Chapman
42. Vishal Chauhan
43. Katherine Chesterman
44. Phillipa Clarke
45. Oliver Clegg
46. Orla Coghlan
47. John Coghlan
48. Ruth Cook

49. Heather Cooper
50. Jasmine Corkhill Harris
51. Joy Susan Corrigan
52. Richard Crane
53. David Crawford
54. Rosemary Croft
55. Joseph Daldorph
56. Beverley Ann Daniel
57. Ben Delap
58. Gaie Delap
59. Gabriella Ditton
60. Igors Djomins
61. Laura Doehlei
62. Marguerite Doubleday
63. Ella Eason
64. Christine Essex
65. Janet Flynn
66. Michael Forton
67. Phoebe Frewer
68. Amy Friel
69. Robin Gardner
70. Cressida Gething
71. Alasdair Gibson
72. Hugo Glashier
73. Stephanie Golder
74. William Goldring
75. Xavier Gonzalez Trimmer
76. Alfie Goodland
77. Emma-Rose Goodwin
78. Sophie Greenland
79. Aaron Gunning
80. Louisa Hadden
81. Catherine Hallett
82. Finn Halsall
83. Jake Handling
84. Gareth Harper
85. Louise Harris
86. Patrick Hart
87. Yvonne Hayward
88. Selma Heimedinger
89. Jonathan Herbert
90. Noah Herfort
91. Suzanne Hetherington
92. Sarah Hirons
93. Rupert Horlick
94. Adrian Howlett
95. Eric Hoyland
96. Abigail Hubbucks
97. Hannah Hunt
98. Emma Ireland

99. Pavel Ivanov
100. Rik Jansen
101. Ruth Jarman
102. Stephen Jarvis
103. Russell Jarvis
104. John Johnson
105. Hannah Johnston
106. Timothy Jones
107. Pascale Kann
108. Hallum Kelly
109. Linda Latter
110. Charles Laurie
111. Peter Lay
112. Eben Lazarus
113. Isobel Lewis
114. Elanor Lewis-Holmes
115. Joseph Linheart
116. El Litten
117. Rebecca Lockyer
118. Felix Lozano
119. Barbara Lund
120. Jacqueline Macey
121. Catharine Maclean
122. Jacob Main
123. Elizabeth McCormack
124. Eilidh McFadden
125. Nathan McGovern
126. Louis McKechnie
127. Lilah McKim
128. Grace McMeekin
129. Adalaide Meaney
130. Anna Middleton
131. Hannah Miles
132. Benjamin Mitchell
133. Darcy Mitchell
134. Deborah Mitchell
135. Teddy Monroe
136. Fiona Moore
137. Stefania Morosi
138. Paul Morozzo
139. Virgenia Morris
140. Paul Morrison
141. Zak Mullen
142. Alexandra Mulvey
143. Reuben Mychalecky
144. Richard Newell-Price
145. Ben Newman
146. Alexander Newnham
147. Jessica Norgard
148. Rachel Norris

149. Rose Norris
150. George Oakenfold
151. Nicholas Onley
152. Jakub Pabiniak
153. Ella-Rose Paez
154. Sophie Page-Hall
155. Susan Parfitt
156. Dillon Parsons
157. Rose Patterson
158. Ethan Paul
159. Rosalind Pears
160. Abigail Percy-Ratcliff
161. Ursula Pethick
162. Jacqueline Phillips
163. Mitchel Phillips-White
164. Robert Possnett
165. Matthew Powell
166. Emily Price
167. Robert Price
168. Amy Pritchard
169. Felix Reeves-Whymark
170. Anna Retallack
171. Anne Richards
172. Bethan Roberts
173. Jasmin Robertson
174. Sebastian Roblyn
175. Isabel Rock
176. Elizabeth Rosser
177. Christian Rowe
178. Finn Roweth
179. Adelheid Russenberger
180. Isla Sandford
181. Daniel Sargison
182. James Sargison
183. Cat Scothorne
184. James Sebley
185. Rosa Sharkey
186. Sophie Sharples
187. Susan Sidey
188. James Skeet
189. Hannah Skwarska
190. Jacqueline Slade
191. Oliver Slaughter
192. David Smartknight
193. Heather Smith
194. Joshua Smyth
195. David Squire
196. Katherine Steer
197. Oliver Stevens
198. Madeleine Stewart

199. Ferdi Suleyman
200. Vivien Talbot
201. Ben Taylor
202. Jacqueline Teggin
203. Zachary Tenquist
204. David Thorneywork
205. Hannah Torrance-Bright
206. Lucy Trinder
207. Morgan Trowland
208. Jan Van Der Knapp
209. Rik Venhoutteghem
210. Sally Webber
211. Leonard Weber
212. Miranda Whelehan
213. Philip White
214. Edred Whittingham
215. Alexander Wilcox
216. Clare Wilson
217. Thomas Winter
218. Carol-Ann Wood
219. Lizia Woolf
220. Amorel Kennedy
221. Grace Lally
222. Morien Morgan

SCHEDULE 2-NOTICES

On the package containing this Order:

“VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWNLOAD IT FROM <https://www.thurrock.gov.uk/protest-injunction> OR CALL 020 7405 4600”

to affix to the front door when the package has been posted through the letterbox or placed in a mailbox:

“VERY URGENT: A PACKAGE HAS BEEN LEFT THAT CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWLOAD IT FROM <https://www.thurrock.gov.uk/protest-injunction> OR CALL 020 7405 4600”

For service by text message:

“VERY URGENT: A HIGH COURT INJUNCTION ORDER HAS BEEN MADE AGAINST YOU, THE LINK PROVIDED IN THIS TEXT MESSAGE CONTAINS AN ORDER OF THE HIGH COURT AND THE SUPPORTING DOCUMENTS RELIED UPON BY THE CLAIMANTS. YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL 020 7405 4600”

SCHEDULE 3-POWER OF ARREST

Power of arrest

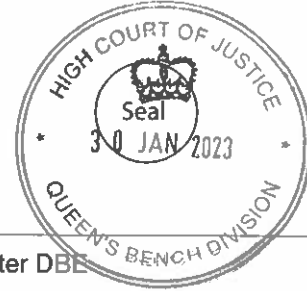
| | |
|---|------------------------------------|
| Name of court High Court of Justice King's Bench Division | Claim No. QB-2022-001317 |
| Claimant's name (including ref.) (1) Thurrock Council (2) Essex County Council | |
| Defendant's name (including ref.) (1) Madeline Adams (2)-(222) Other Named Defendants (223)-(229) Persons Unknown | |

Name of defendant

(1) Madeline Adams
(2)-(222) Other Named Defendants
(223)-(229) Persons Unknown (see continuation sheet)

Defendant's address

See attached continuation sheet



Date order made / / Name of judge

Order made under (insert statutory provision)

This order includes a power of arrest under (Insert statutory provision)

The relevant paragraphs of the order to which a power of arrest has been attached are:
(set out those paragraphs of the order to which the power of arrest is attached, if necessary continue on a separate sheet)

This power of arrest was ordered on / / and expires on the / /

Note to Arresting Officer

Where the defendant is arrested under the power given by section 155 of the Housing Act 1996, or section 27 of the Police and Justice Act 2006; or section 43 of the Policing and Crime Act 2009; or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014:-

- the defendant shall be brought before the judge within the period of 24 hours beginning at the time of their arrest;
- a constable shall inform the person on whose application the injunction was granted, forthwith where the defendant is arrested under the power given by section 155 of the Housing Act 1996 or as soon as reasonably practicable where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014.

Nothing in section 155 of the Housing Act 1996 or section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014, shall authorise the detention of the respondent after the expiry of the period of 24 hours beginning at the time of their arrest.

In calculating any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Name of Claimant

Claimant's address

Claimant's phone number

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

26 January 2023
Before Mrs Justice Foster DBE

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

(223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

Defendants

POWER OF ARREST: CONTINUATION SHEET

NAMES AND ADDRESSES OF DEFENDANTS

| Surname | Forename | Address | Defendant Number |
|----------------|-----------------|----------------|-------------------------|
| ADAMS | MADELINE | [REDACTED] | 1 |
| ADAMS | MARY | [REDACTED] | 2 |
| ADDY | DAVID | [REDACTED] | 3 |
| ALEXANDER | AMBER | [REDACTED] | 4 |
| ALEXANDER | MINA-MAE | [REDACTED] | 5 |
| ANDERSON | ERIC | [REDACTED] | 6 |

| | | | |
|-------------|-------------|------------|----|
| ASLETT | NICHOLAS | [REDACTED] | 8 |
| ASLETT | CHRISTINE | [REDACTED] | 7 |
| AYLES | LACHLAN | [REDACTED] | 9 |
| AYLETT | STEPHANIE | [REDACTED] | 10 |
| BAILEY | PETE | [REDACTED] | 11 |
| BAJWA | WILLIAM | [REDACTED] | 12 |
| BANKS | JEREMY | [REDACTED] | 13 |
| BARRINGTON | COLIN | [REDACTED] | 14 |
| BARTLETT | KAI | [REDACTED] | 15 |
| BATES | JOSHUA | [REDACTED] | 16 |
| BENNETT | CHRISTOPHER | [REDACTED] | 17 |
| BIRD | GILLIAN | [REDACTED] | 18 |
| BLANCO | JOHN | [REDACTED] | 19 |
| BLEWETT | JOHN | [REDACTED] | 20 |
| BLISS | POPPY | [REDACTED] | 21 |
| BOND | HILARY | [REDACTED] | 22 |
| BOULDEN | TREVOR | [REDACTED] | 23 |
| BOWMAN | GEOFFREY | [REDACTED] | 24 |
| BRAMWELL | SIMON | [REDACTED] | 25 |
| BREAM | JOSEPH | [REDACTED] | 26 |
| BREEN | SCOTT | [REDACTED] | 27 |
| BRETT | STEPHEN | [REDACTED] | 28 |
| BROCKLEBANK | EMILY | [REDACTED] | 29 |
| BROOK | CLAIRE | [REDACTED] | 30 |
| BROOKER | EMMA | [REDACTED] | 31 |

| | | | |
|-----------------|-----------|------------|----|
| BROWN | MICHAEL | [REDACTED] | 32 |
| BRUCE | JUDITH | [REDACTED] | 33 |
| BUDD | MADELEINE | [REDACTED] | 34 |
| BURNS | TES | [REDACTED] | 35 |
| BUSE | BENJAMIN | [REDACTED] | 36 |
| CANNON | CATHERINE | [REDACTED] | 37 |
| CASSAR | REBECCA | [REDACTED] | 38 |
| CAUSBY | JESSICA | [REDACTED] | 39 |
| CHAMBERLAYNE | SUSAN | [REDACTED] | 40 |
| CHAPMAN | SALLY | [REDACTED] | 41 |
| CHAUHAN | VISHAL | [REDACTED] | 42 |
| CHESTERMAN | KATHERINE | [REDACTED] | 43 |
| CLARKE | PHILIPPA | [REDACTED] | 44 |
| CLEGG | OLIVER | [REDACTED] | 45 |
| COGHLAN | ORLA | [REDACTED] | 46 |
| COGHLAN | JOHN | [REDACTED] | 47 |
| COOK | RUTH | [REDACTED] | 48 |
| COOPER | HEATHER | [REDACTED] | 49 |
| CORKHILL HARRIS | JASMINE | [REDACTED] | 50 |
| CORRIGAN | JOY SUSAN | [REDACTED] | 51 |
| CRANE | RICHARD | [REDACTED] | 52 |
| CRAWFORD | DAVID | [REDACTED] | 53 |
| CROFT | ROSEMARY | [REDACTED] | 54 |

| | | | |
|------------------|--------------|------------|----|
| DALDORPH | JOSEPH | [REDACTED] | 55 |
| DANIEL | BEVERLEY ANN | [REDACTED] | 56 |
| DELAP | BEN | [REDACTED] | 57 |
| DELAP | GAIE | [REDACTED] | 58 |
| DITTON | GABRIELLA | [REDACTED] | 59 |
| DJOMINS | IGORS | [REDACTED] | 60 |
| DOEHLEI | LAURA | [REDACTED] | 61 |
| DOUBLEDAY | MARGUERITE | [REDACTED] | 62 |
| EASON | ELLA | [REDACTED] | 63 |
| ESSEX | CHRISTINE | [REDACTED] | 64 |
| FLYNN | JANET | [REDACTED] | 65 |
| FORTON | MICHAEL | [REDACTED] | 66 |
| FREWER | PHOEBE | [REDACTED] | 67 |
| FRIEL | AMY | [REDACTED] | 68 |
| GARDNER | ROBIN | [REDACTED] | 69 |
| GETHING | CRESSIDA | [REDACTED] | 70 |
| GIBSON | ALASDAIR | [REDACTED] | 71 |
| GLASHIER | HUGO | [REDACTED] | 72 |
| GOLDER | STEPHANIE | [REDACTED] | 73 |
| GOLDRING | WILLIAM | [REDACTED] | 74 |
| GONZALEZ TRIMMER | XAVIER | [REDACTED] | 75 |
| GOODLAND | ALFIE | [REDACTED] | 76 |
| GOODWIN | EMMA-ROSE | [REDACTED] | 77 |
| GREENLAND | SOPHIE | [REDACTED] | 78 |
| GUNNING | AARON | [REDACTED] | 79 |
| HADDEN | LOUISA | [REDACTED] | 80 |

| | | | |
|--------------|-----------|------------|-----|
| HALLETT | CATHERINE | [REDACTED] | 81 |
| HALSALL | FINN | [REDACTED] | 82 |
| HANDLING | JAKE | [REDACTED] | 83 |
| HARPER | GARETH | [REDACTED] | 84 |
| HARRIS | LOUISE | [REDACTED] | 85 |
| HART | PATRICK | [REDACTED] | 86 |
| HAYWARD | YVONNE | [REDACTED] | 87 |
| HEIMEDINGER | SELMA | [REDACTED] | 88 |
| HERBERT | JONATHAN | [REDACTED] | 89 |
| HERFORT | NOAH | [REDACTED] | 90 |
| HETHERINGTON | SUZANNE | [REDACTED] | 91 |
| HIRONS | SARAH | [REDACTED] | 92 |
| HORLICK | RUPERT | [REDACTED] | 93 |
| HOWLETT | ADRIAN | [REDACTED] | 94 |
| HOYLAND | ERIC | [REDACTED] | 95 |
| HUBBUCKS | ABIGAIL | [REDACTED] | 96 |
| HUNT | HANNAH | [REDACTED] | 97 |
| IRELAND | EMMA | [REDACTED] | 98 |
| IVANOV | PAVEL | [REDACTED] | 99 |
| JANSEN | RIK | [REDACTED] | 100 |
| JARMAN | RUTH | [REDACTED] | 101 |
| JARVIS | STEPHEN | [REDACTED] | 102 |
| JARVIS | RUSSELL | [REDACTED] | 103 |
| JOHNSON | JOHN | [REDACTED] | 104 |

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|--------------|------------|------------|-----|
| JOHNSTON | HANNAH | [REDACTED] | 105 |
| JONES | TIMOTHY | [REDACTED] | 106 |
| KANN | PASCALE | [REDACTED] | 107 |
| KELLY | HALLUM | [REDACTED] | 108 |
| LATTER | LINDA | [REDACTED] | 109 |
| LAURIE | CHARLES | [REDACTED] | 110 |
| LAY | PETER | [REDACTED] | 111 |
| LAZARUS | EBEN | [REDACTED] | 112 |
| LEWIS | ISOBEL | [REDACTED] | 113 |
| LEWIS-HOLMES | ELANOR | [REDACTED] | 114 |
| LINHART | JOSEPH | [REDACTED] | 115 |
| LITTEN | EL | [REDACTED] | 116 |
| LOCKYER | REBECCA | [REDACTED] | 117 |
| LOZANO | FELIX | [REDACTED] | 118 |
| LUND | BARBARA | [REDACTED] | 119 |
| MACEY | JACQUELINE | [REDACTED] | 120 |
| MACLEAN | CATHERINE | [REDACTED] | 121 |
| MAIN | JACOB | [REDACTED] | 122 |
| MCCORMACK | ELIZABETH | [REDACTED] | 123 |
| MCFADDEN | EILIDH | [REDACTED] | 124 |
| MCGOVERN | NATHAN | [REDACTED] | 125 |
| MCKECHNIE | LOUIS | [REDACTED] | 126 |
| MCKIM | LILAH | [REDACTED] | 127 |
| MCMEEKIN | GRACE | [REDACTED] | 128 |
| MEANEY | ADALAIDE | [REDACTED] | 129 |

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|--------------|-----------|------------|-----|
| MIDDLETON | ANNA | [REDACTED] | 130 |
| MILES | HANNAH | [REDACTED] | 131 |
| MITCHELL | DARCY | [REDACTED] | 133 |
| MITCHELL | BENJAMIN | [REDACTED] | 132 |
| MITCHELL | DEBORAH | [REDACTED] | 134 |
| MONROE | TEDDY | [REDACTED] | 135 |
| MOORE | FIONA | [REDACTED] | 136 |
| MOROSI | STEFANIA | [REDACTED] | 137 |
| MOROZZO | PAUL | [REDACTED] | 138 |
| MORRIS | VIRGENIA | [REDACTED] | 139 |
| MORRISON | PAUL | [REDACTED] | 140 |
| MULLEN | ZAK | [REDACTED] | 141 |
| MULVEY | ALEXANDRA | [REDACTED] | 142 |
| MYCHALECKYJ | REUBEN | [REDACTED] | 143 |
| NEWELL-PRICE | RICHARD | [REDACTED] | 144 |
| NEWMAN | BEN | [REDACTED] | 145 |
| NEWNHAM | ALEXANDER | [REDACTED] | 146 |
| NORGARD | JESSICA | [REDACTED] | 147 |
| NORRIS | RACHEL | [REDACTED] | 148 |
| NORRIS | ROSE | [REDACTED] | 149 |
| OAKENFOLD | GEORGE | [REDACTED] | 150 |
| ONLEY | NICHOLAS | [REDACTED] | 151 |
| PABINIAK | JAKUB | [REDACTED] | 152 |
| PAEZ | ELLA-ROSE | [REDACTED] | 153 |

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|----------------|------------|------------|-----|
| PAGE HALL | SOPHIE | [REDACTED] | 154 |
| PARFITT | SUSAN | [REDACTED] | 155 |
| PARSONS | DILLON | [REDACTED] | 156 |
| PATTERSON | ROSE | [REDACTED] | 157 |
| PAUL | ETHAN | [REDACTED] | 158 |
| PEARS | ROSALIND | [REDACTED] | 159 |
| PERCY-RATCLIFF | ABIGAIL | [REDACTED] | 160 |
| PETHICK | URSULA | [REDACTED] | 161 |
| PHILLIPS | JACQUELINE | [REDACTED] | 162 |
| PHILLIPS-WHITE | MITCHEL | [REDACTED] | 163 |
| POSSNETT | ROBERT | [REDACTED] | 164 |
| POWELL | MATTHEW | [REDACTED] | 165 |
| PRICE | ROBERT | [REDACTED] | 167 |
| PRICE | EMILY | [REDACTED] | 166 |
| PRITCHARD | AMY | [REDACTED] | 168 |
| REEVES-WHYMARK | FELIX | [REDACTED] | 169 |
| RESTALLACK | ANNA | [REDACTED] | 170 |
| RICHARDS | ANNE | [REDACTED] | 171 |
| ROBERTS | BETHAN | [REDACTED] | 172 |
| ROBERTSON | JASMIN | [REDACTED] | 173 |
| ROBLYN | SEBASTIAN | [REDACTED] | 174 |
| ROCK | ISABEL | [REDACTED] | 175 |

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|--------------|------------|------------|-----|
| ROSSER | ELIZABETH | [REDACTED] | 176 |
| ROWE | CHRISTIAN | [REDACTED] | 177 |
| ROWETH | FINN | [REDACTED] | 178 |
| RUSSENBERGER | ADELHEID | [REDACTED] | 179 |
| SANDFORD | ISLA | [REDACTED] | 180 |
| SARGISON | DANIEL | [REDACTED] | 181 |
| SARGISON | JAMES | [REDACTED] | 182 |
| SCOTHORNE | CAT | [REDACTED] | 183 |
| SEBLEY | JAMES | [REDACTED] | 184 |
| SHARKEY | ROSA | [REDACTED] | 185 |
| SHARPLES | SOPHIE | [REDACTED] | 186 |
| SIDEY | SUSAN | [REDACTED] | 187 |
| SKEET | JAMES | [REDACTED] | 188 |
| SKWARSKA | HANNAH | [REDACTED] | 189 |
| SLADE | JACQUELINE | [REDACTED] | 190 |
| SLAUGHTER | OLIVER | [REDACTED] | 191 |
| SMARTKNIGHT | DAVID | [REDACTED] | 192 |
| SMITH | HEATHER | [REDACTED] | 193 |
| SMYTH | JOSHUA | [REDACTED] | 194 |
| SQUIRE | DAVID | [REDACTED] | 195 |
| STEER | KATHERINE | [REDACTED] | 196 |
| STEVENS | OLIVER | [REDACTED] | 197 |
| STEWART | MADELEINE | [REDACTED] | 198 |

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|-----------------|------------|------------|-----|
| SULEYMAN | FERDI | [REDACTED] | 199 |
| TALBOT | VIVIEN | [REDACTED] | 200 |
| TAYLOR | BEN | [REDACTED] | 201 |
| TEGGIN | JACQUELINE | [REDACTED] | 202 |
| TENQUIST | ZACHARY | [REDACTED] | 203 |
| THORNEYWORK | DAVID | [REDACTED] | 204 |
| TORRANCE-BRIGHT | HANNAH | [REDACTED] | 205 |
| TRINDER | LUCY | [REDACTED] | 206 |
| TROWLAND | MORGAN | [REDACTED] | 207 |
| VAN DER KNAAP | JAN | [REDACTED] | 208 |
| VANHOUTTEGHEM | RIK | [REDACTED] | 209 |
| WEBBER | SALLY | [REDACTED] | 210 |
| WEBER | LEONARD | [REDACTED] | 211 |
| WHELEHAN | MIRANDA | [REDACTED] | 212 |
| WHITE | PHILIP | [REDACTED] | 213 |
| WHITTINGHAM | EDRED | [REDACTED] | 214 |
| WILCOX | ALEXANDER | [REDACTED] | 215 |
| WILSON | CLARE | [REDACTED] | 216 |
| WINTER | THOMAS | [REDACTED] | 217 |
| WOOD | CAROL-ANN | [REDACTED] | 218 |
| WOOLF | LIZIA | [REDACTED] | 219 |

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|--|--------|------------|-----|
| KENNEDY | AMOREL | [REDACTED] | 220 |
| LALLY | GRACE | [REDACTED] | 221 |
| MORGAN | MORIEN | [REDACTED] | 222 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM | | | 223 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM | | | 224 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM) | | | 225 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM) | | | 226 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM) | | | 227 |
| PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM) | | | 228 |
| PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY | | | 229 |

THE RELEVANT PARAGRAPHS OF THE ORDER TO WHICH A POWER OF ARREST HAVE BEEN ATTACHED ARE:

Paragraphs 2.1 to 2.16 of the Order of Mrs Justice Foster DBE dated 26 January 2023:

2. The Defendants and each of them (whether by themselves or by instructing, encouraging or allowing any other person) are forbidden from:
 - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
 - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
 - 2.3 Entering, climbing onto, climbing into, climbing under any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
 - 2.4 Entering, climbing onto, climbing into, climbing under any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
 - 2.5 Affixing themselves (“locking on”) to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.
 - 2.6 Affixing themselves (“locking on”) to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the “locking on” is for the purpose of protesting.
 - 2.7 Affixing themselves (“locking on”) or any other items to any of the Roads or any other person or object on, under or over the Roads.
 - 2.8 Affixing themselves (“locking on”) or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the “locking on” is for the purpose of protesting.
 - 2.9 Erecting any structure on the Roads.
 - 2.10 Tunnelling, excavating, drilling or digging under or adjacent to the Roads.
 - 2.11 Occupying existing tunnels under the Roads for the purpose of protesting.
 - 2.12 Causing damage to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.
 - 2.13 Abandoning any vehicle or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.

- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station forecourt or access road, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by delivery tankers of fuel supplies and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.

**For Annexes 1-3 please see pages 31 to 48 of
Exhibit AA2/1**

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

**(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE
CLAIM FORM**

(223)-(229) PERSONS UNKNOWN

Defendants

EXHIBIT AA2/4

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

The Honourable Mrs Justice Jefford DBE
20th December 2023

B E T W E E N :

- (1) THURROCK COUNCIL
(2) ESSEX COUNTY COUNCIL



QB-2022-001317
Claimants

-and-

- (1) MADELINE ADAMS
- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)
- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH

VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

Defendants

DIRECTIONS ORDER

UPON the Claimants writing to the Court within 28 days of the judgement of the Supreme Court in *Wolverhampton City Council & Ors v Persons Unknown & Ors* [2023] UKSC 47, in accordance with paragraph 12 of the Order of the Honourable Mrs Justice Foster DBE dated 26 January 2023

AND UPON the Court considering that correspondence (with the proposed directions) on the papers and without a hearing

IT IS ORDERED THAT:

Directions

1. The Parties shall by 4.30pm on 27 March 2024 make all additional applications (if any) required to enable the trial to take place.
2. A case management hearing shall be listed on 19 April 2024 with a time estimate of 1 day to deal with all extant applications and set directions to final hearing on the first practicable date thereafter.

Power of arrest

3. The power of arrest provided for at paragraph 3 of the Order of the Honourable Mrs Justice Foster DBE shall continue until the case management hearing listed at paragraph 2 above.

Alternative service

4. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission, in addition to personal service, or in the alternative to personal service, to serve the **1st to 222nd Defendants** and any further named Defendants with this Order (4.1 – 4.5 to be treated conjunctively) by:

- 4.1. **Websites:** placing a copy of this Order on the Claimants' websites and Facebook pages; and

- 4.2. **Email:** sending a copy of this Order to Just Stop Oil, Youth Climate Swarm, Extinction Rebellion and Insulate Britain at the following email addresses: juststopoilpress@protonmail.com; youthclimateswarm@protonmail.com; press@extinctionrebellion.uk; insulatebritainpress@protonmail.com

and providing a web link at which they can access this Order; and

- 4.3. **Post:** where an address of a named Defendant is known to the Claimants, by posting a copy of this Order together with a covering letter through the letterbox of the named Defendant's address (or by leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact that the package contains a court order. If the premises do not have a letterbox, or mailbox, or the package will not fit through the letterbox, a package may be left next to the front door and a notice containing this Order may be affixed to the front door marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The notices shall be given in the form set out in Schedule 2 to this Order; and

- 4.4. **Text messages:** sending a text message to any named Defendant for whom the Claimants have a mobile telephone number, notifying them that an injunction order has been granted against them with a power of arrest, and providing a web link at which the Defendant can access this Order. The notice shall be given in the form set out in Schedule 2 to this Order; and

- 4.5. **Placing signs:** on A-Road entry points and exit points to the administrative area of Thurrock, and within 50 metres of The Fuel Terminals and on the A130 and B1014 between the entrance to Canvey Island and the roundabout known as the Waterside Road roundabout on Canvey Island, stating that there is a High Court Injunction in place prohibiting protest on the highway and providing a web link and QR code at which this Order; or

- 4.6. **Where requested:** this Order may be served by email where the Defendant has requested that they be served by email and by sending the email to the address provided by the Defendant; or

4.7. **Lawyers:** By serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.

5. The **deemed date of service** of any documents referred to in paragraph 4 above shall be the day on which service of the document or documents is completed in accordance with paragraph 4 above.
6. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission to serve the **223rd to the 229th Defendants** with this Order by the methods in paragraphs 4.1, 4.2 and 4.5 above (to be read conjunctively).
7. The **deemed date of service** of any of the documents referred to in paragraph 6 above shall be the day on which service of the document or documents is completed in accordance with paragraph 6 above.

Further directions

8. The Defendants or any other person affected by this order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants' solicitors at the same time as the application is filed at court (and in any event not less than 48 hours before the hearing of any such application, not to include weekends or public holidays).
9. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time (to the extent they are not already so named).
10. The Claimant has permission to apply to extend or vary this Order or for further directions. The Claimant must serve any such application on those Defendants who have acknowledged service and provided an address for service.

Costs

11. Costs in the case.

SCHEDULE 1-NAMED DEFENDANTS

1. Madeline Adams
2. Mary Adams
3. David Addy
4. Amber Alexandar
5. Mina-Mae Alexander
6. Eric Anderson
7. Christine Aslett
8. Nicholas Aslett
9. Lachlan Ayles
10. Stephanie Aylett
11. Pete Bailey
12. William Bajwa
13. Jeremy Banks
14. Colin Barrington
15. Kai Bartlett
16. Joshua Bates
17. Christopher Bennett
18. Gillian Bird
19. John Blanco
20. John Blewett
21. Poppy Bliss
22. Hilary Bond
23. Trevor Boulden
24. Geoffroy Bowman
25. Simon Bramwell
26. Joseph Bream
27. Scott Breen
28. Stephen Brett
29. Emily Brocklebank
30. Claire Brook
31. Emma Brooker
32. Michael Brown
33. Judith Bruce
34. Madeleine Budd
35. Tes Burns
36. Benjamin Buse
37. Catherine Cannon
38. Rebecca Cassar
39. Jessica Causby
40. Susan Chamberlayne
41. Sally Chapman
42. Vishal Chauhan
43. Katherine Chesterman
44. Phillipa Clarke
45. Oliver Clegg
46. Orla Coghlan
47. John Coghlan
48. Ruth Cook

49. Heather Cooper
50. Jasmine Corkhill Harris
51. Joy Susan Corrigan
52. Richard Crane
53. David Crawford
54. Rosemary Croft
55. Joseph Daldorph
56. Beverley Ann Daniel
57. Ben Delap
58. Gaie Delap
59. Gabriella Ditton
60. Igors Djomins
61. Laura Doehlei
62. Marguerite Doubleday
63. Ella Eason
64. Christine Essex
65. Janet Flynn
66. Michael Forton
67. Phoebe Frewer
68. Amy Friel
69. Robin Gardner
70. Cressida Gething
71. Alasdair Gibson
72. Hugo Glashier
73. Stephanie Golder
74. William Goldring
75. Xavier Gonzalez Trimmer
76. Alfie Goodland
77. Emma-Rose Goodwin
78. Sophie Greenland
79. Aaron Gunning
80. Louisa Hadden
81. Catherine Hallett
82. Finn Halsall
83. Jake Handling
84. Gareth Harper
85. Louise Harris
86. Patrick Hart
87. Yvonne Hayward
88. Selma Heimedinger
89. Jonathan Herbert
90. Noah Herfort
91. Suzanne Hetherington
92. Sarah Hirons
93. Rupert Horlick
94. Adrian Howlett
95. Eric Hoyland
96. Abigail Hubbucks
97. Hannah Hunt
98. Emma Ireland

99. Pavel Ivanov
100. Rik Jansen
101. Ruth Jarman
102. Stephen Jarvis
103. Russell Jarvis
104. John Johnson
105. Hannah Johnston
106. Timothy Jones
107. Pascale Kann
108. Hallum Kelly
109. Linda Latter
110. Charles Laurie
111. Peter Lay
112. Eben Lazarus
113. Isobel Lewis
114. Elanor Lewis-Holmes
115. Joseph Linheart
116. El Litten
117. Rebecca Lockyer
118. Felix Lozano
119. Barbara Lund
120. Jacqueline Macey
121. Catharine Maclean
122. Jacob Main
123. Elizabeth McCormack
124. Eilidh McFadden
125. Nathan McGovern
126. Louis McKechnie
127. Lilah McKim
128. Grace McMeekin
129. Adalaide Meaney
130. Anna Middleton
131. Hannah Miles
132. Benjamin Mitchell
133. Darcy Mitchell
134. Deborah Mitchell
135. Teddy Monroe
136. Fiona Moore
137. Stefania Morosi
138. Paul Morozzo
139. Virgenia Morris
140. Paul Morrison
141. Zak Mullen
142. Alexandra Mulvey
143. Reuben Mychalecky
144. Richard Newell-Price
145. Ben Newman
146. Alexander Newnham
147. Jessica Norgard
148. Rachel Norris

149. Rose Norris
150. George Oakenfold
151. Nicholas Onley
152. Jakub Pabiniak
153. Ella-Rose Paez
154. Sophie Page-Hall
155. Susan Parfitt
156. Dillon Parsons
157. Rose Patterson
158. Ethan Paul
159. Rosalind Pears
160. Abigail Percy-Ratcliff
161. Ursula Pethick
162. Jacqueline Phillips
163. Mitchel Phillips-White
164. Robert Possnett
165. Matthew Powell
166. Emily Price
167. Robert Price
168. Amy Pritchard
169. Felix Reeves-Whymark
170. Anna Retallack
171. Anne Richards
172. Bethan Roberts
173. Jasmin Robertson
174. Sebastian Roblyn
175. Isabel Rock
176. Elizabeth Rosser
177. Christian Rowe
178. Finn Roweth
179. Adelheid Russenberger
180. Isla Sandford
181. Daniel Sargison
182. James Sargison
183. Cat Scothorne
184. James Sebley
185. Rosa Sharkey
186. Sophie Sharples
187. Susan Sidey
188. James Skeet
189. Hannah Skwarska
190. Jacqueline Slade
191. Oliver Slaughter
192. David Smartknight
193. Heather Smith
194. Joshua Smyth
195. David Squire
196. Katherine Steer
197. Oliver Stevens
198. Madeleine Stewart

199. Ferdi Suleyman
200. Vivien Talbot
201. Ben Taylor
202. Jacqueline Teggim
203. Zachary Tenquist
204. David Thorneywork
205. Hannah Torrance-Bright
206. Lucy Trinder
207. Morgan Trowland
208. Jan Van Der Knapp
209. Rik Venhoutteghem
210. Sally Webber
211. Leonard Weber
212. Miranda Whelehan
213. Philip White
214. Edred Whittingham
215. Alexander Wilcox
216. Clare Wilson
217. Thomas Winter
218. Carol-Ann Wood
219. Lizia Woolf
220. Amorel Kennedy
221. Grace Lally
222. Morien Morgan

SCHEDULE 2-NOTICES

On the package containing this Order:

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to affix to the front door when the package has been posted through the letterbox or placed in a mailbox:

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