

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

Claim No. QB-2022-001317

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) VARIOUS DEFINED CATEGORIES OF PERSONS UNKNOWN

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

Defendants

EXHIBIT AA5/6

**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)

**The Honourable Mrs Justice Collins Rice DBE CB
19 April 2024**

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
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**(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,
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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 application of the Claimants dated 27 March 2024 (the ‘Application’), made in accordance with the Order of the Honourable Mrs Justice Jefford DBE dated 20 December 2023 and by which the Claimants seek (i) to add 33 named Defendants to the Claim for injunctive relief, (ii) to continue the power of arrest in the interim injunction Order pending the final hearing of the Claim, (iii) to discontinue against the Seventy-Fifth Defendant (in so far as it is necessary to do so) and (iv) directions to final hearing

AND UPON the Court being informed that 204 of the 222 existing named Defendants have settled the proceedings by way of an undertaking

AND UPON the Court being informed that 16 of the 33 proposed new named Defendants have consented to their addition to the Claim as defendants and have settled the proceedings by way of an undertaking

AND UPON hearing Natalie Pratt of counsel for the Claimants and no Defendant either appearing or being represented (but the Twenty-Sixth, Twenty-Eighth and the One-Hundred and Seventy-First Defendants being present and observing)

AND UPON the Court being satisfied that the Defendants and proposed new Defendants have been served with the Application and that the hearing should proceed in their absence, but noting that those persons who are affected by this Order (including but not limited to those persons who are being added as Defendants to the Claim) may apply pursuant to Civil Procedure Rule 40.9 to vary or discharge this Order in so far as it affects them

IT IS ORDERED THAT:

Addition of further Defendants

1. The Claimants are permitted to add the persons named at Schedule 2 of this Order as Defendants to the proceedings (the ‘**Additional Defendants**’) where those persons have not been added by consent, and are permitted to amend the Claim Form accordingly.
2. The Claimants shall serve on the **Additional Defendants** the Amended Claim Form (in which the Additional Defendants are named) within 21 days of this Order. Service of the Amended Claim Form on the **1st to 229th Defendants** is dispensed with.

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 of the Order of the Honourable Mrs Justice Foster DBE dated 26 January 2023 in the form attached at Schedule 3 to this Order. The power of arrest, in so far as it relates to the named Defendants, shall expire on the final determination of the Claim against the named Defendants. The power of arrest, in so far as it relates to Persons Unknown, shall expire upon the making of the consequential Order following the review hearing provided for at paragraph 5 below.

Discontinuance

4. The Claimants are permitted to discontinue the Claim against the Seventy-Fifth Defendant, Xavier Gonzalez Trimmer, and the interim injunction dated 26 January 2023 is discharged against the Seventy-Fifth Defendant (only) accordingly.

Further directions: Persons Unknown

5. A hearing shall be listed on **12 July 2024** with a time estimate of one day (a further ½ day should be allocated for judicial pre-reading) at which the continuation of the injunction of the Honourable Mrs Justice Foster DBE dated 26 January 2023 shall be reviewed in so far as it relates to Persons Unknown only.
6. The Claimants shall file and serve, and any person who may be affected by the injunction Order may (if so advised) file and serve on the Claimants, any evidence upon which they wish to rely at the review hearing by 4.30pm on 28 June 2024.
7. The Claimants shall file and serve a hearing bundle 7 days before the date of the review hearing. The Claimants need only serve those persons who have indicated that they intend to participate in the review hearing (if any).

8. Skeleton arguments shall be filed and served 3 days before the date of the review hearing. The Claimants need only serve those persons who have indicated that they intend to participate in the review hearing (if any).

Further directions: named Defendants

9. The Claimants shall file and serve any evidence upon which they will seek to rely at the disposal of the Claim by 4.30pm on 14 August 2024.
10. The Defendants shall file and serve any evidence upon which they will seek to rely at the disposal of the Claim by 4.30pm on 11 September 2024.
11. The Claimants may (if so advised) file and serve any evidence in reply by 4.30pm on 25 September 2024.
12. The final hearing of the Claim shall be listed on **9 October 2024** with a time estimate of one day. A further ½ day should be allocated for judicial pre-reading. In the event that the time estimate requires revision (whether upwards or downwards), the Claimants shall inform the Court as soon as it is reasonably practicable to do so.
13. The Claimants shall file and serve a hearing bundle 7 days before the date of the final hearing. The Claimants need only serve those named Defendants who have acknowledged service of the Claim and/or filed evidence in defence of the Claim or indicated that they intend to participate in the final hearing of the Claim (if any).
14. Skeleton arguments shall be filed and served 3 days before the date of the final hearing. The Claimants need only serve those named Defendants who have acknowledged service of the Claim and/or filed evidence in defence of the Claim or indicated that they intend to participate in the final hearing of the Claim (if any).
15. Solicitors for the Claimants shall liaise with the KB Judges Listing Office as to the audio-visual technology required at the trial of the Claim (if any).

Alternative service

16. 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**, the **230th to 262nd Defendants** and any further named Defendants with the Amended Claim Form (where applicable), the Application and evidence in support, all further evidence in the Claim and this Order and the power of arrest (16.1 – 16.5 to be treated conjunctively):

16.1. **Websites:** placing a copy of the documents to be served on the Claimants' websites and Facebook pages; and

16.2. **Email:** sending a copy of the documents to be served 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 documents to be served; and

- 16.3. **Post:** where an address of a named Defendant is known to the Claimants, by posting a copy of the documents to be served together with a covering letter by way of first-class post;
 - 16.4. **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 sought and/or granted against them with a power of arrest (as applicable), and providing a web link at which the Defendant can access the documents to be served;
 - 16.5. **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 documents to be served can be found; or
 - 16.6. **Where requested:** the documents to be served may be served by email where the Defendant has requested that they be served by email, by sending the email to the address provided by the Defendant; or
 - 16.7. **Lawyers:** By serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
17. The **deemed date of service** of any documents referred to in paragraph 16 above shall be the day on which service of the document or documents is completed in accordance with paragraph 16 above.
18. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission to serve the **223rd to the 229th Defendants** with the Application and evidence in support, all further evidence in the Claim and this Order and the power of arrest by the methods in paragraphs 16.1, 16.2 and 16.5 above (to be read conjunctively).
19. The **deemed date of service** of any of the documents referred to in paragraph 18 above shall be the day on which service of the document or documents is completed in accordance with paragraph 18 above.

Liberty to Apply

20. The Claimants and Defendants (or anyone notified of this Order) may apply to the Court on 72 hours written notice to all parties to these proceedings and their legal advisers to vary or discharge this Order (or so much of it as affects that person).

Costs

21. No order as to costs on the Application to discontinue against the Seventy-Fifth Defendant.
22. Save for the above, 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 Tegg
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 – ADDITIONAL DEFENDANTS

230	Alice Wharrie
231	Anne Hart*
232	Anthony Whitehouse*
233	Callum Goode
234	Caroline Cattermole*
235	[Not used]
236	Christopher Hardy
237	David Nixon
238	Isabel Walters*
239	Jade Calland*
240	Jane Touil*
241	Joe Howlett
242	John Jordan
243	Jonathan Coleman*
244	Judy Judkins*
245	Karan Wildin
246	Kayleigh Matthews
247	Larch Maxey
248	Lindsay Hart*
249	Margaret Reid
250	Mia Powell*
251	Phoebe Plummer
252	Sam Parry Holland
253	Samuel Johnson
254	Sarah MacDonald*
255	Seiriol Davies
256	Simon Reding
257	Stephen Gingell
258	Suzie Webb*
259	Victoria Lindsell*
260	Wendy Cocks*
261	Diana Martin*
262	Tony Muir*

* indicates those persons who were added to the proceedings by consent independent of this Order

SCHEDULE 3 – POWER OF ARREST

N110A

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
 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 (see continuation sheet)



Date order made 19/04/2024

Name of judge Mrs Justice Collins Rice DBE

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 Mrs Justice Foster dated 26 January 2023 (see attached continuation sheet)

The power of arrest, in so far as it relates to the named Defendants, shall expire on the final determination of the Claim against the named Defendants. The power of arrest, in so far as it relates to Persons Unknown, shall expire upon the making of the consequential Order following the review hearing listed for 12 July 2024.

This power of arrest was ordered on 19/04/2024

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

(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
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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)

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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
AYLETT	STEPHANIE		10
BREEN	SCOTT		27
BUDD	MADELEINE		34
BURNS	TES		35
DJOMINS	IGORS		60
GETHING	CRESSIDA		70
GIBSON	ALASDAIR		71
HANDLING	JAKE		83
HARPER	GARETH		84

HOYLAND	ERIC		95
IRELAND	EMMA		98
LAURIE	CHARLES		110
LOZANO	FELIX		118
MEANEY	ADALAIDE		129
ROBLYN	SEBASTIAN		174
SKWARSKA	HANNAH		189
TORRANCE-BRIGHT	HANNAH		205
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
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ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)	
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.