

**IN THE HIGH COURT OF JUSTICE
KINGS'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

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

Defendants

FIFTH WITNESS STATEMENT OF ADAM RULEWSKI

I, **ADAM RULEWSKI**, an employed barrister in the Legal Services Department at the London Borough of Barking and Dagenham, will say as follows –

1. I am a barrister employed by the Legal Services Department at the London Borough of Barking and Dagenham. I represent the First Claimant, Thurrock Council (the ‘Council’ hereafter) in these proceedings. I am also authorised to make this statement on behalf of the Second Claimant, Essex County Council.
2. 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 correspondence with the Claimants' external legal representatives.

3. There is exhibited to this statement a document marked 'AR5'.

Statement by Just Stop Oil

4. I exhibit at **AR5/1** a pdf copy of the following webpage from the Just Stop Oil website: <https://juststopoil.org/2024/07/10/paint-the-town-orange-just-stop-oil-wins-first-demand/>. The webpage appears in the 'press releases' section of the Just Stop Oil website, and is a news article dated 10 July 2024.
5. In that article, Just Stop Oil details how four of its supporters poured orange paint across three intersections of Parliament Square on the morning of 10 July 2024. According to the article, the action was taken following the election and formation of a Labour government, which has committed to ending oil and gas licensing, that being a core demand of Just Stop Oil (hence the statement that Just Stop Oil has 'won' its demand).
6. However, the article also goes on to explain that the meeting of the demand for no new oil and gas licensing is not enough; Just Stop Oil now also demand internationally co-ordinated action to phase out fossil fuels and end the extraction and burning of oil, coal and gas by 2030. The article ends with Just Stop Oil pledging keep pursuing direct action until its demands are met, and expressly states:

This summer, areas of key importance to the fossil fuel economy will be declared sites of civil resistance around the world. Sign up to take action at juststopoil.org.

Stansted Airport injunction

7. It has today (11 July 2024) come to my attention that Stansted Airport sought and obtained injunctive relief against Persons Unknown to prevent acts of direct-action protest at the airport (including acts of trespass, locking on and obstruction).

8. I exhibit at **AR5/2** a copy of the Order of HHJ Coe KC of the King's Bench Division, dated 5 July 2024.

9. In light of this Order, it is even more likely that protestors will be displaced from Stansted Airport, and instead target the oil terminals housed in the Borough and County (especially those that supply the aviation industry), and the surrounding roads and infrastructure. As such, I respectfully submit that it is necessary that the Claimants' Injunction Order is continued, as sought.

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: Arulewski

Adam Rulewski

Dated: 11 July 2024

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Defendants

EXHIBIT "AR5/1"



'Paint the town orange!' – Just Stop Oil wins first demand

Press / July 10, 2024

Four Just Stop Oil supporters have painted Parliament Square orange to celebrate winning Just Stop Oil's

Support
Just Stop Oil

Donate

Join Our
Mailing List

EMAIL
SUBSCRIPTION
FORM

Browser window showing the website <https://juststopoil.org/2024/07/10/paint-the-town-orange-just-stop-oil-wins-first-demand/>. The page features a navigation bar with links for **Get involved**, **Donate**, **News & Press**, **FORM**, and **Law**.

The main content area contains the following text:

Four Just Stop Oil supporters have painted Parliament Square orange to celebrate winning Just Stop Oil's original demand, that the UK Government commit to ending all new licences and consents for fossil fuel exploration and extraction. [1]

At around 8:30 this morning, four supporters began pouring orange cornstarch-based children's powder-paint across three intersections leading into Parliament Square. Cars proceeded to drive through the paint spreading it around the road that encircles the square.


One of those taking action this morning is Sheila Shatford, 69, an NHS nurse and grandmother from Bristol, who said:

"Just Stop Oil has won their demand for no new oil and gas, however this is not enough. Now we must demand internationally coordinated action to phase out fossil fuels. Labour must commit to cancelling all oil and gas licences granted by the Tories in their final arson spree before they left office."

"To our new government: we have put our trust in you to keep us safe. It's time to work with other countries to sign an international, legally binding treaty to end the extraction and burning of oil, gas and coal by 2030. Oil Kills. It's time to protect our country and our communities. Sign the treaty!"

Today's action comes in the wake of the new governments' commitment to end new oil and gas licensing, in line with Just Stop Oil's original demand, which was first issued to the UK government on 14th February 2022. During April and August 2022, Just Stop Oil supporters engaged in two rounds of disrupting the flow of oil out of key terminals around the country, causing many service stations to run out of petrol and diesel. By the 25th September 2022, the Financial Times reported Keir Starmer had pledged to end new oil and gas. This was reaffirmed on the 24th Oct 2022 when Just Stop Oil supporter, Fiona Atkinson, spoke to Keir Starmer on Nick Ferrari's program on LBC, where the Labour leader re-stated his commitment to ending new oil and gas. Throughout 2022, mentions of 'Just Stop Oil' were up 400% and the campaign reached 92% name recognition nationally by November 2022. [2][3]

The right-hand side of the page features a registration form with the following fields and options:

- Email *
- First Name *
- Mobile Number *, 074 
- I'm happy to get occasional texts and calls about specific actions or about events I've signed up to.
- [Not in GB?](#)
- SUBMIT**
- Opt in to email updates from Just Stop Oil

The Windows taskbar at the bottom shows the system tray with the time 12:22 and date 11/07/2024, along with various application icons.

Starmers on Nick Ferrari's program on LBC, where the Labour leader re-stated his commitment to ending new oil and gas. Throughout 2022, mentions of 'Just Stop Oil' were up 400% and the campaign reached 92% name recognition nationally by November 2022. [2][3]



Throughout 2023, the saliency of the topic continued to increase, with press mentions of 'new oil and gas' increasing a further 23% during the year. This culminated in Rishi Sunak committing to 'max out' North Sea oil and gas- a story which made the front pages of The Guardian, Mirror, Telegraph, Times and The Metro on 1st Aug 2023, with the Mirror running "Just Stop Sunak" as their main title. By November 2023, polling demonstrated that Just Stop Oil actions create a positive 'radical flank' effect, by building support for more moderate groups, through the use of radical tactics. [4][5]

Throughout the past 2 1/2 years evidence has continued to mount that disapproval of disruptive tactics utilised by climate defenders, has had no negative impact on support for the cause itself, whilst forcing the issue to the top of the political agenda, through a process known as 'agenda seeding'. [6]



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Also taking action today is Deborah Wilde, 68, a retired teacher from London who said:

"The evidence is in, and disruptive civil resistance gets the goods! For two and a half years, Just Stop Oil supporters have been taking action to force the debate around new oil and gas up the news agenda and to the forefront of voter's minds. We appreciate the new governments' commitment to ending new oil and gas, but there is already enough carbon in the atmosphere to wreak havoc to our society and economy in the coming years. Labour must cancel all fossil fuel licences green-lit by the Tories and sign the fossil fuel treaty to end burning of oil, gas and coal by 2030."

Civil resistance works. In the past year we have seen victories in Sweden and the Netherlands and now the UK. However, as long as political leaders fail to take swift and decisive action to protect our communities from the worst effects of climate breakdown, Just Stop Oil supporters, working with other groups internationally, will take the proportional action necessary to generate much needed political pressure. This summer, areas of key importance to the fossil fuel economy will be declared sites of civil resistance around the world. Sign up to take action at juststopoil.org. [7][8]

ENDS

Press contact: 07762 997224

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: <https://juststopoil.org/press-media>

Website: <https://juststopoil.org/>

Facebook: <https://www.facebook.com/JustStopOil/>

Instagram: <https://www.instagram.com/just.stopoil/>

Twitter: https://twitter.com/JustStop_Oil

Youtube: <https://juststopoil.org/youtube>

TikTok: <https://www.tiktok.com/@juststopoil>

Notes to Editors

[1] Just Stop Oil is a coalition of groups working together to demand that the government immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK. Just Stop Oil is a member of the A22 Network of civil resistance projects.

Just Stop Oil 'Blue Lights' policy: our policy is, and has always been, to move out of the way for emergency vehicles with siren sounding and 'blue lights' on.

[2] <https://www.ft.com/content/331a0465-4125-49d7-bf79-d4eaf90ce60c>

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[2] <https://www.ft.com/content/331a0465-4125-49d7-bf79-d4eaf90ce60c>

[3] <https://www.youtube.com/watch?v=rjJGLLAsGdI>

[4] <https://www.tomorrowpapers.co.uk/uk-front-pages-1st-of-august-2023/>

[5] https://www.socialchangelab.org/_files/ugd/503ba4_a184ae5bbce24c228d07eda25566dc13.pdf

[6] <https://theconversation.com/just-stop-oil-do-radical-protests-turn-the-public-away-from-a-cause-heres-the-evidence-192901>

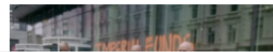
[7] <https://juststopoil.org/2024/05/08/swedish-just-stop-oil-ally-group-restore-wetlands-declare-victory-in-huge-win-for-civil-resistance/>

[8] <https://diem25.org/can-extinction-rebellions-surprise-success-in-the-netherlands-be-replicated/>

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

Defendants

EXHIBIT "AR5/2"

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-

- (1) MANCHESTER AIRPORT PLC**
- (2) AIRPORT CITY (MANCHESTER) LTD**
- (3) MANCHESTER AIRPORT CAR PARK (1) LIMITED**
- (4) STANSTED AIRPORT LTD**
- (5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD**



Claimants

- v -

KB-2024-002132

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**
- (2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**
- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS 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 OR PERSONS UNKNOWN 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.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimants' claim by the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

AND UPON the Fourth Claimant giving and the Court accepting the undertakings set out in Schedule 2 to this Order

IT IS ORDERED THAT:

DEFINITIONS

1. "**Stansted Airport**" means the land shown in red outlined in red on Plan 2 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 2**").

2. **“Warning Notice”** means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (<https://www.stanstedairport.com/injunction/>) at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the Second Defendants and each of them are forbidden from doing the following:
 - a. Entering, occupying or remaining on any part of Stansted Airport without the consent of the Fourth Claimant;
 - b. Affixing themselves to any other person or object on Stansted Airport;
 - c. Impeding access to or enjoyment of Stansted Airport by the Fourth Claimant and those authorised by the Fourth Claimant, whether by blocking any entrance or otherwise;
 - d. Continuing to do any act prohibited by paragraphs 3(a) to (c) above.
4. This Order is subject to periodic review by the Court on application by the Fourth Claimant at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Fourth Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (**“the Claim Documents”**) upon the Second Defendants:
 - a. Uploading a copy onto the following website:
<https://www.stanstedairport.com/injunction>
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.

- c. Affixing a notice at those locations marked with an "X" on Plan 2 setting out where these documents can be found and obtained in hard copy.
6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the Defendants by the Claimant carrying out each of the following steps:
 - a. Uploading a copy of the Order onto the following website:
<https://www.stanstedairport.com/injunction>
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
 - c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 2.
 - d. Affixing Warning Notices of A2 size at those locations marked with an "X" on Plan 2.
7. The taking of such steps set out at paragraph 5 and 6 shall be good and sufficient service of this Order and of the Claim Documents upon the Second Defendants and each of them.
8. The Court will provide sealed copies of this Order to the Fourth Claimant's solicitors for service (whose details are set out below).
9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

10. Service on the Second Defendants of any further applications or documents in the proceedings by the Fourth Claimant shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).
11. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Fourth Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Fourth Claimant's solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
13. The Fourth Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

COMMUNICATIONS WITH THE FOURTH CLAIMANT

16. The Fourth Claimant's solicitors and their contact details are:

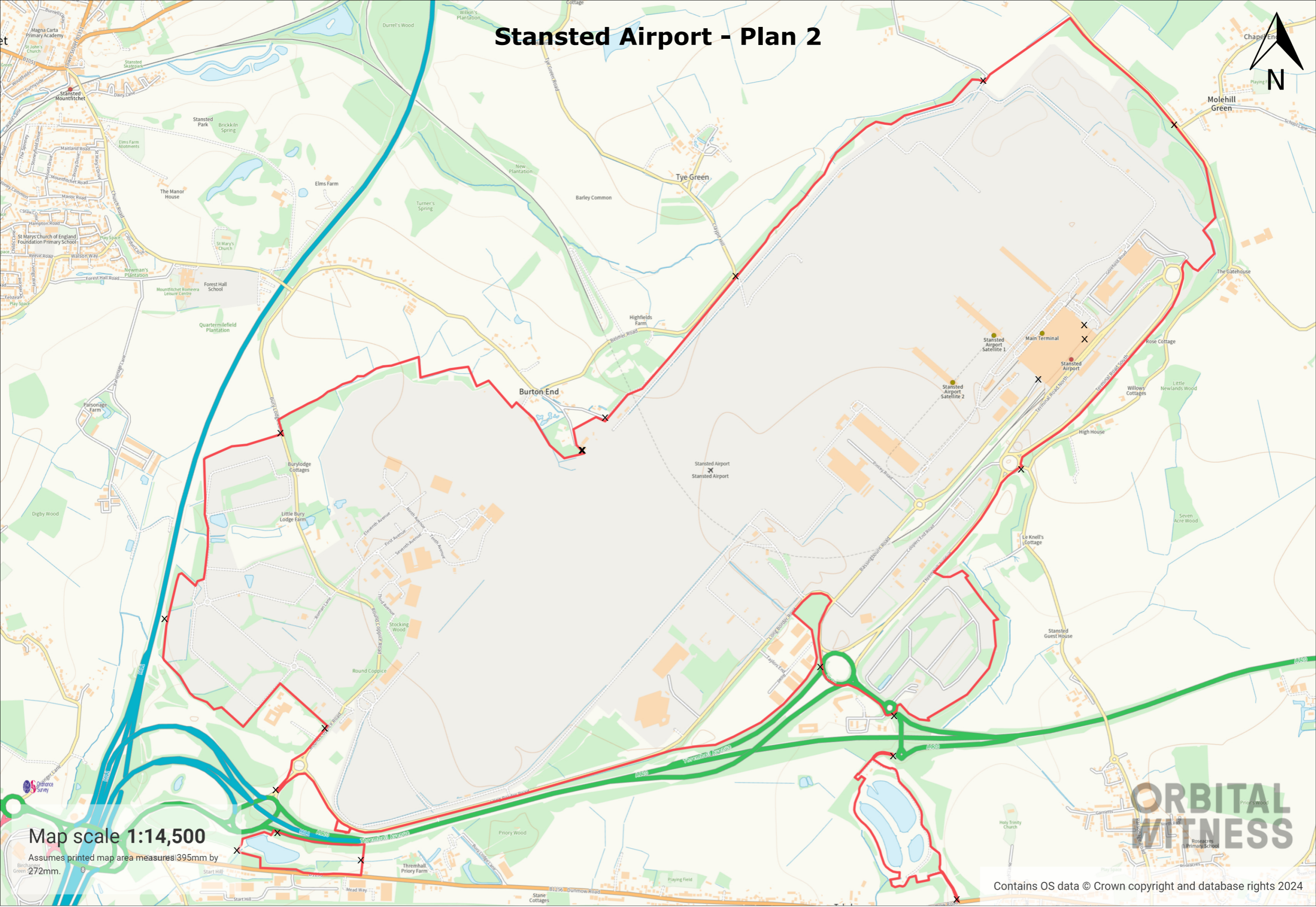
(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Stansted Airport - Plan 2



Map scale 1:14,500
Assumes printed map area measures 395mm by 272mm.



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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FOURTH CLAIMANT

- (1) The Fourth Claimant will take steps to serve the Second Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.

- (2) The Fourth Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 - EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 - WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

TO: Persons Unknown whose purpose is or includes protest on the premises at Stansted Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the “**Defendants**”)

FROM: Stansted Airport Ltd (“the **Fourth Claimant**”)

This notice relates to the land known as Stansted Airport, Stansted, CM24 1QW which is shown edged red on the Plan below (the “**Airport**”)

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the Fourth Claimant
2. Affixing themselves to any other person or object on the Airport.
3. Impeding access to or enjoyment of the Airport by the Fourth Claimant or those authorised by the Fourth Claimant, whether by blocking access to any entrance or otherwise.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any 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 Fourth Claimant’s solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: <https://www.stanstedairport.com/injunction/>

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.

