

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim no. QB-2021-XXXX

Before: Mr Justice Jay

Dated: 5th November 2021

B E T W E E N:

TRANSPORT FOR LONDON

Claimant

-and-

(1) PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE 1) LAMBETH BRIDGE AND BOTH ADJOINING ROUNDABOUTS; 2) HOGARTH ROUNDABOUT INCLUSIVE OF ALL ADJOINING ENTRY AND EXIT ROADS; 3) MARBLE ARCH INCLUSIVE OF ALL ENTRY AND EXIT ROADS; 4) ROTHERHITHE TUNNEL AND BOTH APPROACHES; 5) BECKTON ROUNDABOUT; 6) GANTS HILL ROUNDABOUT; 7) BRIXTON; 8) A406 (KNOWN AS THE NORTH CIRCULAR) BETWEEN AND INCLUSIVE OF ALL INTERSECTIONS WITH THE A40 HANGER LANE TO THE A13 ALFRED'S WAY INCLUSIVE OF ALL INTERSECTIONS; 9) A1 BETWEEN AND INCLUSIVE OF ALL INTERSECTIONS WITH THE A406 AT GREAT NORTH WAY TO ELSTREE WAY, BOREHAM WOOD; 10) A10 GREAT CAMBRIDGE ROAD BETWEEN AND INCLUSIVE OF ALL INTERSECTIONS WITH THE A406 NORTH CIRCULAR ROAD TO THE GLA ROAD BOUNDARY AT M25 JUNCTION 25; 11) A12 APPROACH TO BLACKWALL TUNNEL INCLUSIVE OF ALL INTERSECTIONS TO GLA BOUNDARY AT M25 J28; 12) A127 BETWEEN AND INCLUSIVE OF ALL INTERSECTIONS WITH THE A12 AT GALLOWS CORNER TO THE GLA ROAD BOUNDARY AT M25 J29; 13) A13/A1203/A1261 BETWEEN LIMEHOUSE LINK (INCLUSIVE) AND M25 JUNCTION 30 INCLUSIVE OF ALL INTERSECTIONS WITH THE BLACKWALL TUNNEL TO THE GLA ROAD BOUNDARY; 14) A102 APPROACH TO BLACKWALL TUNNEL INCLUSIVE OF ALL INTERSECTIONS THAT PROVIDE ENTRY AND EGRESS TO THE TUNNEL SOUTH AND NORTH SIDES; 15) A3 BETWEEN AND INCLUSIVE OF ALL INTERSECTIONS AT THE WANDSWORTH GYRATORY TO THE HOOK ROAD JUNCTION WHERE IT MEETS THE A309; 16) A40 BETWEEN AND INCLUSIVE OF ALL INTERSECTIONS WITHIN THE INNER RING ROAD AT A5 EDGWARE ROAD / HARROW ROAD TO THE GLA BOUNDARY; 17) A2 OLD BEXLEY LANE TO BLACKWALL TUNNEL INCLUSIVE OF ALL INTERSECTIONS; 18) A4 HYDE PARK CORNER INCLUSIVE OF ALL INTERSECTIONS TO KEW BRIDGE, 19) A302 WESTMINSTER BRIDGE BETWEEN BRIDGE STREET / VICTORIA EMBANKMENT AND WESTMINSTER BRIDGE ROAD / LAMBETH PALACE ROAD 20) BLACKFRIARS BRIDGE, FOR THE PURPOSE OF PROTESTING

**(2) MR ALEXANDER RODGER AND OTHER DEFENDANTS LISTED IN THE
SCHEDULE TO THE CLAIM FORMS**

ORDER

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS AND 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

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 HEARING the Claimant's application in trespass and nuisance by Claim Form dated 4 November 2021.

AND UPON READING the Claim Form and the Witness Statement of Carl Eddleston dated 4 November 2021

AND UPON the Claimant undertaking to file the claim and application and pay the relevant court fees by the end of the next working day after the sealing of this Order

AND UPON hearing Andrew Fraser-Urquhart QC and Charles Forrest, Counsel for the Claimant

AND UPON the Claimant indicating that it will provide to the Defendants copies of further evidence or other documents filed in these proceedings upon request, following the Defendants or their representatives providing contact details to the Claimant's solicitors

AND UPON the Court accepting the Claimant's undertaking that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss

AND UPON the Claimant undertaking to identify and name Defendants and apply to add them as named Defendants to this Order as soon as reasonably practicable

AND UPON the Claimant confirming that this Order is not intended to prohibit lawful protest which does not slow, obstruct, prevent or otherwise interfere with the flow of traffic onto off or along the Roads to which this Order relates

AND UPON the Claimant undertaking to file updated plans of improved legibility for all Roads in Annex 2 as soon as practicable and to serve those plans

IT IS ORDERED THAT:

1. The "within named Defendants" are those Defendants whose names appear in the schedule annexed to this Order (Annex 1). The term "Defendants" refers to both "persons unknown" and the within named Defendants.
2. For the purposes of this Order, the Roads means the Roads identified by the descriptions and plans annexed to this Order (Annex 2) including but not limited to any verges, central reservations, and any apparatus related to those Roads.

Injunction in force

3. With immediate effect until the earlier of (i) Trial; (ii) Further Order; or (iii) 23:59 on 1 May 2022, the Defendants and each of them are forbidden from:
 - a. Blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
 - b. Blocking, slowing down, obstructing or otherwise interfering with access to or from the Roads for the purpose of protesting.

- c. Causing damage to the surface of or to any apparatus on or around the Roads or any structure supporting the Roads including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
 - d. Affixing themselves (“locking on”) to the Roads or any of them or to any other person or object on the Roads or any of them.
 - e. Erecting any structure on the Roads.
 - f. Tunnelling in the vicinity of the Roads.
 - g. Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.
 - h. Refusing to leave the area within 30m of the centre of the Roads when asked to do so by a police constable, TfL Road Traffic Enforcement Officers or High Court Enforcement Officer.
 - i. Causing, assisting or encouraging any other person to do any act prohibited by paragraphs a-h above.
 - j. Continuing any act prohibited by sub-paragraphs a-i above.
4. The publication by the Claimant of any orders and the claim form in these proceedings shall not include (in the published version) the addresses of the Named Defendants.
 5. The Claimant shall:
 - a. Place a copy of this Order on the TfL and Mayor of London/GLA London.gov.uk websites; and
 - b. Send a copy of this Order to Insulate Britain’s email address: Insulate Britain ring2021@protonmail.com.
 6. For the avoidance of doubt, compliance with paragraph 5 shall not constitute service.

Alternative Service

7. The Claimant is permitted, in addition to personal service, to serve this Order, the Claim Form, Particulars of Claim, and any other documents in these proceedings by both of the following methods together:
 - a. Service of the sealed Order on Insulate Britain by email; and

- b. Posting a copy of this Order together with a copy of the claim form and evidence in support through the letterbox of each Defendant (or leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing this Order and the proceedings 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 prominent lettering in the form set out in Schedule 1.

Disclosure

8. The Claimant has permission in these proceedings to add Named Defendants using the names and addresses disclosed to it pursuant to CPR r31.17 by the Metropolitan Police under the Order granted by Lavender J on 19 October 2021 in Claim no. QB-2021-003841. The continuing disclosure duty on the Metropolitan Police under that Order shall apply in these proceedings and to this Order until that duty expires.
9. The Claimant is granted a disclosure order under CPR r31.17 in the following terms:
 - a. the Metropolitan Police shall by 4pm on 9 November 2021 disclose to the Claimant the name and address of any person who has been arrested by one of their officers in the course of, or as a result of, protests on the Roads;
 - b. the Metropolitan Police shall disclose to the Claimant as soon as reasonably practicable all arrest notes, body cam footage and/or other photographic material relating to any breach of this Interim Injunction;
 - c. the disclosure duties in sub-paragraphs a.-b on the Metropolitan Police shall be continuing ones, continuing until 23 December 2021.

Further directions

10. This claim shall proceed and be heard together with Claim No. QB-2021-003841
11. 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 Claimant's

solicitors immediately (and in any event not less than 48 hours before the hearing of any such application).

12. 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.

13. The Claimant has permission to apply to extend or vary this Order or for further directions.

14. The return date hearing is to be listed for 10am on 12 November 2021 in person

15. Any Defendant who proposes to attend and oppose the Order on the return date shall file a skeleton argument and any evidence to be relied upon by no later than 10 am on 11 November 2021

16. Costs reserved.

Communications with the Claimant

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

FAO Mr Abbey Ameen
Team Legal, Transport for London,
5 Endeavour Square, 4th Floor, Stratford, Yellow Zone,
Stratford, E20 1JN
Tel: 02030547921

BY THE COURT

Mr Justice Jay

Dated: 5th November 2021

SCHEDULE 1

[On the package containing the Court order and proceedings]

“VERY URGENT: THIS PACKAGE CONTAIN AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL – Mr Abbey Ameen of TfL 02030547921

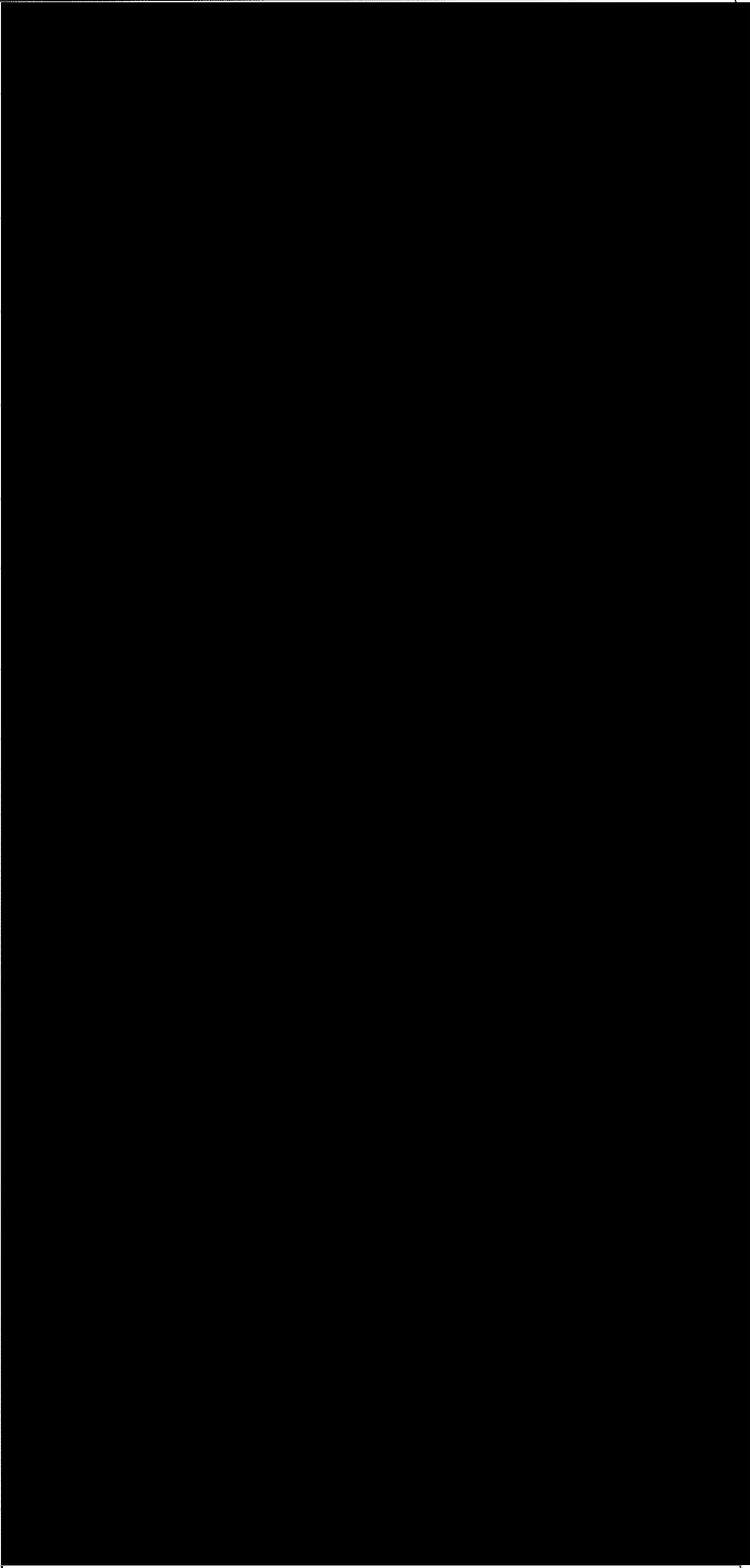
[To affix to front door when the package has been posted through the letterbox or placed in a mailbox]

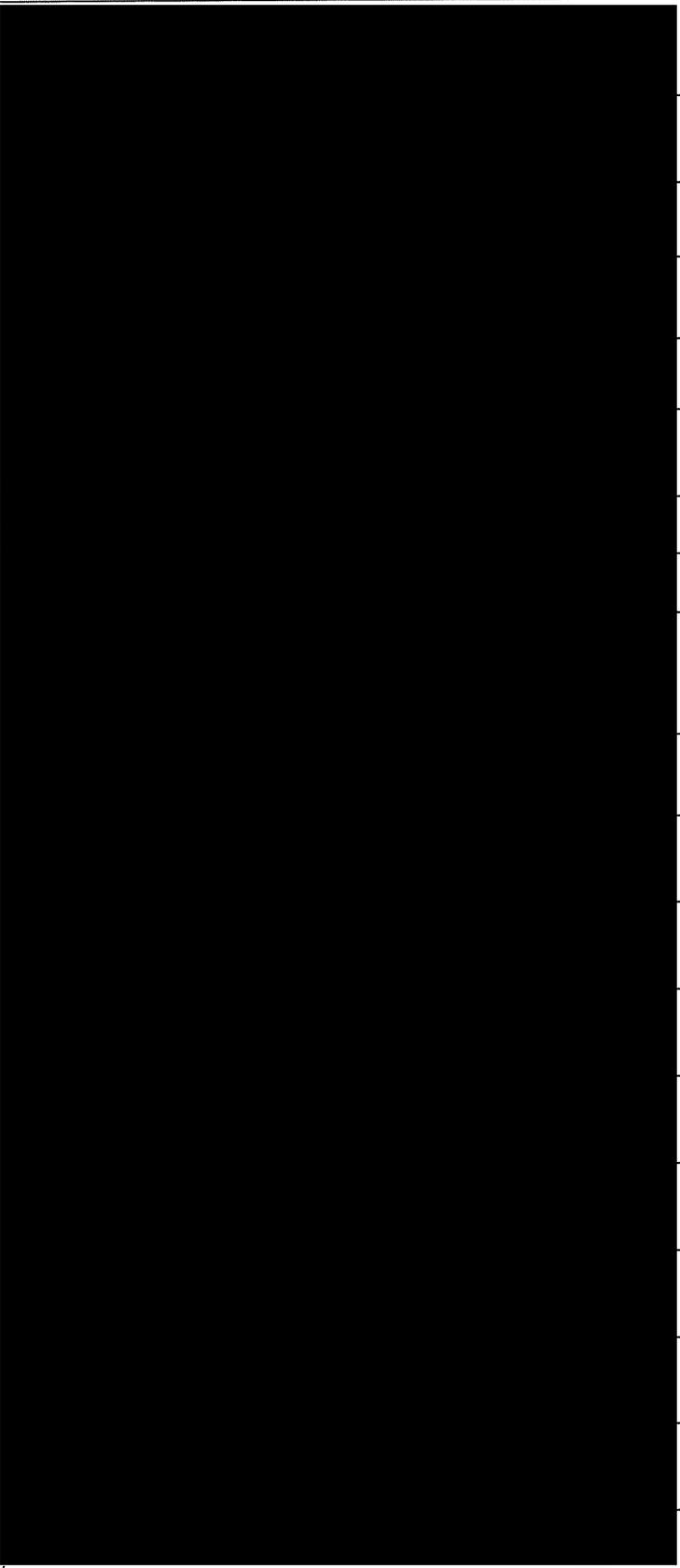
“VERY URGENT: A PACKAGE HAS BEEN LEFT THAT CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL - Mr Abbey Ameen of TfL 02030547921

ANNEX 1 SCHEDULE OF NAMED DEFENDANTS (AS AMENDED 4.11.21)

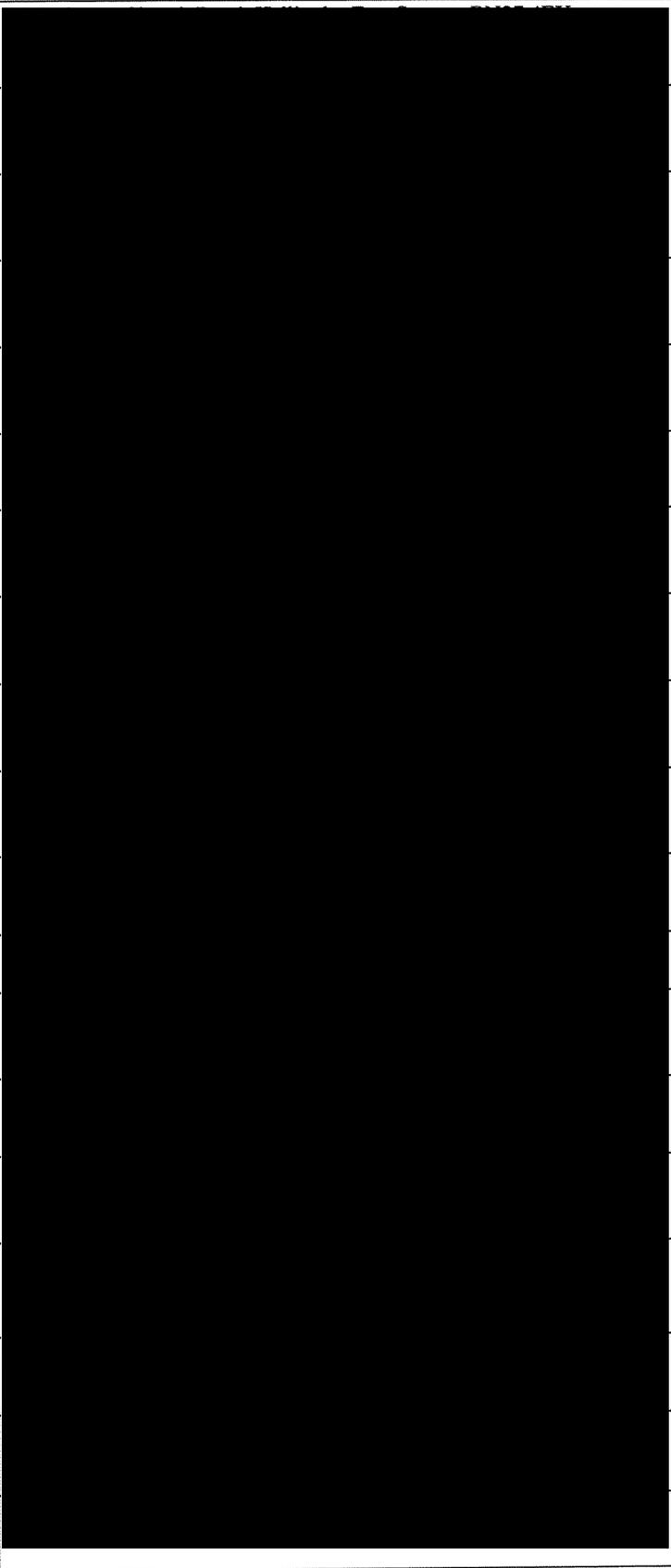
	Name	Address
1	Alexander RODGER	
2	Alyson LEE	
3	Amy PRITCHARD	
4	Ana HEYATAWIN	
5	Andrew WORSLEY	
6	Anne TAYLOR	
7	Anthony WHITEHOUSE	
8	Arne SPRINGORUM	
9	Barry MITCHELL	
10	Ben TAYLOR	
11	Benjamin BUSE	
12	Biff William Courtenay WHIPSTER	
13	Cameron FORD	
14	Catherine RENNIE- NASH	
15	Catherine EASTBURN	
16	Christian MURRAY- LESLIE	

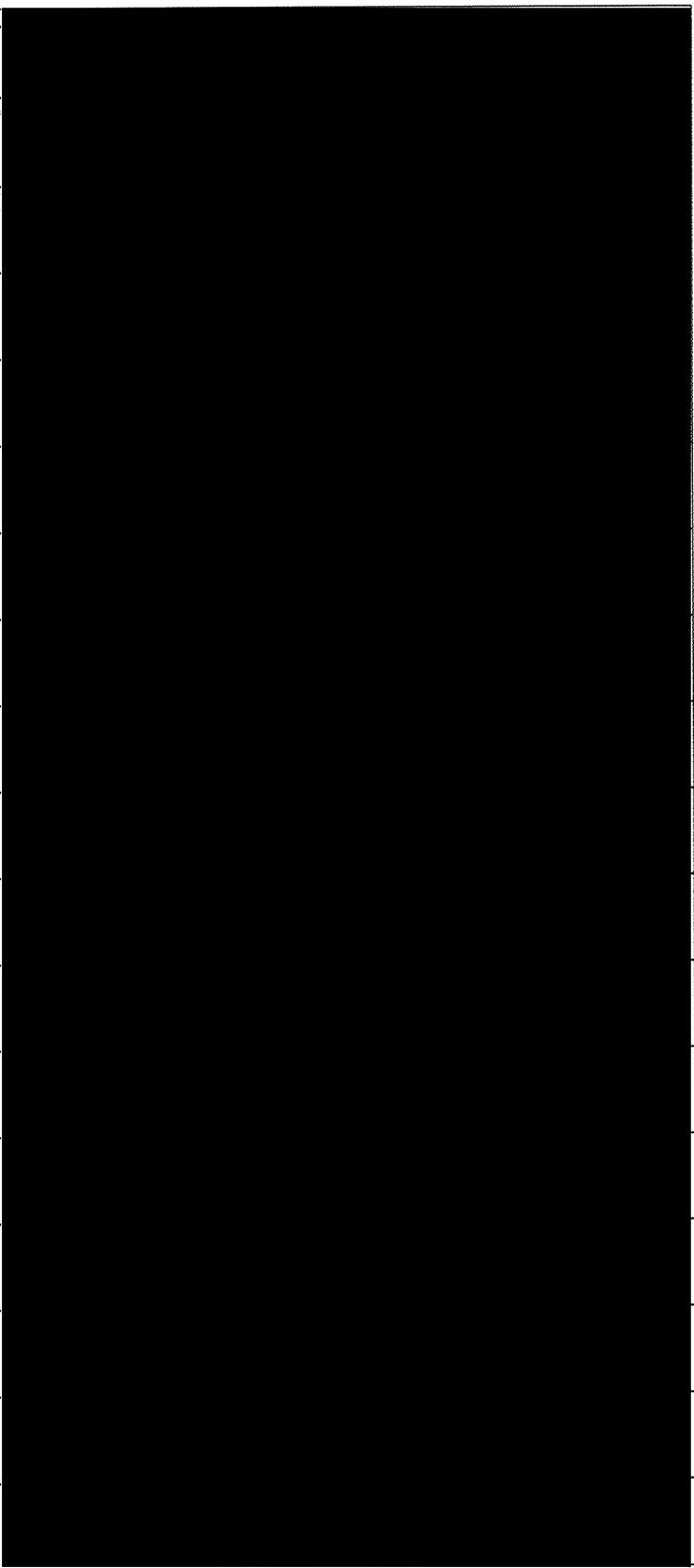
17	Christian ROWE	
18	Cordelia ROWLATT	
19	Daniel SARGISON	
20	Daniel SHAW	
21	David CRAWFORD	
22	David JONES	
23	David NIXON	
24	David SQUIRE	
25	Diana BLIGH	
26	Diana HEKT	
27	Diana Lewen WARNER	
28	Donald BELL	
29	Edward HERBERT	
30	Elizabeth ROSSER	
31	Emily BROCKLEBANK	
32	Emma Joanne SMART	
33	Gabriella DITTON	
34	Gregory FREY	
35	Gwen HARRISON	

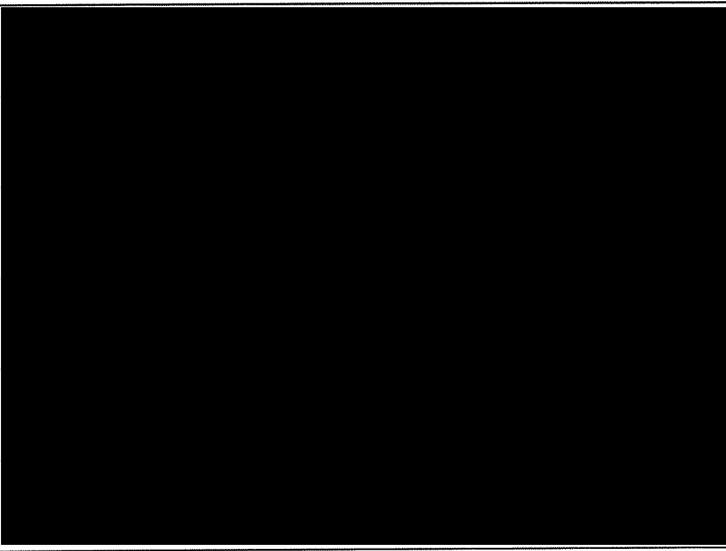
36	Harry BARLOW	
37	Ian BATES	
38	Ian Duncan WEBB	
39	James BRADBURY	
40	James SARGISON	
41	James THOMAS	
42	Janet BROWN	
43	Janine EAGLING	
44	Jerrard Mark LATIMER	
45	Jessica CAUSBY	
46	Jonathan COLEMAN	
47	Joseph SHEPHERD	
48	Joshua SMITH	
49	Judith BRUCE	
50	Julia MERCER	
51	Julia SCHOFIELD	
52	Karen MATTHEWS	
53	Karen WILDIN	

54	Liam NORTON	
55	Louis MCKECHNIE	
56	Louise Charlotte LANCASTER	
57	Lucy CRAWFORD	
58	Mair BAIN	
59	Margaret MALOWSKA	
60	Marguerite DOUBLEDAY	
61	Maria LEE	
62	Martin NEWELL	
63	Mary ADAMS	
64	Matthew LUNNON	
65	Matthew TULLEY	
66	Meredith WILLIAMS	
67	Michael BROWN	
68	Michael WILEY	
69	Michelle CHARLSWORTH	
70	Natalie MORLEY	
71	Nathaniel SQUIRE	
72	Nicholas COOPER	

73	Nicholas ONLEY	
74	Nicholas TILL	
75	Oliver ROCK	
76	Paul COOPER	
77	Paul SHEEKY	
78	Peter BLENCOWE	
79	Peter MORGAN	
80	Phillipa CLARKE	
81	Priyadaka CONWAY	
82	Richard RAMSDEN	
83	Rob STUART	
84	Robin COLLETT	
85	Roman Andrzej PALUCH-MACHNIK	
86	Rosemary WEBSTER	
87	Rowan TILLY	
88	Ruth Ann COOK	
89	Ruth JARMAN	
90	Sarah HIRONS	

91		
92	Simon REDING	
93	Stefania MOROSI	
94	Stephanie AYLETT	
95	Stephen GOWER	
96	Stephen PRITCHARD	
97	Sue CHAMBERS	
98	Sue PARFITT	
99	Sue SPENCER- LONGHURST	
100	Susan HAGLEY	
101	Suzie WEBB	
102	Tam MILLAR	
103	Tessa-Marie BURNS	
104	Theresa NORTON	
105	Tim SPEERS	
106	Tim William HEWES	
107	Tracey MALLAGHAN	
108	Tyrone HODGE	
109	Valerie SAUNDERS	

110	Venitia CARTER	
111	Victoria Anne LINDSELL	
112	Xavier GONZALEZ TRIMMER	
113	Bethany MOGIE	
114	Indigo RUMBELOW	
115	Adrian TEMPLE-BROWN	
116	Ben NEWMAN	
117	Christopher PARISH	
118	Elizabeth SMAIL	
119	Julian MAYNARD SMITH	
120	Rebecca LOCKYER	
121	Simon MILNER-EDWARDS	
122	Stephen BRETT	
123	Virginia MORRIS	
124	Jan GOODEY	
125	Alex GOUGH	
126	Gareth Richard HARPER	
127	Samuel JOHNSON	

128	Giovanna LEWIS	
129	Susan LYLE	
130	Darcy MITCHELL	
131	Morien MORGAN	
132	Lucia WHITTAKER DE ABREU	
133	Pam WILLIAMS	