

Party: **Claimant**
Name: **Carl Eddleston**
No: **4**
Date: **6 November 2025**

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim Nos. QB-2021-003841, QB-2021-004122, KB-2022-003542

BETWEEN

TRANSPORT FOR LONDON

-and-

[INSULATE BRITAIN AND JUST STOP OIL PROTESTERS, BOTH NAMED AND PERSONS UNKNOWN]

Claimant

Defendants

Witness Statement of CARL EDDLESTON

I, **CARL EDDLESTON**, of Transport for London ("**TfL**" / "**the Claimant**") will say as follows:

1. I am the Director Network Management and Resilience at TfL. I joined TfL in 2006 and have held a variety of positions having varied responsibility from road network design to Chief Engineer for Road Network Performance. I am duly authorised by TfL to make this statement.
2. This is my fourth witness statement. Its purpose is to set out the service and notification which has been undertaken by TfL following the second review hearing and for the purposes of this third review hearing.
3. I am informed by TfL's lawyers that TfL served/notified the following people/organisations with the following material:
 - a. on 28 May 2025 all Named Defendants in the TfL Claims were served via email or post with: i) the Order made at the second review hearing by Morris J dated 12 May 2025 ("**Second Review Hearing Order**"), and ii) the Judgment Order dated 3 May 2023, as amended on 12 May 2025 under the slip rule;

- b. on 27 May 2025, TfL complied with the publicisation/notification requirements contained in paragraph 8 of the Second Review Hearing Order and paragraph 7 of the Judgment Order dated 3 May 2023, as amended on 12 May 2025 under the slip rule;
- c. on 2 October 2025 all Named Defendants in the TfL Claims were served via email or post with notification of the date and location of this third review hearing. Notification was also sent to those organisations listed in paragraph 8b of the Second Review Hearing Order;
- d. on 21 October 2025, TfL notified Morris J, via a letter and draft Orders all attached to an email, that it does not seek to maintain the Final Injunctions. Giovanna Lewis (Named Defendant 128 in the TfL IB Claims), who has acted as a representative for Named Defendants in those Claims, was copied into that email;
- e. TfL will via email or post notify all Named Defendants in the TfL Claims that it would not be seeking to maintain the Final Injunctions and that the third review hearing was going ahead. Notification will also be sent to those organisations listed in paragraph 8b of the Second Review Hearing Order. This will clarify what TfL sent via email or post to Named Defendants on 17 October 2025 which was, having informed them that TfL would not be seeking to maintain the Final Injunctions, that it would ask that this third review hearing be vacated.

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 made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:



Name: CARL EDDLESTON

Dated: 6 November 2025