

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim no. KB-2022-003542

Before: Mr Justice Freedman

On: 31 October 2022

B E T W E E N:

TRANSPORT FOR LONDON

-and-

(1) PERSONS UNKNOWN DELIBERATELY CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE 1) VAUXHALL BRIDGE INCLUDING VAUXHALL GYRATORY AND ALL ENTRY AND EXIT ROADS; 2) LAMBETH BRIDGE AND BOTH ADJOINING ROUNDABOUTS; 3) A1221 MILLBANK; 4) A4 - KNIGHTSBRIDGE & SCOTCH CORNER; 5) A202 ST GEORGE'S CIRCUS AND APPROACH ROADS; 6) A10 SHOREDITCH HIGH STREET, A1202 GREAT EASTERN STREET, A5201 OLD STREET; 7) A3211 VICTORIA EMBANKMENT; 8) LONDON BRIDGE AND BOTH APPROACHES; 9) TOWER BRIDGE AND BOTH APPROACHES; 10) ROTHERHITHE TUNNEL AND BOTH APPROACHES; 11) BLACKWALL TUNNEL & BOTH APPROACHES; 12) PARK LANE INCLUSIVE OF MARBLE ARCH AND HYDE PARK CORNER; 13) A302 WESTMINSTER BRIDGE BETWEEN BRIDGE STREET/VICTORIA EMBANKMENT AND WESTMINSTER BRIDGE ROAD/LAMBETH PALACE ROAD; 14) A501 EDGWARE ROAD TO OLD STREET; 15) VICTORIA ONE WAY SYSTEM; 16) ELEPHANT AND CASTLE INCLUSIVE OF ALL ENTRY AND EXIT ROADS; 17) BLACKFRIARS BRIDGE BETWEEN NEW BRIDGE STREET AND BLACKFRIARS ROAD AND SOUTHWARK STREET/STAMFORD STREET; 18) A4 TALGARTH ROAD IN THE VICINITY OF BARONS COURT TUBE STATION; 19) HANGER LANE GYRATORY INCLUSIVE OF ALL ADJOINING ENTRY AND EXIT SLIPS; 20) STAPLES CORNER; 21) CHISWICK ROUNDABOUT; 22) REDBRIDGE ROUNDABOUT; 23) KIDBROOKE INTERCHANGE, FOR THE PURPOSES OF PROTESTING ON BEHALF OF, IN ASSOCIATION WITH, UNDER THE INSTRUCTION OR DIRECTION OF, OR USING THE NAME OF, JUST STOP OIL

(2) MS ALYSON LEE AND OTHER DEFENDANTS LISTED THE SCHEDULE TO THE CLAIM FORM

Defendants

INTERIM INJUNCTION 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 READING information provided to the Court before the hearing, namely the Claimant's Skeleton Argument, the Witness Statement of Abbey Ameen dated 26 October 2022 (extracts of which form the basis of Annex 4 to this Order), the Witness Statement of Abbey Ameen dated 18 October 2022, N244 Application Notice dated 20 October 2022, draft Order and draft Interim Injunction, and the sealed Order of Yip J made on 18 October 2022

AND UPON READING information provided to the Court during the hearing, namely information disclosed to the Claimant by the Metropolitan Police under the Order of Yip J consisting of the names and addresses of individuals who are said by the Police to have protested on the Roads subject to the Order of Yip J in connection with JSO, and an email from the relevant Detective Sergeant to the Claimant explaining how the information to be disclosed was obtained and verified by the Police prior to that disclosure.

AND UPON READING information provided to the Court after the hearing, namely a witness statement of Abbey Ameen dated 1 November 2022, verifying and explaining the additional information referred to above which was provided to the Court during the hearing

AND UPON the Claimant through Counsel informing the Court that the Claimant checked with the Metropolitan Police that they had conducted a check of the body worn videos for each additional defendant as to the date of arrest, location of arrest and qualifying connection with JSO who are to be added as additional defendants.

AND UPON the Claimant undertaking to verify the information contained in the above recital in an additional witness statement prior to effecting service of the Order.

AND UPON HEARING Counsel for the Claimant, Andrew Fraser-Urquhart KC and Charles Forrest

AND UPON none of the Defendants appearing or being represented

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 undertaking to scrutinise, as soon as reasonably practicable after disclosure, the materials referred to in paragraph 11b of this Order, in order to ascertain whether any individual whose identity has been disclosed to it pursuant to paragraph 11a should properly be or remain a Named Defendant in this matter

AND UPON the Claimant confirming that this Order is not intended to prohibit lawful protest onto or along the Roads to which this Order relates

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 any verges, central reservations, and any apparatus related to those Roads.
3. This Order replaces the Order made by Yip J on 18 October 2022 (sealed on 19 October 2022) which is discharged with effect from today

Injunction in force

4. With immediate effect until the earlier of a) 23:59 on 28 February 2023; or b) Further Order, the Defendants and each of them are forbidden from deliberately undertaking the following activities:
 - 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 which has the effect of slowing down or otherwise interfering with the flow of traffic onto or along or off the Roads.
 - c. Causing, assisting or encouraging any other person to do any act prohibited by sub-paragraphs a-b above.
 - d. Continuing any act prohibited by sub-paragraphs a-c above.
5. The activities prohibited by paragraphs 4a-b include, but are not limited to, the following when done for the purpose of protesting and with the deliberate effect of blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads:
 - a. Affixing themselves (“locking on”) to any other person or object on the Roads or to the surface of the Roads
 - b. Erecting any structure on the Roads.
 - c. Tunnelling in the vicinity of the Roads.
 - d. Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.
 - e. 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
6. The publication by the Claimant of any Orders or other documents (such as the Claim Form or Particulars of Claim) in these proceedings shall not include (in the published version) the addresses of the Named Defendants. Liberty to any of the Named Defendants on prior notice to the Claimant to apply for any wider protection as regards the addresses.
7. 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 Just Stop Oil’s email address: juststopoilpress@protonmail.com
8. For the avoidance of doubt, compliance with paragraph 7 shall not constitute service.

Alternative Service

9. The Claimant is permitted, in addition to personal service and any other permitted mode of service as the case may be, to serve this Order, the Claim Form, and any other documents in these proceedings by both of the following methods together:
 - a. Service on Just Stop Oil by email; and
 - b. Posting a copy 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 a copy 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 Annex 3.
10. Where alternative service is used, pursuant to CPR r6.15(4) and r6.27:
 - a. a document is deemed served on the second business day following completion by the Claimant of the later of the following (see 9a-b above): email of it to Just Stop Oil or delivery of it to/collection of it by the process server chosen to carry out alternative service under paragraph 9b of this Order;
 - b. the periods for filing an acknowledgement of service, an admission, and a defence are respectively those in CPR r10.3, r14.2, and r15.4, subject to any provision to extend those periods which is otherwise available under the CPR.

Disclosure

11. The Claimant is granted a disclosure order under CPR r31.17 in the following terms:
 - a. the Metropolitan Police shall by 7 November 2022 disclose to the Claimant the name and address of any person whose name has not previously been disclosed who has been arrested by one of their officers in the course of, or as a result of, any protests on the Roads which have been carried out on behalf of, in association with, under the instruction or direction of, or using the name of, Just Stop Oil;
 - 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 not previously disclosed relating to any breach or potential breach of this Interim Injunction or its predecessors in this claim;
 - c. the disclosure duties in sub-paragraphs a.-b. on the Metropolitan Police shall be continuing ones, continuing for as long as this Order remains in force.

Further directions

12. 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).
13. Any person applying to vary or discharge this Order must provide their full name and an address for service.
14. Any person who applies to vary or discharge this Order shall file a skeleton argument and any evidence to be relied upon no later than 48 hours before the application hearing (excluding weekends and bank holidays)
15. The Claimant has permission to apply to extend or vary this Order or for further directions.
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

Dated: 31 October 2022

Approved

Mr Justice Freedman

4 November 2022

ANNEX 3

[On the package containing a Court order/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 4: Just Stop Oil protests on roads in London since 1 October 2022

1. On 1 October 2022, Just Stop Oil protesters (as part of the Just Stop Oil Coalition) formed part of a group of thousands of protesters who marched to Westminster where they blocked Waterloo Bridge, Westminster Bridge, Lambeth Bridge, and Vauxhall Bridge, by sitting down on the road at those locations¹.
2. On 2 October 2022, hundreds of Just Stop Oil protesters blocked Waterloo Bridge by sitting in the road².
3. On 4 October 2022, around 60 Just Stop Oil protesters blocked Parliament Square by sitting in the road on all four sides of it³.
4. On 5 October 2022, around 30 Just Stop Oil protesters sat down on the approach roads to Lambeth Bridge⁴.
5. On 6 October 2022, around 35 Just Stop Oil protesters blocked roads near Trafalgar Square by sitting down in them and gluing themselves to the road surface⁵.
6. On 7 October 2022, around 25 Just Stop Oil protesters blocked two roads leading to Vauxhall Bridge by sitting down on them and gluing themselves to the road surface.⁶ Also two Just Stop Oil protesters threw paint on the outside walls of HMP Altcourse where two other such protesters are imprisoned (see below)⁷.
7. On 8 October 2022, around 40 Just Stop Oil protesters blocked Edgware Road, Gloucester Place and Station Approach adjacent to the A501 by sitting in the roads, resulting in severe disruption on Marylebone Road⁸.
8. On 9 October 2022, around 45 Just Stop Oil protesters established, by sitting down in the road with many of them gluing themselves to the road, four roadblocks near Piccadilly Circus stopping traffic in all directions⁹.

¹ <https://juststopoil.org/2022/10/01/we-can-win-thousands-of-people-block-4-london-bridges-to-demand-an-end-to-the-cost-of-living-and-climate-crisis/>

² <https://juststopoil.org/2022/10/02/just-stop-oil-supporters-block-waterloo-bridge-for-a-second-day/>

³ <https://juststopoil.org/2022/10/04/just-stop-oil-supporters-block-parliament-square-on-fourth-day-of-action-to-demand-no-new-oil-and-gas/>

⁴ <https://juststopoil.org/2022/10/05/just-stop-oil-supporters-block-lambeth-bridge-on-fifth-day-of-action-to-demand-no-new-oil-and-gas/>

⁵ <https://juststopoil.org/2022/10/06/just-stop-oil-supporters-block-roads-around-traffic-junction-in-sixth-day-of-resistance/>

⁶ <https://juststopoil.org/2022/10/07/just-stop-oil-supporters-block-roads-around-westminster-for-7th-day-to-demand-no-new-oil-and-gas/>

⁷ <https://juststopoil.org/2022/10/07/civil-resistance-at-hmp-altcourse-as-just-stop-oil-supporter-faces-more-than-6-months-in-prison-without-trial/>

⁸ <https://juststopoil.org/2022/10/08/just-stop-oil-supporters-joined-by-animal-rebellion-on-8th-day-of-disruption-in-london/>

⁹ <https://juststopoil.org/2022/10/09/just-stop-oil-supporters-block-piccadilly-circus-on-9th-day-of-disruption-in-london/>

9. On 10 October 2022, 30 Just Stop Oil protesters blocked The Mall near Buckingham Palace by sitting down in the road¹⁰.
10. On 11 October 2022, 32 Just Stop Oil protesters established 3 roadblocks on Knightsbridge and Brompton Road stopping traffic in both directions by sitting down in the road and with some gluing themselves to the road surface¹¹.
11. On 12 October 2022, 9 Just Stop Oil protesters established a roadblock on the Horseguards Road entrance to Downing Street by sitting in the road and gluing themselves to the road surface¹².
12. On 13 October 2022, 26 Just Stop Oil protesters established a series of roadblock on the roads adjoining St. George's Circus in Southwark by sitting down in the road and with some gluing themselves to the road surface¹³.
13. On 14 October 2022, 31 Just Stop Oil protesters established a roadblock in front of New Scotland Yard, by sitting in the road and gluing themselves to the road surface. One protester also sprayed (using a fire extinguisher) with orange paint the whole surface of the iconic rotating triangular Metropolitan Police sign¹⁴. Also on 14 October 2022, 2 Just Stop Oil protesters threw soup over Vincent Van Gogh's world-famous *Sunflowers* painting (estimated value of \$84.2m) at the National Gallery, Trafalgar Square¹⁵, before then gluing their hands to the wall beneath it¹⁶. The incident caused minor damage to the frame but the painting, covered by glass, was undamaged¹⁷.
14. On 15 October 2022, 29 Just Stop Oil protesters established a roadblock on Shoreditch High Street at the junction of Great Eastern Street, by sitting in the road and gluing themselves to the road surface¹⁸.
15. On 16 October 2022, 14 Just Stop Oil supporters blocked Park Lane by sitting down in the road, with some gluing themselves to the road surface and others glued themselves together. Shortly afterwards, one protester sprayed (in a fire extinguisher) orange paint over a nearby Aston Martin car showroom on Park Lane¹⁹.

¹⁰ <https://juststopoil.org/2022/10/10/just-stop-oil-supporters-block-the-mall-on-10th-day-of-disruption-in-london/>

¹¹ <https://juststopoil.org/2022/10/11/just-stop-oil-supporters-target-knightsbridge-on-11th-day-of-disruption-in-london/>

¹² <https://juststopoil.org/2022/10/12/just-stop-oil-supporters-target-downing-street-on-12th-day-of-disruption-in-london/>

¹³ <https://juststopoil.org/2022/10/13/just-stop-oil-supporters-block-south-london-roundabout-on-13th-day-of-disruption-in-the-capital/>

¹⁴ <https://juststopoil.org/2022/10/14/just-stop-oil-supporters-block-road-and-spray-paint-sign-at-new-scotland-yard-on-14th-day-of-disruption-in-the-capital/>

¹⁵ <https://juststopoil.org/2022/10/14/just-stop-oil-supporters-throw-soup-over-van-goghs-sunflowers-to-demand-no-new-oil-and-gas/>

¹⁶ <https://news.sky.com/story/two-women-charged-after-soup-thrown-over-van-goghs-sunflowers-painting-12720894>

¹⁷ <https://news.sky.com/story/two-women-charged-after-soup-thrown-over-van-goghs-sunflowers-painting-12720894>

¹⁸ <https://juststopoil.org/2022/10/15/just-stop-oil-supporters-block-roads-on-shoreditch-high-street-and-are-glued-to-the-tarmac-on-the-15th-day-of-disruption-in-the-capital/>

¹⁹ <https://juststopoil.org/2022/10/16/day-16-just-stop-oil-supporters-defy-home-secretary-by-blocking-park-lane-and-spray-painting-an-upmarket-car-showroom/>

16. On 17 October 2022, 2 Just Stop Oil supporters climbed to the top of the Queen Elizabeth II Bridge (i.e. up its 84 metre masts) forcing police to close the bridge²⁰. They remained hanging from the top of the bridge for 37 hours, meaning it had to be closed to the public and traffic for all that time²¹. They were brought down by the emergency services who had to risk their own safety doing so. Also on 17 October 2022, Just Stop Oil protesters sat down in and blocked Victoria Road outside of Department for Business, Energy and Industrial Strategy and they also sprayed soup on that Department's building²².
17. Also on 17 October 2022, there was a hearing before Yip J to hear TfL's urgent without notice application for the TfL Interim JSO Injunction against proposed named defendants and persons unknown defined with reference to Just Stop Oil. Mrs Justice Yip had not had a sufficient opportunity to read the papers in support of the application and therefore the hearing was adjourned to the following morning for a remote hearing. On 18 October 2022, following a remote hearing, Yip J made the TfL Interim JSO Injunction against 62 Named Defendants for whom there was an evidential foundation of having protested on behalf of Just Stop Oil.
18. Also on 18 October 2022, 30 Just Stop Oil supporters blocked the A4 Talgarth Road near Barons Court tube station by sitting down in the road, with some gluing themselves to the road surface and others 'locked themselves on' to each other.²³
19. On 19 October 2022, 25 Just Stop Oil supporters (including proposed Named Defendants 158 and 167 in the Just Stop Oil Claim) blocked the A4 on the Cromwell Road at the junction with Exhibition Road, in central London, by sitting down in the road, with some gluing themselves to the road surface and others 'locked themselves on' to each other.²⁴
20. On 20 October 2022, 20 Just Stop Oil supporters blocked Knightsbridge by sitting down in the road, with some gluing themselves to the road surface and others 'locked themselves on' to each other. Two supporters also sprayed (using a fire extinguisher) the windows and facade of Harrods department store with orange paint.²⁵

²⁰ <https://juststopoil.org/2022/10/17/day-17-just-stop-oil-supporters-defy-gravity-by-climbing-the-qe2-bridge-forcing-police-to-close-the-bridge/>

²¹ <https://juststopoil.org/2022/10/19/day-19-just-stop-oil-blocks-a4-cromwell-road-bringing-traffic-to-a-standstill/>

²² <https://juststopoil.org/2022/10/17/day-17-just-stop-oil-supporters-throw-soup-over-government-building-while-inviting-home-secretary-to-talk/>

²³ <https://juststopoil.org/2022/10/18/day-18-just-stop-oil-blocks-the-a4-talgarth-road-to-demand-an-end-to-new-oil-and-gas/>

²⁴ <https://juststopoil.org/2022/10/19/day-19-just-stop-oil-blocks-a4-cromwell-road-bringing-traffic-to-a-standstill/>

²⁵ <https://juststopoil.org/2022/10/20/just-stop-oil-blocks-knightsbridge-and-spray-paints-harrods-on-20th-day-of-action-in-the-capital/>

21. On 21 October 2022, 22 Just Stop Oil supporters (including proposed Named Defendant 151 in the JSO Claim) blocked the junction of High Holborn and Kingsway by sitting down in the road, with some gluing themselves to the road surface.²⁶
22. On 22 October 2022, 20 Just Stop Oil supporters blocked Upper Street next to Islington Green by sitting down in the road, with some gluing themselves to the road surface and others ‘locked themselves on’ to each other.²⁷
23. On 23 October 2022, 4 Just Stop Oil supporters (including proposed Named Defendant 119 in the JSO Claim) blocked Abbey Road, London. They re-created the iconic Beatles’ Abbey Road album cover by posing on the zebra crossing, read out a statement, and then glued themselves to the crossing. They also provided a weblink so people could watch the roadblock live online²⁸
24. On 24 October 2022, 2 Just Stop Oil supporters covered the waxwork model of King Charles III at Madame Tussauds with chocolate cake²⁹.
25. On 25 October 2022, 6 Just Stop Oil supporters blocked Horseferry Road at the junction with Tufton Street, by sitting down in the road, with some also gluing themselves to the road surface while others locked themselves together. Two Just Stop Oil supporters also, using a fire extinguisher, sprayed orange paint on the outside of 55 Tufton Street which is the headquarters of the Global Warming Policy Foundation, and what Just Stop Oil calls “*other fossil fuel lobby groups*”³⁰.
26. On 26 October 2022, Just Stop Oil supporters, using a fire extinguisher, sprayed orange paint on the outside of numerous high end car-dealerships (including HR Owen Bugatti, Jack Barclay Bentley, Bentley Motor Cars London and Ferrari Mayfair) in Berkeley Square³¹.

²⁶ <https://juststopoil.org/2022/10/21/day-21-just-stop-oil-blocks-key-road-junction-at-holborn-to-demand-no-new-oil-and-gas/>

²⁷ <https://juststopoil.org/2022/10/22/day-22-just-stop-oil-blocks-roads-in-islington-to-demand-no-new-oil-and-gas/>

²⁸ <https://juststopoil.org/2022/10/23/day-23-just-stop-oil-block-road-at-famous-abbey-road-crossing/>

²⁹ <https://juststopoil.org/2022/10/24/day-24-just-stop-oil-cakes-the-king/>

³⁰ <https://juststopoil.org/2022/10/25/day-25-just-stop-oil-sprays-fossil-fuel-lobby-hq-with-orange-paint/>

³¹ <https://juststopoil.org/2022/10/26/day-26-just-stop-oil-sprays-high-end-car-dealers-with-orange-paint/>