



9. Who should be served with this application?

Defendants (Persons Unknown)

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

The Claimants will arrange for service on the Defendants (Persons Unknown)

N244 Application notice (06.22)

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10. What information will you be relying on, in support of your application?

- the attached witness statement
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

We refer to the witness statement of Alexander James Wright dated 11 June 2026 which has previously been filed with the Court in these proceedings.

The Claimants apply for permission to amend the Claim Form and Particulars of Claim in the form enclosed with this application so as to amend the definition of the Defendants (Persons Unknown) in the light of the evidence contained within such witness statement - which the Claimants respectfully submit should be reflected in the statements of case and the definition of the Defendants (Persons Unknown).

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

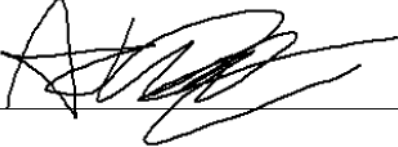
No

## Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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.

- I believe that the facts stated in section 10 (and any continuation sheets) are true.
- The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

### Signature



- Applicant
- Litigation friend (where applicant is a child or a Protected Party)
- Applicant's legal representative (as defined by CPR 2.3(1))

### Date

Day

18

Month

June

Year

2026

Full name

Alexander James Wright

Name of applicant's legal representative's firm

Eversheds Sutherland (International) LLP

If signing on behalf of firm or company give position or office held

Legal Director

Applicant's address to which documents should be sent.

Building and street

Two New Bailey

Second line of address

6 Stanley Street

Town or city

Salford

County (optional)

Postcode

M	3	5	G	X		
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If applicable

Phone number

+44 750 057 8620

Fax phone number

DX number

Your Ref.

292659.000057/WRIGHTAX

Email

alexwright@eversheds-sutherland.com



# Claim Form

**You may be able to issue your claim online which may save time and money. Go to [www.moneyclaim.gov.uk](http://www.moneyclaim.gov.uk) to find out more.**

<b>In the</b>	High Court of Justice King's Bench Division
<b>Fee Account no.</b>	PBA 0087211
<b>Help with Fees - Ref no.</b> (if applicable)	<b>H W F</b> - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/>

For court use only	
Claim no.	
Issue date	

Claimant(s) name(s) and address(es) including postcode

- (1) London City Airport Limited of London City Airport, City Aviation House, Royal Docks, London E16 2PB
- (2) Docklands Aviation Group Limited of City Aviation House, London City Airport, Royal Docks, London E16 2PB



Defendant(s) name and address(es) including postcode

Persons Unknown who, in connection with the Just Stop Oil or other environmental campaign, enter occupy or remain (without the Claimants' consent) upon that area of land known as London City Airport (as shown for identification edged red on the attached Plan 1) but excluding those areas of land as further defined below

Brief details of claim

The Claimants seek an injunction to restrain the Defendant from acts of trespass and/or nuisance on the land edged red on Plan 1 but excluding:-

- (1) the land and buildings coloured blue on Plan 1
- (2) the defined areas coloured pink and purple on Plan 1
- (3) those parts of buildings edged blue on the attached Plans 2 - 8.

The Claimants also seek costs and further and/or other relief

Value

This is a non monetary claim

Defendant's name and address for service including postcode

	£
Amount claimed	
Court fee	£626
Legal representative's costs	TBC
<b>Total amount</b>	

For further details of the courts [www.gov.uk/find-court-tribunal](http://www.gov.uk/find-court-tribunal).

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.

You must indicate your preferred County Court Hearing Centre for hearings here  
(see notes for guidance)

King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL

Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

- No

Does, or will, your claim include any issues under the Human Rights Act 1998?

- Yes  
 No

Claim no.

Particulars of Claim

attached

to follow


## Statement of truth

**Note:** you are reminded that a copy of this claim form must be served on all other parties.

I understand that proceedings for contempt of court may be brought against a person 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.

- I **believe** that the facts stated in this claim form and any attached sheets are true.
- The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

### Signature



- Claimant
- Litigation friend (where claimant is a child or protected party)
- Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day

11

Month

0 6

Year

2 0 2 4

Full name

Stuart Sherbrooke Wortley

Name of claimant's legal representative's firm

Eversheds Sutherland (International) LLP

If signing on behalf of firm or company give position or office held

Partner

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

One Wood Street

Second line of address

Town or city

London

County (optional)

Postcode

E C 2 V 7 W S

If applicable

Phone number

DX number

Your Ref.

WortleyS/292659.000057

Email

AMENDED PURSUANT TO THE ORDER OF [ ] DATED [ ]

IN THE HIGH COURT OF JUSTICE  
KING BENCH DIVISION

CLAIM NO:

BETWEEN:-

- (1) LONDON CITY AIRPORT LIMITED
- (2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

- v -

PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL **CAMPAIGN OR THE TAKE BACK THE POWER CAMPAIGN OR OTHER WEALTH INEQUALITY** CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER DEFINED BELOW

Defendants

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**[DRAFT] AMENDED** PARTICULARS OF CLAIM

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**I. INTRODUCTION**

1. The First Claimant is the operator of London City Airport, located at Royal Docks, London, E16 2PB (the "**Airport**"). The Airport serves around 3.7 million travelling passengers each year with an annual revenue of approximately £85 million.
2. The Second Claimant is a company, the principal activity of which is to own and develop the key assets of the Airport.

3. The Defendants are Persons Unknown who are environmental activists and who have committed to engaging in a campaign of disruptive direct action at airports across the country in summer 2024.

## II. LAND TO WHICH CLAIM RELATES

4. The land and property to which this Claim relates is London City Airport, located at Royal Docks, London, E16 2PB (the “**Airport**”).

5. The Airport is the subject of 13 relevant registered titles. In particular:

- 5.1 The First Claimant is the registered owner of the following five registered titles:

- (1) TGL469846 (freehold);
- (2) EGL527797 (leasehold);
- (3) EGL527799 (leasehold);
- (4) TGL617976 (leasehold); and,
- (5) EGL555153 (leasehold).

- 5.2 The Second Claimant is the registered owner of the following eight registered titles:

- (1) EGL519692 (freehold);
- (2) EGL552140 (freehold);
- (3) EGL518399 (freehold);
- (4) EGL530134 (freehold);
- (5) EGL338199 (leasehold);
- (6) EGL291578 (leasehold);
- (7) EGL465048 (leasehold); and,
- (8) EGL373364 (leasehold).

6. The extent of the Claimants’ land (a larger area of land than the land over which the injunction is sought) is shown on Plan A attached to the Claim Form (showing the various parcels of land owned or leased by the Claimants). The extent of the land

sought to be covered by the injunction is set out on Plan 1 attached to the Claim Form.

7. For the avoidance of doubt, the Claimant's land does not include (and this claim does not purport to relate to) the following areas on Plan 1:
  - 7.1 In relation to the areas shaded purple in Plan 1, the viaduct suspended over the ground level and forming part of the Docklands Light Railway.
  - 7.2 In relation to the areas shaded pink, those areas located below ground level forming (i) a rail tunnel (ii) a subway and (iii) a tunnel forming part of the Docklands Light Railway.
8. By this claim, the Claimants seek injunctive relief over the Claimants' land but excluding the following parcels of land, which are the subject of leases to third parties:
  - 8.1 Those buildings shaded blue on Plan 1;
  - 8.2 In those buildings shaded green on Plan 1, the areas edged blue on Plans 2-9.
9. The land over which injunctive relief is sought is referred to as the "**Land**".

### **III. PREVIOUS DIRECT ACTION AT THE AIRPORT**

10. In October 2019, Extinction Rebellion carried out direct action at the Airport as part of a series of protests on climate change. This included:
  - 10.1 A large group of individuals blocking the main entrance to the Airport.
  - 10.2 A large group of individuals occupying the DLR station adjoining the Airport.
  - 10.3 One individual climbing onto the top of an aircraft and gluing himself onto it.
  - 10.4 One individual boarding a flight and refusing to take his seat.

11. As a result of this direct action, around 50 individuals were arrested. The Airport suffered losses of approximately £279,000.

#### IV. THE AIRPORTS CAMPAIGN

12. On 9 March 2024, at a meeting in Birmingham in early March 2024, the environmental group Just Stop Oil discussed a new campaign to undertake direct action at airports across the UK in the summer of 2024 (the “Airports Campaign”).

13. At this meeting, a co-founder of Just Stop Oil was reported to have advocated:

- Cutting through fences and gluing themselves to runway tarmac;
- Cycling in circles on runways;
- Climbing on to planes to prevent them from taking off;
- Staging sit-ins at terminals 'day after day' to stop passengers getting inside airports.

14. Since this meeting, Just Stop Oil has announced the following on its website:

##### ***“SO WHAT’S THE PLAN?***

*Our Government doesn't give a f\*\*\* about its responsibilities. The country is in ruins. You know it, I know, they know it. That means it's up to us to come together and be the change we need.*

*We need bold, un-ignorable action that confronts the fossil fuel elites. We refuse to comply with a system which is killing millions around the world, and that's why we have declared airports a site of nonviolent civil resistance.”*

*We can't do this alone, we have a plan for this Summer, are you willing help make this happen?”*

15. It says, further:

***“This summer, Just Stop Oil will be taking action at airports.***

*As the grass becomes scorched, hosepipe bans kick in and the heat of the climate crisis enters peoples' minds, our resistance will put the spotlight on the heaviest users of fossil fuels and call everyone into action with us.*

*We'll work in teams of between 10-14 people willing to risk arrest from all over the UK. We need to be a minimum of 200 people to make this happen, but we'll be prepared to scale in size as our numbers increase. Exact dates and more details are coming.*

*Our plan can send shockwaves around the world and finish oil and gas. But we need each other to make it happen. Are you ready to join the team?"*

16. Just Stop Oil has also organised a fundraising page on the website <https://chuffed.org/project/just-stop-oil-resisting-against-new-oil-and-gas>, which says the following:<sup>1</sup>

***"Cat's out the bag. Just Stop Oil will take action at airports***

***The secret is out – and our new actions are going to be big.***

*We're going so big that we can't even tell you the full plan, but know this – Just Stop Oil will be taking our most radical action yet this summer. We'll be taking action at sites of key importance to the fossil fuel industry; **super-polluting airports.***

*..."*

17. On 6 June 2024, an email was sent from [info@juststopoil.org](mailto:info@juststopoil.org) to a subscriber list stating:

*"This is the most exciting email I've ever sent.*

*As many of you already know, this summer Just Stop Oil is taking action at airports.*

*That's exciting right? Well, there's more.*

*We won't be taking action alone.*

*Resistance groups across several countries in Europe have agreed to work together. That means this summer's actions will be internationally coordinated.*

**PICTURE OF AIRPORT ACTIONS SYMBOLISING INTERNATIONAL COMMUNITY**

***(<https://us02web.zoom.us/meeting/register/tZloduqppqTMtE9dgMMhlaymvEZgO45jgJ19A>)***

*People across Europe will be taking the fight to airports, the heart of the fossil economy.*

*This summer's actions across multiple countries will go down in history.*

*Want to meet the people making this happen?*

*Every Thursday for the next four weeks starting on the 13th of JUNE, 6.30pm*

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<sup>1</sup> As of 7 June 2024, £23,835 had been raised on this website.

*You don't want to miss this.*

*See you there,*

*Just Stop Oil"*

18. On 2 June 2024, Extinction Rebellion environmental activists blocked access to Farnborough Airport.

## V. CAUSES OF ACTION

19. The Claimants apprehend that, unless restrained by the Court, Persons Unknown will carry out acts amounting to trespass and nuisance on the Land.
20. In relation to trespass, members of the public have an implied consent to enter the Airport for air-travel and directly related purposes (such as dropping-off and picking-up passengers). They do not have the Claimants' consent to enter, remain on or occupy the Land for the purposes of carrying out a protest or taking part in any demonstration, procession or public assembly.
21. On 10 June 2024, notices were posted at various prominent locations around the Airport stating the following:

*"Members of the public do not have consent to enter or remain at London City Airport for the purpose of carrying out a protest or taking part in any demonstration, procession or public assembly. For the avoidance of any doubt, any individual entering London City Airport for the purposes of carrying out a protest or taking part in any demonstration, procession or public assembly has no licence to do so and is a trespasser. Moreover, pursuant to Byelaw 3(12) of the London City Airport Byelaws 1988, breach of which is a criminal offence, all persons intending to enter London City Airport in order to undertake a protest or to take part in any demonstration, procession or public assembly are prohibited from doing so."*

22. This notice was also published on the First Claimant's website on the same day.
23. Further, the London City Airport Byelaws prohibit the following acts (breach of which amounts to a criminal offence):

23.1. Byelaw 3(11): *"No person shall remain on the airport, or any part thereof, after having been requested by LCA or a constable to leave."*

23.2. Byelaw 3(12): *“No person shall enter the airport except as a bona fide airline passenger, whilst having been prohibited from entering by LCA or a constable.”*

23.3. Byelaw 3(13): *“No person shall in the airport:*

*(a) intentionally obstruct any officer of LCA in the proper execution of his duties;*

*(b) intentionally obstruct any person carrying out an act which is necessary to the proper execution of any contract with LCA; or*

*(c) intentionally obstruct any other person in the proper use of the airport, or behave so as to give reasonable grounds for annoyance to other persons in the airport.”*

23.4. Byelaw 5(7): *“No person shall climb any wall, fence, barrier, railing or post.”*

23.5. Byelaw 5(11): *“No person shall remove, displace or alter any structure or other property (including any notice) forming part of or provided for or in connection with the airport or erect or place on any part of the airport any such structure or property.”*

23.6. Byelaw 7(3): *“No person shall enter or climb upon, or attempt to enter or climb upon, any part of any aircraft without the authority of the person in charge of it or otherwise without lawful authority or reasonable cause or excuse.”*

24. Consequently, Persons Unknown taking part in the Airports Campaign (or related campaign) do not have the Claimants’ consent to enter, remain or occupy the Land for the purpose of protest or taking part in any demonstration, procession or public assembly. As such, they would be committing a trespass were they to do so.

25. In relation to nuisance, the threatened acts referred to at paragraphs 12-17 above would amount to an undue and substantial interference with the Claimants’ enjoyment of the Land.

## **VI. RELIEF SOUGHT**

26. As a result of the above, the Claimants seek injunctive relief to prevent the apprehended trespasses and nuisance.
27. In addition, the Claimants seek damages for any losses suffered as a result of the unlawful conduct.

## **VII. IDENTITIES OF THE DEFENDANTS**

28. The Claimants are not aware of the identities of any individuals who are likely to carry out direct action on the Land. This is because such direct action has not yet occurred. Even once it occurs, the Claimants would likely be unable to identify the participating individuals unless their details were provided by the police following arrest.

## **VIII. SERVICE/NOTIFICATION**

29. Pursuant to *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claimants are not able to serve Persons Unknown. Rather, the Claimants propose to notify Persons Unknown of the Claim Form, the Application Notice and evidence in support by taking the following steps:

- 29.1 Uploading a copy onto the following website:

<https://www.londoncityairport.com/corporate/injunction>.

- 29.2 Sending an email to [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com), [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com) and [info@juststopoil.org](mailto:info@juststopoil.org) stating that a claim has been brought and the application for an interim injunction made, and that the documents can be found at the website referred to above.

- 29.3 Affixing a notice at those locations marked with an "x" on Plan 1 stating that the claim has been brought and the application for an interim

injunction made, and setting out where these documents can be found and obtained in hard copy.

**IX. HUMAN RIGHTS**

30. Any reliance by the Defendants or Persons Unknown on their rights to freedom of expression and/or assembly within Articles 10/11 ECHR provides no defence to this claim. Articles 10 and 11 ECHR include no right to trespass on private property and thereby override the rights of private landowners: *DPP v Cuciurean* [2022] 3 WLR 446 (DC), §§40-50; *Ineos Upstream v Persons Unknown* [2019] 4 WLR 100 (CA), §36 (Longmore LJ).

**AND THE CLAIMANTS CLAIM**

- (1) An order that until 7 June 2027 the Defendants and Persons Unknown must not, without the consent of the Claimants, enter, occupy or remain upon the Land;
- (2) Costs; and,
- (3) Further and/or other relief.

**YAASER VANDERMAN**

**Landmark Chambers**

## STATEMENT OF TRUTH

The Claimants believe that the facts stated in these amended particulars of claim are true. The Claimants 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.

I am duly authorised by the Claimants to sign this statement.

---

~~Stuart Sherbrooke Wortley~~

~~Partner~~

Eversheds Sutherland (International) LLP

Claimants' solicitor