

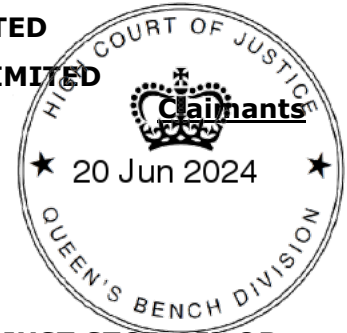
**IN THE HIGH COURT OF JUSTICE**  
**KING BENCH DIVISION**

**CLAIM NO: KB-2024-001765**

**Before Mr Justice Julian Knowles**  
**On 20 June 2024**

**BETWEEN:-**

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



**- v -**

**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 IN THE CLAIM FORM**

**Defendant**

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**ORDER**

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**PENAL NOTICE**

**IF YOU THE WITHIN DEFENDANTS OR 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 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 AND PERSONS UNKNOWN**

**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 Claim Form, dated 12 June 2024

**AND UPON** hearing the Claimants' application for an interim injunction, dated 12 June 2024, and supporting evidence, without Persons Unknown being notified

**AND UPON** hearing Counsel for the Claimants

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

**AND UPON** the "Land" being defined as that land known as London City Airport, as shown for identification edged red on the attached Plan 1 in Schedule 1, but excluding:

- a. Those buildings shaded blue on Plan 1;
- b. In those buildings shaded green on Plan 1, the areas edged blue on Plans 2-8;
- c. In those areas shaded purple, the land suspended over the ground and forming part of the Docklands Light Railway.
- d. In the areas shaded pink, the underground rail tunnel, the subway and that part of Docklands Light Railway located below ground level.

**IT IS ORDERED THAT:**

**INJUNCTION**

1. Until 20 June 2029 or final determination of the claim or further order in the meantime, whichever shall be the earlier, Persons Unknown must not, without the consent of the Claimants, enter, occupy or remain upon the Land.
2. In respect of paragraph 1, Persons Unknown must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
3. The injunction contained at paragraph 1 of this Order shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1.5 hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the review hearing.

**VARIATION**

4. Anyone served with or notified of this Order 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 Claimants' solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 48 hours in advance of any hearing.
5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimants have liberty to apply to vary this Order.

### **SERVICE AND NOTIFICATION**

7. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and Note of the Hearing on 20 June 2024 will be notified to Persons Unknown by the Claimants carrying out each of the following steps:
  - a. Uploading a copy onto the following website:  
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/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. Either affixing a notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9(d) below.
9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to Persons Unknown by the Claimants carrying out each of the following steps:

- a. Uploading a copy of the Order onto the following website:  
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/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 1.
  - d. Affixing warning notices of A2 size at those locations marked with an "X" on Plan 1.
10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to Persons Unknown of any further applications shall be effected by the Claimants carrying out each of the following steps:
  - a. Uploading a copy of the application onto the following website:  
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>.
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
  - c. Affixing a notice at those locations marked with an "X" on Plan 1 stating that the application has been made and where it can be accessed in hard copy and online.
11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(a)-(b) only.
12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8(c), 9(c)-(d) and 10(c), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

### **FURTHER DIRECTIONS**

14. Liberty to apply.
15. Costs are reserved.

### **COMMUNICATIONS WITH THE CLAIMANT**

16. The Claimants' solicitors and their contact details are:

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

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

**Dated: 20 June 2024**

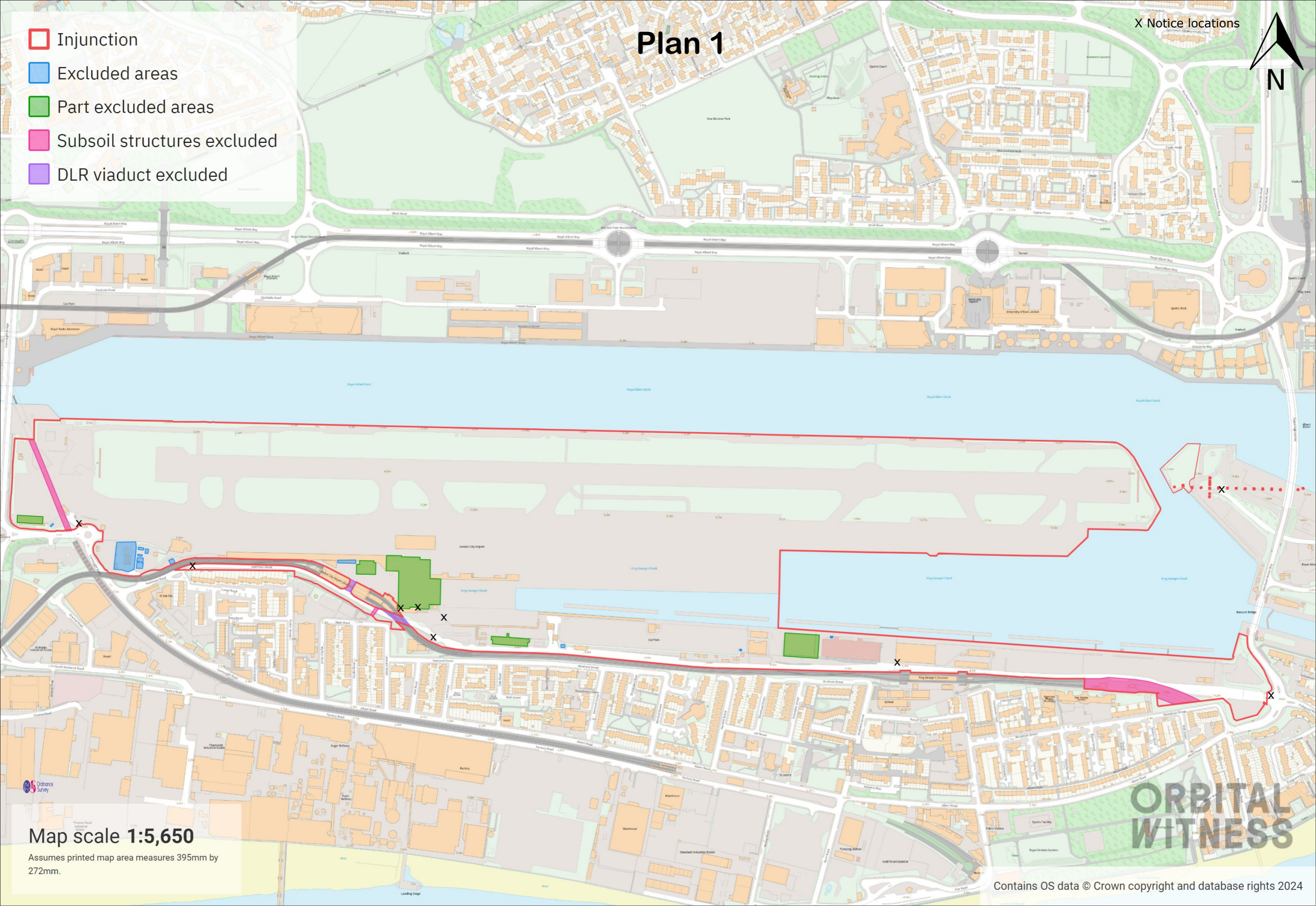
## **SCHEDULE 1 - PLANS**



- Injunction
- Excluded areas
- Part excluded areas
- Subsoil structures excluded
- DLR viaduct excluded

# Plan 1

X Notice locations



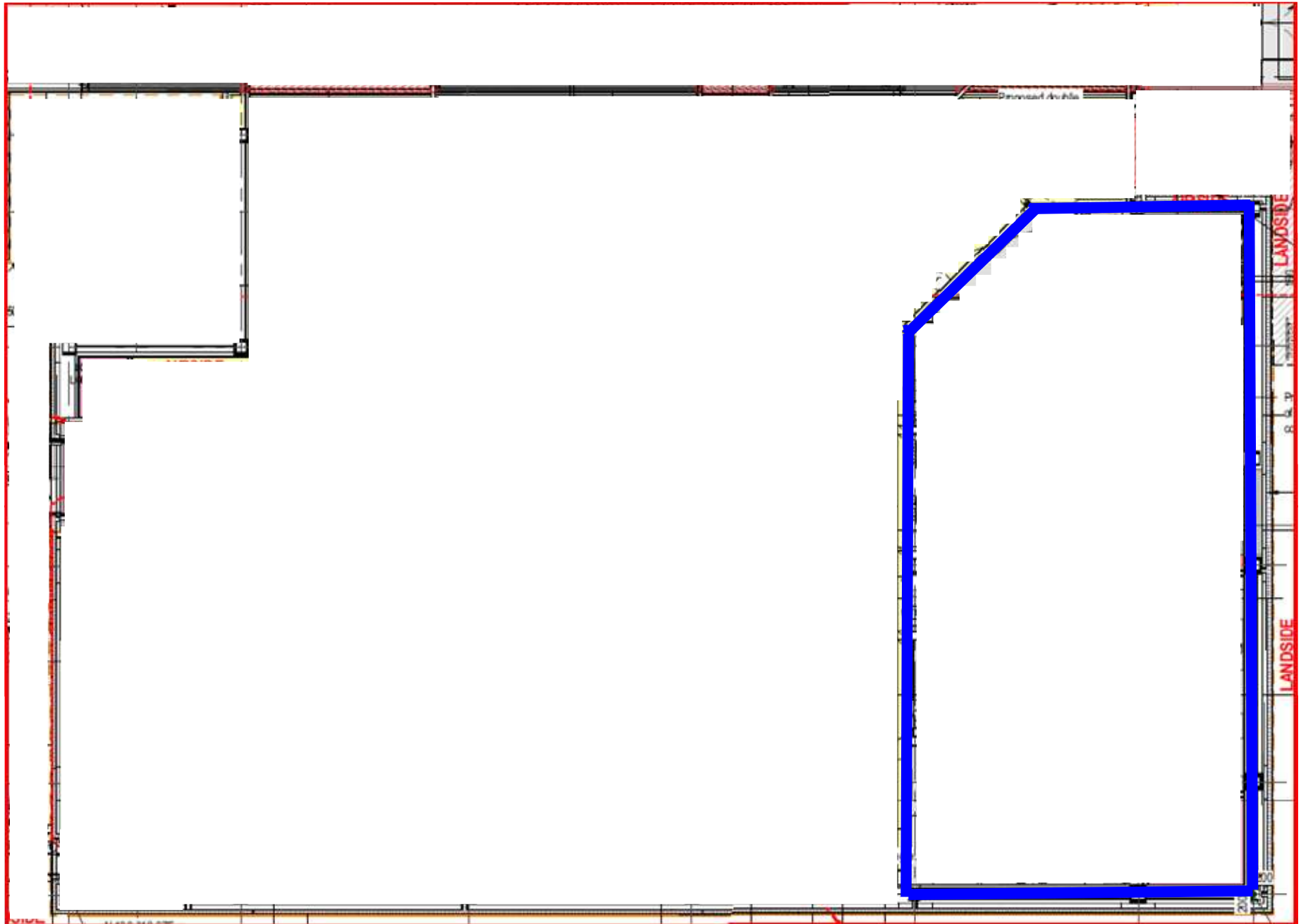
 Ordnance Survey  
**Map scale 1:5,650**  
 Assumes printed map area measures 395mm by 272mm.

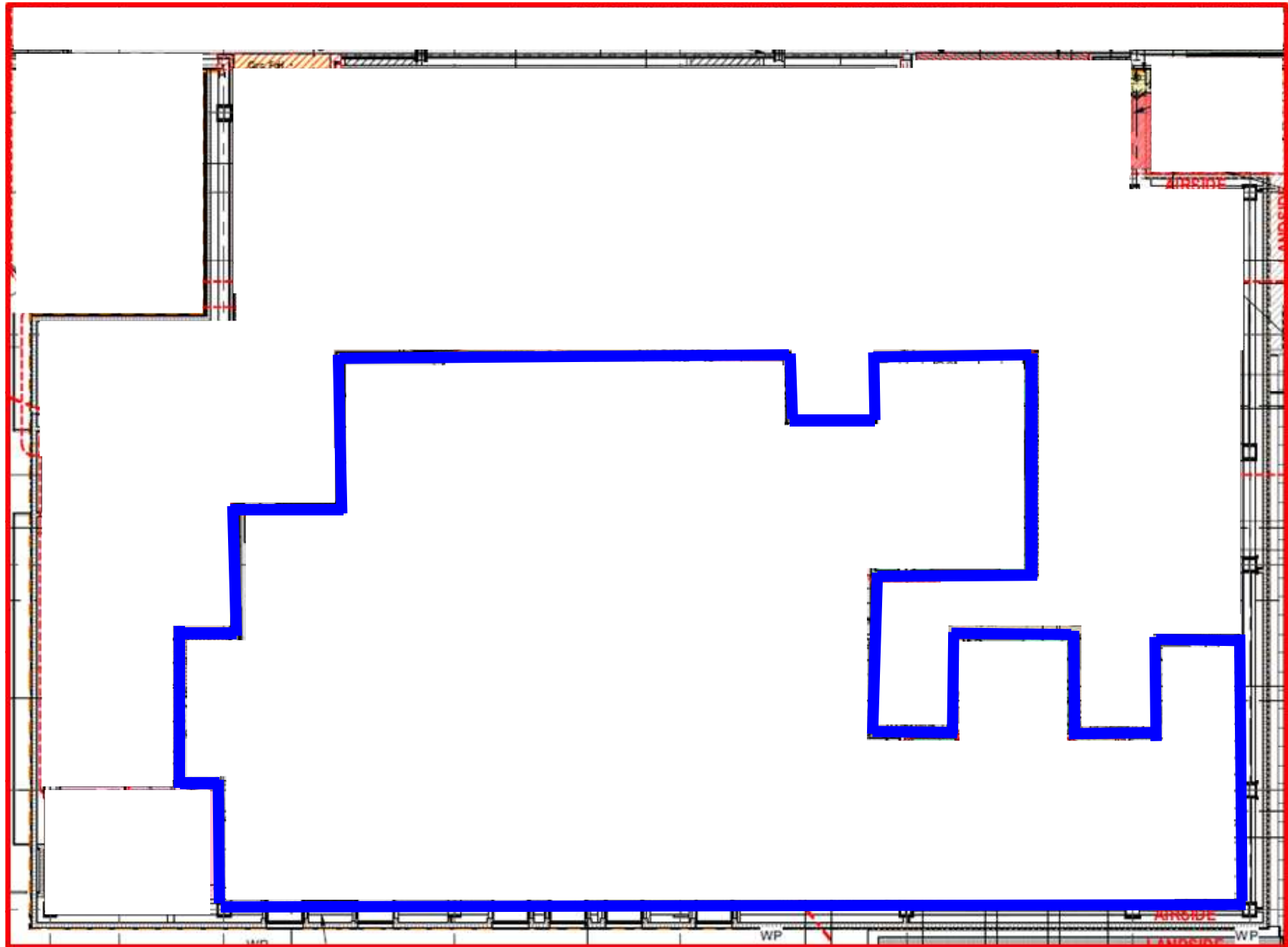
**ORBITAL  
WITNESS**







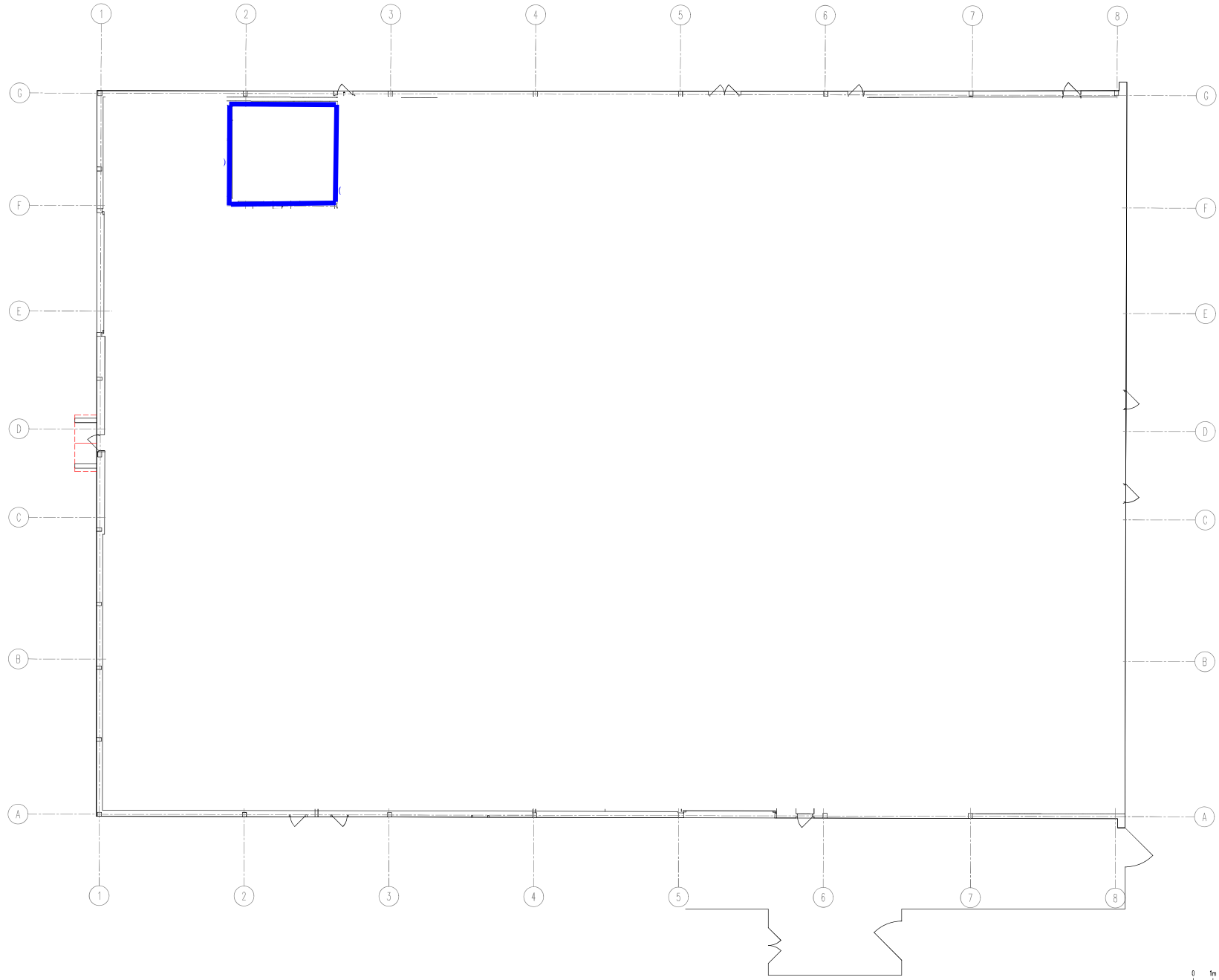




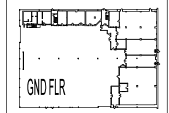
# Blue Shed - Ground Floor

# Plan 5

General Notes:



B Room Numbers Added	01/11/16
A Door Numbers Added	01/03/16



London City Airport, City Aviation House  
Royal Docks, London, E16 2PB  
**RECORD DRAWING**

<b>BLUE SHED</b>	
Ground Floor General Arrangement Plan	
Drawn: 04/08/15	VR
Checked: R/BS/G/A/001	VR
Scale: 1:100	1:100

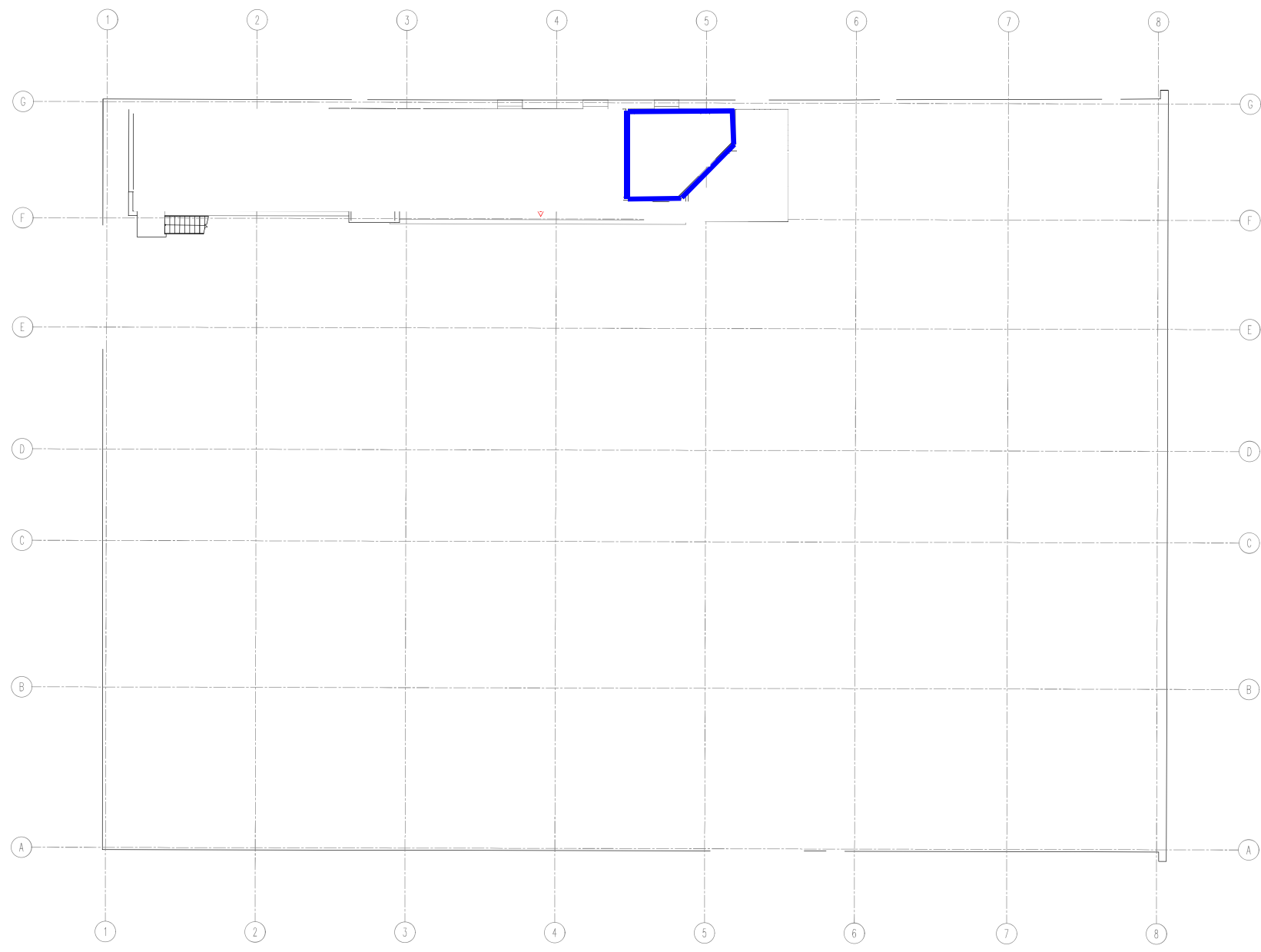


# Blue Shed - First Floor

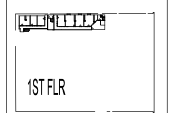
# Plan 6

General Notes:

**LEGEND**  
 FIRE DOOR  
 STANDARD DOOR



B	Room Numbers Added	01/11/16
A	Door Numbers Added	01/03/16



**London City Airport**  
 Get closer.  
 London City Airport, City Aviation House  
 Royal Docks, London, E16 2PB

**RECORD DRAWING**

**BLUE SHED**

Sheet 06  
 First Floor  
 General Arrangement

04/08/15	VR	1:100	A1
R/BS/1/A/001			
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drawing may be reproduced, stored in a retrieval			
system, or transmitted in any form or by any			
means, electronic, mechanical, photocopying, recording			
or otherwise, without the written permission of LCA.			





# Jet Centre - Ground Floor

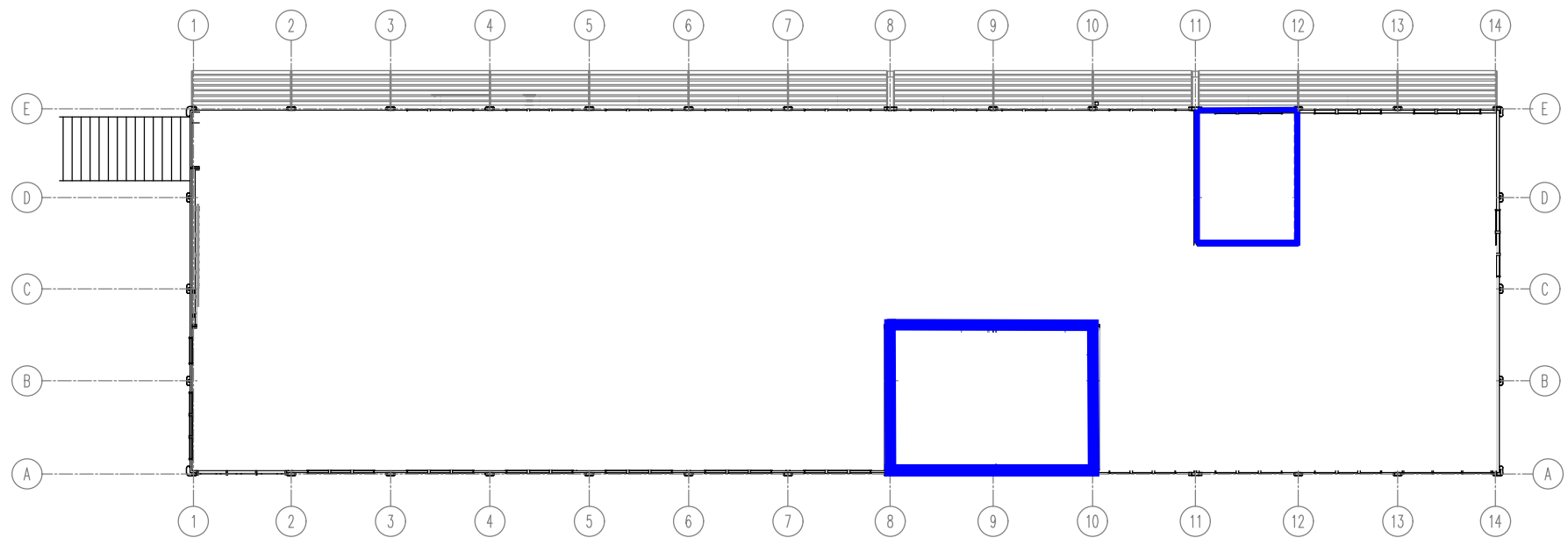
# Plan 7

DO NOT SCALE - IF IN DOUBT ASK Associated Drawing

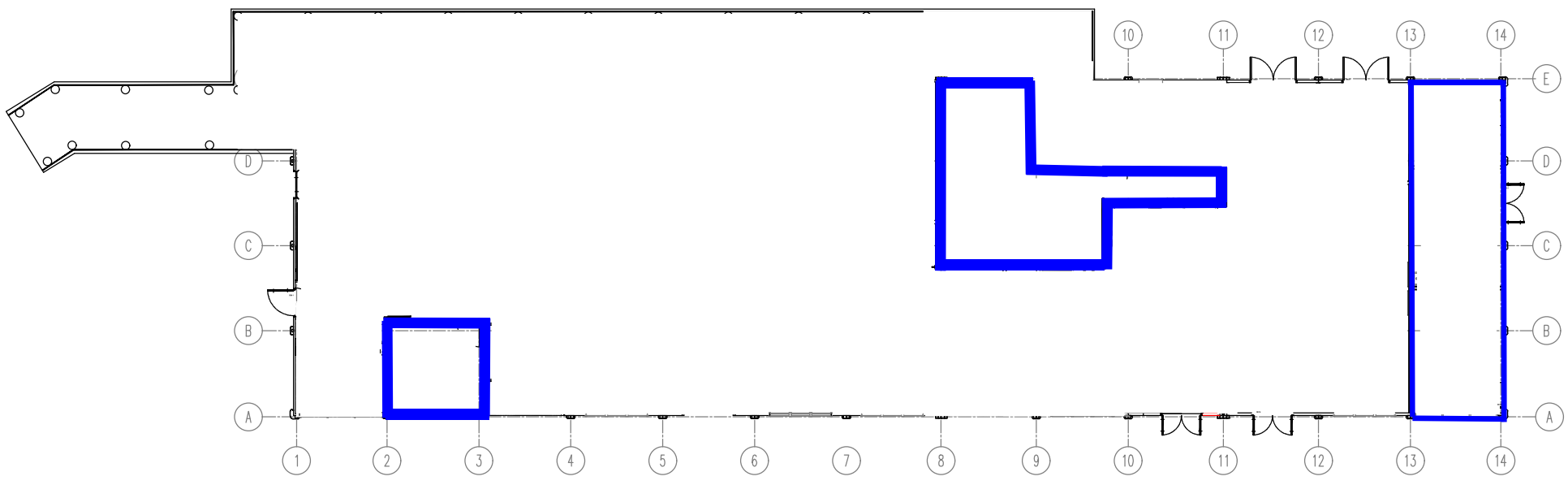
General Notes

### LEGEND

-  Fire Door
-  Standard Door



# Jet Centre - First Floor



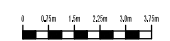
E Item Numbers Added	16/06/18
D Layout amended	19/06/18
C 04/06/18	04/06/18
B Item Numbers Added	04/02/18
A Modified as indicated	15/06/15

G-1 FLRS

London City Airport  
Get closer.  
London City Airport, City Action House  
Royal Dock, London, E16 1JH

RECORD DRAWING

JET CENTRE  
Grid 11  
Ground to First Floor  
General Arrangement Plan

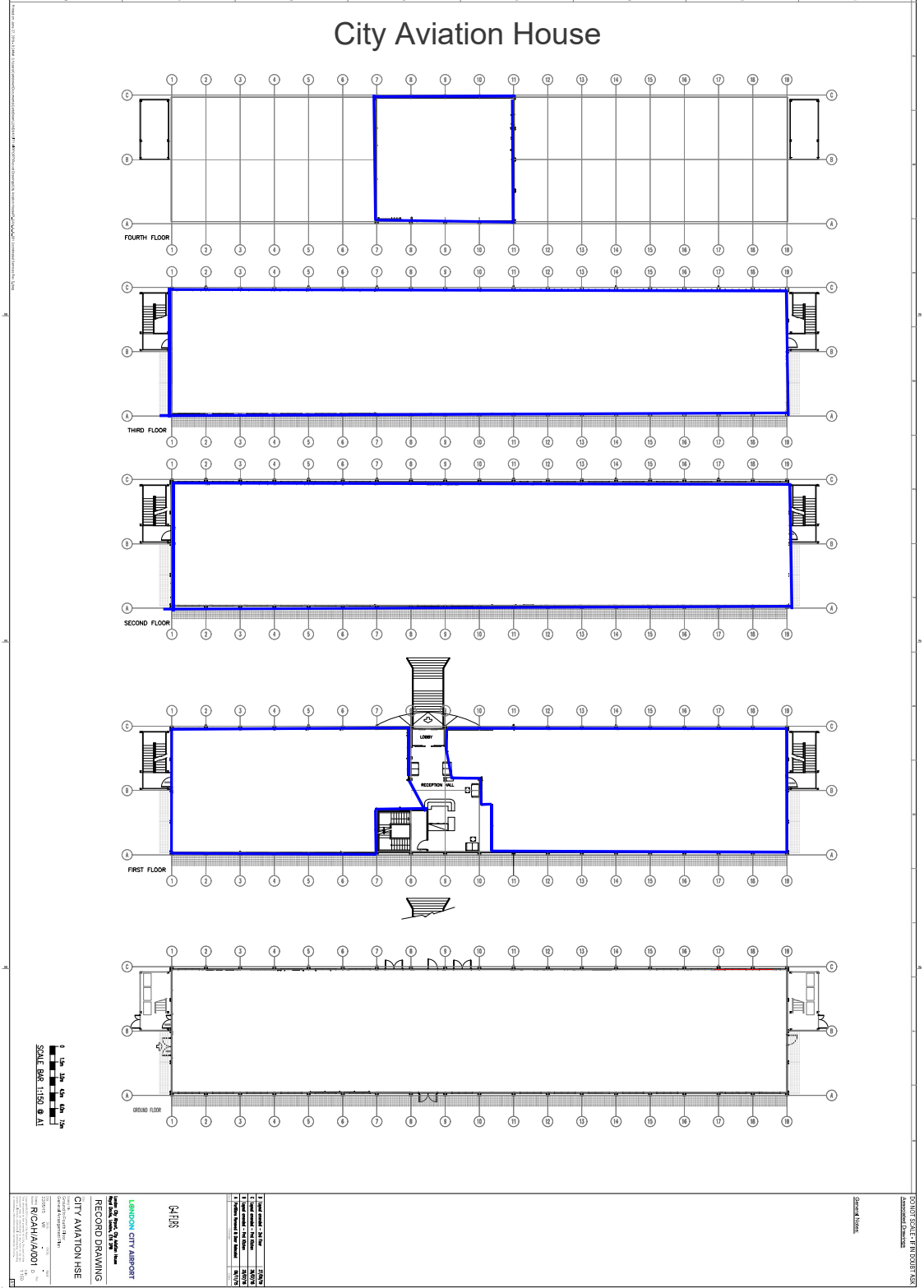


SCALE BAR 1:75 @ A1

24/07/15 VJR  
R/JC/A/001  
175

# City Aviation House

Plan



0 1/4" = 1'-0"  
 1/8" = 1'-0"  
 SCALE: ARCH. 1/8" = 1'-0"  
 1/4" = 1'-0"

**SHS**  
**LANSON CITY AIRPORT**  
**CITY AVIATION HSE**  
**RECORD DRAWING**  
**CITY AVIATION HSE**  
**ARCHITECT**  
**1000 S. 10TH AVENUE**  
**MINNEAPOLIS, MN 55415**  
**PHONE: 612.338.1111**  
**FAX: 612.338.1112**  
**WWW.SHSA.COM**  
**DATE: 11/11/11**  
**PROJECT: CITY AVIATION HSE**  
**DRAWING: RECORD DRAWING**  
**SCALE: ARCH. 1/8" = 1'-0"**  
**1. DATE PLOTTED: 11/11/11**  
**2. PLOTTER: HP DesignJet T1100PS**  
**3. PLOT SCALE: 1/8" = 1'-0"**  
**4. PLOT SIZE: 36" x 48"**  
**5. PLOT ORIENTATION: LANDSCAPE**  
**6. PLOT RANGE: ALL**  
**7. PLOT METHOD: PLOT TO FILE**  
**8. PLOT FILE NAME: C:\Users\shs\Documents\CITY AVIATION HSE\111111\111111.dwg**  
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**18. PLOT RANGE: ALL**  
**19. PLOT METHOD: PLOT TO FILE**  
**20. PLOT FILE NAME: C:\Users\shs\Documents\CITY AVIATION HSE\111111\111111.dwg**

## **SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS**

- (1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.
  
- (2) The Claimants 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 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

### **SCHEDULE 3 – EMAIL ADDRESSES**

- [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
- [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
- [info@juststopoil.org](mailto:info@juststopoil.org)