

QB-2021-003576, 003626 and 003737

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
AMENDED UNDER THE SLIP RULE**

**Before: Mr Justice Cotter  
On: 5<sup>th</sup> May 2023**

BETWEEN:



QB-2021-003576

**NATIONAL HIGHWAYS LIMITED**

Claimant

- and -

**(1) PERSONS UNKNOWN CAUSING THE BLOCKING OF, ENDANGERING,  
OR PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25  
MOTORWAY, A2 A20 AND A2070 TRUNK ROADS AND M2 AND M20  
MOTORWAY, A1(M), A3, A12, A13, A21, A23, A30, A414 AND A3113 TRUNK  
ROADS AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40  
MOTORWAYS FOR THE PURPOSE OF PROTESTING  
(2) MR ALEXANDER RODGER AND 139 OTHERS**

Defendants

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**ORDER**

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**PENAL NOTICE**

**IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER  
YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED,  
FINED OR HAVE YOUR 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.**

**A Defendant who is an individual who is ordered not to do something must not do it himself/herself or in any other way. He/she must not do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.**

**FURTHER TO** the Orders made in these proceedings by Bennathan J on 9 May 2022 (“**Bennathan Order**”) and 16 January 2023 (“**Costs Order**”) and by the Court of Appeal on 14 March 2023 (“**CoA Order**”)

**AND UPON** the Claimant’s application by Application Notice dated 13<sup>th</sup> April 2023 pursuant to the provisions at paragraph 16 of the **CoA Order**

**AND UPON** the Claimant confirming that this Order is not intended to prohibit lawful protest which does not block or endanger, or prevent the free flow of traffic on the Roads defined in paragraph 1 of this Order.

**AND UPON HEARING** Counsel for the Claimants, Myriam Stacey KC and Michael Fry, and various Named Defendants in person at a hearing on 24 April 2023 (“**Review Hearing**”) and also after consideration of submissions lodged by /on behalf of Named Defendants after the hearing

**AND FURTHER UPON** the handing down of a judgment

**IT IS ORDERED THAT:**

**Definitions**

1. In this Order, the following defined terms shall apply:
  - a. “**Named Defendants**” means D2 to D140 whose names appear in the revised and renumbered Schedule 1 annexed to this Order to reflect the Order made at paragraph 7.
  - b. “**Defendants**” refers to all defendants.
  - c. “**24 Defendants**” means those defendants defined in the Costs Order against whom costs were ordered in favour of the Claimant.

- d. **“109 Defendants”** means those defendants defined in the Costs Order as those listed in Schedule 1 of the Bennathan Order as D2 to D134 except for the 24 Defendants.
- e. **“April 2023 Removed Defendants”** means those defendants removed from the Schedule of Defendants as provided for by order in paragraph 2(a) of this Order.
- f. **“the Roads”** shall mean all of the following:
- i. The M25, meaning the London Orbital Motorway and shown in red on the plans at Appendix 1 annexed to this Order.
  - ii. The A2, A20, A2070, M2 and M20, meaning the roads shown in blue and green on the plans at Appendix 2 annexed to this Order.
  - iii. The A1(M) (Junction 1 to Junction 6), A1 (from A1M to Rowley Lane and from Fiveways Corner roundabout to Hilltop Gardens), M11 (Junction 4 to Junction 7), A12 (M25 Junction 28 to A12 Junction 12), A1023 (Brook Street) (from M25 Junction 28 roundabout to Brook Street Shell Petrol Station access), A13 (M25 Junction 30 to A1089), A13 (from junction with A1306 for Wennington to M25 Junction 30), A1089 (from junction with A13 to Port of Tilbury entrance), M26 (whole motorway from M25 to M20), A21 (M25 to B2042), A23 (M23 to Star Shaw), M23 (Junction 7 to Junction 10 (including M23 Gatwick Spur)), A23 (between North and South Terminal Roundabouts), A3 (A309 to B2039 Ripley Junction), M3 (Junction 1 to Junction 4), A316 (from M3 Junction 1 to Felthamhill Brook), A30 (M25 Junction 13 to Harrow Road, Stanwell, Feltham), A3113 (M25 Junction 14 to A3044), M4 (Junction 1 to Junction 7), M4 Spur (whole of spur from M4 Junction 4 to M4 Junction 4a), M40 (Junction 7 to A40 at Fray’s River Bridge), M1 (Junction 1 to Junction 8), A405 (from M25 Junction 21A to M1 Junction 6), A1 (from Fiveways Corner roundabout to Hilltop Gardens), and A414 (M1 Junction 8 to A405), meaning the roads shown in red on the plan at Appendix 3 annexed to this Order.
  - iv. In the case of each of the Roads, the reference to the Roads shall include all carriageways, hard shoulders, central reservations, motorway (including the A1(M)) verges, slip roads, roundabouts (including those at junctions providing access to and from the Roads), gantries, traffic tunnels, traffic bridges including in the case of the M25 the Dartford Crossing and Queen Elizabeth II Bridge and other highway structures whether over, under or adjacent to the

motorway/trunk road, together with all supporting infrastructure including all fences and barriers, road traffic signs, road traffic signals, road lighting, communications installations, technology systems, laybys, police observation points/park up points, and emergency refuge areas.

- g. “**Injunction Website**” means the page on the National Highways website which holds the information as to injunctions in force, which is presently at: <https://nationalhighways.co.uk/about-us/high-court-injunctions-for-motorways-and-major-a-roads/>.

### **Amendments to the Claim**

2. The Claimant has permission to amend the Schedule of Defendants in the form set out at Schedule 1. Those amendments are as follows:

- a. Removal of Named Defendants: D6, D9, D12, D29, D63, D64, D69, D105, D108, D111, D115 and D128
- b. Addition of Named Defendants:
- i. D135: Marcus Decker
  - ii. D136: Morgan Trowland
  - iii. D137: Abigail Percy Radcliff
  - iv. D138: Alexander Wilcox
  - v. D139: Cressida Gethian
  - vi. D140: Emma Mani
- c. The addition of the following wording to the Schedule of Defendants:
- “For the avoidance of doubt, any person who has been a defendant in these proceedings, or who has given undertakings to the Claimant, may nevertheless become Defendant 1 as a person unknown if they commit any of the prohibited acts.”*

### **Injunction in force**

3. By way of variation of the **Bennathan order** and the **CoA** order and with immediate effect and until 23.59 hrs on 10<sup>th</sup> May 2024 the Defendants (save for Defendant 119 and if the order is discharged against them Defendants 116 and 133) and each of them are forbidden from:
  - a. Blocking or endangering, or preventing the free flow of traffic on the Roads for the purposes of protesting by any means including their presence on the Roads, or affixing themselves to the Roads or any object or person, abandoning any object, erecting any structure on the Roads or otherwise causing, assisting, facilitating or encouraging any of those matters.
  - b. Causing damage to the surface of or to any apparatus on or around the Roads including by painting, damaging by fire, or affixing any structure thereto.
  - c. Entering on foot those parts of the Roads which are not authorised for access on foot, other than in cases of emergency.

#### **Service by Alternative Method on the First Defendant**

4. The Court will provide sealed copies of this Order to the Claimant's solicitors for service (whose details are set out below).
5. Pursuant to CPR r. 6.15, 6.27 and r.81.4:
  - a. The Claimant shall serve this Order upon D1 by:
    - i. Posting a direct link to this Order on the National Highways Injunctions Website at: <https://nationalhighways.co.uk/about-us/high-court-injunctions-for-motorways-and-major-a-roads/m25-high-court-injunction-proceedings/>
    - ii. Sending a notification of the existence of this Order to the Press Association and in particular advertising the web address of the Injunction Website and a direct link to this Order.
    - iii. Publishing social media posts on the National Highways Twitter and Facebook platforms advertising the existence of this Order and providing a link to the Injunction Website.
    - iv. Emailing a copy of this Order to:

1. [juststopoil@protonmail.com](mailto:juststopoil@protonmail.com)
2. [juststopoilpress@protonmail.com](mailto:juststopoilpress@protonmail.com)
3. [insulatebritainlegal@protonmail.com](mailto:insulatebritainlegal@protonmail.com)
4. [Ring2021@protonmail.com](mailto:Ring2021@protonmail.com)
5. [actions@animalrebellion.org](mailto:actions@animalrebellion.org)
6. [fundraising@animalrebellion.org](mailto:fundraising@animalrebellion.org)
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15. [techsupport@animalrebellion.org](mailto:techsupport@animalrebellion.org)
16. [info@animalrising.org](mailto:info@animalrising.org)

6. Service in accordance with paragraph 5 above shall:

- a. Be verified by certificates of service to be filed with the Court;
- b. Be deemed effective as at the date of service specified by the certificates of service;
- c. Be good and sufficient service of this Order on D1 and each of them and the need for personal service is dispensed with.

#### **Service by Alternative Method on Named Defendants**

7. Pursuant to CPR r. 6.15, 6.27 and r.81.4, the Claimant is permitted in addition to personal service, where practicable, to serve this Order on each Named Defendant by:

- a. Placing this Order on the Injunction Website; and
- b. Electronic means: where a Named Defendant has provided an email address to the Claimant, the Claimant shall serve that Named Defendant with this Order by sending this Order by email to that email address. If necessary due to the size of this Order, the appendices may be served by emailing that Named Defendant with a secure link to a file-sharing platform which hosts the appendices. It is open to any Defendant to contact the Claimant to require postal service instead of electronic means; or

- c. Post: by posting a copy of this Order through the letterbox of each Named Defendant (or leaving in a separate mailbox) at their last known address, with a notice drawing the recipient's attention to the fact the package contains a Court Order. If the address does not have a letterbox, or mailbox, a package containing this Order may be affixed to or left at the front door or other prominent feature 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 Appendix 4. It is open to any Defendant to contact the Claimant to identify an alternative place for service and, if they do so, it is not necessary for a notice or package to be affixed to or left at the front door or other prominent feature; or
  - d. Social media: only in circumstances where the Claimant has no address, or no email address for a Named Defendant, but is aware of that Named Defendant having a social media account which will permit the Claimant to contact that Named Defendant directly, the Claimant may serve this Order by sending a message to that Named Defendant providing either this Order or a link to the Injunction Website.
8. Where a Named Defendant is known by the Claimant to be in prison this order shall be served by sending it by first class and/or special delivery post to the Named Defendant at the prison in which the Claimant reasonably considers they are being held
9. Service in accordance with paragraphs 7 and 8 above shall:
  - a. be verified by certificates of service to be filed with Court;
  - b. be deemed effective as at the date specified by the certificates of service; and
  - c. be good and sufficient service of this Order on the Defendants and each of them and the need for personal service be dispensed with.
10. Further, without prejudice to paragraphs 6, 8 and 9 , while this Order is in force, the Claimant shall take all reasonably practicable steps to effect personal service of the Order upon any Defendant of whom it becomes aware is, or has been, on the Roads for the purposes of protesting and shall verify any such service with further certificates of service (where possible if persons unknown can be identified) to be filed with Court.

### **Third-Party Disclosure**

11. Until further order and pursuant to CPR 31.17, the Chief Constables for those forces listed in Schedule 2 to this Order shall procure that the officers within their forces disclose to the Claimant:
  - a. all of the names and addresses 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 referred to in these proceedings; and
  - b. all arrest notes, body camera footage and/or all other photographic material relating to possible breaches of this Order.
12. Without the permission of the Court, the Claimant shall not make use of any document disclosed by virtue of paragraph 10 of this Order, other than for one or more of the following uses:
  - a. applying to name and join any person as a Named Defendant to these proceedings and to serve the said person with any document in these proceedings;
  - b. investigating, formulating, pleading and prosecuting any claim within these proceedings arising out of any alleged breach of this Order;
  - c. use for purposes of formulating, pleading and prosecuting any application for committal for contempt of court against any person for breach of any Order made within these proceedings.
13. The Claimant has until 4.00pm on 5<sup>th</sup> June 2023 to file, and serve on the First Defendant in accordance with paragraph 5(a) (i) and (iv) above, and the Police Representative Assistant Chief Constable in accordance with paragraph 15, written submissions as to whether/on what basis the court should continue to make the order at paragraphs 11 and 12 ; such submissions (if filed and served ) to include addressing the power of the Court to make such an order in respect of confidential data/information (including material not yet in existence) and the inability of any person arrested to challenge the provision of information
14. Until further Order, the postal address and/or address for service of any person who is added as a defendant to these proceedings shall be redacted in any copy of any document which is served other than by means of it being sent directly to that person or their legal representative.
15. The Claimant is to serve this order on the Police Representative Assistant Chief Constable Owen Weatherill (owen.weatherill@npocc.police.uk), by email only.



## Further Directions

16. The **Bennathan order** and the **CoA** order are discharged with immediate effect as against Virginia Morris, Defendant 119.
17. Unless the Claimant files and serves a statement (verified) as to the basis upon which Rebecca Locker (Defendant 116) and Giovanna Lewis (Defendant 133) have been properly joined as named Defendants by 4.00pm on 19<sup>th</sup> May 2023 the **Bennathan order** and the **CoA** order will be discharged against them as at that time without further order. In the event that a statement is served the Court will consider further directions to resolve any issue arising. If either Defendant does not wish to further challenge the making of the order against them (for example because of potential costs consequences) the Claimant and the Court should be notified forthwith and the order will not be discharged under this paragraph.
18. Any named Defendant has permission to file with the Court, and serve on the Claimant through its solicitors (using the details below), a signed undertaking in the form at schedule 3 by 4.00pm on the 22<sup>nd</sup> May 2023. As soon as practicable after that date the Court will consider the removal as a Named Defendant of any person who has signed the undertaking.
19. Unless the Court is notified that no hearing is required ( as no continuation of the order is sought) this order will be reconsidered at a hearing on Friday 26<sup>th</sup> April 2024 at 10.30 am at the Royal Courts of Justice, London to determine whether there is a continued threat which justifies continuation of this Order. It will be the Claimant's responsibility to place details of the hearing on the Injunction Website. No further application shall be required.
20. 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 by email to the addresses specified at paragraph 23 below 48 hours before making such application of the nature of such application and the basis for it.
21. Any person applying to vary or discharge this Order must provide their full name and address, and address for service to the Claimant and to the Court, and must also apply to be joined as a Named Defendant to these proceedings at the same time.
22. The Claimant has liberty to apply to extend, vary or discharge this Order, or for further directions.

## Costs

23. Save for Defendant 119 (and if the order is discharged against them Defendants 116 and 133) each of the 109 Defendants shall pay the Claimant's costs in these proceedings incurred up to and including 12 May 2022 on the standard basis but not exceeding £4,360 for each of them, to be assessed if not agreed.
24. Save for Defendant 119 (and if the order is discharged against them Defendants 116 and 133) each of the 109 Defendants shall pay the Claimant £1,500 costs on account under CPR 42.2.8 by 4pm on Friday 9<sup>th</sup> June 2023.
25. Each of the Defendants, except for the April 2023 Removed Defendants, Defendant 119 (and if the order is discharged against them Defendants 116 and 133) shall pay the Claimant's costs of the Review Hearing on the standard basis, to be assessed if not agreed, such costs to be divided on a pro-rata basis.

#### **Communications with the Claimant**

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

DLA Piper UK LLP

Attention: Petra Billing and Rob Shaw

1 St. Paul's Place

Sheffield

S1 2JX

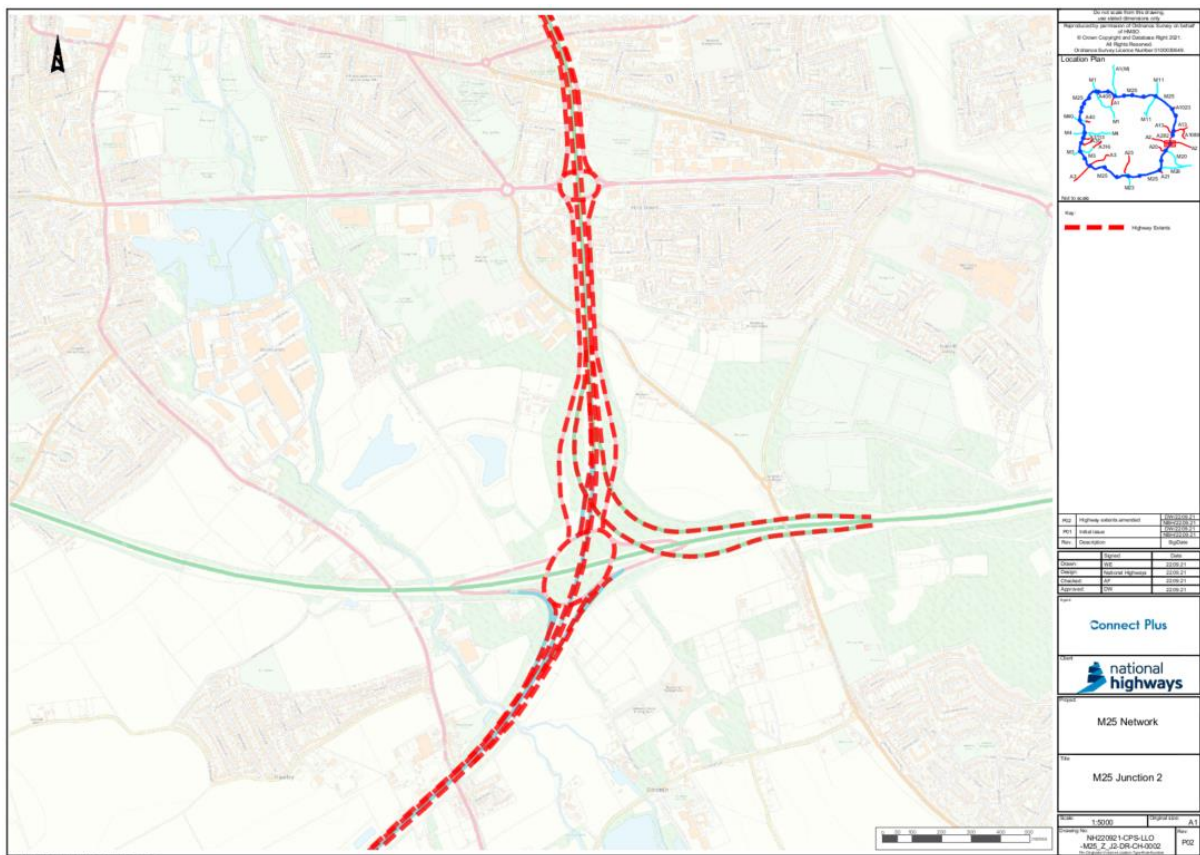
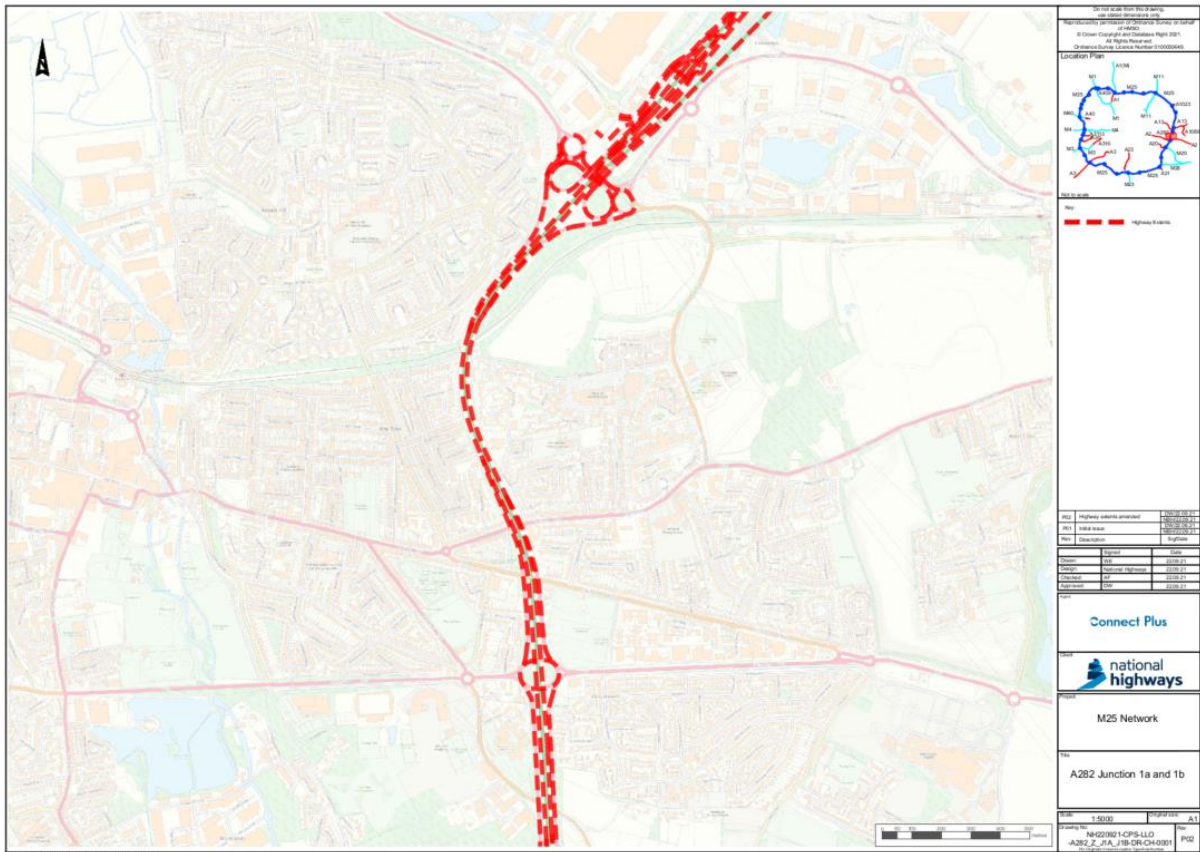
E: [petra.billing@dlapiper.com](mailto:petra.billing@dlapiper.com) and [rob.shaw@dlapiper.com](mailto:rob.shaw@dlapiper.com)

T: 0207 796 6047 / 0114 283 3312

**BY THE COURT**

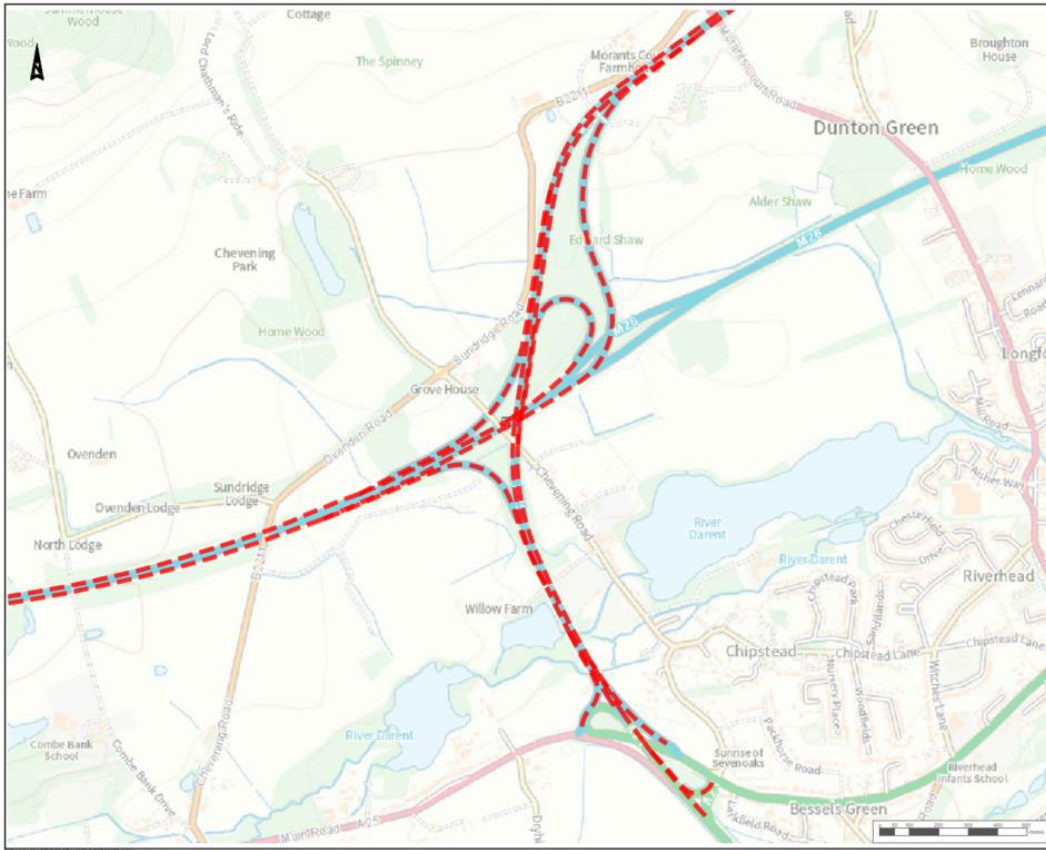
**MADE ON 5<sup>th</sup> May 2023**

# APPENDIX 1









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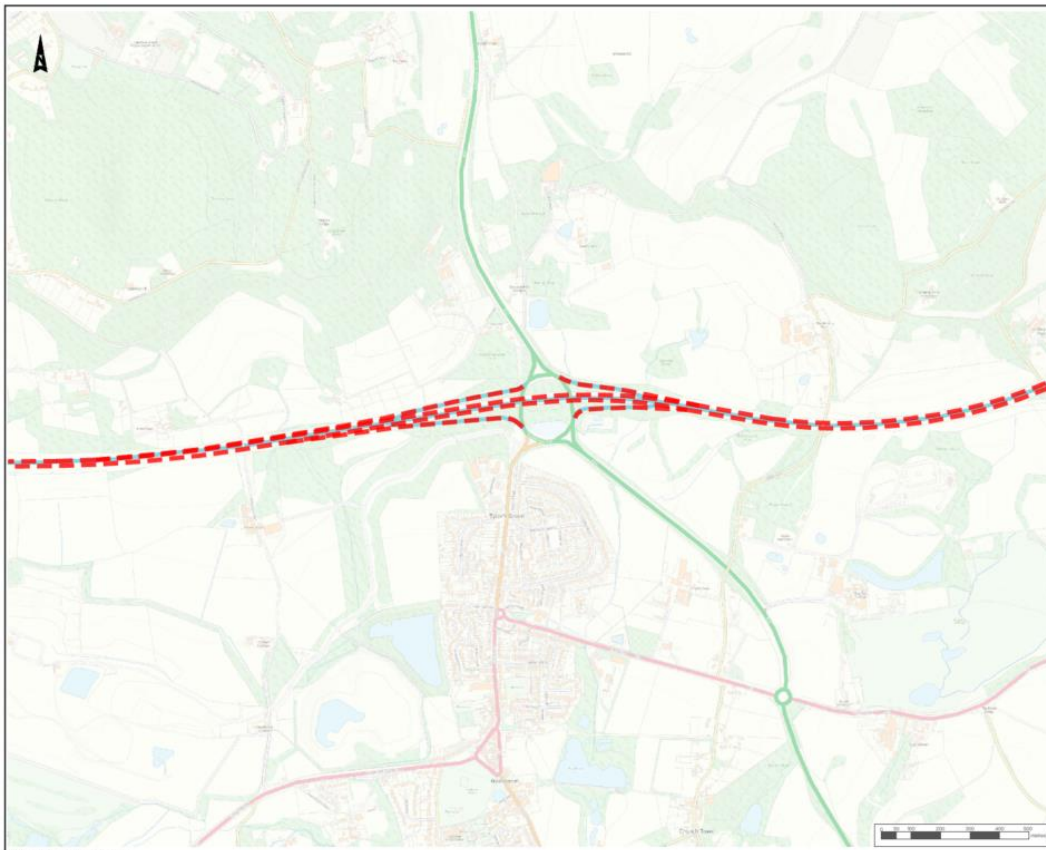
**Location Plan**

Scale: 1:5000  
 Highway Route:

REV	Description	DATE
001	Issue for Approval	10/10/16
002	Issue for Construction	10/10/16
003	Final Issue	10/10/16

**Connect Plus**  
**national highways**  
 M25 Network  
 M25 Junction 5

Scale: 1:5000  
 Drawing: NP22062-1-CPS-LLD  
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 Page: 1 of 1



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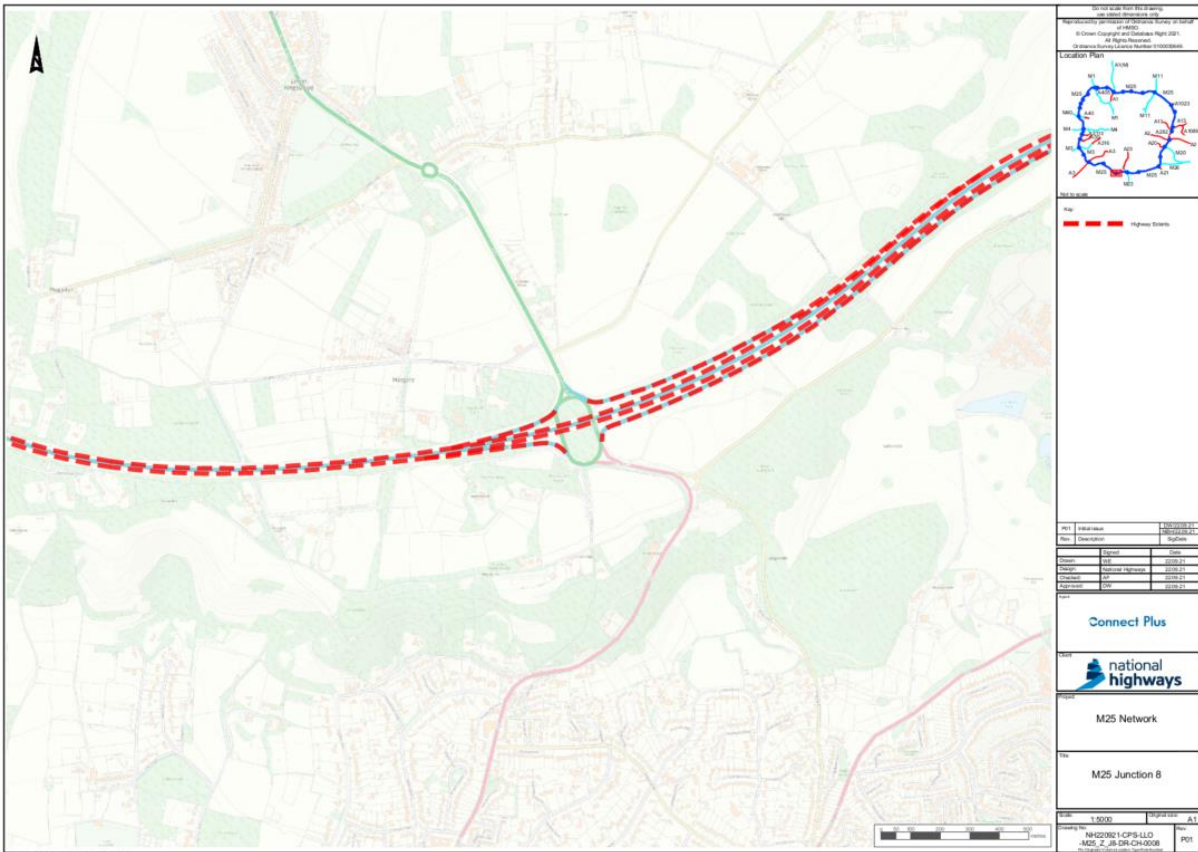
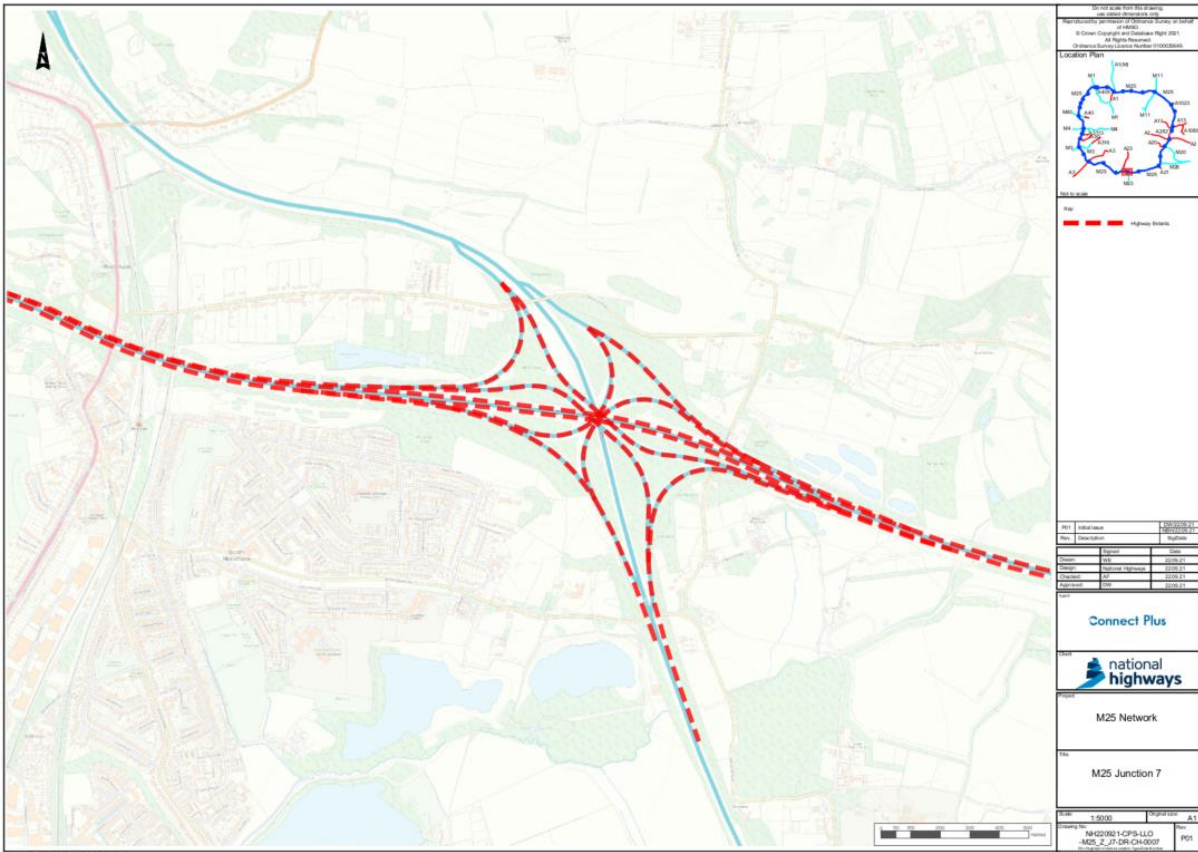
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 Highway Route:

REV	Description	DATE
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003	Final Issue	10/10/16

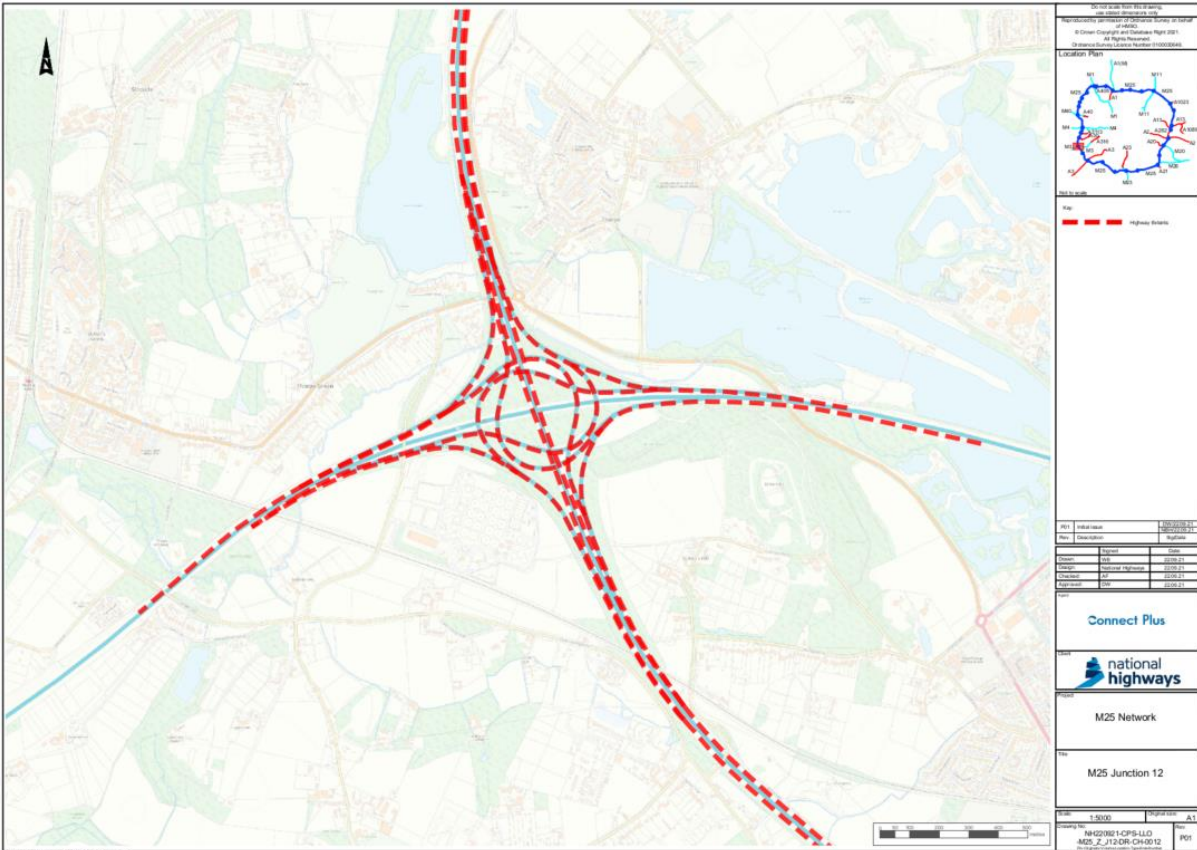
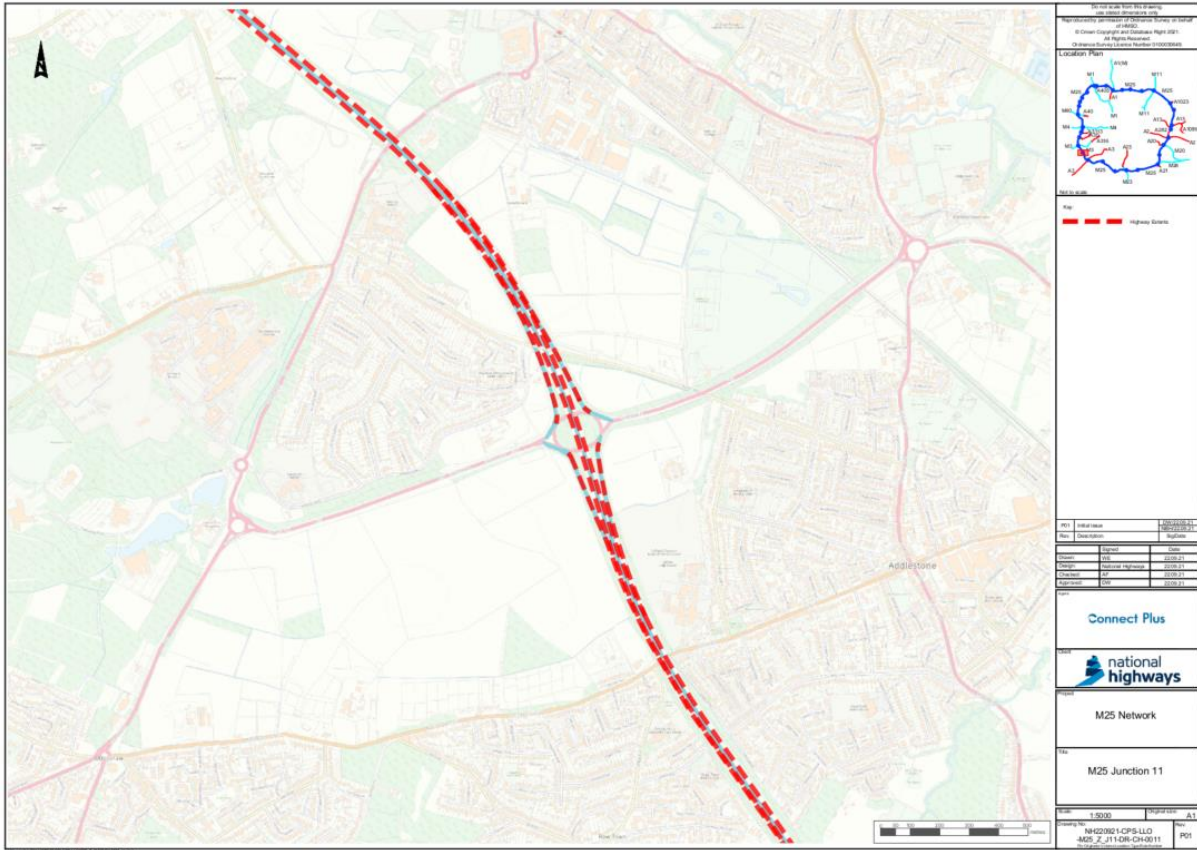
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**national highways**  
 M25 Network  
 M25 Junction 6

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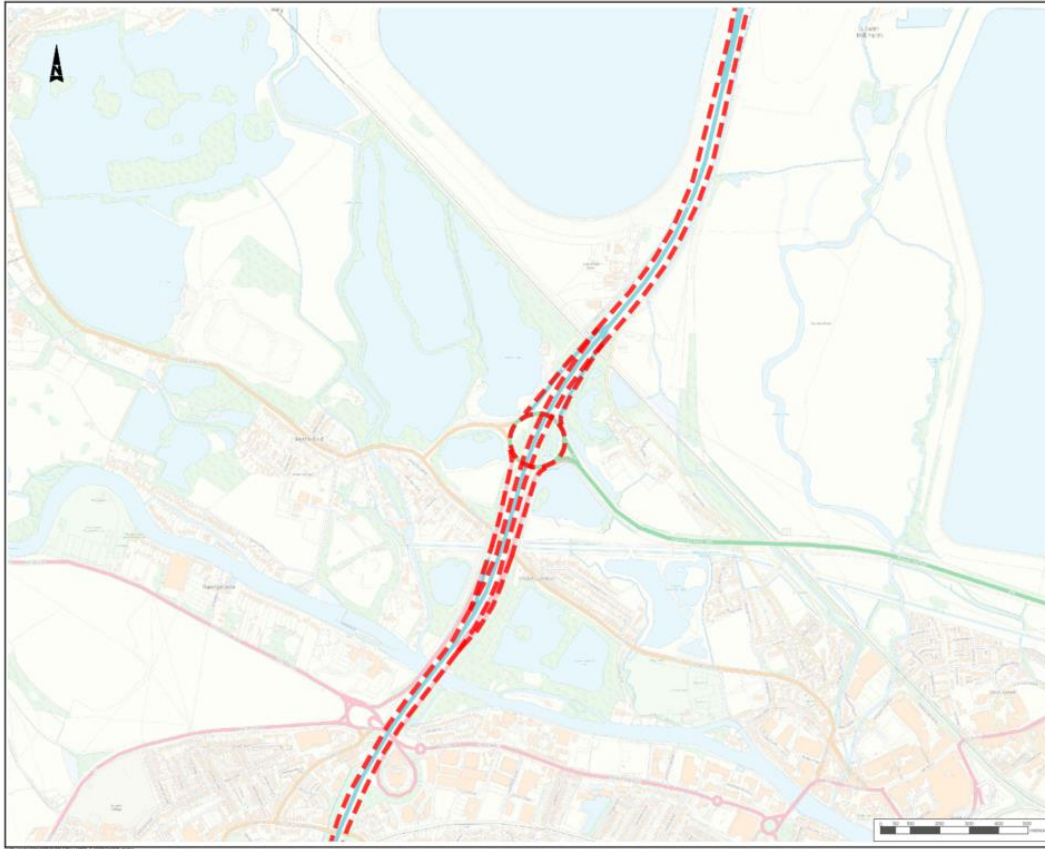












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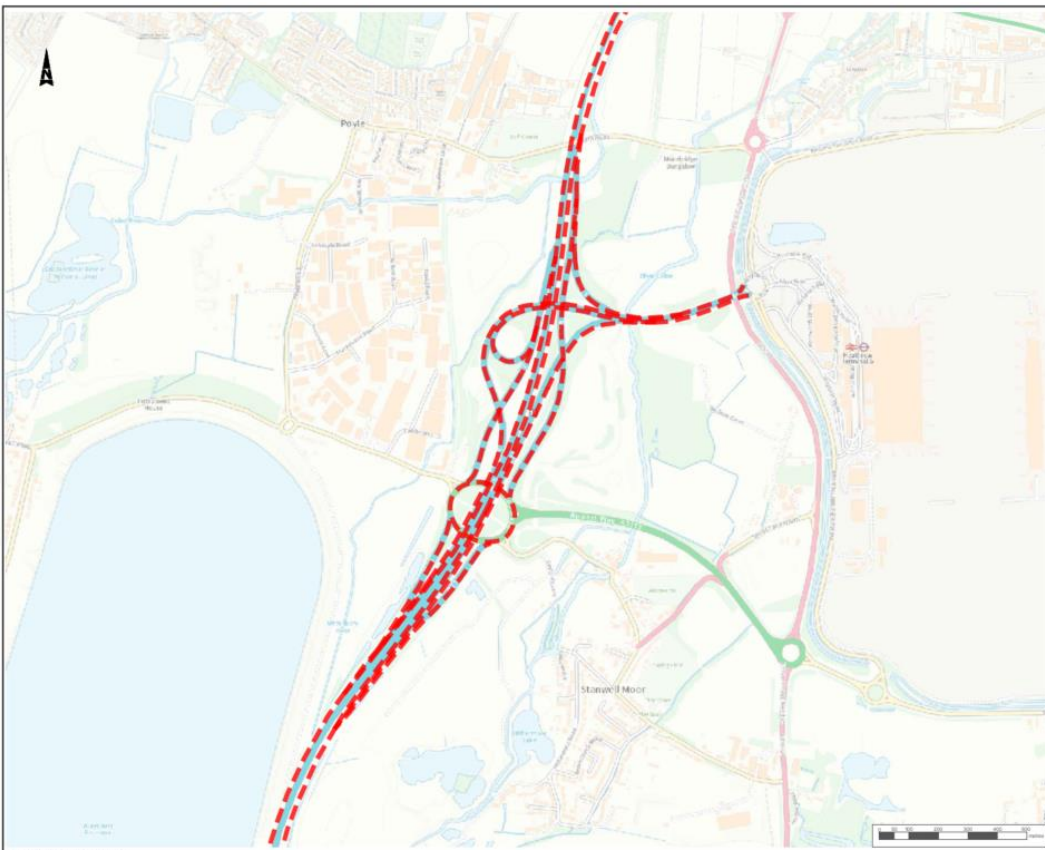
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Client	Highways England
Contract Reference	CH013
Contract Date	2013
Contract Value	£100m
Contract Status	Open

**Connect Plus**  
  
**national highways**  
**M25 Network**  
**M25 Junction 13**

Scale: 1:5000  
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 Date: P01



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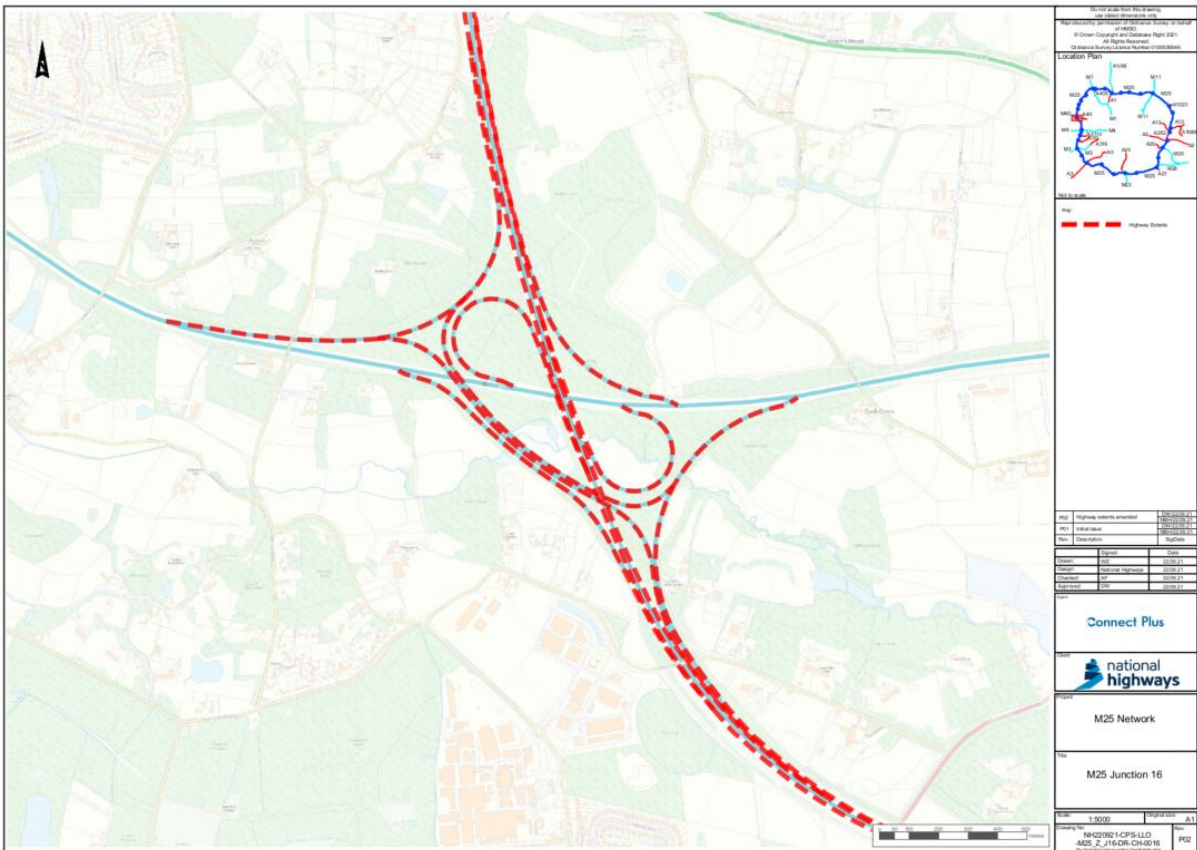
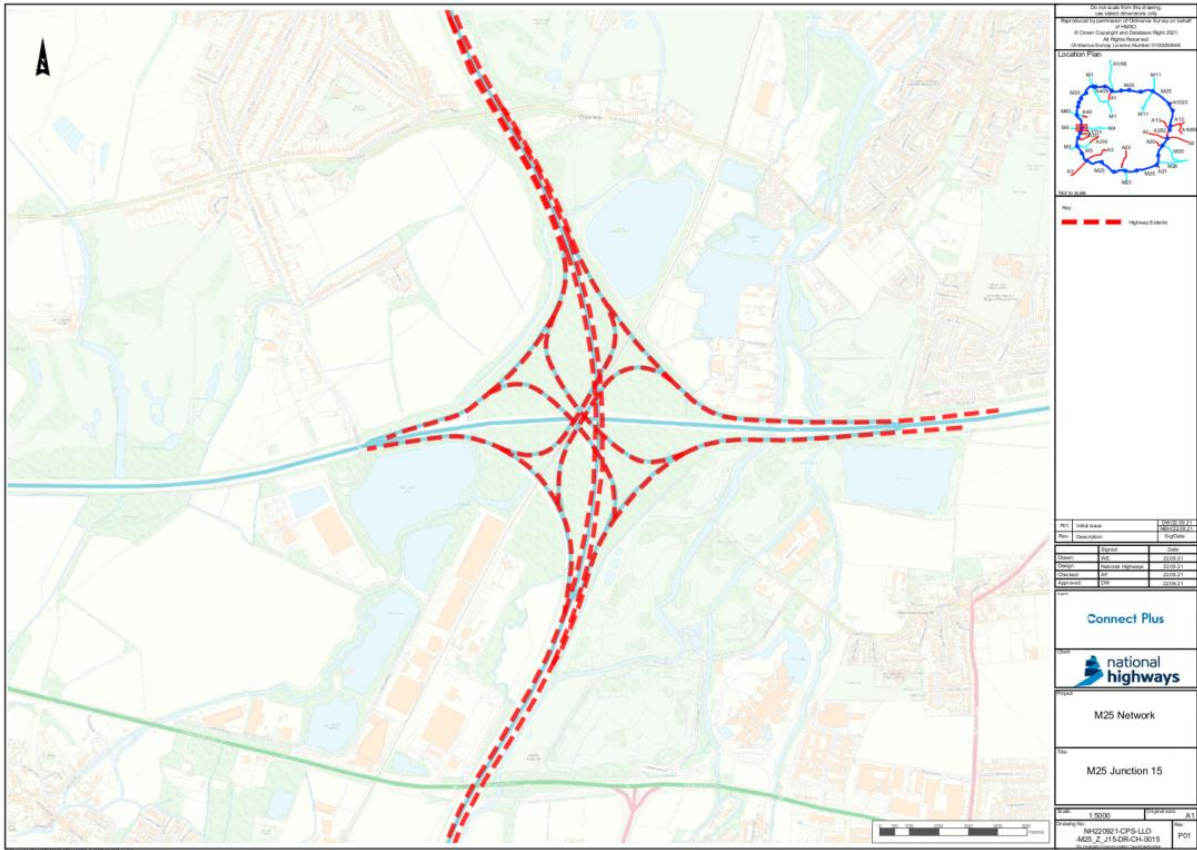
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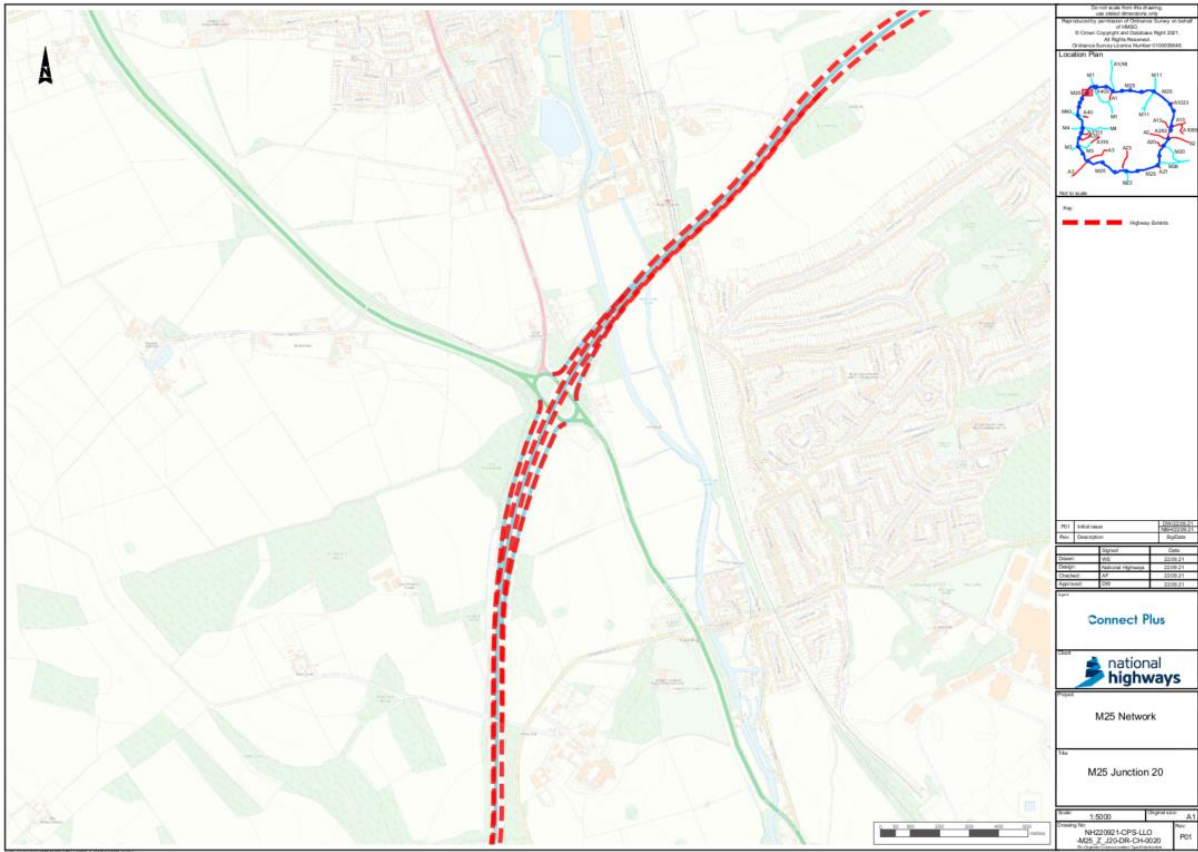
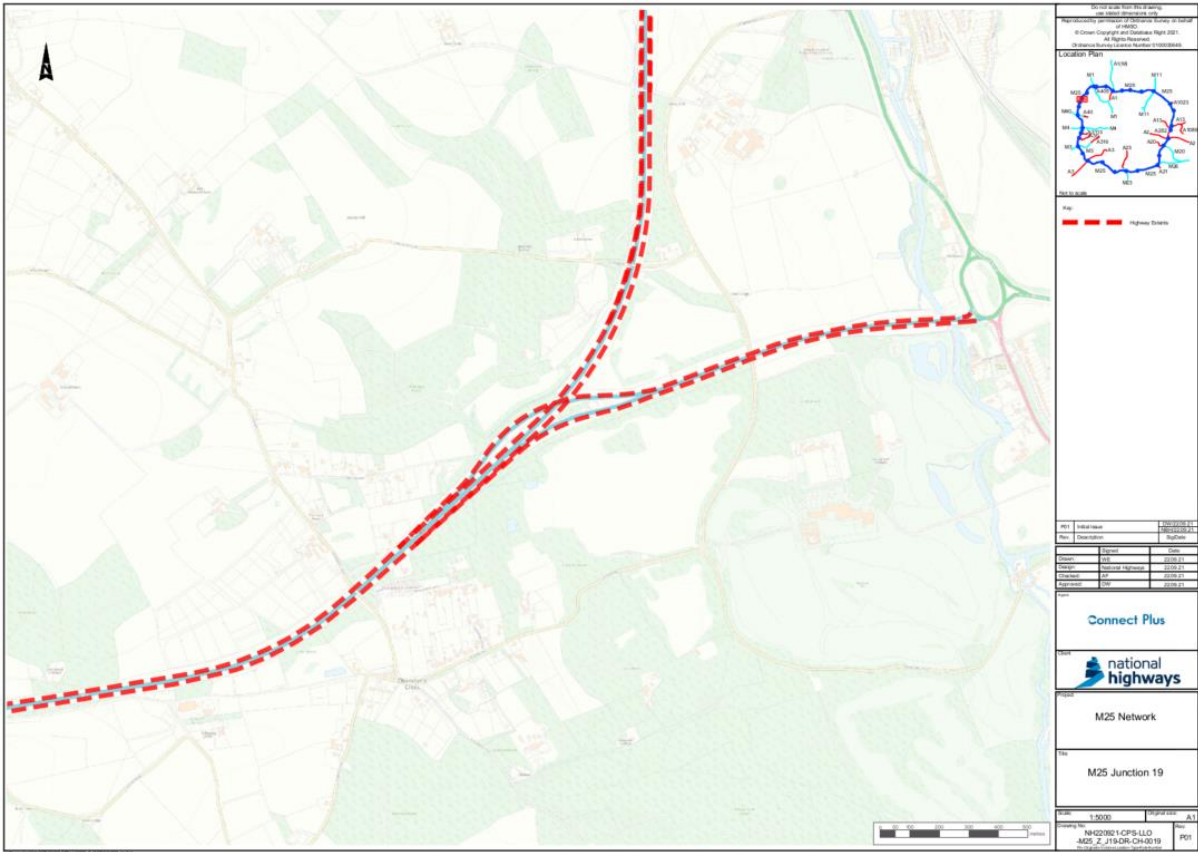
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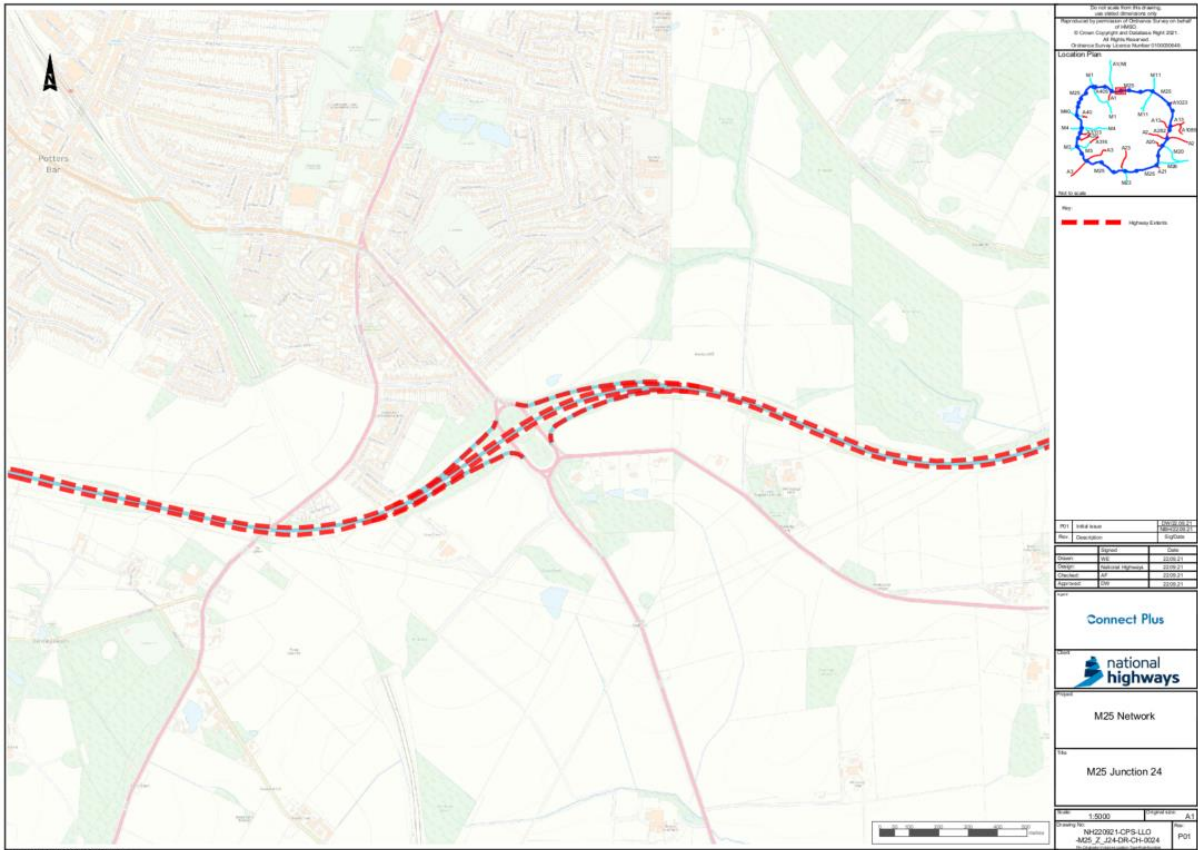
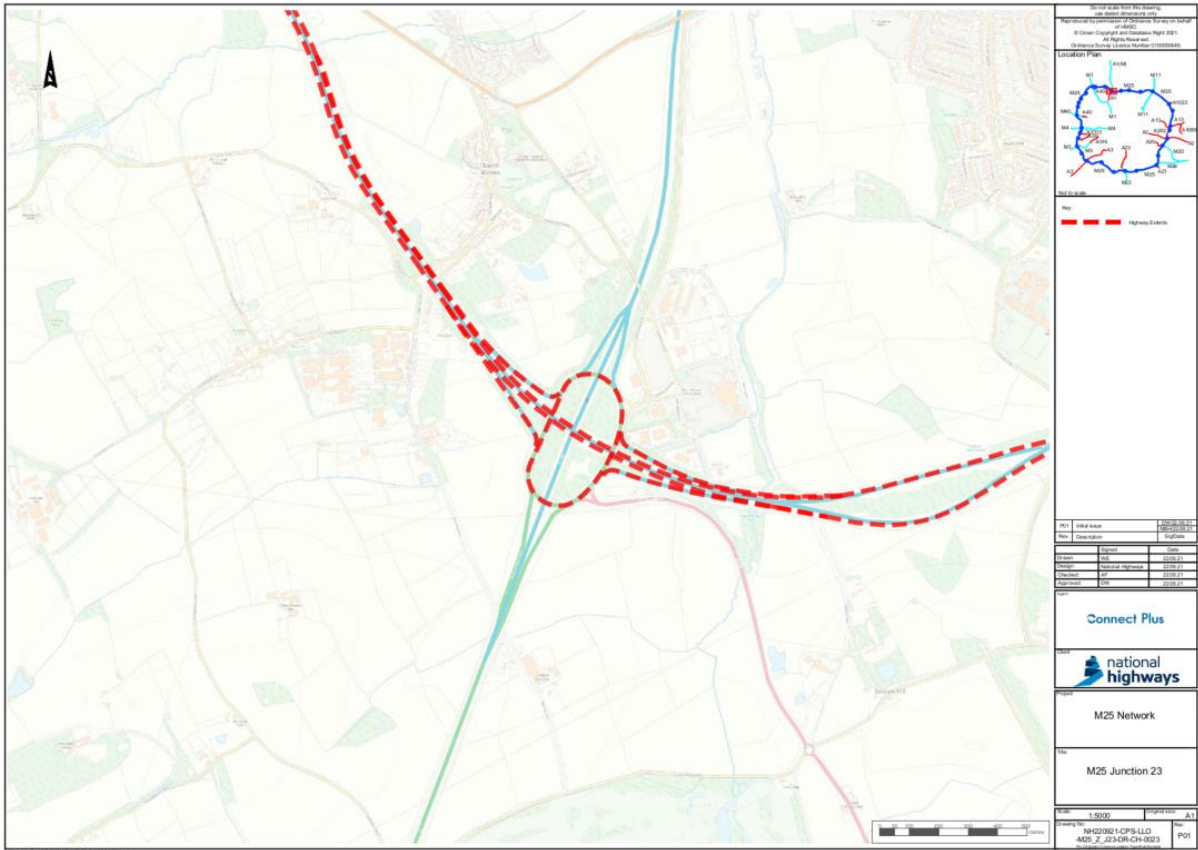




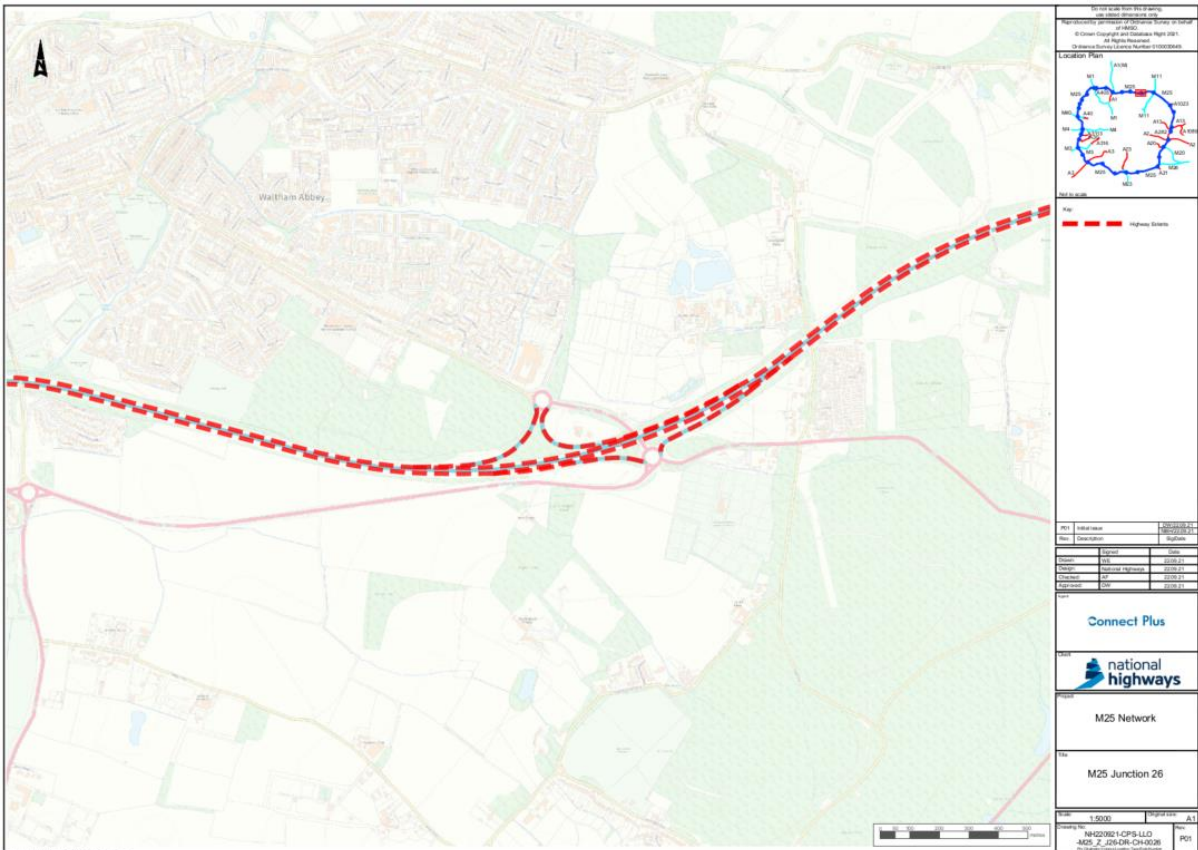
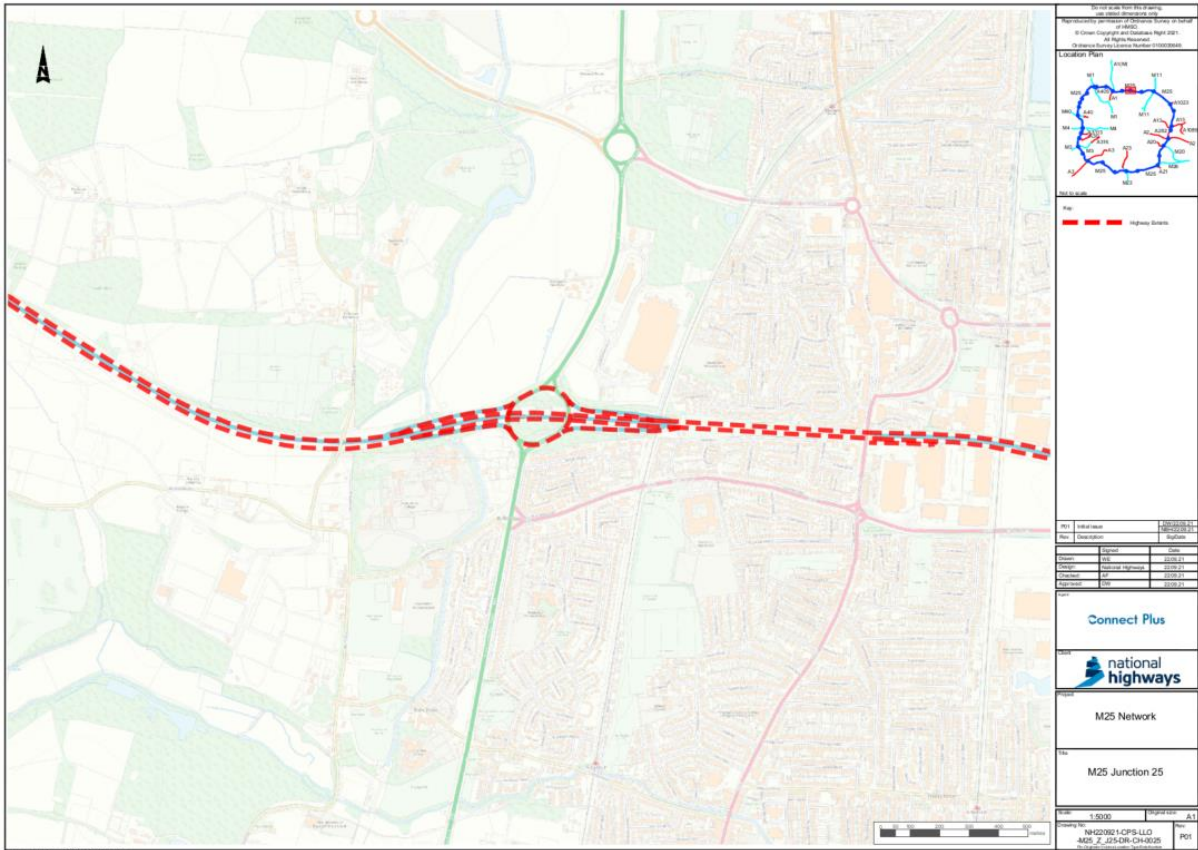


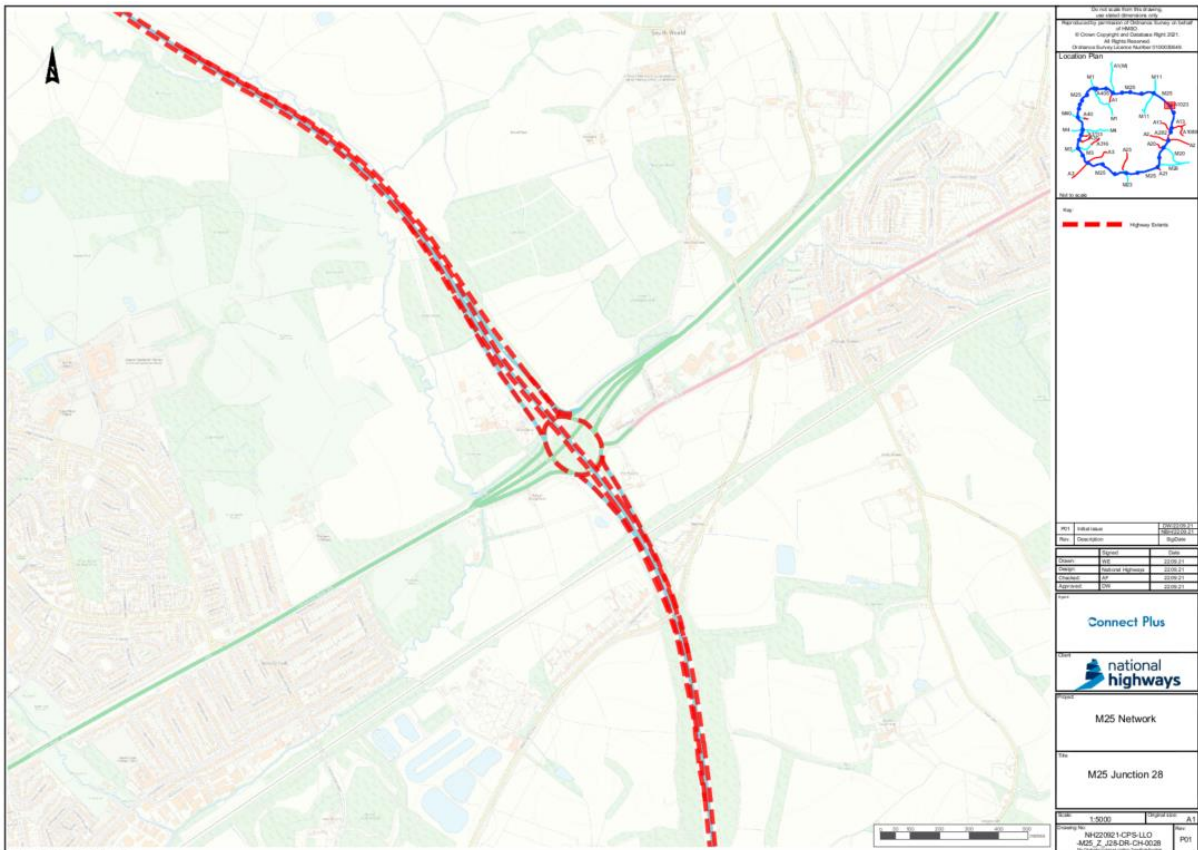
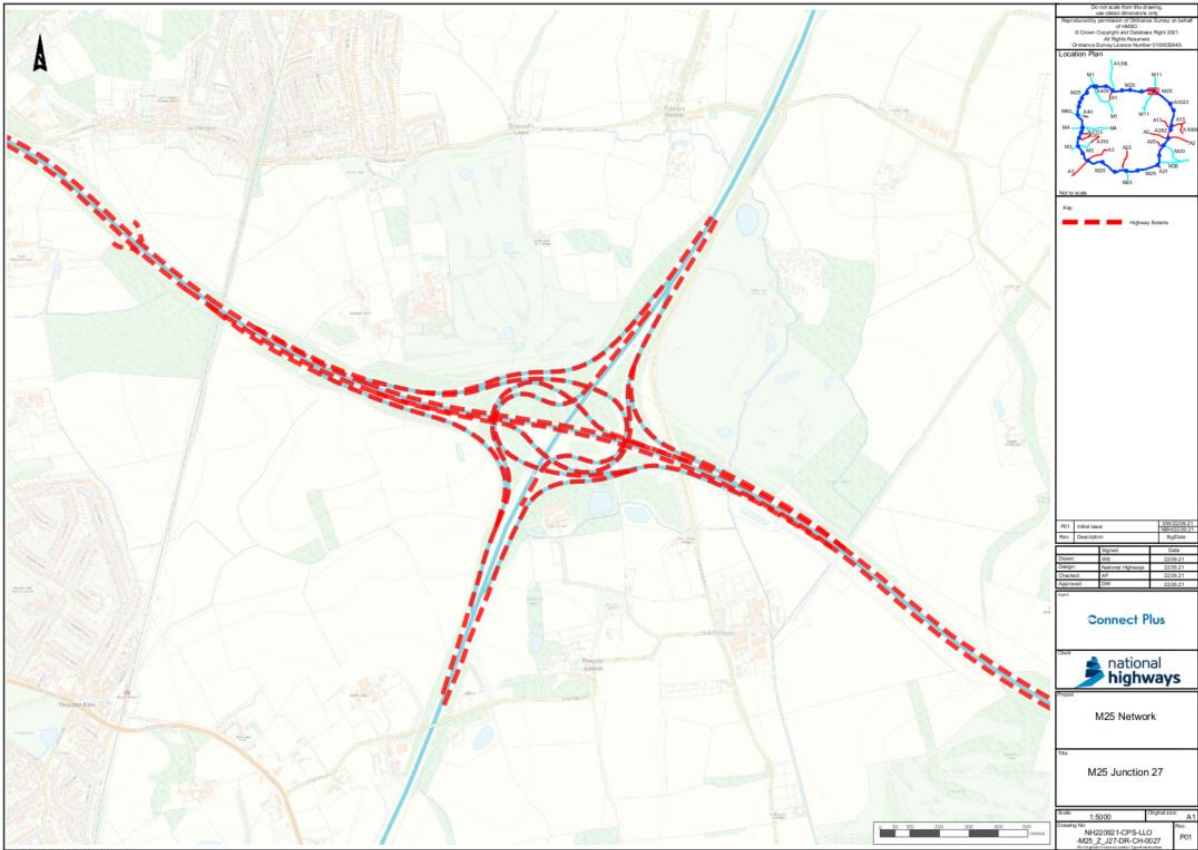




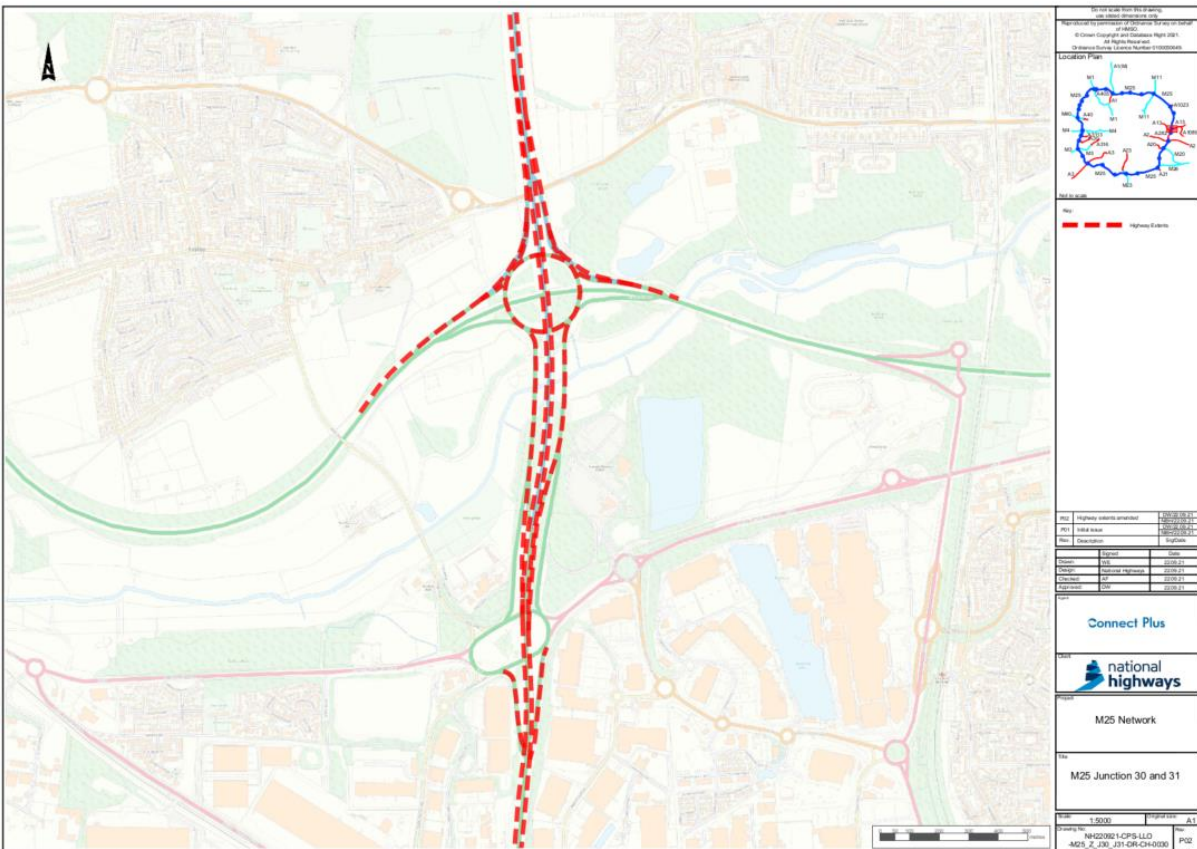
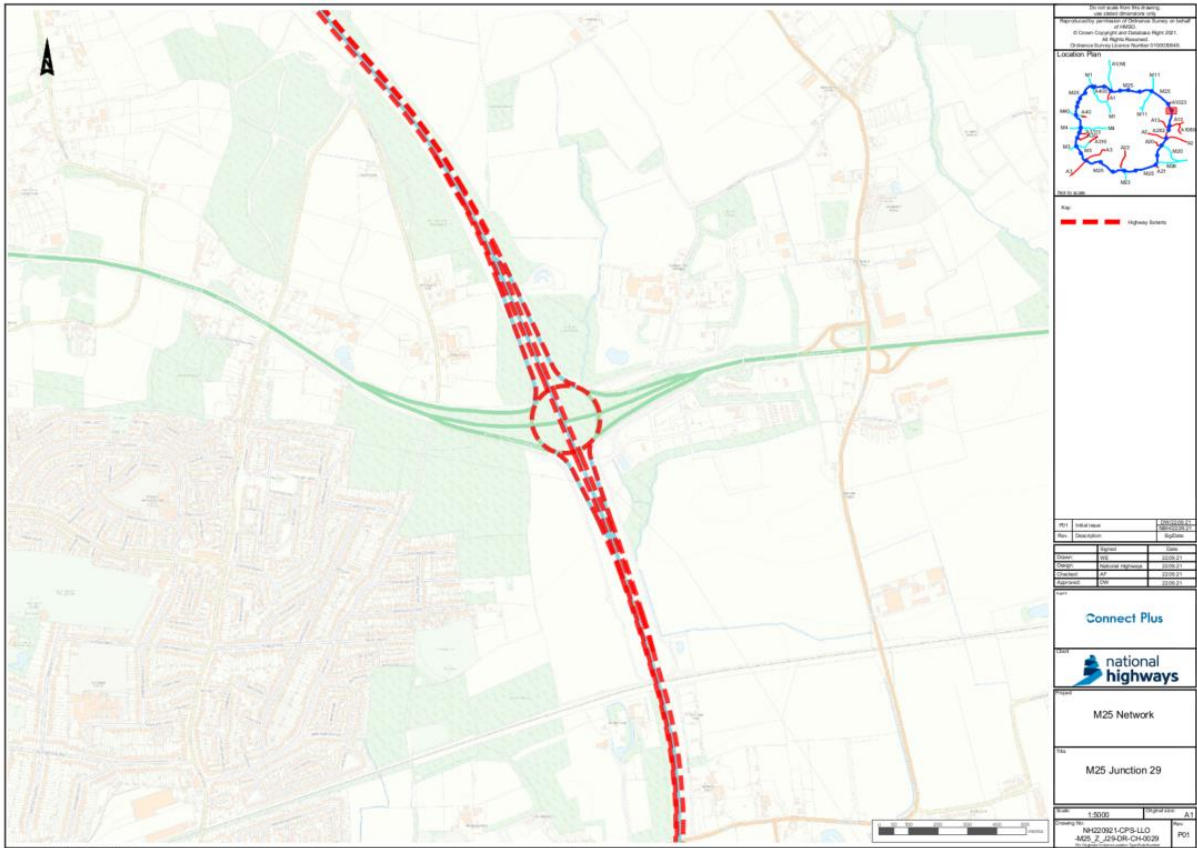






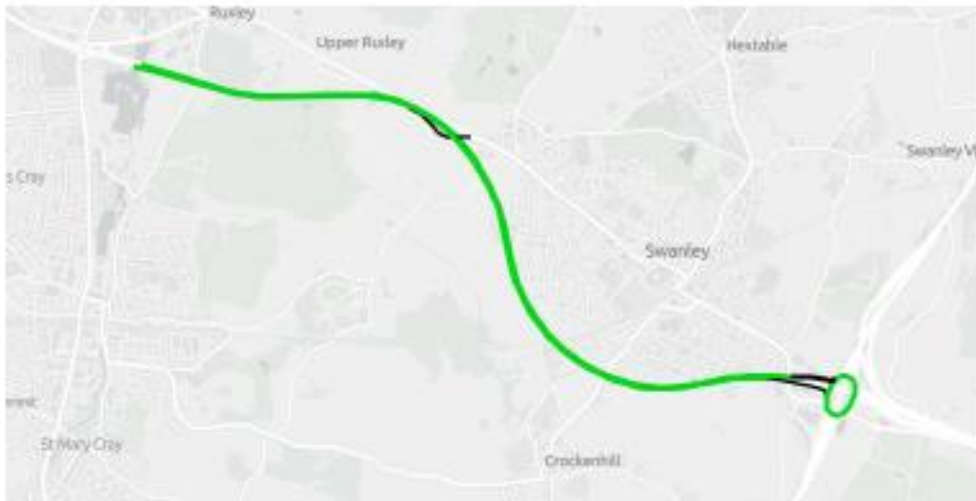






## APPENDIX 2

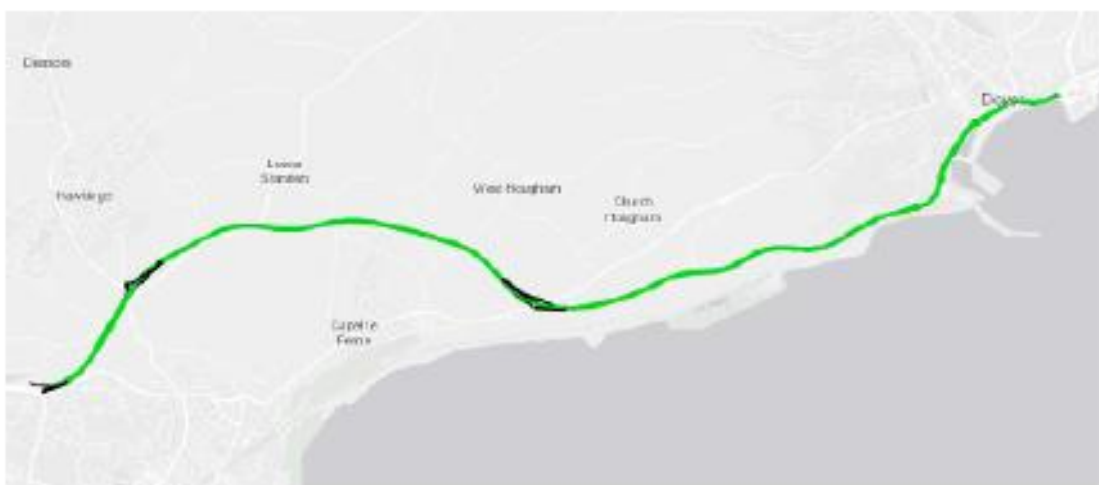
### A20 London - M25



### M20



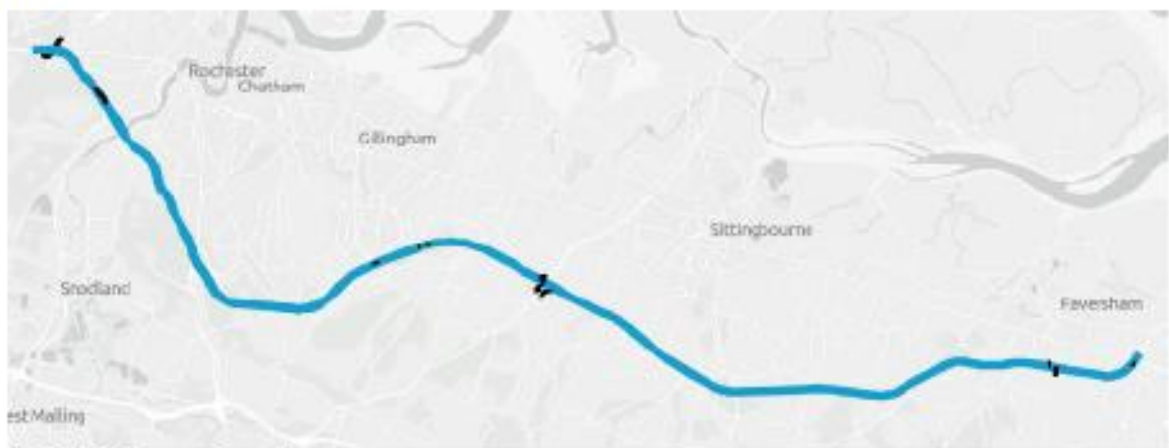
### A20 Coast Section



## A2 London – M2 Section



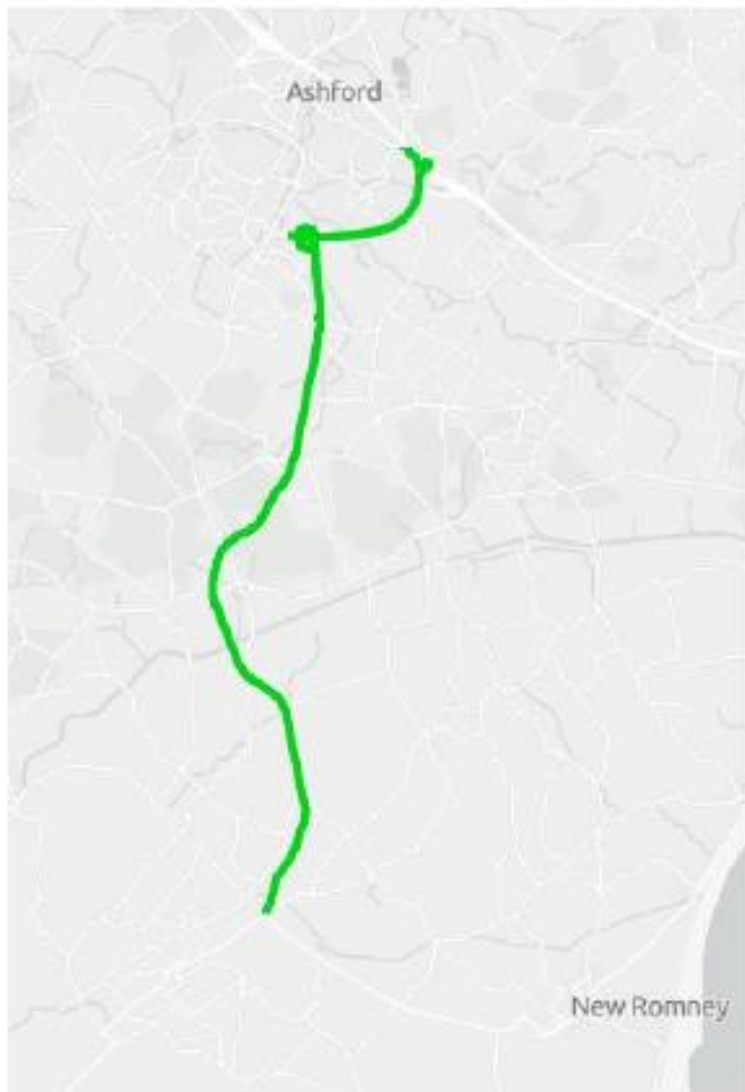
## M2



## A2 M2 - Dover Section



A2070



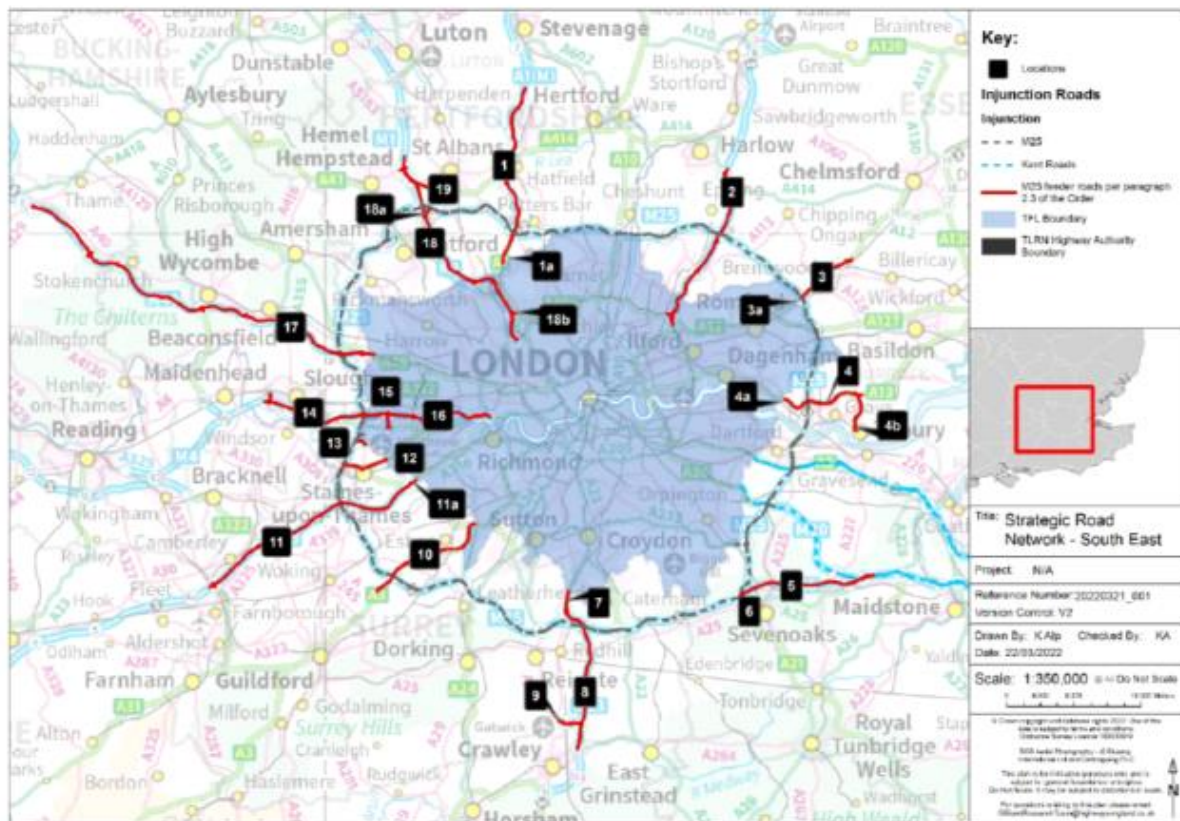
Kent & Surrounding areas SRN





## APPENDIX 3

### Strategic Road Network – South East



1. A1(M) from Junction 1 to Junction 6

1a. A1 from A1(M) to Rowley Lane

2. M11 from Junction 4 to Junction 7

3. A12 from M25 Junction 28 to A12 Junction 12

3a. A1023 (Brook Street) from M25 Junction 28 roundabout to Brook Street Shell Petrol Station access

4. A13 from M25 Junction 30 to junction with A1089

4a. A13 from junction with A1306 for Wennington to M25 Junction 30

4b. A1089 from junction with A13 to Port of Tilbury entrance

5. M26 (the whole motorway) from M25 to M20
6. A21 from the M25 to B2042
7. A23 from M23 to Star Shaw
8. M23 from Junction 7 to Junction 10 (including M23 Gatwick Spur)
9. A23 between North and South Terminal Roundabouts
10. A3 from A309 to B2039 Ripley Junction
11. M3 from Junction 1 to Junction 4
- 11a. A316 from M3 Junction 1 to Felthamhill Brook
12. A30 from M25 Junction 13 to Harrow Road, Stanwell, Feltham
13. A3113 from M25 Junction 14 to A3044
14. M4 from Junction 4B to Junction 7
15. M4 Spur (whole spur) from M4 Junction 4 to M4 Junction 4a
16. M4 from Junction 1 to Junction 4B
17. M40 from M40 Junction 7 to A40 (Fray's River Bridge)
18. M1 from Junction 1 to Junction 8
- 18a. A405 from M25 Junction 21A to M1 Junction 6
- 18b. A1 from Fiveways Corner roundabout to Hilltop Gardens
19. A414 from M1 Junction 8 to A405

**APPENDIX 4**

**[On the package containing the Court order]**

**“VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE EMAIL NH-INJUNCTIONS@DLAPIPER.COM”**

**[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 EMAIL: NH-INJUNCTIONS@DLAPIPER.COM”**

## SCHEDULE 1 – NAMED DEFENDANTS

**For the avoidance of doubt, any person who has been a defendant in these proceedings, or who has given undertakings to the Claimant, may nevertheless become Defendant 1 as a person unknown if they commit any of the prohibited acts.**

	Name	Address
1.	PERSONS UNKNOWN CAUSING THE BLOCKING OF, OR ENDANGERING, OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25 MOTORWAY, A2, A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY, A1(M), A3, A12, A13, A21, A23, A30, A414 AND A3113 TRUNK ROADS AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40 MOTORWAYS FOR THE PURPOSE OF PROTESTING	
2.	Alexander RODGER	
3.	Alyson LEE	
4.	Amy PRITCHARD	
5.	Ana HEYATAWIN	
6.	Not used.	
7.	Anne TAYLOR	
8.	Anthony WHITEHOUSE	
9.	Not used.	
10.	Ben TAYLOR	
11.	Benjamin BUSE	
12.	Not used.	
13.	Cameron FORD	
14.	Catherine RENNIE-NASH	



15.	Catherine EASTBURN	
16.	Christian MURRAY-LESLIE	
17.	Christian ROWE	
18.	Cordelia ROWLATT	
19.	Daniel Lee Charles SARGISON	
20.	Daniel SHAW	
21.	David CRAWFORD	
22.	David JONES	
23.	David NIXON	
24.	David SQUIRE	
25.	Diana Elizabeth BLIGH	
26.	Diana HEKT	
27.	Diana Lewen WARNER	
28.	Donald BELL	
29.	Not used.	
30.	Elizabeth ROSSER	
31.	Emma Joanne SMART	
32.	Gabriella DITTON	

33.	Gregory FREY	
34.	Gwen HARRISON	
35.	Harry BARLOW	
36.	Ian BATES	
37.	Ian Duncan WEBB	
38.	James BRADBURY	
39.	James Malcolm Scott SARGISON	
40.	James THOMAS	
41.	Janet BROWN	
42.	Janine EAGLING	
43.	Jerrard Mark LATIMER	
44.	Jessica CAUSBY	
45.	Jonathan Mark COLEMAN	
46.	Joseph SHEPHERD	
47.	Joshua SMITH	
48.	Judith BRUCE	
49.	Julia MERCER	
50.	Julia SCHOFIELD	

51.	Karen MATTHEWS	
52.	Karen WILDIN	
53.	Liam NORTON	
54.	Louis MCKECHNIE	
55.	Louise Charlotte LANCASTER	
56.	Lucy CRAWFORD	
57.	Mair BAIN	
58.	Margaret MALOWSKA	
59.	Marguerite DOUBLEDAY	
60.	Maria LEE	
61.	Martin John NEWELL	
62.	Mary ADAMS	
63.	Not used.	
64.	Not used.	
65.	Meredith WILLIAMS	
66.	Michael BROWN	
67.	Michael Anthony WILEY	
68.	Michelle CHARLSWORTH	

69.	Not used.	
70.	Nathaniel SQUIRE	
71.	Nicholas COOPER	
72.	Nicholas ONLEY	
73.	Nicholas TILL	
74.	Oliver ROCK	
75.	Paul COOPER	
76.	Paul SHEEKY	
77.	Peter BLENCOWE	
78.	Peter MORGAN	
79.	Philippa CLARKE	
80.	Priyadaka CONWAY	
81.	Richard RAMSDEN	
82.	Rob STUART	
83.	Robin Andrew COLLETT	
84.	Roman Andrzej PALUCH-MACHNIK	
85.	Rosemary WEBSTER	
86.	Rowan TILLY	

87.	Ruth Ann COOK	
88.	Ruth JARMAN	
89.	Sarah HIRONS	
90.	Simon REDING	
91.	Stefania MOROSI	
92.	Stephanie AYLETT	
93.	Stephen Charles GOWER	
94.	Stephen PRITCHARD	
95.	Susan CHAMBERS	
96.	Sue PARFITT	
97.	Sue SPENCER- LONGHURST	
98.	Susan HAGLEY	
99.	Suzie WEBB	
100.	Tessa-Marie BURNS	
101.	Theresa NORTON	
102.	Tim SPEERS	
103.	Tim William HEWES	
104.	Tracey MALLAGHAN	

105.	Not used.	
106.	Venitia CARTER	
107.	Victoria Anne LINSELL	
108.	Not used.	
109.	Bethany MOGIE	
110.	Indigo RUMBELOW	
111.	Not used.	
112.	Ben NEWMAN	
113.	Christopher PARISH	
114.	Elizabeth SMAIL	
115.	Not used.	
116.	Rebecca LOCKYER	
117.	Simon MILNER- EDWARDS	
118.	Stephen BRETT	
119.	Virginia MORRIS	
120.	Andria EFTHIMIOUS- MORDAUNT	
121.	Christopher FORD	
122.	Darcy MITCHELL	

123.	David MANN	
124.	Ellie LITTEN	
125.	Julie MECOLI	
126.	Kai BARTLETT	
127.	Sophie FRANKLIN	
128.	Not used.	
129.	Nicholas BENTLEY	
130.	Nicola STICKELLS	
131.	Mary LIGHT	
132.	David McKENNY	
133.	Giovanna LEWIS	
134.	Margaret REID	
135.	Marcus DECKER	
136.	Morgan TROWLAND	
137.	Abigail PERCY- RADCLIFF	
138.	Alexander WILCOX	
139.	Cressida GETHIAN	
140.	Emma MANI	

## **SCHEDULE 2**

### **CHIEF CONSTABLES OF THE FORCES OF:**

**City of London Police**

**Metropolitan Police Service**

**Avon and Somerset Constabulary**

**Bedfordshire Police**

**Cambridgeshire Constabulary**

**Cheshire Constabulary**

**Cleveland Police**

**Cumbria Constabulary**

**Derbyshire Constabulary**

**Devon & Cornwall Police**

**Dorset Police**

**Durham Constabulary**

**Essex Police**

**Gloucestershire Constabulary**

**Greater Manchester Police**

**Hampshire Constabulary**

**Hertfordshire Constabulary**

**Humberside Police**

**Kent Police**

**Lancashire Constabulary**

**Leicestershire Police**

**Lincolnshire Police**

**Merseyside Police**

**Norfolk Constabulary**

**North Yorkshire Police**

**Northamptonshire Police**

**Northumbria Police**



**Nottinghamshire Police**

**South Yorkshire Police**

**Staffordshire Police**

**Suffolk Constabulary**

**Surrey Police**

**Sussex Police**

**Thames Valley Police**

**Warwickshire Police**

**West Mercia Police**

**West Midlands Police**

**West Yorkshire Police**

**Wiltshire Police**

**SCHEDULE 3; FORM OF UNDERTAKING**

“I promise to the Court that for a period of two years (up to 10<sup>th</sup> May 2025) I will not engage in the following conduct

- (a) Blocking or endangering, or preventing the free flow of traffic on the roads (as specified and defined at paragraph 4 of the order of Mr Justice Bennathan made on 12<sup>th</sup> May 2022) for the purposes of protesting by any means including their presence on the roads, or affixing themselves to the roads or any object or person, abandoning any object, erecting any structure on the roads or otherwise causing, assisting, facilitating or encouraging any of those matters
- (b) causing damage to the surface of or to any apparatus on or around the roads including by painting, damaged by fire, or affixing any structures thereto
- (c) Entering on foot those parts of the roads which are not authorised for access on foot other than in cases of emergency.

I understand what is covered by that the promises which I have given and also that that if I break any of my promises to the court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.”

Signed .....

Date .....

