

IN THE HIGH COURT OF JUSTICE

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
PROPERTY TRUSTS AND PROBATE LIST (Ch)

**BEFORE MR JOHN MALE QC (SITTING AS A JUDGE OF THE CHANCERY DIVISION
OF THE HIGH COURT)**

TUESDAY 27 NOVEMBER 2018

PT-2018-000160

06 Dec 2018

PT-2018-000160

B E T W E E N:

- (1) UK OIL & GAS PLC
(PREVIOUSLY KNOWN AS UK OIL & GAS INVESTMENTS PLC)
(2) UKOG (234) Ltd
(PREVIOUSLY KNOWN AS KIMMERIDGE OIL & GAS LIMITED)
(3) MAGELLAN PETROLEUM (UK) LIMITED
(4) HORSE HILL DEVELOPMENTS LTD
(5) UKOG (GB) LIMITED

Claimants

- and -

**PERSONS UNKNOWN WHO ARE PROTESTORS AGAINST THE EXPLORATION
AND/OR EXTRACTION OF MINERAL OIL OR RELATIVE HYDROCARBON OR
NATURAL GAS BY THE CLAIMANT(S) AND WHO ARE INVOLVED IN THE FOLLOWING
ACTS OR ANY OF THEM:**

- (1) ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANT(S) ON
LAND AND BUILDINGS SHOWN EDGED RED ON THE PLANS ANNEXED TO THIS
ORDER ("THE LAND");
- (2) OBSTRUCTING OR INTERFERING WITH THE RIGHTS OF WAY ENJOYED BY THE
PROTECTED PERSONS AS DEFINED IN THIS ORDER OVER THE PUBLIC
HIGHWAY AND/OR THEIR ACCESS TO AND FROM THE LAND.
- (3) COMBINING TOGETHER TO COMMIT THE UNLAWFUL ACTS OR OFFENCES
SPECIFIED IN PARAGRAPHS 2 OF THIS ORDER WITH THE INTENTION SET OUT
THEREIN.
- (4) INTERFERING WITH THE CLAIMANT(S) ECONOMIC INTERESTS BY THE
COMMISSION OF UNLAWFUL ACTS AS DEFINED IN PARAGRAPH () OF THIS
ORDER
- (14) SCOTT BREEN
- (15) MAVIS MACDUFF (ALSO KNOWN AS "CHRISSEY" OR "CHRISSIE")
- (16) ROZ AROO

Defendants

ORDER

PENAL NOTICE

IF YOU THE FIRST TO FOURTH AND/OR FOURTEENTH, FIFTEENTH AND/OR SIXTEENTH DEFENDANTS (AS DEFINED IN THIS ORDER) DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED OR FINED OR HAVE YOUR ASSETS SEIZED.

FOR THE AVOIDANCE OF DOUBT NOTHING IN THIS ORDER SHALL IN ANY WAY LIMIT THE POWERS OF THE POLICE OR ANY OTHER PUBLIC AUTHORITY IN RESPECT OF PRESERVING PUBLIC ORDER PERMITTING THE FREE FLOW OF PEDESTRIAN OR VEHICULAR TRAFFIC OR ANY OTHER LAWFUL PURPOSE

UPON the Claimant's application dated 1 March 2018

AND UPON HEARING from Mr Timothy Polli QC and Mr Sam Madge-Wyld, Counsel for the Claimants, and from Ms Stephanie Harrison QC, Mr Tim Baldwin and Mr Owen Greenhall, Counsel for the Seventh to Twelve Defendants and Mr Stephen Simblet for the Thirteenth Defendant on 2nd, 3rd, 4th, 5th July 2018 and on 3 September 2018

AND UPON the Court making an Injunction on 3 September 2018

AND UPON the Claimants' application dated 27 September 2018 to vary the Order made by the Court on 3 September 2018

AND UPON HEARING from Mr Timothy Polli QC, Counsel for the Claimants on 27 November 2018

AND UPON reading the letter dated 13 November 2018 sent to the Court by Messrs Bhatt Murphy, Solicitors for the 7th to 13th Defendants

AND UPON the Proposed 14th, 15th and 16th Defendants having been served with the Claimant's application of 27 September 2018 in accordance with Chief Master Marsh's Order of 4 October 2018 but not being present or represented

AND UPON the Court deciding to vary the Injunction Order made on 27 November 2018 but, for the sake of clarity to lay-people trying to understand what order has been made, not to make an Order varying the Injunction made on 3 September 2018 but to re-make the Injunction in its varied form

AND UPON the First Claimant undertaking that if the Court later finds that this order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the First Claimant will comply with any order the court may make

AND UPON the Court being satisfied that it is appropriate and proportionate on an interim basis to make the Injunction Order below at common law.

AND UPON READING the Witness Statements listed in Schedule 1 to this Order

IT IS ORDERED THAT:

DEFINITIONS

This Order shall be construed in accordance with the following Orders and/or

Definitions:-

- (i) In this Order “**Broadford Bridge Site**” shall mean that area of land that forms part of Woodbarn Farm, Broadford Bridge, Billingshurst, West Sussex more particularly shown for illustration purposes edged in red (when presented in colour) on the plan annexed at Schedule 2 (“**Broadford Bridge Site Plan**”) and being part of the land now comprised in title number WSX267507.
- (ii) In this Order “**Horse Hill Site**” shall mean that land on the West side of Horse Hill, Horley more particularly shown for illustration purposes edged in red (when presented in colour) on the plan annexed at Schedule 3 (“**Horse Hill Site Plan**”).
- (iii) In this Order “**Campaign**” means the campaign against the exploration and/or extraction of mineral oil or relative hydrocarbon or natural gas by the Claimants
- (iv) In this Order “**Protected Persons**” shall mean the Claimants, their Group Companies, their Contractors and Sub-Contractors and/or the servants or agents of any of them working at or visiting any of the Sites.
- (v) In this Order “**Contractors**”, “**Sub-Contractors**” and/or “**Group Companies**” shall mean the persons named in Schedule 5 to this Order. Schedule 5 may be updated by the Claimants from time to time by uploading a revised Schedule 5 to the Dropbox folder name “*UKOG Injunction PT-2018-000160 (Horse Hill & Broadford Bridge): List of protected suppliers and contractors*” at [https://www.dropbox.com/sh/gj9z03rvpxd9o83/AAC74KsgBlfeVo5IOMYL0jCNa/20.%20UKOG%20Injunction%20PT-2018-000160%20\(Horse%20Hill%20%26%20Broadford%20Bridge\)%20-%20List%20of%20protected%20suppliers%20and%20contractors?dl=0&subfolder_n_av_tracking=1](https://www.dropbox.com/sh/gj9z03rvpxd9o83/AAC74KsgBlfeVo5IOMYL0jCNa/20.%20UKOG%20Injunction%20PT-2018-000160%20(Horse%20Hill%20%26%20Broadford%20Bridge)%20-%20List%20of%20protected%20suppliers%20and%20contractors?dl=0&subfolder_n_av_tracking=1) and such revision shall take effect from the date on which the revised Schedule 5 is so uploaded
- (vi) In this Order “**Defendant**” or “**Defendants**” shall mean the parties listed in the heading to this Order. For the avoidance of doubt, any Protestor or Protestors who breaches this order shall thereby become one or more of the First, Second, Third and/or, Fourth Defendants as defined above.

- (vii) In this order “**Demonstrating**” and “**Demonstrate**” means carrying out any activity as part of or in furtherance of the Campaign
- (viii) In this Order “**Form of Notice**” means the document at Schedule 2 which relates to the Site(s) specified on a given Form of Notice
- (ix) In this Order “**Interfering with the Claimant(s) economic interests by the commission of unlawful acts**” shall mean undertaking the following unlawful acts:
 - a) trespass to the Sites;
 - b) substantial interference with the rights of way enjoyed by the Protected Persons with the intention specified in paragraph 1(c) and 2 of this order;
 - c) action to prevent the Protected Persons, leaving or entering the Sites and passing and repassing on the public highway with the intention specified in paragraphs 1(c) and 2 of this order; and
 - d) threat of economic injury directed at the Protected Persons to prevent the Protected Persons parties dealing with the Claimants or some of them.

For the avoidance of doubt, this shall include the following acts:

- e) erecting protest camps on the Sites or any of them by way of tents and erection of wooden structures which Protestors then sit atop to impede their eviction;
 - f) slow walking on the public highway in front of vehicles supplying or removing goods and services to or from the Sites;
 - g) climbing onto vehicles supplying or removing goods and services to or from the Sites or some of them. A practice known as “lorry surfing”;
 - h) locking themselves onto vehicles supplying or removing goods and services to or from the Sites or any of them;
 - i) parking vehicles across the entrances to the Sites or any of them;
 - j) locking themselves onto gates at the entrances to the Sites or any of them; and
 - k) locking themselves to one another in front the entrances to the Sites or any of them.
- (x) In this Order “**Notice of Order**” means the document at Schedule 4.
 - (xi) In this Order “**Protestor**” or “**Protestors**” shall mean any person who Demonstrates or intends to Demonstrate
 - (xii) In this Order “**Sites**” shall mean Broadford Bridge Site and Horse Hill Site.
 - (xiii) In this Order “**Site Plans**” shall mean Broadford Bridge Site Plan and the Horse Hill Site Plan.

THE INJUNCTION ORDER

IT IS ORDERED THAT:

1. With immediate effect, and until trial or further order, the First to Fourth and Fourteenth, Fifteenth and Sixteenth Defendants and each of them are forbidden from:
 - a. Entering or remaining on the Sites
 - b. Blocking the public highway with persons or things when done with a view to slowing down or stopping the traffic, and with the intention of causing inconvenience and delay to the Claimants
 - c. Slow walking in front of vehicles being driven by a servant or agents of any of the Claimants with the object of slowing them down, and with the intention of causing inconvenience and delay to the Claimants
 - d. Climbing onto vehicles belonging to or in the possession of the Claimants, their servants or agents, or onto trailers attached to any such vehicles
 - e. Obstructing the public highway at the entrance to the Sites and thereby preventing any of the Protected Persons from having access to or egress from any of the Sites
2. With immediate effect, and until trial or further order the First to Fourth and Fourteenth, Fifteenth and Sixteenth Defendants and each of them are forbidden from whether by themselves or by combining together to commit any of the following offences or unlawful acts and in each case with the intention of damaging the Claimants by obstructing, impeding or interfering with the lawful activities undertaken by the Protected Persons or any of them:
 - a) Gathering or loitering outside the Sites or either of them with a view (a) to compelling the Claimants not to pursue their business of exploring and/or extracting mineral oil or relative hydrocarbon or natural gas and/or (b) to compelling the Contractors, Sub-Contractors and/or Group Companies not to work for or to deal with the Claimants.
 - b) Gathering or loitering outside the Sites or either of them with a view (a) to compelling the Claimants not to pursue their business of exploring and/or extracting mineral oil or relative hydrocarbon or natural gas and/or (b) to compelling the Contractors, Sub-Contractors and/or Group Companies not to work for or to deal with the Claimants.
 - c) Obstructing the free passage along a public highway, or the access to or from a public highway, by:

- i. blocking the highway with persons or things when done with a view to slowing down or stopping the traffic, and with the intention of causing inconvenience and delay;
 - ii. slow walking in front of vehicles with the object of slowing them down, and with the intention of causing inconvenience and delay;
 - iii. climbing onto vehicles;
 - iv. otherwise, unreasonably and/or without lawful authority or excuse, obstructing the highway and with the intention of causing inconvenience and delay.
- d) causing anything to be done on or over a road, or that which interferes with a motor vehicle, trailer or cycle, or interferes (directly or indirectly) with traffic equipment, in such circumstances that it would be obvious to a reasonable person that to do so would be dangerous.

FURTHER ORDER

IT IS FURTHER ORDERED THAT:-

1. The service requirements under Rules 81.5 to 81.7 including the need for personal service of this Order are dispensed with in accordance with Rule 81.8.
2. Notice and service of this Order may be given by handing or attempting to hand the Notice of Order at or in the close vicinity of the Sites, and this Order will be deemed served at the moment of such handing or, if later, at the moment that they are made available in the Dropbox Folder at <https://www.dropbox.com/sh/gj9z03rvpxd9o83/AADkT5tWFzVBhxLJBvnhR6V4a?dl=0>. For the avoidance of doubt this Order shall be deemed served at the moment that the Form of Notice is proffered whether or not a person has accepted the handing of it
3. Notice and service of this Order may also be given by affixing the Form of Notice applicable to a Site in clearly visible locations at the entrance to the Site and on the perimeter fence to the Site (in no smaller than A3 format in size) and by uploading a copy of this Order in the Dropbox Folder at <https://www.dropbox.com/sh/gj9z03rvpxd9o83/AADkT5tWFzVBhxLJBvnhR6V4a?dl=0>.
4. This Order shall continue in force unless varied or discharged by further order of the Court.

5. All further procedural directions in this claim shall be stayed save in the event that a named party in this Claim gives written notice to the other named parties (or their solicitor's where solicitors are instructed) that such stay of directions should be lifted (and for the avoidance of doubt notwithstanding such stay of directions this Order remains in full force and effect).
6. Within 21 days of the giving or receipt of written notice to lift the stay (and in any event not later than 4pm on 1 April 2019) the Claimants shall apply to the Master for a case management conference or (if so advised) shall apply for summary judgment and for directions in respect of such application, the Claimants being permitted (pursuant to CPR 24.4.1) to make such application insofar as by such date no acknowledgement of service or Defence has been filed on behalf of those described Defendants against whom the Claimant claims its injunction. If neither such application is made by 1 April 2019 the claim shall stand dismissed and the Injunction will be discharged without further order.
7. No order as to costs.

GUIDANCE NOTES

THE EFFECTS OF THIS ORDER

- I A Defendant which is a corporation and which is ordered not to do something must not do it itself or by its directors, officers, employees or agents or in any other way.

INTERPRETATION OF THIS ORDER

- II In this Order, where there is more than one Defendant, (unless otherwise stated) references to "the Defendant" means all or any of them.
- III A requirement to serve on "the Defendant" means on each of them. However, the Order is effective against any Defendant and Protestor on whom it is served.
- IV An Order requiring "the Defendant" to do or not to do anything applies to all Defendants.

SCHEDULE 1

Evidence: The Court read the following Witness Statements:

Of the Claimants:-

The witness statements of Kevin Aidan Lee dated 28 February 2018, 16 May 2018 and 27 September 2018;

The witness statements of James Court dated 27 February 2018, 23 August 2018 and 25 September 2018;

The witness statements of Stephen Sanderson dated 27 February 2018, 17 May 2018, 21 June 2018 and 25 September 2018.

Of the Defendants:-

Michael Oswald dated 16 March 2018

Constance Whiston dated 3 May 2018

Elizabeth Hutchins dated 4 April 2018

Jacqui Hamlin dated 3 May 2018

Sue Jameson dated 2 May 2018

Kevin Blowe dated 2 May 2018

Keith Taylor MEP dated 2 May 2018

Vicki Elcoate, dated 3 May 2018

Ann Stewart dated 2 May 2018

Natasha Doane dated 1 May 2018

Dr Julian Neal dated 27 April 2018

Lorraine Inglis dated 23 May 2018

David Timms dated 12 June 2018

David Timms dated 3 July 2018

Natasha Doane, dated 12 November 2018

Debra Mallard, dated 12 November 2018

Steve Tremmel, dated 12 November 2018

SCHEDULE 2 – Form of Notice (to be produced no smaller than A3)

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 27 NOVEMBER 2018

A FULL COPY OF THE APPLICATION CAN BE FOUND VIA WEblink LISTED BELOW

TO: PERSONS UNKNOWN WHO ARE PROTESTORS AGAINST THE EXPLORATION AND/OR EXTRACTION OF OIL OR GAS BY THE CLAIMANTS ("THE CAMPAIGN") AND ARE INVOLVED IN CERTAIN ACTS, AS MORE PARTICULARLY DEFINED AND DESCRIBED IN THE ORDER MENTIONED BELOW ("DEFENDANTS")

FROM: UK OIL & GAS PLC & OTHERS ("CLAIMANTS") **CONCERNING:** SITE AT BROADFORD BRIDGE ("LAND")

IF YOU THE DEFENDANTS (AS DEFINED IN THE ORDER) DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED OR FINED OR HAVE YOUR ASSETS SEIZED.

ON 27 NOVEMBER 2018 THE COURT GRANTED AN ORDER THAT PROHIBITS THE DEFENDANTS OR ANY ONE OF THEM FROM COMMITTING OR UNDERTAKING CERTAIN UNLAWFUL ACTS IN RELATION TO THE LAND SHADED PINK ON THE PLAN SET OUT IN THIS NOTICE, WHICH INCLUDE:

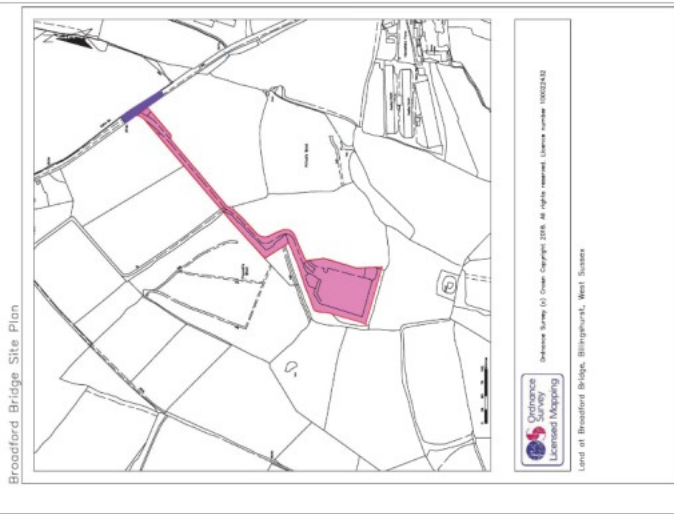
1. ENTERING OR REMAINING ON THE LAND.
2. BLOCKING THE PUBLIC HIGHWAY WITH PERSONS OR THINGS WHEN DONE WITH A VIEW TO SLOWING DOWN OR STOPPING THE TRAFFIC, AND WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS.
3. SLOW WALKING IN FRONT OF VEHICLES BEING DRIVEN BY A SERVANT OR AGENTS OF ANY OF THE CLAIMANTS WITH THE OBJECT OF SLOWING THEM DOWN, AND WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS.
4. CLIMBING ON TO VEHICLES BELONGING TO OR IN THE POSSESSION OF THE CLAIMANTS, THEIR SERVANTS OR AGENTS, OR ONTO TRAILERS ATTACHED TO ANY SUCH VEHICLES.
5. OBSTRUCTING THE PUBLIC HIGHWAY AT THE ENTRANCE TO THE LAND, THEREBY PREVENTING ANY OF THE CLAIMANTS, THEIR SERVANTS OR AGENTS AND/OR ANY OF THE PROTECTED PERSONS FROM HAVING ACCESS TO OR EGRESS FROM THE LAND.

THE COURT FURTHER ORDERED THAT THE DEFENDANTS OR ANY ONE OF THEM MUST NOT COMBINE TOGETHER TO COMMIT CERTAIN OFFENCES, NAMELY: (I) Pursuing any course of conduct with a view to compelling another person to abstain from doing or to do any act which that person has a legal right to do or abstain from doing, wrongfully and without legal authority, such as amount to an offence under section 24(1) of the Trade Union and Labour Relations (Consolidation) Act 1992, AND/OR (II) Obstructing the free passage along a public highway, or the access to or from a public highway, by THOSE UNLAWFUL ACTS AT 2, 3, 4, AND 5 ABOVE AND/OR (III) causing anything to be done on or over a road, or that which interferes with a motor vehicle, trailer or cycle, or interferes (directly or indirectly) with traffic equipment, in such circumstances that it would be obvious to a reasonable person that to do so would be dangerous. IN EACH CASE with the intention of damaging the Claimants by obstructing, impeding or interfering with the lawful activities undertaken by the Claimant(s) or the Protected Persons in respect of the LAND and ITS USE FOR EXPLORATION AND/OR EXTRACTION OF OIL OR GAS BY THE CLAIMANTS.

THE COURT HAS ORDERED THAT SERVICE OF THE ORDER CAN BE PROVIDED TO THE DEFENDANTS BY WAY OF THIS NOTICE. IF YOU ARE A DEFENDANT, YOU ARE ADVISED TO SEEK LEGAL ADVICE AND ACCESS COPIES OF THE ORDER. THE TERMS OF THE ORDER APPLY TO ANOTHER SITE KNOWN AS HORSE HILL. COPIES OF THE ORDER, PLANS OF OTHER SITE, AND SUPPORTING DOCUMENTS CAN BE FOUND AT:

<https://www.drobox.com/s/1q9z3rxyw4b83/AADKTSWVFzVBhLwBvnhR6Y4s7dH=Q>

IF YOU COMMIT ANY OF THE ABOVE UNLAWFUL ACTS AND/OR OFFENCES YOU ARE WITHIN THE DESCRIPTION OF THE DEFENDANTS AND ARE BOUND BY THE ORDER, AND MAY BE HELD TO BE IN CONTEMPT OF COURT.



CLAIMANTS' SOLICITORS: HILL DICKINSON LLP THE BROADGATE TOWER, PRIMROSE STREET, LONDON EC2A 2EW(T: 0207 280 9350/ 0161 817 9280/0207 283 9033) (E: UKOFTeam@HILLDICKINSON.COM)

COURT COMMUNICATIONS: ALL COMMUNICATIONS ABOUT THIS ORDER SHOULD BE SENT TO THE COURT MANAGER, HIGH COURT OF JUSTICE (REF PT-2018-000160) DETAILS FOUND AT <https://courttribunalfinder.service.gov.uk/courts/rolls-building>

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 27 NOVEMBER 2018

A FULL COPY OF THE APPLICATION CAN BE FOUND VIA WEblink LISTED BELOW

TO: PERSONS UNKNOWN WHO ARE PROTESTORS AGAINST THE EXPLORATION AND/OR EXTRACTION OF OIL OR GAS BY THE CLAIMANTS ("THE CAMPAIGN") AND ARE INVOLVED IN CERTAIN ACTS, AS MORE PARTICULARLY DEFINED AND DESCRIBED IN THE ORDER MENTIONED BELOW ("DEFENDANTS")

FROM: UK OIL & GAS PLC & OTHERS ("CLAIMANTS") CONCERNING: SITE AT HORSE HILL ("LAND")

IF YOU THE DEFENDANTS (AS DEFINED IN THE ORDER) DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED OR FINED OR HAVE YOUR ASSETS SEIZED.

ON 27 NOVEMBER 2018 THE COURT GRANTED AN ORDER THAT PROHIBITS THE DEFENDANTS OR ANY ONE OF THEM FROM COMMITTING OR UNDERTAKING CERTAIN UNLAWFUL ACTS IN RELATION TO THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE, WHICH INCLUDE:

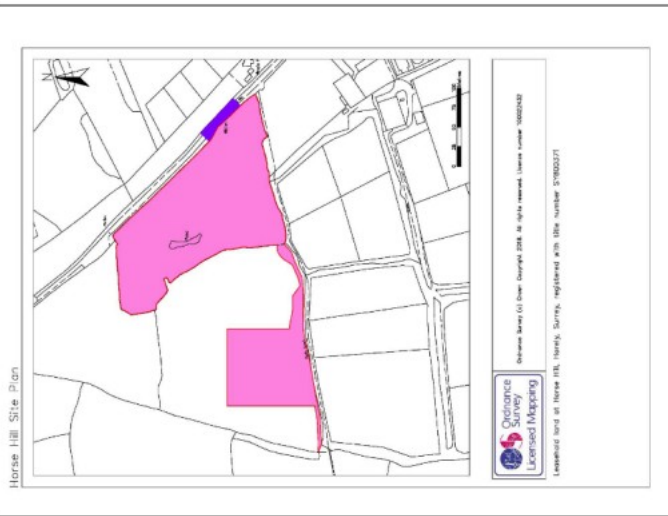
1. ENTERING OR REMAINING ON THE LAND.
2. BLOCKING THE PUBLIC HIGHWAY WITH PERSONS OR THINGS WHEN DONE WITH A VIEW TO SLOWING DOWN OR STOPPING THE TRAFFIC, AND WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS.
3. SLOW WALKING IN FRONT OF VEHICLES BEING DRIVEN BY A SERVANT OR AGENTS OF ANY OF THE CLAIMANTS WITH THE OBJECT OF SLOWING THEM DOWN, AND WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS.
4. CLIMBING ON TO VEHICLES BELONGING TO OR IN THE POSSESSION OF THE CLAIMANTS, THEIR SERVANTS OR AGENTS, OR ONTO TRAILERS ATTACHED TO ANY SUCH VEHICLES.
5. OBSTRUCTING THE PUBLIC HIGHWAY AT THE ENTRANCE TO THE LAND, THEREBY PREVENTING ANY OF THE CLAIMANTS, THEIR SERVANTS OR AGENTS AND/OR ANY OF THE PROTECTED PERSONS FROM HAVING ACCESS TO OR EGRESS FROM THE LAND.

THE COURT FURTHER ORDERED THAT THE DEFENDANTS OR ANY ONE OF THEM MUST NOT COMBINE TOGETHER TO COMMIT CERTAIN OFFENCES, NAMELY: (i) Pursuing any course of conduct with a view to compelling another person to abstain from doing or to do any act which that person has a legal right to do or abstain from doing, wrongfully and without legal authority, such as amount to an offence under section 241(1) of the Trade Union and Labour Relations (Consolidation) Act 1992, AND/OR (ii) Obstructing the free passage along a public highway, or the access to or from a public highway, by THOSE UNLAWFUL ACTS AT 2, 3, 4, AND 5 ABOVE AND/OR (iii) causing anything to be done on or over a road, or that which interferes with a motor vehicle, trailer or cycle, or interferes (directly or indirectly) with traffic equipment, in such circumstances that it would be obvious to a reasonable person that to do so would be dangerous. IN EACH CASE with the intention of damaging the Claimants by obstructing, impeding or interfering with the lawful activities undertaken by the Claimant(s) or the Protected Persons in respect of the LAND and ITS USE FOR EXPLORATION AND/OR EXTRACTION OF OIL OR GAS BY THE CLAIMANTS.

THE COURT HAS ORDERED THAT SERVICE OF THE ORDER CAN BE PROVIDED TO THE DEFENDANTS BY WAY OF THIS NOTICE. IF YOU ARE A DEFENDANT, YOU ARE ADVISED TO SEEK LEGAL ADVICE AND ACCESS COPIES OF THE ORDER. THE TERMS OF THE ORDER APPLY TO ANOTHER SITE KNOWN AS BROADFORD BRIDGE. COPIES OF THE ORDER, PLANS OF OTHER SITE, AND SUPPORTING DOCUMENTS CAN BE FOUND AT:

<https://www.dropbox.com/s/1a923vxd9a83/AA0KTSWFXvBhLJbYnHr6V4a7dE-Q>

IF YOU COMMIT ANY OF THE ABOVE UNLAWFUL ACTS AND/OR OFFENCES YOU ARE WITHIN THE DESCRIPTION OF THE DEFENDANTS AND ARE BOUND BY THE ORDER, AND MAY BE HELD TO BE IN CONTEMPT OF COURT.

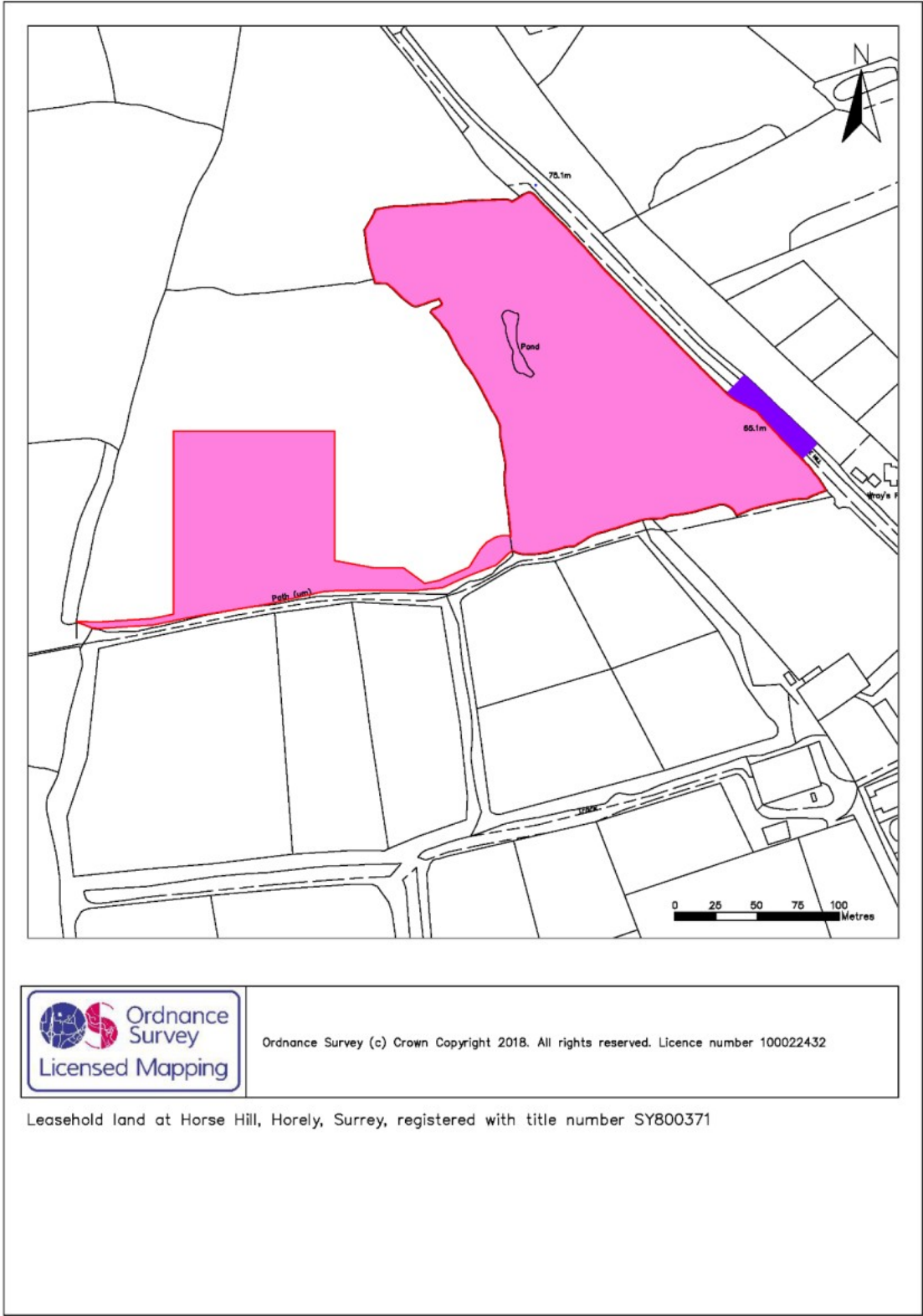


CLAIMANTS' SOLICITORS: HILL DICKINSON LLP THE BROADGATE TOWER, PRIMROSE STREET, LONDON EC2A 2EW(T: 0207 280 9350/ 0161 817 9280/0207 283 9033) (E: UKOFTeam@HILLDICKINSON.COM)

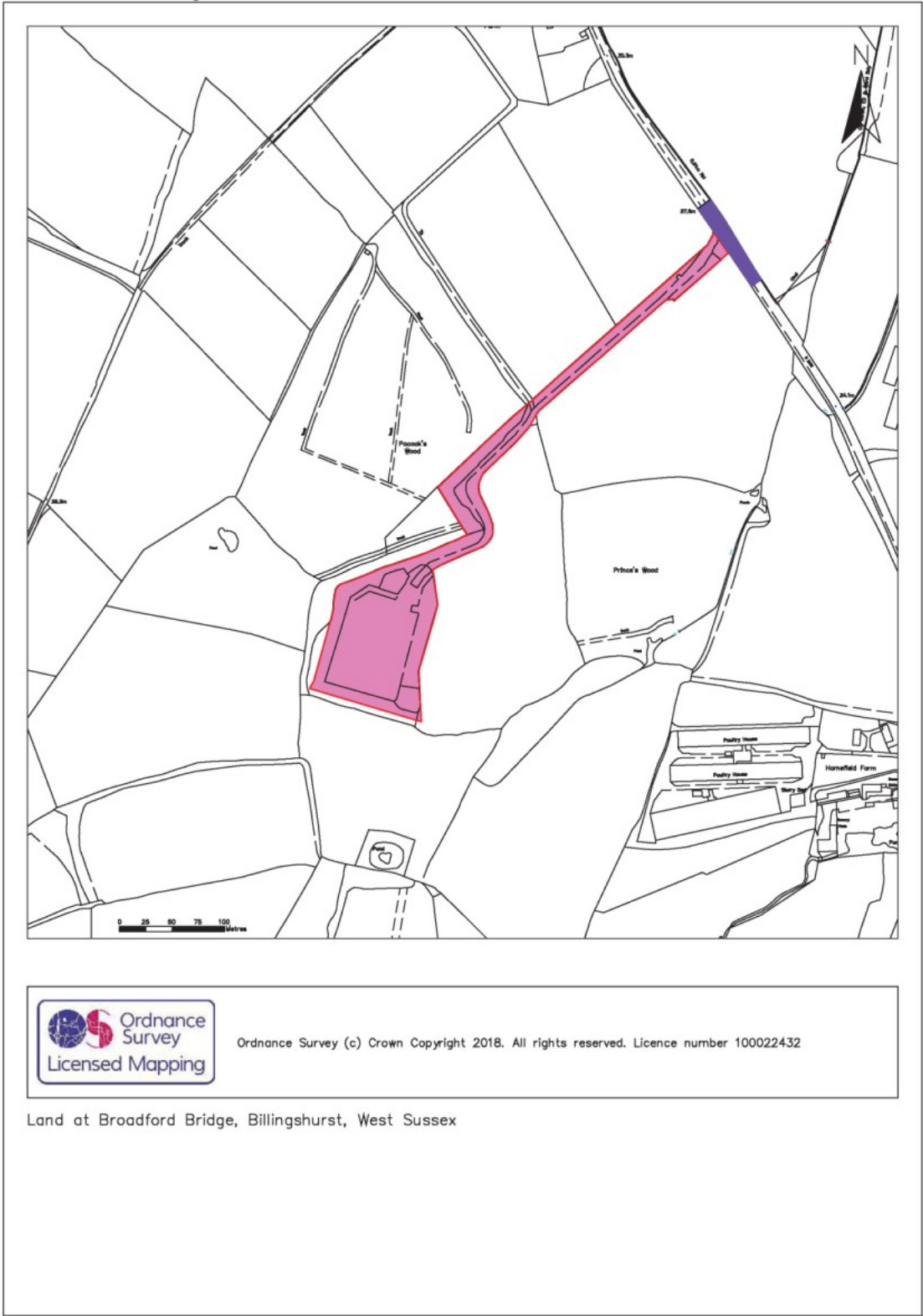
COURT COMMUNICATIONS: ALL COMMUNICATIONS ABOUT THIS ORDER SHOULD BE SENT TO THE COURT MANAGER, HIGH COURT OF JUSTICE (REF PT-2018-000160) DETAILS FOUND AT <https://courttribunalfinder.service.gov.uk/courts/rolls-building>

SCHEDULE 3 – Site Plans.

Horse Hill Site Plan



Broadford Bridge Site Plan



SCHEDULE 4 – Notice of Order

**HIGH COURT INJUNCTION IN FORCE
HIGH COURT CLAIM NO: PT-2018-000160**

**NOTICE OF HIGH COURT INJUNCTION ORDER DATED 27 NOVEMBER 2018
("ORDER")**

A COPY OF THE ORDER CAN BE FOUND VIA THE WEBLINK LISTED BELOW

TO: PERSONS UNKNOWN WHO ARE PROTESTORS AGAINST THE EXPLORATION AND/OR EXTRACTION OF OIL OR GAS BY THE CLAIMANTS AND ARE INVOLVED IN CERTAIN ACTS, AS MORE PARTICULARLY DEFINED AND DESCRIBED IN THE ORDER ("DEFENDANTS")

FROM: UK OIL & GAS PLC & OTHERS ("CLAIMANTS")

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

ON 27 NOVEMBER 2018 THE COURT MADE AN INJUNCTION ORDER IN THE FOLLOWING TERMS

- 1. With immediate effect, and until trial or further order, the First to Fourth and/or Fourteenth, Fifteenth and/or Sixteenth Defendants and each of them are forbidden from:**
 - a. Entering or remaining on the Sites**
 - b. Blocking the public highway with persons or things when done with a view to slowing down or stopping the traffic, and with the intention of causing inconvenience and delay to the Claimants**
 - c. Slow walking in front of vehicles being driven by a servant or agents of any of the Claimants with the object of slowing them down, and with the intention of causing inconvenience and delay to the Claimants**
 - d. Climbing onto vehicles belonging to or in the possession of the Claimants, their servants or agents, or onto trailers attached to any such vehicles**
 - e. Obstructing the public highway at the entrance to the Sites and thereby preventing any of the Protected Persons from having access to or egress from any of the Sites**
- 2. With immediate effect, and until trial or further order the First to Fourth and/or Fourteenth, Fifteenth and/or Sixteenth Defendants and each of them are forbidden from whether by themselves or by combining together to commit any of the following offences or unlawful acts and in each case with the intention of damaging the Claimants by obstructing, impeding or interfering with the lawful activities undertaken by the Protected Persons or any of them:**
 - a) Gathering or loitering outside the Sites or either of them with a view**
 - (a) to compelling the Claimants not to pursue their business of exploring and/or extracting mineral oil or relative hydrocarbon or natural gas and/or (b) to compelling the Contractors, Sub-Contractors and/or Group Companies not to work for or to deal with the Claimants.**
 - b) Obstructing the free passage along a public highway, or the access to or from a public highway, by:**
 - i. blocking the highway with persons or things when done with a view to slowing down or stopping the traffic, and with the intention of causing inconvenience and delay;**
 - ii. slow walking in front of vehicles with the object of slowing them down, and with the intention of causing inconvenience and delay;**

- iii. climbing onto vehicles;
 - iv. otherwise, unreasonably and/or without lawful authority or excuse, obstructing the highway and with the intention of causing inconvenience and delay.
- c) causing anything to be done on or over a road, or that which interferes with a motor vehicle, trailer or cycle, or interferes (directly or indirectly) with traffic equipment, in such circumstances that it would be obvious to a reasonable person that to do so would be dangerous.

THE COURT HAS ORDERED THAT SERVICE OF INJUNCTION ORDER CAN BE PROVIDED TO THE DEFENDANTS BY WAY OF THIS NOTICE. IF YOU ARE A DEFENDANT, YOU ARE ADVISED TO SEEK LEGAL ADVICE AND ACCESS A FULL COPY OF THE ORDER. COPIES OF THE APPLICATION AND SUPPORTING DOCUMENTS CAN BE FOUND AT:

<https://www.dropbox.com/sh/gj9z03rvpxd9o83/AADkT5tWFzVBhxLJBvnhR6V4a?dl=0>

Court communications: all communications about this order should be sent to the Court manager, High Court of Justice (ref PT-2018-000160) details found at (<https://courttribunalfinder.service.gov.uk/courts/rolls-building>)

Claimants' solicitors: Hill Dickinson LLP The Broadgate Tower, Primrose street, London EC2A 2EW (t: 0207 280 9350/ 0161 817 9280/0207 283 9033) (email:ukogteam@hilledickinson.com).

SCHEDULE 5 – A List of group companies, contractors and sub-contractors covered by paragraph 2 of this order

- **Eclipse Strategic Security Limited**
- **BKP Waste & Recycling Limited**
- **Moorhouse Petroleum Limited (trading as Moorhouse Drilling and Completions)**
- **Cloughton Limited**
- **Independent Well Examiners Limited**
- **Pragmatic Security Solutions Limited**
- **PW Well Testing & Production Services**
- **FBG Limited**
- **County Clean (?)**
- **S Lyon & Son**
- **Expro Group**
- **Terranova Group**
- **Freeland Freight Service Ltd**