Claim No. QB-2022-BHM-000044

IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY

BETWEEN:

(1) HIGH SPEED TWO (HS2) LIMITED (2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

- and -

PERSONS UNKNOWN & OTHERS

Defendants

CORE BUNDLE (Volume B)

for hearing on 16 May 2023

TAB	DOCUMENT	PAGE
1	Exhibit JD5	CORE-B-2 to
		CORE-B-178
2	Exhibit JD6 – link	CORE-B-179 to
		CORE-B-181
3	Exhibit JG1	CORE-B-182 to
		CORE-B-186
4	Exhibit JAD13	CORE-B-187 to
		CORE-B-222
5	Exhibit JAD14	CORE-B-223 to
		CORE-B-306

DLA Piper UK LLP 1 St Paul's Place Sheffield S1 2IX

Telephone: 0114 283 3312

Email: HS2Injunction@dlapiper.com

Reference: RXS/380900/401

Solicitors for the Claimants

On behalf of: Applicants/Claimants
J.Dobson

1st statement of witness Exhibits: JD5 and JD6 Date: 27 March 2023

Claim No. QB-2022-BHM-000044

IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY Between:

(1) HIGH SPEED TWO (HS2) LIMITED (2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

-and-

- (1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND KNOWN AS LAND AT CASH'S PIT, STAFFORDSHIRE SHOWN COLOURED ORANGE ON PLAN A ANNEXED TO THE ORDER DATED 11 APRIL 2022 ("THE CASH'S PIT LAND")
- (2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND ACQUIRED OR HELD BY THE CLAIMANTS IN CONNECTION WITH THE HIGH SPEED TWO RAILWAY SCHEME SHOWN COLOURED PINK, AND GREEN ON THE HS2 LAND PLANS AT https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings ("THE HS2 LAND") WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES
- (3) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS
- (4) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS
- (5) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE)

AND 58 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM

Defendants

EXHIBIT JD5 TO THE WITNESS STATEMENT OF JAMES DOBSON

The documents in this Exhibit are at: https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings



IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY

MR JUSTICE RITCHIE

Between:

(1) HIGH SPEED TWO (HS2) LIMITED

(2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

-and-

(D31) RORY HOOPER

Defendant

D31 FINAL ORDER AND UNDERTAKINGS

PENAL NOTICE

If you the within named Defendant disobey the undertakings set out in this order or instruct others to do the acts which you have undertaken not to do, 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 Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE DEFENDANT

This order prohibits you from doing the acts set out in paragraph 4 below. You should read it very carefully.

UPON the Claimants' application by an Application Notice dated 25 March 2022 for interim injunctive relief

AND UPON Mr. Justice Cotter making an order dated 11 April 2022 granting that interim injunctive relief

AND UPON the Claimants' application by an Application Notice dated 8 June 2022 that D31 (Rory Hooper) be found in contempt of court for breaches of the Order of Mr. Justice Cotter ("the Contempt Application")

AND UPON the parties having agreed to an order in the terms set out below

AND UPON D31 (Rory Hooper):

1

- a) accepting that:
 - a. he is a Cash's Pit Defendant as defined in the Order of Mr. Justice Cotter; and
 - b. the alternative service provisions of that order insofar as they relate to D31 were complied with;
- b) admitting that his actions in:
 - a. entering and remaining upon the Cash's Pit Land and failing to remove himself from the Cash's Pit Land; and
 - b. (i) entering and being present on the Cash's Pit Land; and
 - (ii) interfering with works, construction or activity on the Cash's Pit Land, which was in both cases conduct that had the effect of damaging and/or delaying and/or hindering the Claimants by obstructing, impeding or interfering with the activities undertaken in connection with the HS2 Scheme by them or by contractors, sub-contractors, suppliers or any other party engaged by the Claimants at the Cash's Pit Land;

was conduct that was contrary to terms 4(a), 4(b)(i) and 4(b)(ii) of the Order of Mr Justice Cotter

c) apologising to the Court for the acts contrary to the terms of the Order

AND UPON D31 (Rory Hooper) giving undertakings to the Court as set out below

IT IS ORDERED THAT:

- 1. The Contempt Application as against (D31) Rory Hooper only is dismissed.
- 2. There be no order for costs between the parties.
- 3. Service of this Order may be effected, as an alternative, by electronic means by email to D31's solicitors at nhall@robertlizar.com and such service shall be deemed to be good and sufficient service on D31.

UNDERTAKINGS TO THE COURT

In this Order the "HS2 Land" means all of the land acquired or held by the Claimants in connection with the High Speed 2 Railway Scheme shown coloured pink and green on the plans which are available electronically on the HS2 Proceedings website at:

https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings.

4. D31 (Rory Hooper) undertakes to the Court promising not to do any of the following where such conduct has the effect of damaging and/or delaying and/or hindering the Claimants. their agents, servants, contractors, sub-contractors, group companies, licensees. invitees and/or employees:

a. Entering or remaining upon the HS2 Land;

b. Obstructing or otherwise interfering with the free movement of vehicles, equipment or persons accessing or egressing the HS2 Land; or

c. interfering with any fence or gate on or at the perimeter of the HS2 Land.

AND TO BE BOUND BY THESE PROMISES UNTIL 11.59PM ON 25 JULY 2024.

5. D31 (Rory Hooper)'s promises at paragraph 4 do not prevent D31 (Rory Hooper) from:

a. Exercising his rights over any open public right of way over the HS2 Land; or

b. Exercising his lawful rights over any public highway.

STATEMENT

I understand the undertakings that I have given, and 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:

D31 - RORY HOOPER

Date: 28/07/2022

We consent to an order in these terms

And from UK LAP

DLA Piper (UK) LLP

Solicitors for the Claimant

Date: 28/7/2022

Claim No. QB-2022-BHM-000044 IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION





(1) HIGH SPEED TWO (HS2) LIMITED (2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

- and -

(18) WILLIAM HAREWOOD (AKA SATCHEL / SATCHEL BAGGINS) (31) RORY HOOPER (33) ELLIOT CUCIUREAN (AKA JELLYTOT) (61) DAVID BUCHAN (AKA DAVID HOLLIDAY) (62) LEANNE SWATERIDGE (AKA FLOWERY ZEBRA) (64) STEFAN WRIGHT (65) LIAM WALTERS

Defendan	U
<u>-</u>	

ORDER

BEFORE Mr. Justice Ritchie, sitting at the Royal Courts of Justice, the Strand, London on 5 September 2022.

UPON the Claimants' application by application notice dated 8 June 2022 ("Committal Application") to commit the Defendants for contempt for breach of the Order of Mr Justice Cotter dated 11 April 2022 ("Cotter Order");

AND UPON the Court finding D61 in contempt of court and sentencing him to 100 days imprisonment and a fine of £1,500 by an order made on 27 July 2022;

AND UPON D61's application dated 19 August 2022 to purge his contempt being heard before Mr Justice Ritchie on the 5th day of September 2022 and such application being granted;

AND UPON D61 giving an undertaking to the Court and the Claimant in the following terms:

1. not to do any of the following where such conduct has the effect of damaging and/or

delaying and/or hindering the Claimants, their agents, servants, contractors, sub-contractors, group companies, licensees, invitees and/or employees:

- a. Enter or remain upon the HS2 Land;
- b. Obstruct or otherwise interfere with the free movement of vehicles, equipment or persons accessing or egressing the HS2 Land; or
- c. Interfere with any fence or gate on or at the perimeter of the HS2 Land

And to be bound by these promises until 11:59 pm on 5th September 2024:

IT IS ORDERED THAT:

- (1) D61's Contempt is discharged; and
- (2) D61 is to be released from custody forthwith.
- (3) No order is made for costs.

Dated the 5th of September 2022



IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY

MR JUSTICE RITCHIE

QB-2022-BHM-000044

Between:

(1) HIGH SPEED TWO (HS2) LIMITED

(2) THE SECRETARY OF STATE FOR TRANSPORT

-and-

Claimants

(D62) LEANNE SWATERIDGE (AKA FLOWERY ZEBRA)

Defendant

D62 FINAL ORDER AND UNDERTAKINGS

PENAL NOTICE

If you the within named Defendant disobey the undertakings set out in this order or instruct others to do the acts which you have undertaken not to do, 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 Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE DEFENDANT

This order prohibits you from doing the acts set out in paragraph 4 below. You should read it very carefully.

UPON the Claimants' application by an Application Notice dated 25 March 2022 for interim injunctive relief

AND UPON Mr. Justice Cotter making an order dated 11 April 2022 granting that interim injunctive relief

AND UPON the Claimants' application by an Application Notice dated 8 June 2022 that D62 (Leanne Swateridge) be found in contempt of court for breaches of the Order of Mr. Justice Cotter ("the Contempt Application")

AND UPON the parties having agreed to an order in the terms set out below

AND UPON D62 (Leanne Swateridge)

- a) asserting that she was not a Cash's Pit Defendant as defined in the Order of Mr. Justice Cotter, but subject to that denial accepting that she was otherwise validly served with, understood and (by her actions in entering and remaining upon the Cash's Pit Land and failing to remove herself from the Cash's Pit Land) breached the Order of Mr. Justice Cotter; and
- b) apologising to the Court for the acts contrary to the terms of the Order

AND UPON D62 (Leanne Swateridge) giving undertakings to the Court as set out below

IT IS ORDERED THAT:

- 1. The Contempt Application as against (D62) Leanne Swateridge only is dismissed.
- 2. There be no order for costs between the parties.
- 3. Service of this Order may be effected, as an alternative, by electronic means by email to D62's solicitors at nhall@robertlizar.com and such service shall be deemed to be good and sufficient service on D62.

UNDERTAKINGS TO THE COURT

In this Order the "HS2 Land" means all of the land acquired or held by the Claimants in connection with the High Speed 2 Railway Scheme shown coloured pink and green on the plans which are available electronically on the HS2 Proceedings website at:

https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings.

- 4. D62 (Leanne Swateridge) undertakes to the Court promising not to do any of the following where such conduct has the effect of damaging and/or delaying and/or hindering the Claimants, their agents, servants, contractors, sub-contractors, group companies, licensees, invitees and/or employees:
 - a. Entering or remaining upon the HS2 Land;
 - b. Obstructing or otherwise interfering with the free movement of vehicles, equipment or persons accessing or egressing the HS2 Land; or
 - c. interfering with any fence or gate on or at the perimeter of the HS2 Land.

AND TO BE BOUND BY THESE PROMISES UNTIL 11.59PM ON 25 JULY 2024.

- 5. D62 (Leanne Swateridge)'s promises at paragraph 4 do not prevent D62 (Leanne Swateridge) from:
 - a. Exercising her rights over any open public right of way over the HS2 Land; or

b. Exercising her lawful rights over any public highway.

STATEMENT

I understand the undertakings that I have given, and 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.

D62 – LEANNE SWATERIDGE

Date: 26.07.2012...

We consent to an order in these terms

Vi that clam

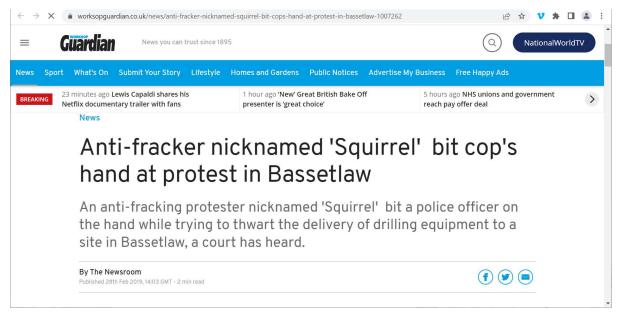
DLA Piper (UK) LLP

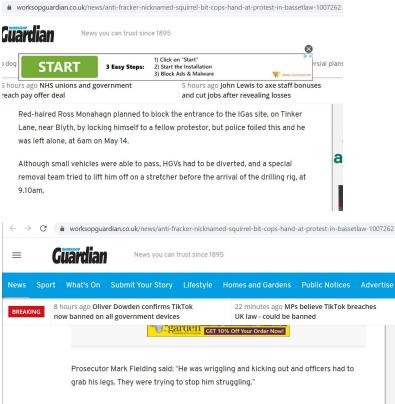
Solicitors for the Claimant

Date: 26 /07 / 2022

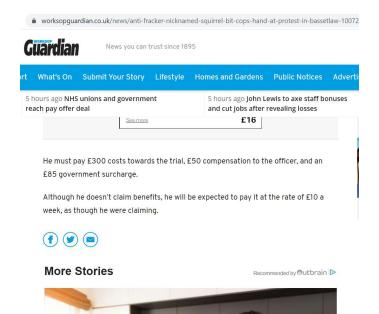
And home We Had

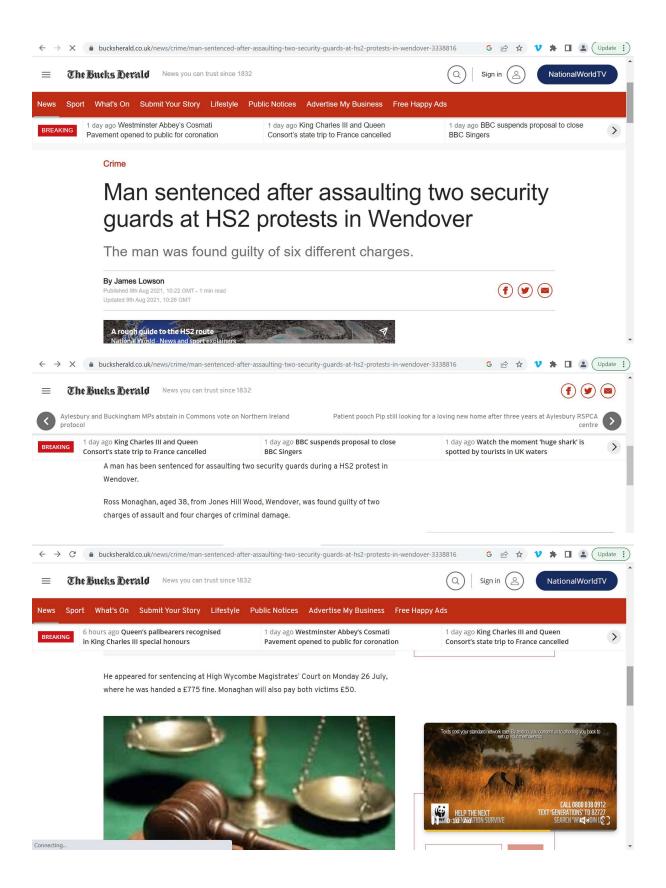
https://www.worksopguardian.co.uk/news/anti-fracker-nicknamed-squirrel-bit-cops-hand-at-protest-in-bassetlaw-1007262

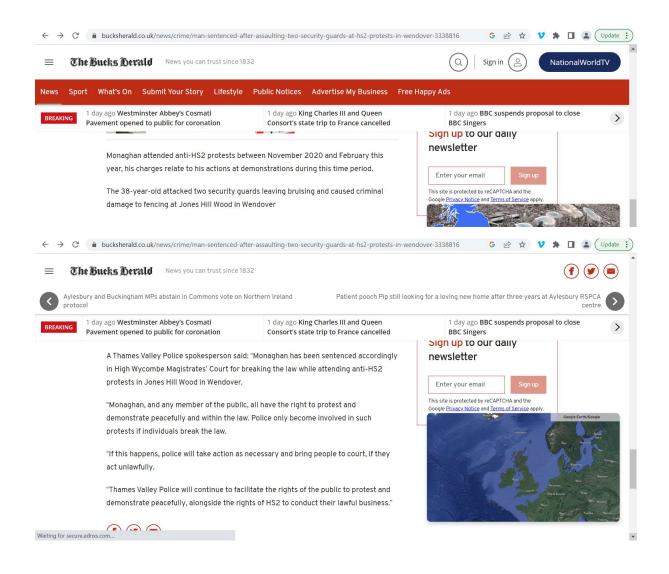




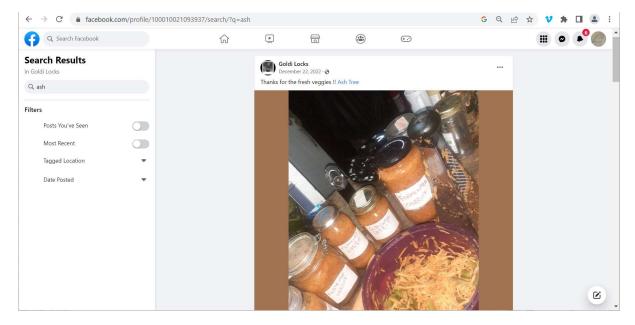








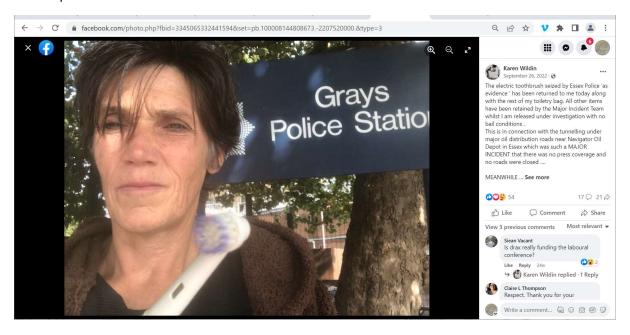
Monaghan referenced at Stonehenge Heritage Action Group Camp



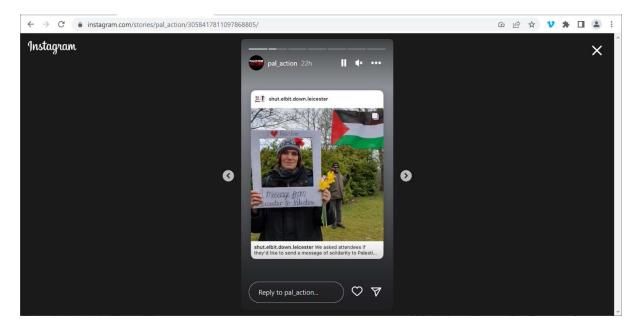
Insulate Britain



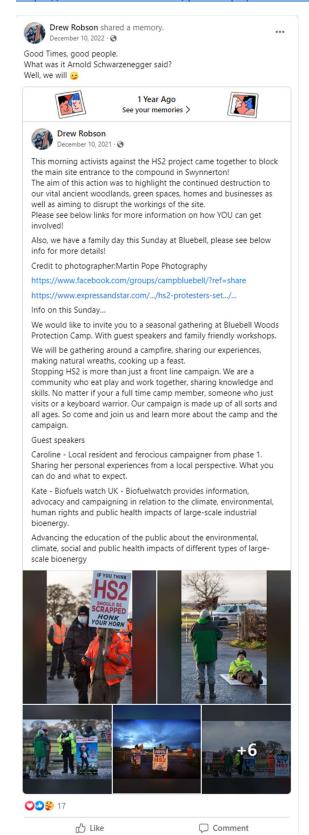
Just Stop Oil



Palestine Action



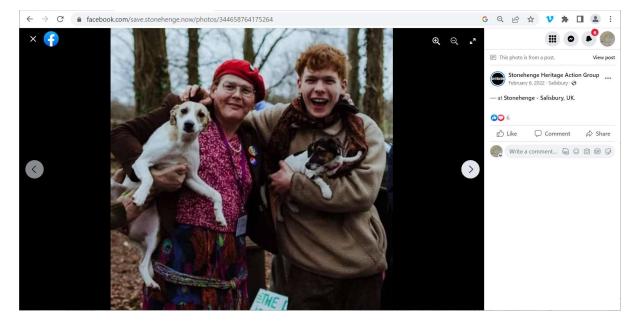
https://www.facebook.com/profile.php?id=100035849292228

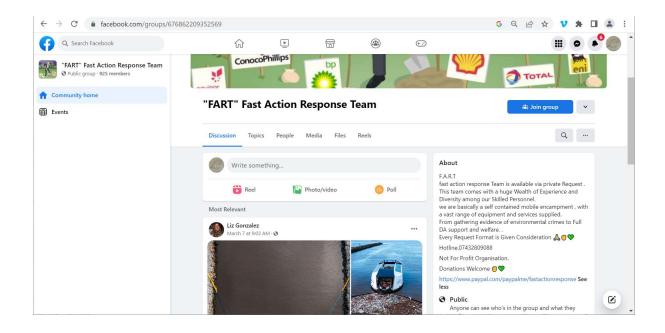


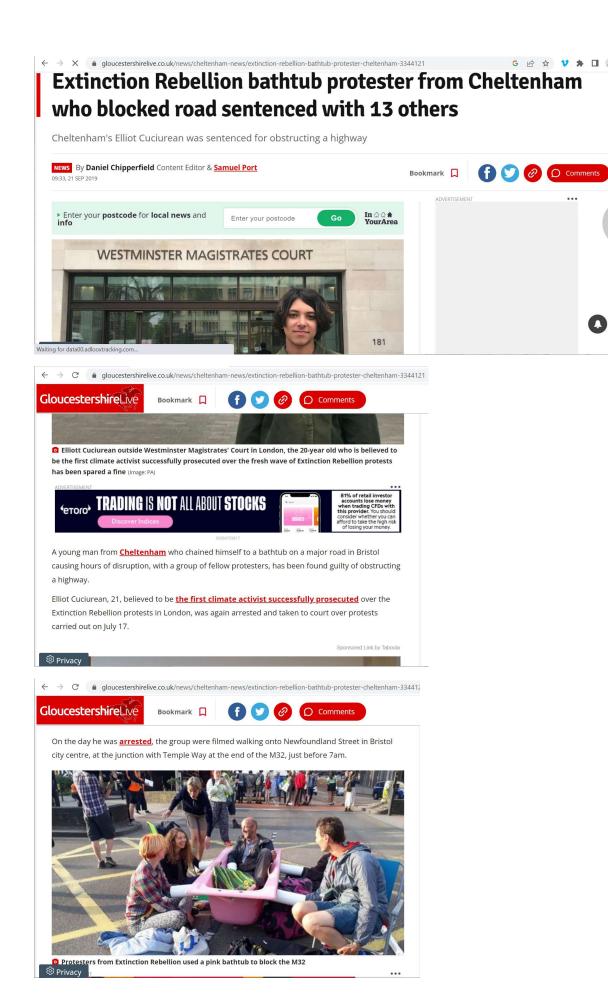
D20 Full Sutton

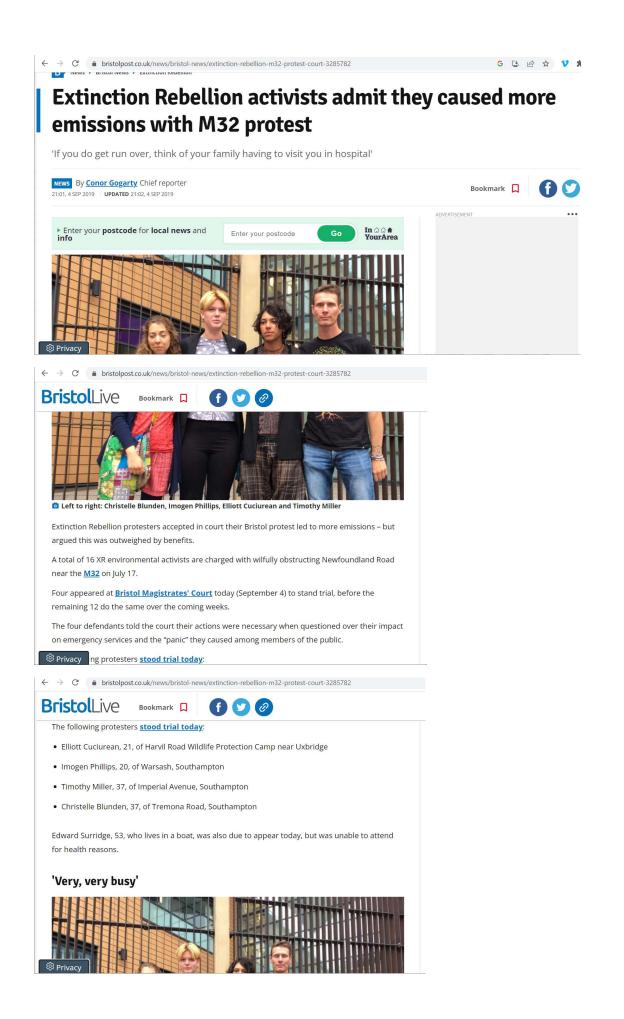


D27 (right) at Stonehenge Heritage Action Group Camp













Left to right: Christelle Blunden, Imogen Phillips, Elliott Cuciurean and Timothy Miller

The four defendants told the court they admit obstructing the road, but have pleaded not guilty to the offence because they believe their actions were justified by the 'climate emergency'.

They, along with Surridge, were dubbed the 'Bathtub Five' by District Judge Lynne Matthews at the last hearing, because they blocked the M32 by chaining themselves to a pink bathtub.

Privacy D MORE

← → C 🕯 bristolpost.co.uk/news/bristol-news/extinction-rebellion-m32-protest-court-3285782



Bookmark 🔲





The four defendants told the court they admit obstructing the road, but have pleaded not guilty to the offence because they believe their actions were justified by the 'climate emergency'.

They, along with Surridge, were dubbed the 'Bathtub Five' by District Judge Lynne Matthews at the last hearing, because they blocked the M32 by chaining themselves to a pink bathtub.

B READ MORE

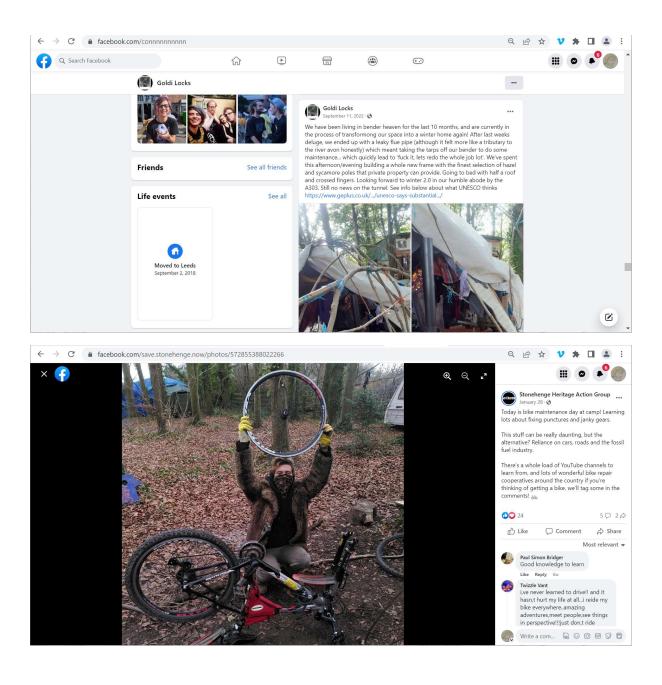
▶ Man amasses more than £500 in parking fines outside his own house

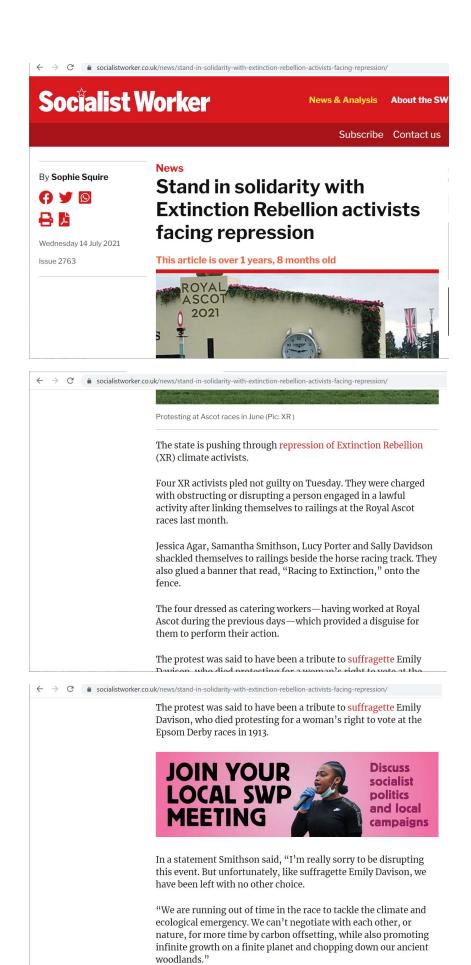
Prosecutor Ed Counsell said a blockade was in place for eight hours and caused "significant" disruption to drivers.

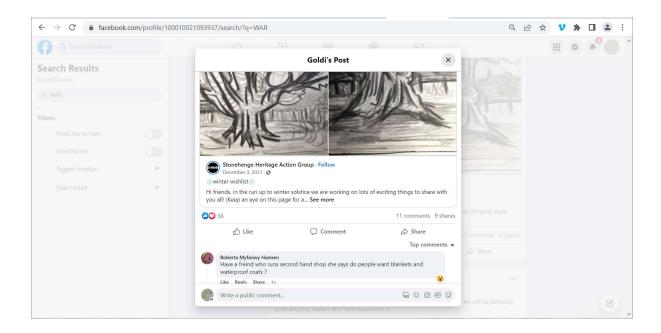
PC Jewell, an officer who had been on the scene, said: "The traffic situation inbound was completely jammed up, all the lanes - very, very busy."

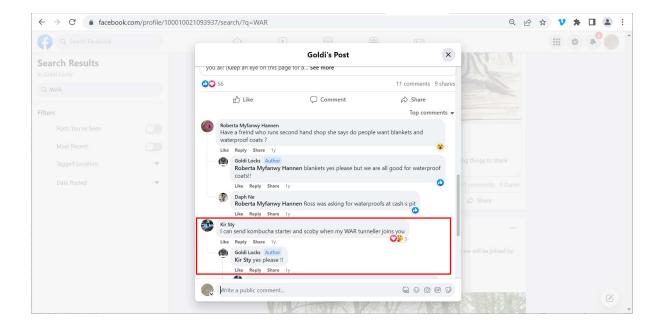
She described a "panic" as six lanes of traffic tried to merge onto the two lanes leading towards Temple Way.

Privacy of your family

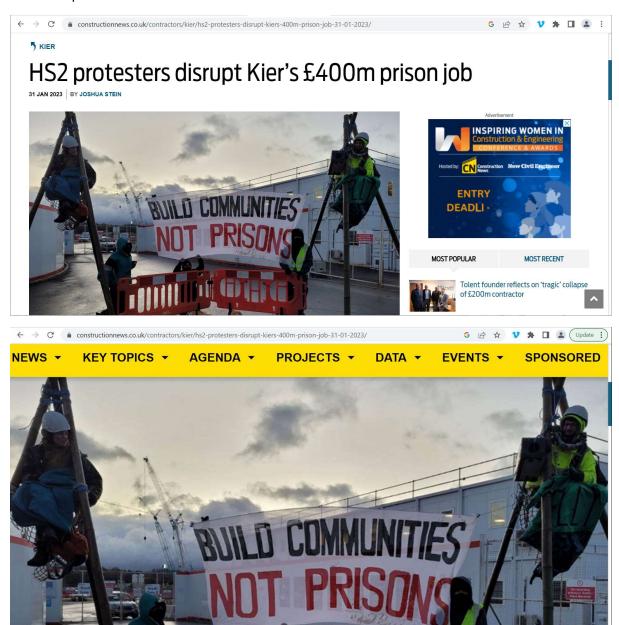


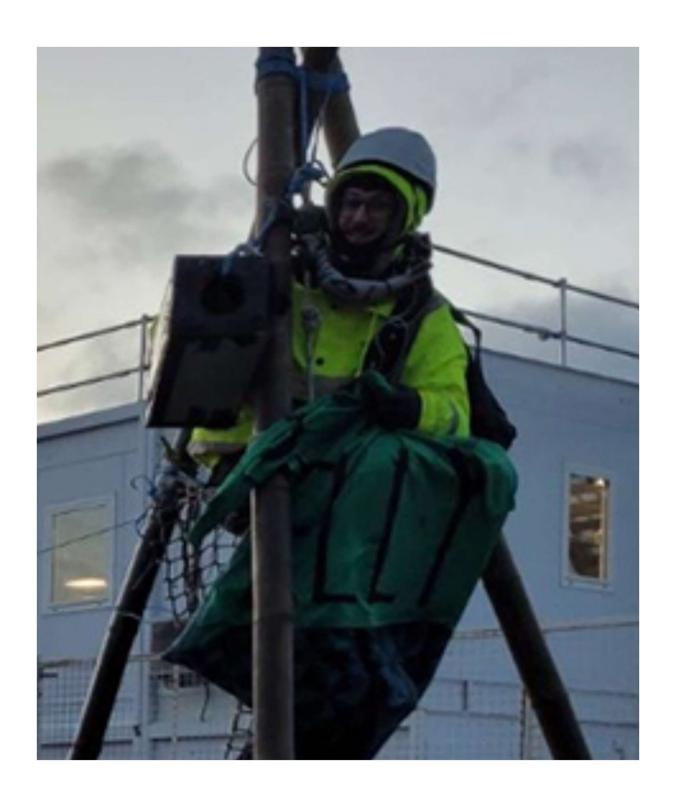




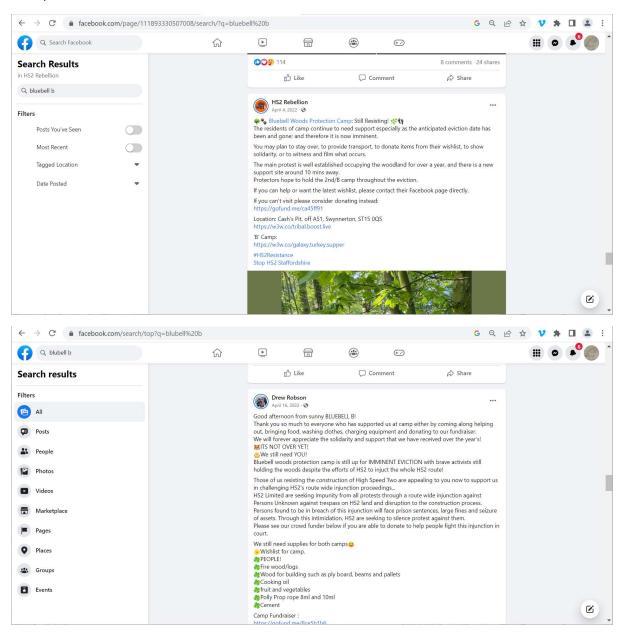


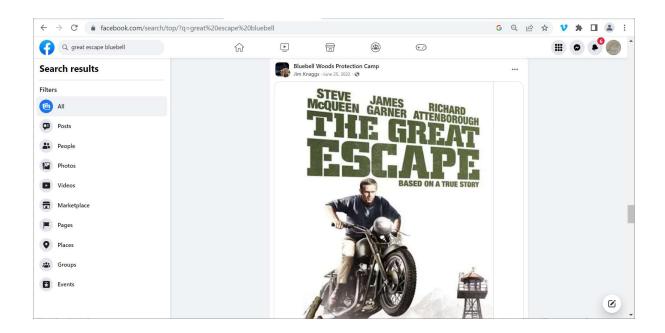
D63 on Tripod at Full Sutton 31.01.2023

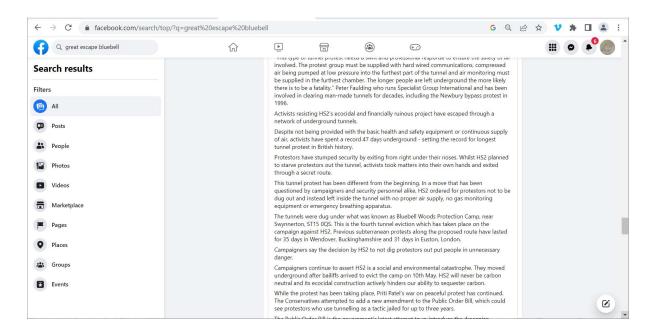


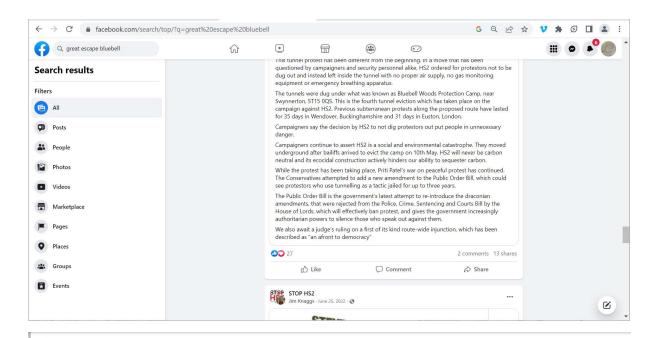


Closepit Plantation / Bluebell B



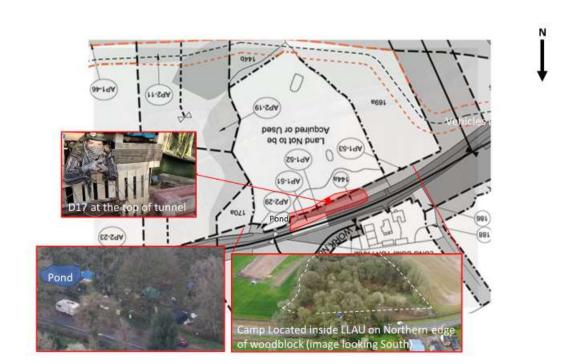




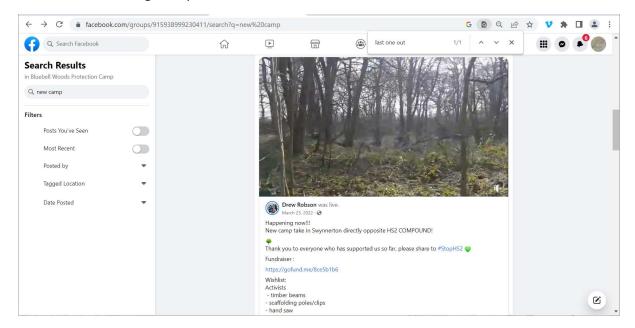


Post Shared at 07:22hrs by D6 to Bluebell Woods Protection Camp Page





D17 Video Introducing Closepit



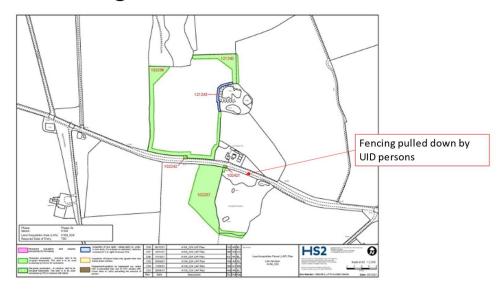
06.10.2022 D66 and D67 Trespass Aylesbury Ecological Area

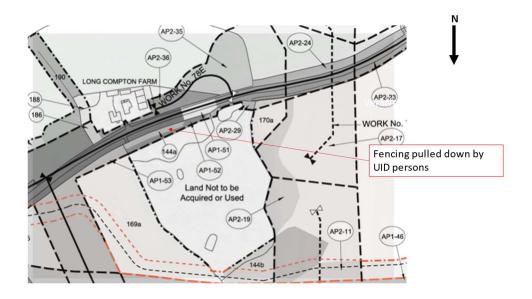




07.11.2022 Fencing Pulled Down at Closepit Plantation

07.11.2022 Fencing Pulled Down





13.11.2022 Old Oak Common Incident

Old Oak Common Incident 07:08 hrs 13 Nov 22

 Male trespassed (entered pink land 4 times) onto HS2 Land at Old Oak Common and assaulted a security officer

W3W:darker.flock.random

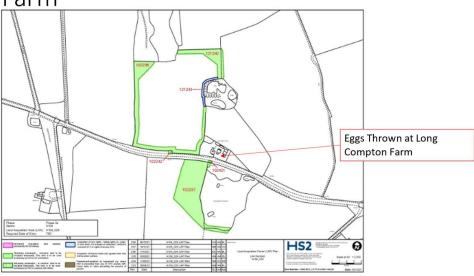
CRN: CHS27008

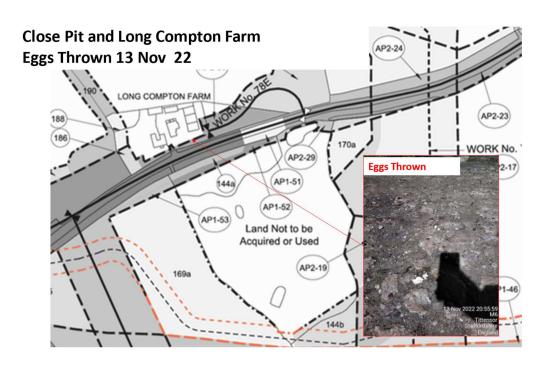


13.11.22 Eggs Thrown Long Compton Farm

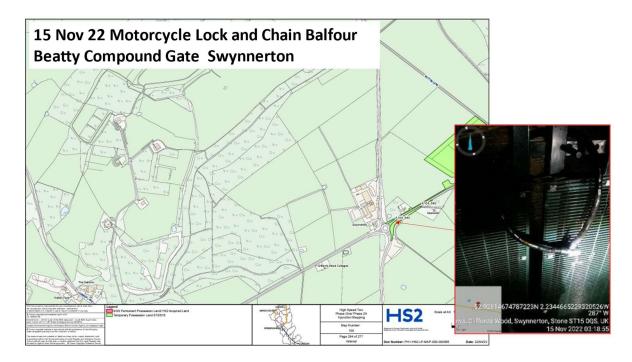
13.11.2022 Eggs Thrown at Long

Compton Farm

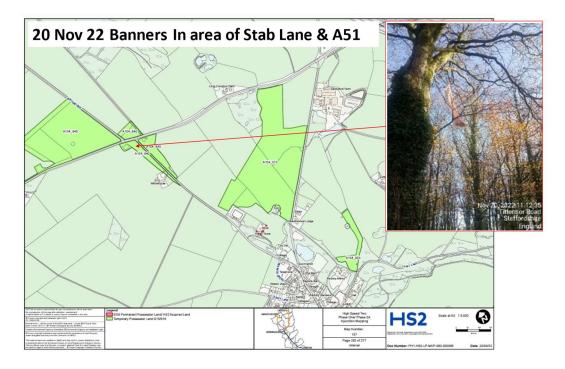




15.11.2022 Motorcycle Chain Attached to Front of Balfour Beatty Compound



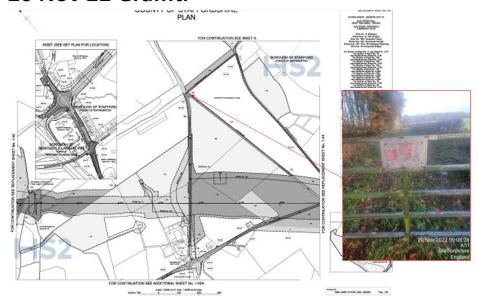
20.11.2022 Banners In Trees at Stab Lane



20.11.2022 Graffiti & Road Signs



20 Nov 22 Graffiti



22.11.2022 Heave Site Trespass – Hunt



04.12.2022 Laser shone at Security Staff

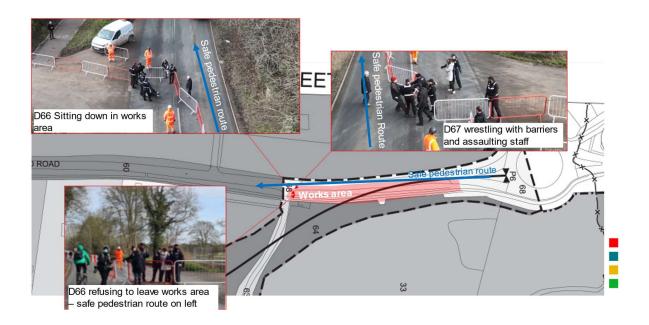


05.12.2022 A421 Interference with gates and fences A421 S



EKFB/HS2 Possessed and Injuncted Land





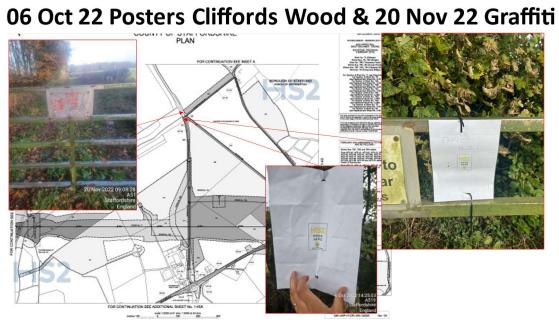
13.03.2023 Madely interference with fencing and gates

Incident Location Plotted on Injunction Mapping and W3W

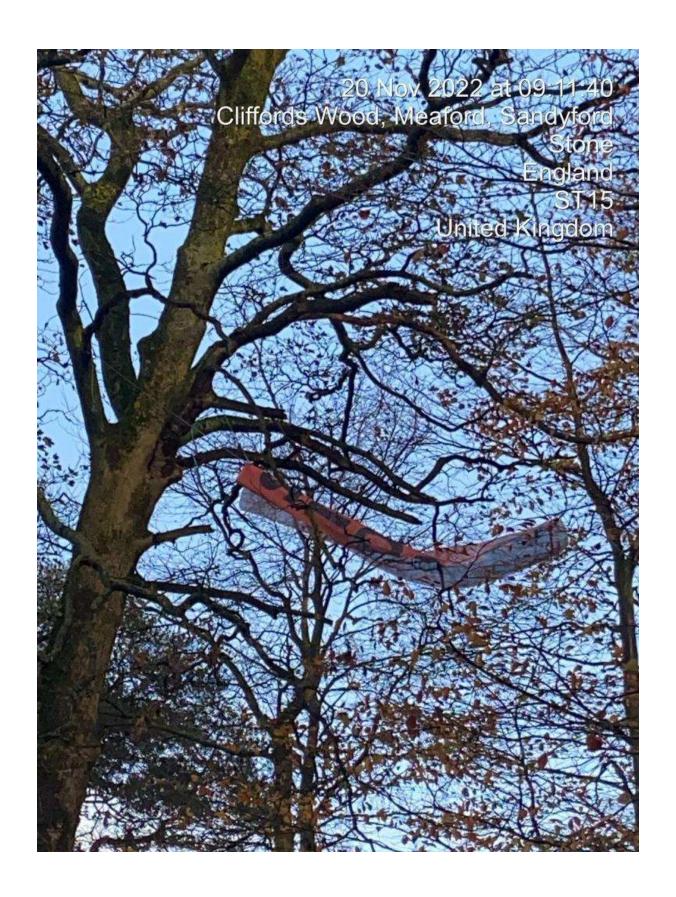


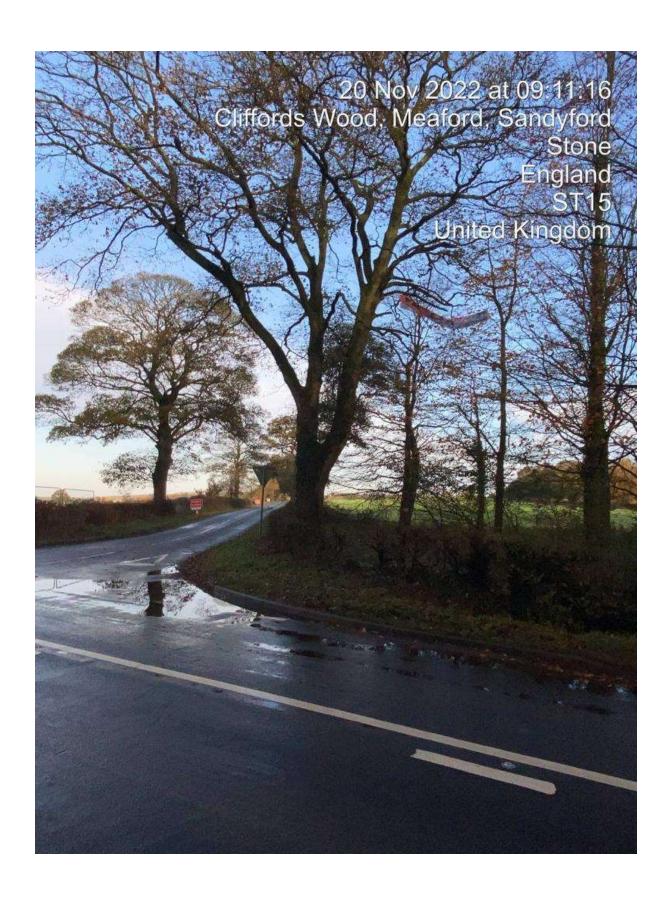
Incident Location LLAU Mapping

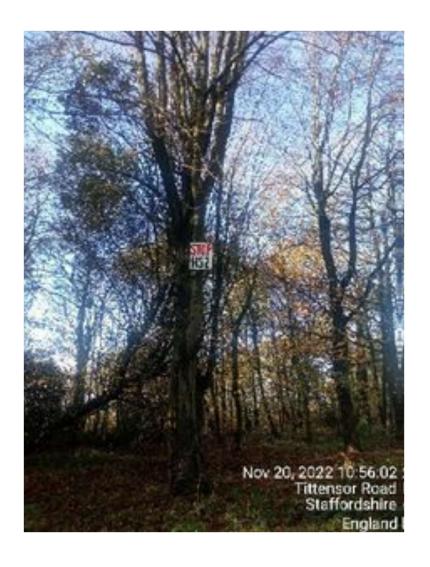




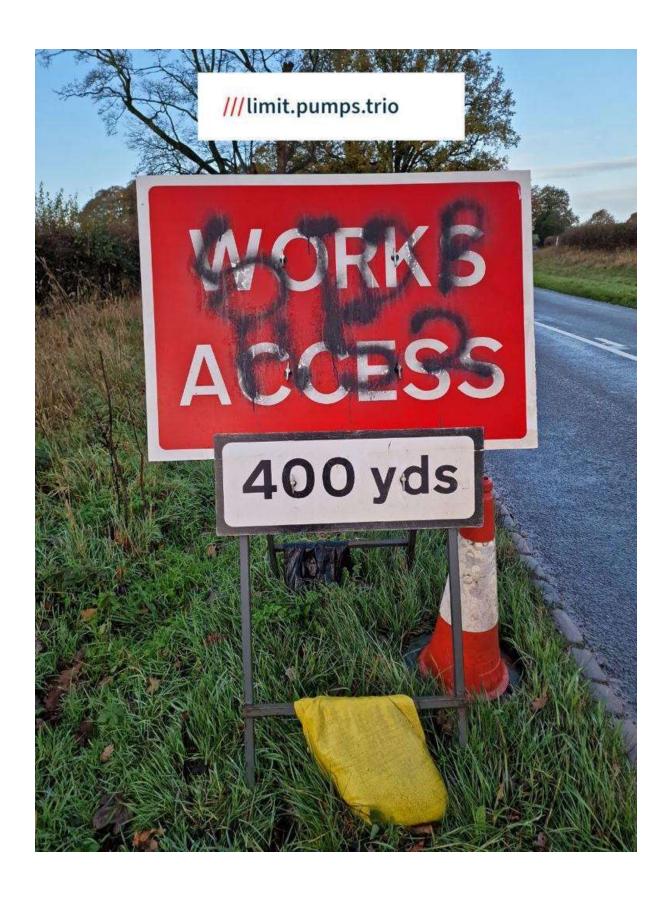


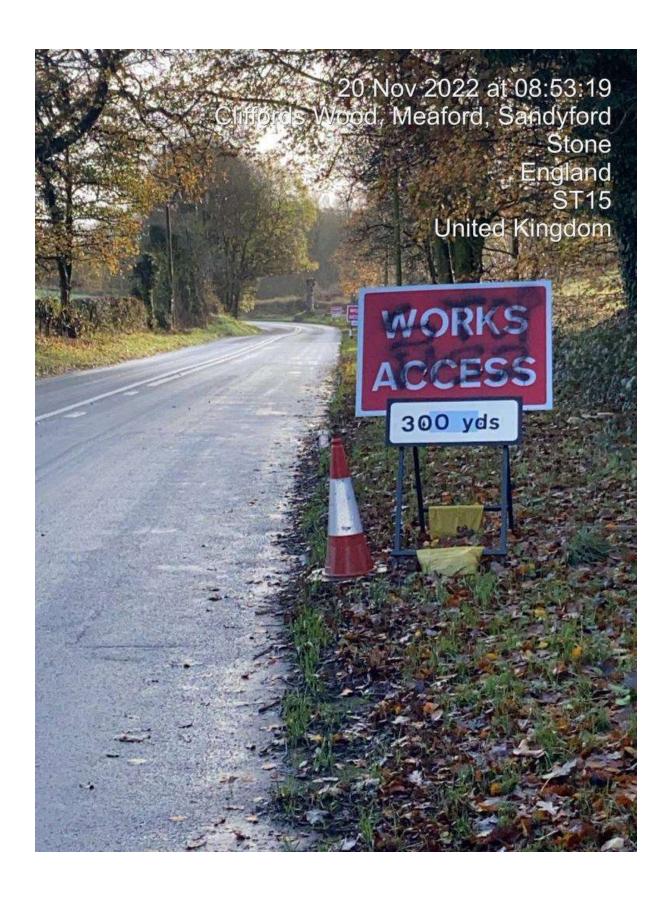






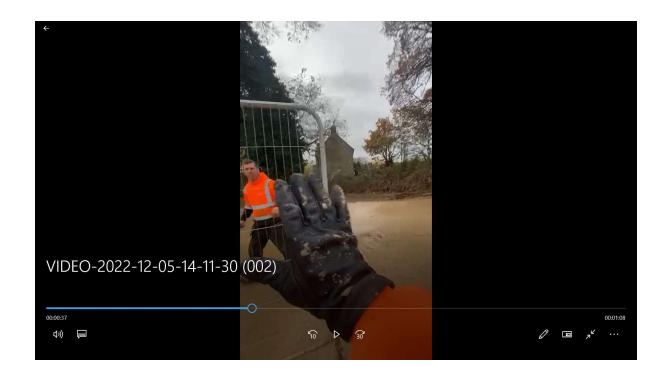












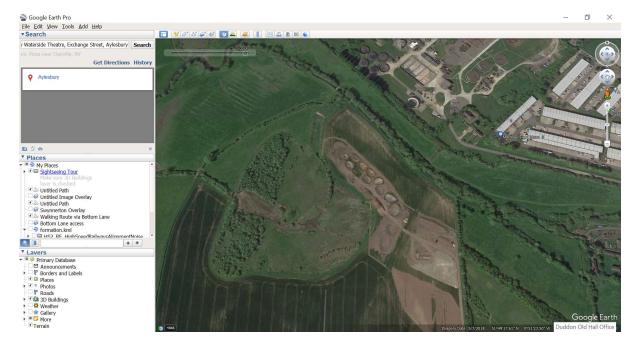
Incident Location Plotted on Injunction Mapping and W3W



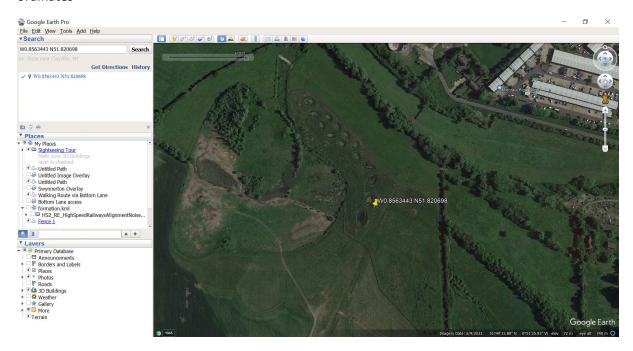
Incident Location LLAU Mapping



Mitigation Ponds Construction 2018



Mitigation Ponds 2021 Showing D66 and D67 Location according to body-worn camera GPS Coordinates



06.10.2022 – Video 2 at $00:\!01:\!38$ – showing location of D66 and D67 on HS2 Land:



06.10.2022 – Video 2 at 00:02:37 – showing location of D66 and D67 on HS2 Land:





06.10.2022 – Video 2 at 00:10:34 - D66 and D67 showing security operatives the gap in the hedge through which they entered onto HS2 Land:



From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 20 October 2022 16:57

To:

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Ors - Approved

Judgment and Injunction Order [DLAP-UKMATTERS.FID6020456]

Attachments: Injunction Order(121325778.1).pdf

Importance: High

Dear Ms Thomson-Smith

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

We refer to our email of 20 September 2022 below, serving the Injunction Order made by the court in these proceedings on you.

You have therefore been aware, since 20 September 2022, of the Injunction that was in force across the "HS2 Land" (as defined in the Injunction Order).

We have been informed by High Speed Two (HS2) Limited that on 6 October 2022 yourself and one other person:

- 1. together entered onto and walked approximately 100m across the HS2 Land without permission in the A41 Thame Valley Viaduct area. This resulted in security personnel having to ask you to leave and escorting you off the land.
- 2. Stood on and obstructed for approximately 5-10 minutes a public right of way crossing point on the HS2 land in the A41 Thame Valley Viaduct area. Due to your proximity to an active works site and that you were no longer passing or repassing along the public right of way but stood still on a crossing point, this resulted in plant and machinery from being unable to continue moving freely on the HS2 Land.

Whilst you have been served with a copy of the Injunction Order and signs are displayed on the land onto which you trespassed (confirming that the land onto which you entered is within the ownership or control of HS2), you are reminded that you should read and consider the terms of the Injunction Order very carefully. We have attached to this email a further copy of the Injunction Order for ease of reference.

Breaching an injunction is a very serious matter and the Penal Notice on the Injunction Order confirms the potential consequences for those who disobey the order.

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours sincerely

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 20 September 2022 13:15

To: HS2Injunction < HS2Injunction@dlapiper.com>

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Ors - Approved Judgment and Injunction Order

[DLAP-UKMATTERS.FID6020456]

Importance: High

Dear Sir/Madam

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

The court has now handed down the approved judgment in these proceedings. A copy is attached.

The court has also made an order as a result of its judgment confirming the terms of the injunction that has been granted (the "Injunction Order").

A copy of the Injunction Order is attached to this email by way of service.

We recommend that the terms of the Injunction Order are read and considered carefully.

If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.

Yours faithfully

DLA Piper UK LLP

From: Caroline Thomson-Smith

Sent: Thursday, October 20, 2022 5:51:14 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London

To: HS2Injunction

Subject: Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Ors - Approved Judgment and Injunction Order [DLAP-UKMATTERS.FID6020456]

EXTERNAL

Dear DLA Piper UKLLP

I am unsure precisely what you have been told and by whom but may I suggest that before you send out such threatening and intimidatory emails to members of the public you and your clients should get the facts right and ensure that what you have been told and what you choose to repeat in emails such as that which you have sent me actually represents the facts accurately and is truthful.

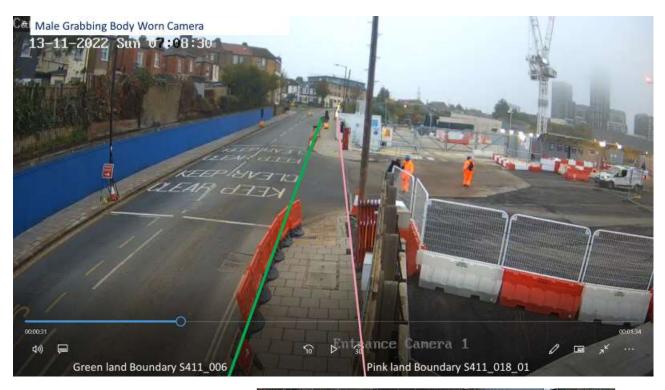
I would be more than happy to provide evidence, should it become necessary, that what you claim to have happened is a distortion of the truth but please bear in mind that my version of events could easily have been sought before firing off such a distessing and inflammatory email.

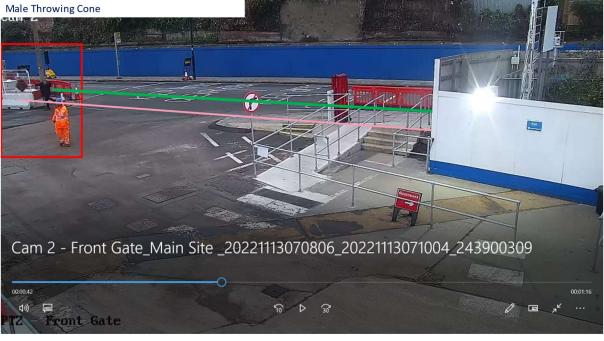
However, you and your clients might prefer to cause me no further inconvenience and distress by gathering accurate information, reconsidering their position, retracting the allegations and providing me with a fullsome and complete apology.

Yours sincerely

Caroline Thomson-Smith

On Thu, 20 Oct 2022, 16:57 HS2Injunction, < HS2Injunction@dlapiper.com> wrote:

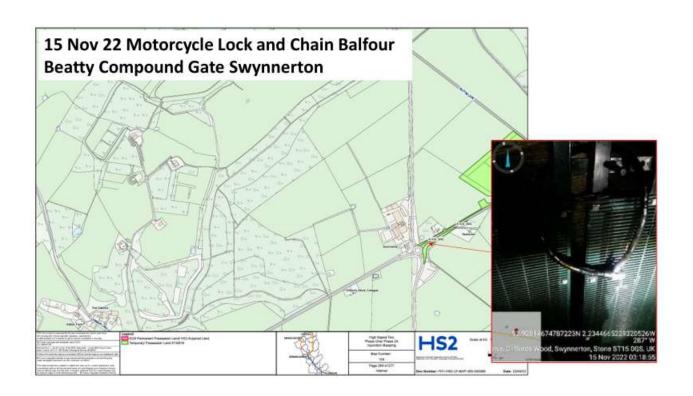










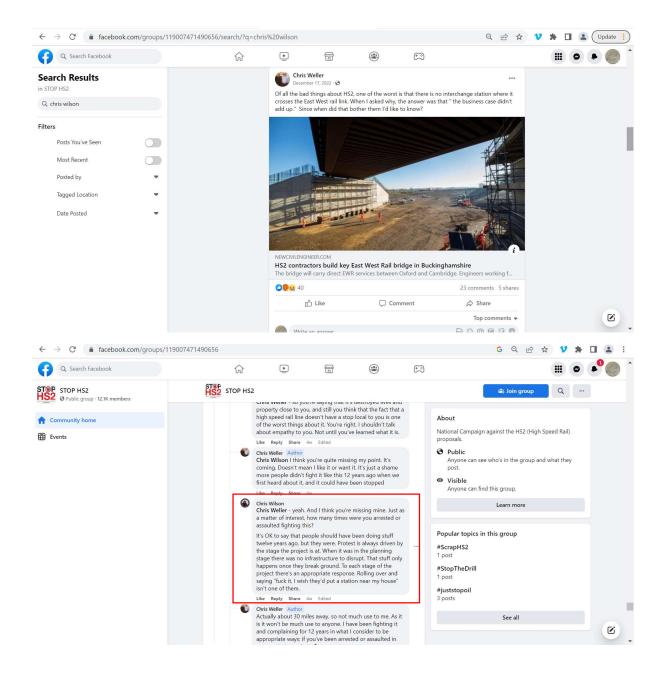




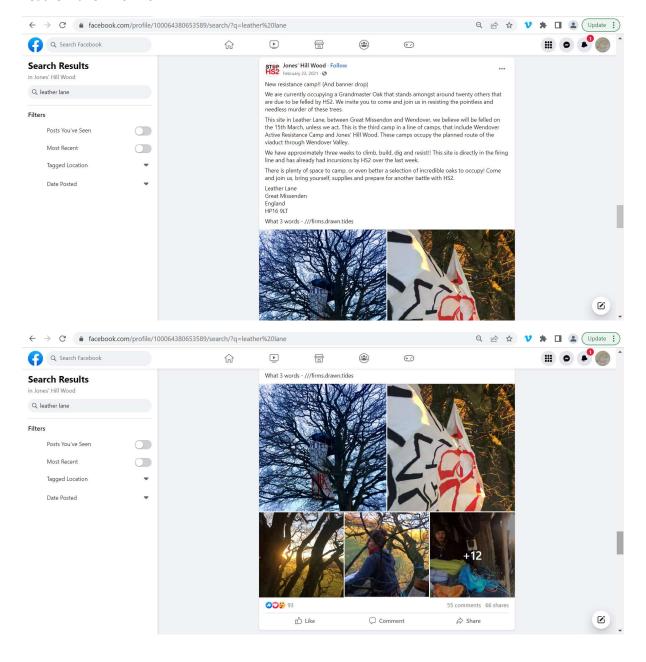








Leather Lane 22.02.2021



 $\underline{https://www.herefordtimes.com/news/23187711.four-custody-500-000-powys-protest-damage-\underline{factory/}}$

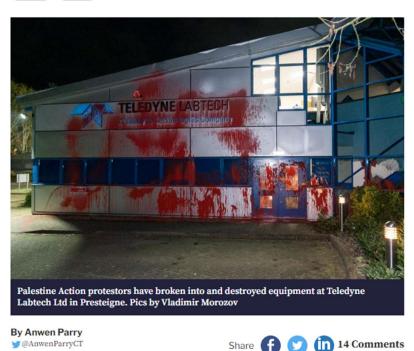


Four in custody over Presteigne protest damage to factory

13th December 2022



Chief Reporter



Four protestors will remain in prison over Christmas after appearing in court accused of causing damage worth more than £500,000 at a factory in a rural town which shut down a secondary school and major trunk road.

Susan Bagshaw, aged 65, of Clawdd Helyg, Commins Coch, Morwenna Grey, aged 41, of Penrallt Street, Machynlleth, Ruth Hogg, aged 39, of Stanley Road, Aberystwyth, and Tristan Dixon, aged 34, of Osprey Drive, Netherton, Huddersfield, were arrested following the break-in at Labtech in Presteigne as part of a protest by political group Palestine Action.

All four will remain in custody charged with conspiring to cause damage and conspiring to commit burglary until they appear at Mold Crown Court on January 6, 2023. The defendants did not enter pleas, but their solicitors indicated that they would be entering not guilty pleas to the offences.

The magistrates' reasons for not granting them bail included that the group may potentially commit other offences, and for their own personal safety.

Welshpool Magistrates' Court was told that protestors were found masked and dressed in overalls with tools, hammers, angle grinder, smoke bombs and a fire extinguisher containing red paint.

More than 25 windows had been broken, as were computers and monitors, and two large machines worth more than £500,000.

The court heard that an angle grinder had been used to cut through to the roof.

Sara Worland, prosecutor, told the court: "A number of staff were present and many of them distressed.

"Smoke bombs were set off and staff were told to leave because the chemicals may be harmful if they remained in the rooms.

"It could have caused a significant environmental incident and significant risk to life and potentially catastrophic.

"The business has been unable to operate given the full extent of the damage caused. Products have been significantly damaged

"The impact on local jobs with many members of the community employed at the factory are unable to operate at present."

Solicitors for the protestors stated that the protest was a "peaceful, well-thoughtthrough targeted action to get their message across".

Protest group Palestine Action claimed that the factory makes parts that support the Israeli military, and responded to the four being remanded by calling for their release and saying it "vows to continue to disrupt the war machine until Palestinians are also free".













14 Comments



Teledyne Presteigne protestors to spend Christmas in prison

(3) 23 December 2022





The factory is on Broadaxe Business Park in Presteigne, Powys

Protestors will spend Christmas behind bars after allegedly causing £500,000 damage to a defence company's factory.

Activists Susan Bagshaw, 65, Morwenna Grey, 41, Ruth Hogg, 39, and Tristan Dixon, 34, are in custody until the New Year.

They are accused over the raid on an American-owned plant.

Campaign group Palestine Action claimed responsibility for the siege at Teledyne Labtech's premises in Presteigne, Powys.

Welshpool Magistrates' Court had refused bail on 12 December.

Their application for bail was then heard on Friday before Judge Niclas Parry at Mold Crown Court.

Judge Parry refused to release them from prison, so they must spend Christmas and New Year's Day in custody.

Police were called at about 07:30 GMT on Friday 9 December after activists entered the Teledyne Labtech building where they are alleged to have caused thousands of pounds worth of damage.

Ms Bagshaw, Ms Grey, Ms Hogg and Mr Dixon are accused of conspiring to cause damage and conspiring to commit burglary and appeared at Welshpool Magistrates' Court.

The court heard protestors used hammers and an angle grinder to smash their way in and broke 25 windows before attacking computers and monitors.

The court was also told protestors had daubed the building in red paint and climbed onto the roof.

Prosecutor Sara Worland said: "A number of staff were present and many of them were distressed.

"Smoke bombs were set off and staff were told to leave because the chemicals may be harmful if they remained in the rooms.

"The business has been unable to operate given the full extent of the damage caused. Products have been significantly damaged."

The court heard all defendants plan on entering not guilty pleas to the charges.

All four were remanded in custody to appear at Mold Crown Court on January

In a statement, Palestine Action said it targeted the factory over its supply of equipment to Israel's ministry of defence.



Q

NEWS

Activists say they will not leave protest camp until Shenstone factory is closed

by Lichfield Live 2nd September, 2022













Palestine Action supporters in Shenstone

Activists who have set up a protest camp in Shenstone say they will not leave until a nearby factory is closed.

Members of Palestine Action have been occupying woodland near the UAV Engines site on Lynn Lane for the past six days.

The campaigners say engines made at the site are used in Israeli military drones manufactured by Elbit Systems.

They have now set up the camp in trees and have been joined by members of the South Staffs Palestine Solidarity group.

A spokesperson for Palestine Action said:

"In less than a week we've had several dozen protestors and supporters join in the struggle to shut Elbit down in Shenstone.

"As Palestine Action, we've seen this kind of support all across the country, whether it was in Leicester, where 500 turned up in support of our activists, or in Manchester, where weekly protests accompanied direct action in forcing the closure of Elbit Ferranti.

"It's quite clear that the people want Elbit gone from their streets – it's time to pack your bags and leave."

Palestine Action spokesperson

"Permanent presence of activists"



Palestine Action supporters in Shenstone

The creation of the camp is the latest action by the group in a bid to disrupt work at the factory.

"Protest camps as a tactic are new to Palestine Action, made possible by a growth in membership and support.

"The permanent presence of activists on site will mean Israel's largest arms company is struck at from all angles – including the usual direct action.

"The addition of supporters and protestors joining in the struggle has been a welcome addition for the activists, who intend to to hold the ground until site closure.

"It was direct action that forced the company to abandon both a factory and a headquarters — and UAV Engines will be no different, with activists seeking permanent closure."

Palestine Action spokesperson

An Elbit Systems spokesperson told Lichfield Live:

"We are aware of a disruptive group trespassing in ancient woodland near UAV Engines Ltd in Shenstone on land not owned by Elbit Systems UK.

"We deplore the actions of those who have recklessly thrown rocks and pyrotechnics into our site in efforts to endanger and intimidate our staff. Thankfully there have been no injuries and a 24 hour police presence remains.

"Our important work providing advanced technology and critical support for the UK armed forces has continued uninterrupted."

Elbit Systems spokesperson

https://freedomnews.org.uk/2022/08/28/palestine-action-scale-trees-occupy-the-ground-beneath-to-uproot-israels-arms-factory-in-shenstone/



NEWS

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Palestine Action scale trees & occupy the ground beneath to uproot Israel's arms factory in Shenstone

News, Aug 28th

Yesterday morning, Palestine Actionists set up a ground camp and scaled the adjacent trees, erecting unreachable hammocks overlooking UAV Engines Ltd — the Israeli drones factory that has rightly been a prime target for extensive action as part of the #ShutElbitDown campaign.

Activists have confirmed they plan to hold their positions, and will not leave until Elbit have vacated Shenstone, a sleepy English village near Lichfield. The factory produces engines and other components used to make drones such as the Hermes 450 — these are lethal munitions that have maimed and killed countless Palestinian men, women and children for decades.

In a statement from the camp, a spokesperson said: "We are here to pressure the war criminals to leave Britain and shut their killer factories. We welcome community support and engagement in support of the Palestinians on the receiving end of this factory's weaponry. Elbit's net contribution to the world is one of abject misery, pain and suffering. Their business has a massive human cost, and so on our part, no cost is too big to stop them. Rain or sun, we'll hold our ground, resist, remain and in the end, we will #ShutElbitDown"

Elbit Systems are the linchpin behind Israel's technological and military dominance over the Palestinian people, supplying 85% of the apartheid regime's drone fleet — the company also produces a wide range of artilleries, chemical weapons, high calibre bulletry and much more. Over the years, they have literally 'made a killing' in profits by using their products, often experimentally, on the people of Gaza and elsewhere — only this month, Elbit's weaponry was used to bomb Gaza for three solid days, killing 49 Palestinians including 17 children.

The Hermes 450 drone, which has been 'tested' on Palestinians and the populations of Iraq and Afghanistan, laid the foundations for the design and production of the Watchkeeper drone: the Watchkeeper is currently being deployed by both the UK Border Force and the British police for surveillance purposes.

This particular factory site in Shenstone is leased to Elbit by the real estate company Fisher German. After extensive direct action, Palestine Action have recently forced Fisher German to close their offices in Birmingham. The campaign against them will continue until they publicly announce their contract with Elbit is terminated — a pledge that was recently honoured after their headquarters in Leicester were sabotaged just last week.

The innovative tree camp and ground occupation comes after two solid years of direct action against UAV Engines — in fact, the factory has been hit no less than five times in the past two months. But, it doesn't stop here: activists intend to ramp up the pressure in Shenstone, educating and galvanising local residents to join the struggle. Palestine Action's intentions are clear: direct action will continue until UAV Engines becomes the third Israeli site to permanently close, joining Elbit Ferranti in Oldham and London's 77 Kingsway offices — both now vacated.



Image: Palestine Action

Palestine Action van rams UAV Engines site in Shenstone as two arrested

Pair in custody after being held on suspicion of criminal damage at site near Lichfield







By Jamie Brassington

13:29, 3 OCT 2022 UPDATED 15:04, 3 OCT 2022



The scene at the factory today (Image: Vladimir Morozov)

Two men were arrested after a van was rammed into factory gates as part of a long-running campaign against a company with alleged links to an Israeli arms company. Palestine Action said it targeted UAV Engines Ltd at Shenstone, near Lichfield, early today, Monday, October 3.

Staffordshire Police confirmed two men were arrested on suspicion of criminal damage. Palestine Action said two vans "made a morning delivery", claiming one van "crashed into the gate" and a second was used to block entry to the factory.

The group has claimed engines made by the company were used in combat drones manufactured by Israeli arms dealer Elbit Systems, which is UAV's majority shareholder. Other activists were said to have 'locked" themselves on to the vans, preventing their removal of the vehicles and bringing the site to a standstill.

A Palestine Action spokesperson said: "This action is the latest in the #ShutElbitDown campaign, intent on driving up pressure on Israel's largest arms company to leave. Many are now realising that when your own government actively supports the oppression of other nations, you have not only a right to disrupt this, but also a duty to.



The scene outside the factory (Image: Vladimir Morozov)

"Day-by-day, Israel's impunity is crumbling, and with it, people are flocking to take direct action at every level to end the daily violence Palestinians face." <u>Staffordshire Police</u> said: "Two men have been arrested at a business site on Lynn Lane at Shenstone, near Lichfield, following reports of a disorder.

"One man, aged 32, from Sheffield, was arrested on suspicion of criminal damage to property valued under £5,000. Another man, aged 26, from Manchester, was arrested on suspicion of criminal damage to property valued over £5,000.

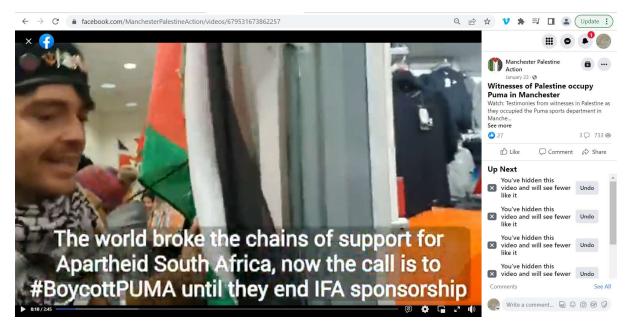
"They each remain in police custody. Officers remain at the scene and are working to keep disruption to the community to a minimum as they look to resolve the incident swiftly and safely."

An Elbit Systems UK spokesperson said: "We can confirm that a group deliberately crashed a vehicle into one gated entrance and blocked another entrance at UAV Engines Ltd. The police have made a number of arrests.

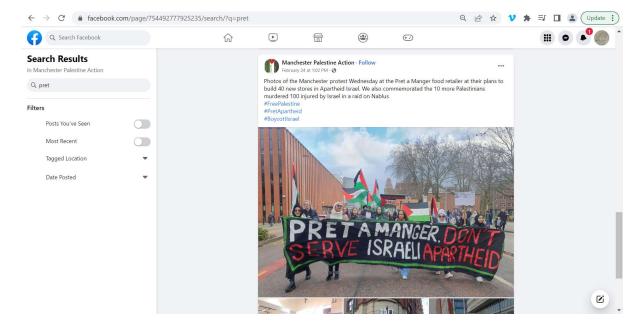
"Thankfully no one was hurt by this latest violent attempt to illegally enter the site of a decades-long established engineering firm. This action was taken without regard for the safety of our staff or local residents.

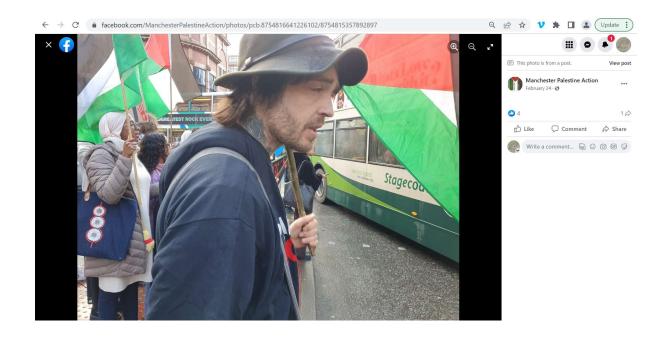
"Elbit Systems UK is proud to provide advanced technology and critical support for the UK armed forces. Using violence to intimidate our staff and attempting to disrupt this important work during a time of heightened global instability is dangerous and highly irresponsible."

D17 At Palestine Action Protest against Puma in Manchester 23.01.23



D17 Attending Pret Protest 24 Feb 23





HS2 Activists & Manchester Palestine Action –



https://drillordrop.com/2022/08/19/climate-campaigner-given-72-hours-to-leave-tunnel-protest-over-aviation-fuel-pipeline/

DRILL OR DROP?

INDEPENDENT JOURNALISM ON UK FRACKING, ONSHORE OIL AND GAS AND THE REACTIONS TO IT

PROTEST

Climate campaigner given 72 hours to leave tunnel protest over aviation fuel pipeline

BY RUTH HAYHURST ON AUGUST 19, 2022 • (29 COMMENTS)

A climate campaigner, who has opposed onshore oil and gas projects, has been given three days to leave a tunnel he dug near a new aviation fuel pipeline.



 $Protest\,site\,and\,tunnel\,over\,Southampton\,to\,London\,Pipeline\,Project\,(SLPP).\,Photo:\,Fast\,Action\,Response\,Teamler\,Action\,Respo$

Scott Breen, also known as Digger, was named in an interim High Court injunction, issued on Tuesday (16 August 2022) over protests against Esso's $105 \,\mathrm{km}$ pipeline from Southampton to London.

The injunction order said he should "remove his person and possessions within 72 hours of service of this order from any and every excavation" he had made in the area of the pipeline.

Notices about the injunction, also issued against persons unknown, were posted this morning.

Scott Breen had previously been named in an injunction aimed at preventing trespass and obstruction at UKOG's oil production site near Gatwick airport.



Protest site and tunnel over Southampton to London Pipeline Project (SLPP). Photo: Fast Action Response Team

His current protest, now in its 19^{th} day, has disrupted work on the pipeline, which will take fuel from Boorley Green in Hampshire to storage at the West London Terminal in Hounslow.

The tunnel was dug on land, near the M25 at Chertsey in Surrey, used by contractors for access to the pipeline work.

|Mr Breen has been asked to leave but has refused.

He said Esso's owner, ExxonMobil, "continued to plan for growth in climate-destroying fossil fuel use" as the UK experienced record-breaking temperatures. He said:

 $\hbox{``Our world is on fire and ExxonMobil is pouring fuel onto the flames.''}$

The new pipeline will replace an original pipe from 1972. Mr Breen said:

"The current pipeline still has at least twenty years of useful life left, time which could be used to scale back air travel and develop zero carbon alternatives."



Security and contractors at the SLPP site near Chertsey, Photo: Fast Action Response Team $\,$



Supporters for Scott Breen's protest. Photo: Fast Action Response Team



Chertsey protest site. Photo: Fast Action Response Team

Esso said the new pipeline would help to keep 100 tankers a day off the road. It was a safe, low-impact method of transporting fuel, the company said.

Essos's court submissions said the injunction had been sought to prevent people from "conspiring to injure" its business "by unlawful means".

It said activities by some protesters went "far beyond lawful and peaceful protest and give rise to serious health and safety concerns".

It described Scott Breen, who was not represented at the injunction hearing, as "a known tunneller".

The judge at the injunction hearing, Mr Justice Eyre, noted that the protest was against a background of "strongly held beliefs and concerns about the effect of air travel" and said he considered the "legitimate public interest in the changes to the climate".

He said he was "just about persuaded" to order an injunction against Scott Breen.

He concluded that an injunction was "proportionate and necessary" to ensure that Esso was "permitted to carry on its lawful activities".

 $\label{thm:exp} Extinction \, Rebellion \, South \, East \, has \, said \, the \, new \, pipeline \, would \, increase \, fuel \, supply \, to \, Heathrow \, airport \, 40\%.$

"The multi-million dollar investment in the new pipe will bake in the increased burning of fossil fuels for many decades beyond the timeframe required to take action to prevent climate breakdown."

It added:

"Flying is the fastest way we can burn fossil fuels and produce greenhouse gas emissions. It is unjust that a tiny number of very rich people, just 1%, are emitting half of commercial aviation's carbon emissions, whilst the poorest suffer and die because of climate breakdown."

The High Court will reconsider the injunction at another hearing on 7 September 2022.

https://www.bbc.co.uk/news/uk-england-surrey-62813479



Chertsey protest: Climate activist jailed for flouting injunction

(§ 6 September 2022





Breen dug a hole and occupied it in an attempt to disrupt the build of an aviation fuel pipeline

A climate activist who occupied a tunnel to disrupt the building of a fuel pipeline has been jailed for flouting a High Court injunction.

Scott Breen, 48, **dug a pit next to the M25 at Chertsey in Surrey** as part of a protest against Esso's Southampton to London Pipeline project.

The 48-year-old, nicknamed "Digger", admitted breaching the court order.

He was jailed for 112 days by a High Court judge following a hearing at the Royal Courts of Justice on Tuesday.

Esso Petroleum Company Limited, owned by ExxonMobil, was granted an interim injunction against Breen and "persons unknown" at a hearing last month.

'Mischief'

It included a requirement that Breen leave his pit within 72 hours of the order being served on him.

In his ruling, Mr Justice Ritchie said Breen had been "arrogant, dismissive" and "sought to cause chaos" by failing to engage with the injunction.

"The defendant's approach to the court order was to flout it continuously," the judge said.

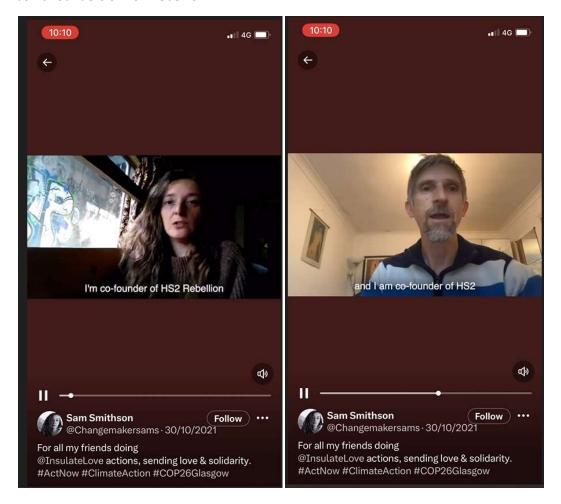
Timothy Morshead QC, representing Esso, told the judge that "nothing less than an immediate custodial sentence will meet the mischief in this case".

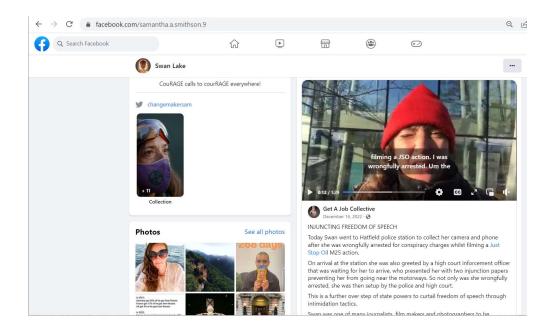
Breen's barrister, Annabel Timan, said her client apologised, "fully accepts that he was in breach" and would "undertake not to engage in any further incursions on the land".

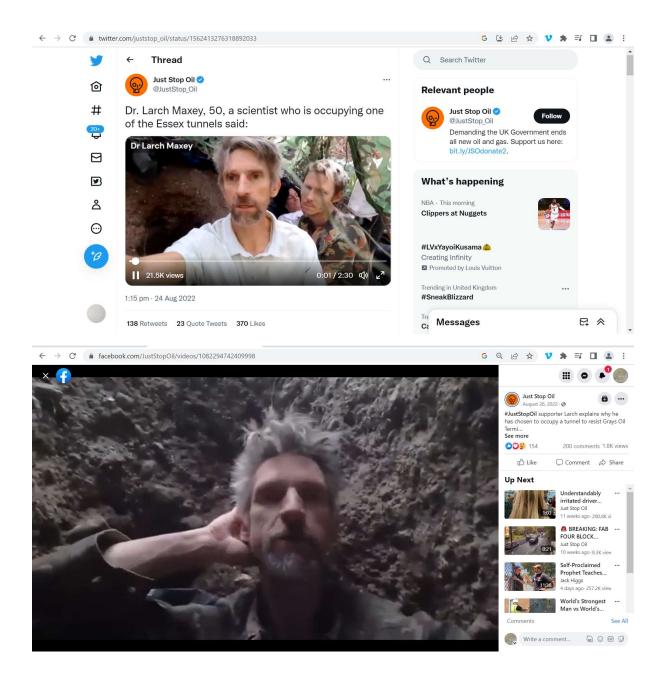
Mr Justice Ritchie said: "There is nothing wrong with protesting, and it's the right of citizens of England and Wales to do so, but they must do so within the law."

Follow BBC South East on $\underline{Facebook}$, on $\underline{Twitter}$, and on $\underline{Instagram}$. Send your story ideas to southeasttoday@bbc.co.uk.

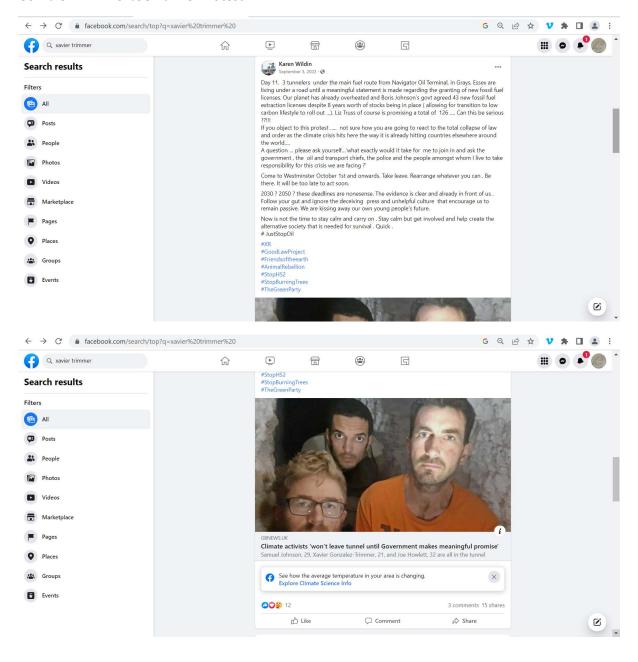
Joint Founders of HS2 Rebellion



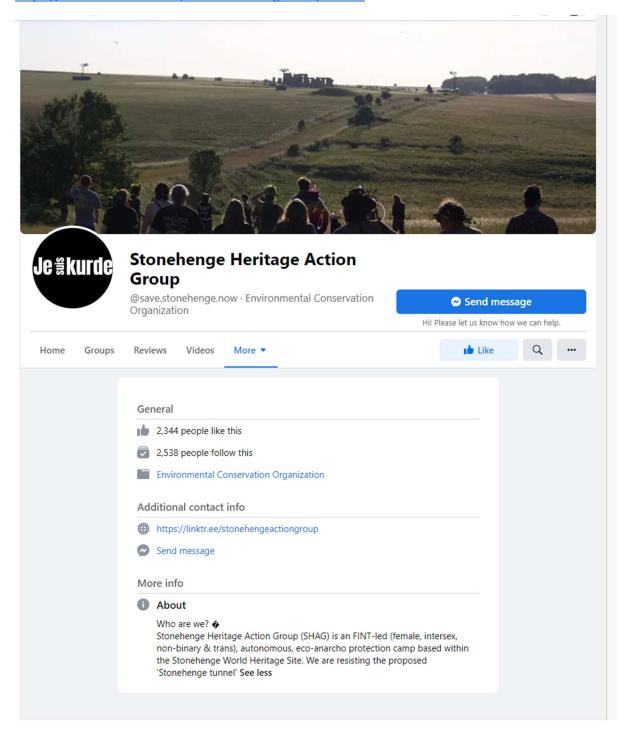


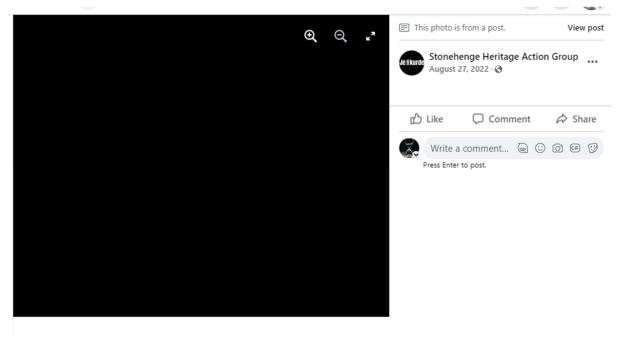


Gonzalez-Trimmer JSO Tunnel Protest



https://www.facebook.com/save.stonehenge.now/about8





Our ecosystem of resistance

We come from, and are connected to, a deep history and living praxis of liberatory resistance. There are always more than we can name in a simple list, but here are some of our strongest relationships of mutual aid, interdependence, solidarity and shared struggle.

In these Isles

Other protest camps

- We come from a long history of protest camps that have come and gone, most recently the beautiful daisy chain of Stop HS2 camps that sprung up between London and Birmingham
- Ryebank Fields, Manchester
- Faslane Peace Camp, near Glasgow
- Campaign against Westdowne Quarry, Somerset

Other longer standing, currently existing radical squats

- . The Lock on who run Cambridge Community Kitchen
- FACS Falmouth Autonomous Community Space

Some of our fave groups

- CPA Campaign for Psychiatric Abolition
- RYSE Radical Youth Space for Educations (and the rest of AYN, Affinity Youth Network)
- CWP Class Work Project
- LWA Land Workers Alliance

Across the globe

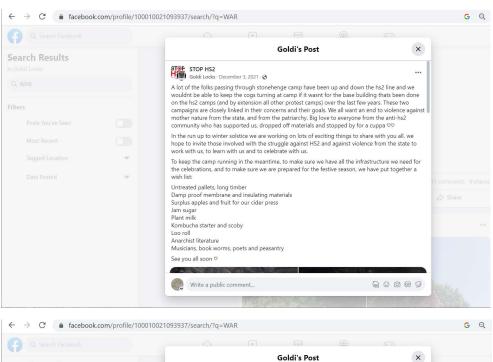
There is so much going on all the time everywhere, but two revolutions we take so much inspiration, hope and learning from, and engage in (beyond) solidarity work with in these isles:

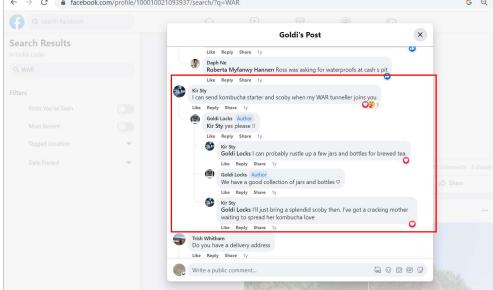
The Zapatistas and their autonomous territory in the Chiapas, in socalled Mexico, and their on-going revolution since 1994

The Kurdish Freedom Movement and the revolution in Rojava, NE Syria, since 2012.

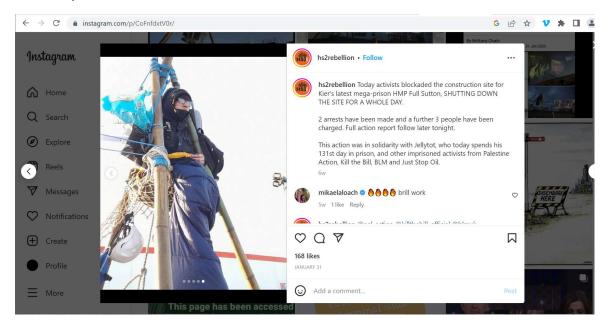
D17 and D48 Walking to Stonehenge Heritage Action Camp



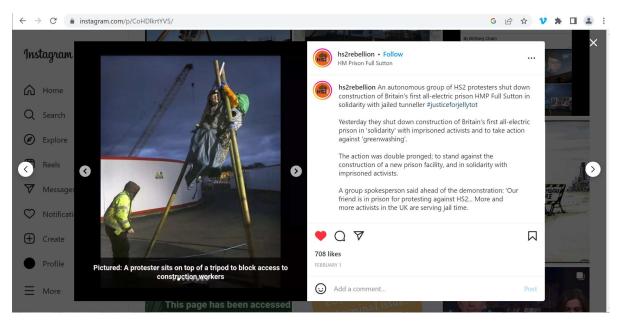


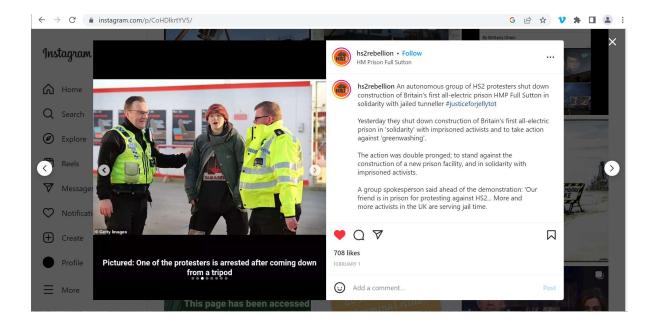


D20 in Tripod at Full Sutton



Rosie Willow Gunter (Mung Bean) at Full Sutton





D63 and Josie Argyle (Gin Ger) on Tripods at Full Sutton



https://www.facebook.com/permalink.php?story_fbid=pfbid0kNZRa4GPJQkRGkkHUJxtPRcyPiJpRLQ CSHNj1RzemsqqFAbqtFLNgU2woy7Ne8YTl&id=100035849292228



!!!!!ACTIVISTS BLOCKADE MEGA-PRISON CONSTRUCTION!!!!!

Today, our friend Jellytot serves his 131st day in prison.

He is 1 amongst 82,000 people in prison in England and Wales right now. Within the next few years, the government plans to create 20,000 new prison places as they 'crack down on crime'.

The Government's idea of 'cracking down on crime' is introducing a tidal-wave of authoritarian bills to make it illegal to protest, to strike, and to be an asylum seeker - ensuring that these prison places will be filled in no time.

Just yesterday, the Lords were debating amendments to the Public Order Bill to give the police powers to shut down any protest that could be 'disruptive' before it even happens. The PCSC Act, Anti-Strikes Bill, Nationality and Borders Act, Elections Bill act, Judicial Review and courts act, are all evidence of an authoritarian government tightening its grip. Even without these latest laws, we are seeing more and more of our comrades facing prison and the corrupt court system. There are people from Palestine Action, the Bristol Kill the Bill uprisings, Black Lives Matter, Just Stop Oil and countless others currently serving time in prison for standing up for what is right - whilst those who plunder our society keep their freedom.

At the same time as giving police seemingly unending powers, barely a week goes by without news of police brutality, racism, misogyny and misconduct. This month it has been revealed that armed MET police officer David Carrick is a serial rapist who used his status as a police officer to keep his victims silent. In the US, Tyre Nichols was brutally beaten to death by 5 police officers during a traffic stop. Whilst tragic, this is sadly unsurprising; the police are a violent institution, rooted in slavery, capitalism and oppression. Instead of giving the police more powers, we should be developing alternative, community-focused ways of responding to harm in society. DEFUND THE POLICE!

Our friend is in prison for their opposition to High Speed 2, for which Kier - the company we are targeting today - have been awarded a £1.4billion contract to build.

HS2 is in shambles! At this point, it may never even be built! Despite the huge amount of destruction it will cause, we are now no longer allowed to protest against it without being threatened by an injunction. This is a draconian, privately bought law which threatens anyone who steps foot on HS2 land - or causes disruption in any way - with a 2 year prison sentence, an unlimited fine, and seizure of assets.

Kier specialises in dirty construction projects - vivisection labs, military infrastructure, airport runways, unaffordable housing and prisons. Kier has been handed £400 million to build this mega-prison - HMP Full Sutton - which we are blockading today.

This construction is part of the UK governments plan to feed the ever growing prison-industrial complex - where the state offers up its own citizens so that private companies can profit from their incarceration. This mega-prison will include factory space, so prisoners can be put to work for slave wages. Last year, Kier built HMP Five Wells in a £253 million contract; they are set to build at least 3 more prisons in the next few years. Instead of investing in communities, and the NHS, for example, the government hands over billions of pounds to private companies, further lining the pockets of the rich.

HMP Full Sutton will be a "green prison" - operating at carbon net-zero from it's day of opening (although the enormous carbon costs of it construction is conspicuously absent from this claim). This greenwashing disguises the direct link between prisons and extractivist industries, and serves to legitimise the construction of more prisons. We must remember that all over the world, earth defenders are being locked up or killed so that the mega-corporations can continue to profit from environmental destruction. Instead of falling for this greenwashing, we must remember that we cannot achieve environmental justice without social justice.

We are not making the case that our friend is less or more deserving of prison than anyone else we believe that no-one should be incarcerated.

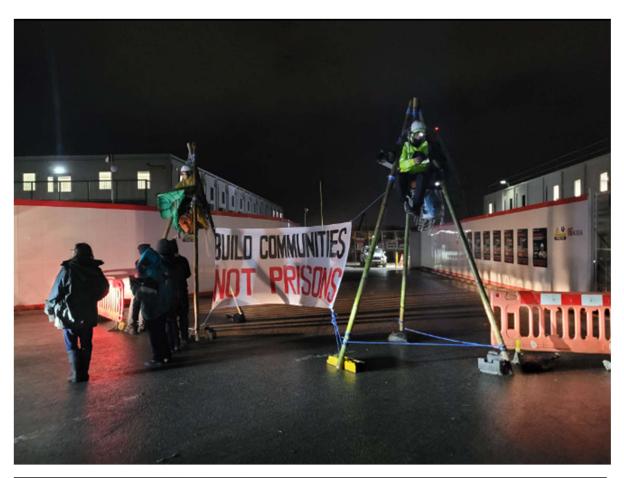
Prisons are oppressive institutions which perpetuate a racist and colonial ideology. They have no place in the just futures we are trying to build.

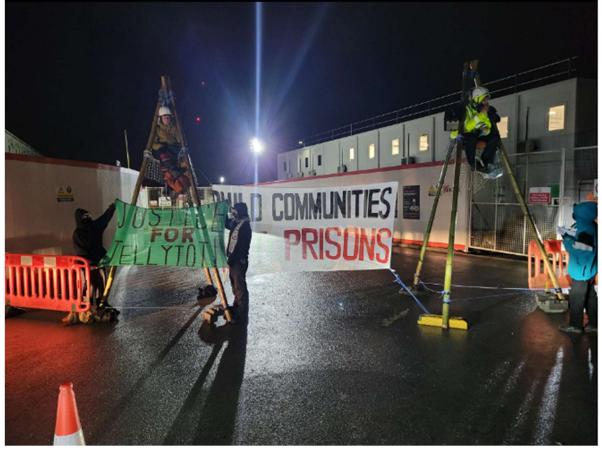
As abolitionists, we understand that harm in society needs to be dealt with. However, we strongly feel the carceral system perpetuates harm for both perpetrators and victims and doesn't deal with societal problems. Prisons 'disappear' people, and discriminate amongst the most marginalised people in our society. In England and Wales, 13% of prisoners are Black, despite making up only 3% of the population and according to the government, and 36-39% of the adult prison population have a learning disability.

We can see how flawed and corrupt the justice system is in this country, through the ongoing fight against IPP sentences, where 3000 people remain in prison on indefinite sentences for minor crimes. IPP sentences were abolished in 2012, yet those sentences already given were not absolved retrospectively. Conditions such as these have led to the UK having one of the highest prisoner suicide rates in the world. In September 2021-2022, there were 307 deaths recorded in UK prisons - 70 of which were self-inflicted. In a similar period of time, there were almost 53,000 reported incidents of self-harm. We act in solidarity with those who have lost their lives to this system.

No one should be in prison. And no one should profit from the conditions which make prisons profitable. We are calling for an end to incarceration in all its forms - whether that be prisons, psychiatric wards, detention centres or factory farms. ABOLITION, NOW!











PRISON ABOLITION

PRISONS CREATE PROBLEMS IN SOCIETY

RATHER THAN SOLVING THEM ...
INCARCERATION AND POLICING ARE ROOTED IN SLAVERY
AND DISPROPORTIONATELY TARGET
BLACK / MIGRANT /
WORKING-CLASS / NEURODIVERGENT GROUPS,
AMONG OTHERS, FURTHER MARGINALISING
VULNERABLE PEOPLE

PRISONS ARE UNNECESSARILY CRUEL
AT LEAST 70 PEOPLE TOOK THEIR OWN LIFE IN PRISON
LAST YEAR
WE STAND IN SOLIDARITY WITH
ALL THOSE INCARCERATED

AUTHORITARIAN LEGISLATION

THE GOVERNMENT ARE INTRODUCING LAWS
TO PUT MORE PEOPLE IN PRISON
AND TAKE AWAY OUR RIGHTS:

PCSC ACT
THE PUBLIC ORDER BILL
ANTI-STRIKES BILL
BILL OF RIGHTS
NATIONALITY AND BORDERS ACT
ELECTIONS ACT
JUDICIAL REVIEW AND COURTS ACT

THE GOVERNMENT IS ALSO USING SECTION 35 TO BLOCK SCOTLAND'S GENDER RECOGNITION ACT, WHICH WOULD IMPROVE THE LIVES OF TRANSGENDER PEOPLE



FUCK GREENWASHING

HMP FULL SUTTON WILL BE
THE UK'S FIRST 'ALL-ELECTRIC PRISON'
AND CARBON NEUTRAL'

(ALTHOUGH THEY-DO NOT INCLUDE THE ENVIRONMENTAL COST OF CONSTRUCTION...)

THERE CAN BE NO ENVIRONMENTAL JUSTICE WITHOUT SOCIAL JUSTICE.

GREENWAGHING PRIGONS PERVERSELY SUPPORTS THE PRIGON-INDUSTRIAL COMPLEX.
FUCK THAT.

THE PRISON-INDUSTRIAL COMPLEX ...

"...THE OVERLAPPING INTERESTS OF GOVERNMENT AND INDUSTRY
THAT USE SURVEILLANCE, POLICING AND IMPRISONMENT AS
SOLUTIONS TO SOCIETIES PROBLEMS."

KIERS GOVERNMENT CONTRACTS:

£400 MILLION: HMP FULL SUTTON.
£253 MILLION: HMP FIVE WELLS
£1.4 BILLION: HS2
THEY ALSO HAVE CONTRACTS TO BUILD
AT LEAST 3 MORE UK PRISONS.

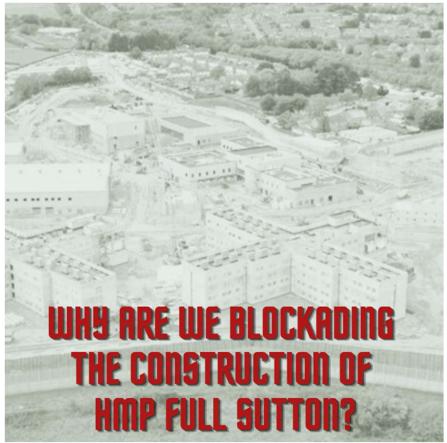
OTHER CORPORATIONS WHO PROFIT FROM INCARCERATION INCLUDE SERCO, G49, AND MITIE

KIER ENDS HERE

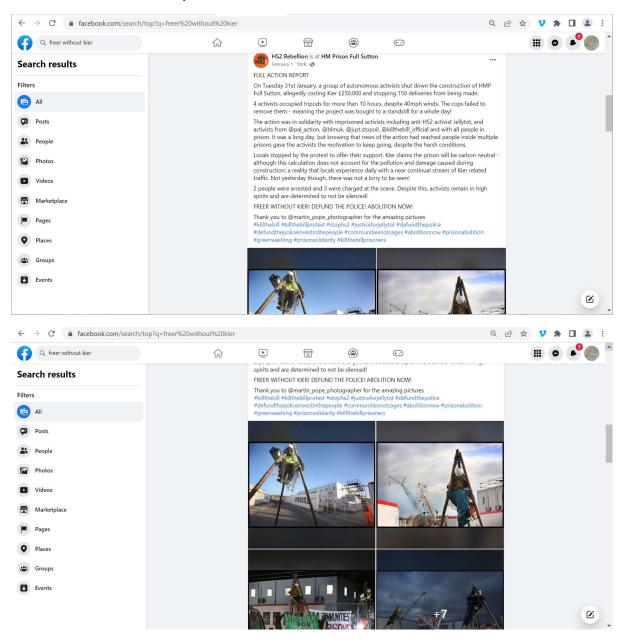
KIER PROFITS FROM BUILDING HS2 AND PRISONS

AMONGST OTHER THINGS ...
ANIMAL TESTING FACILITIES.
MILITARY INFRASTRUCTURE, AIRPORTS,
HIGHWAYS, NUCLEAR POWER STATIONS,
LUXURY HOUSING,...





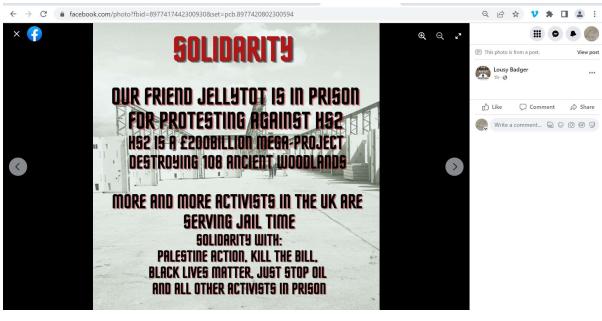
HS2 Rebellion Full Action Report – Full Sutton Prison Protest

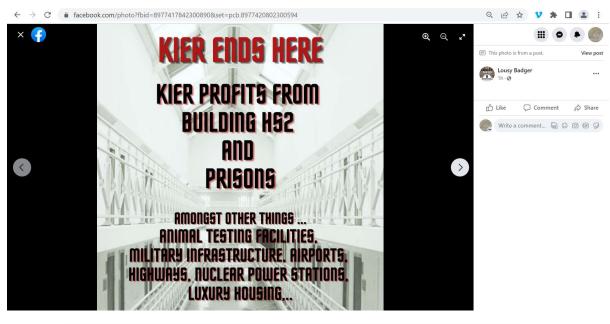


31 Jan 22 Instagram & Facebook Stories



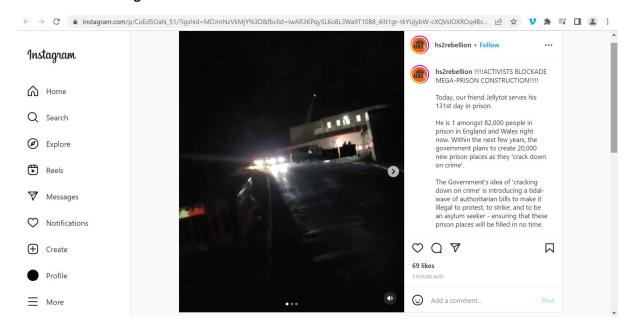




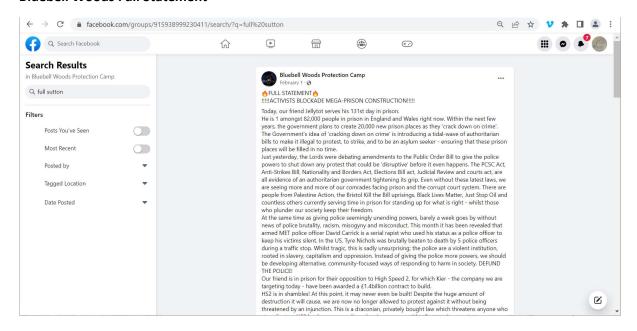


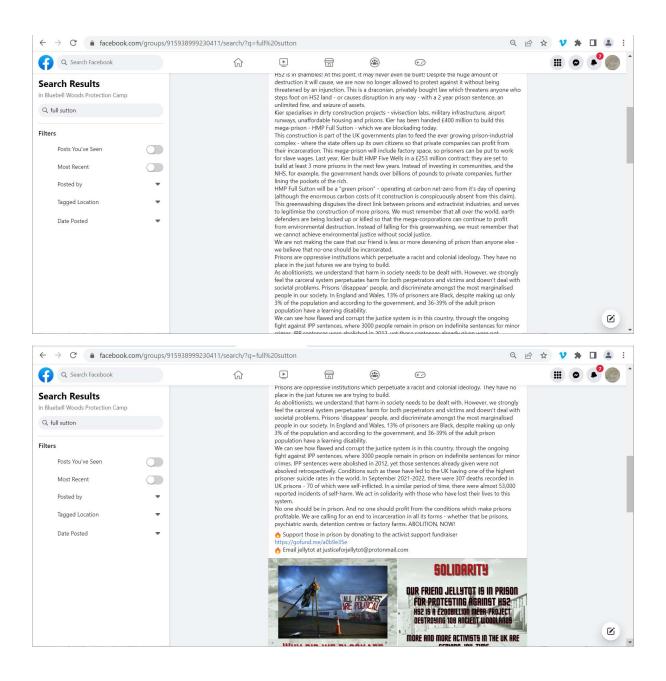


HS2 Rebellion Instagram

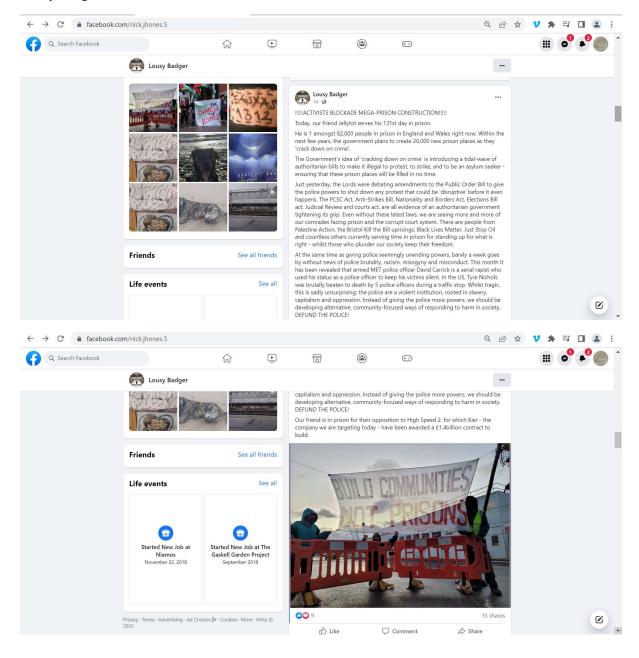


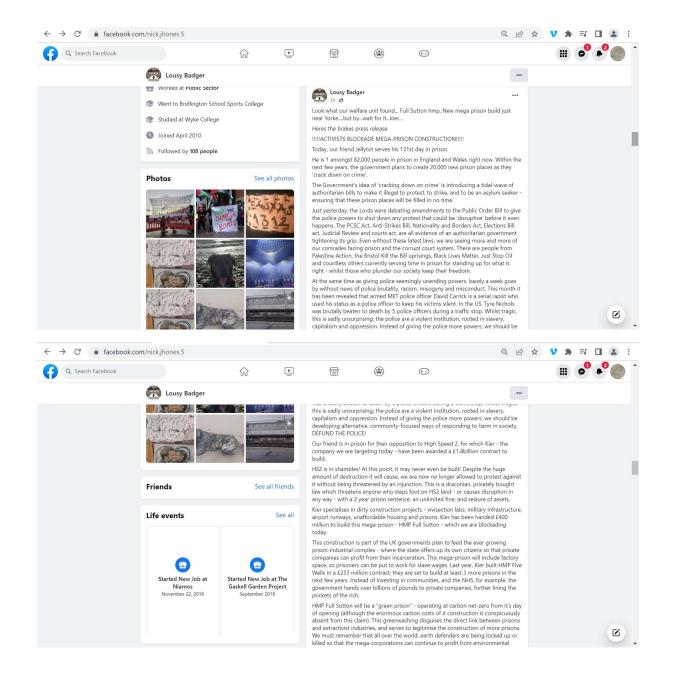
Bluebell Woods Full Statement

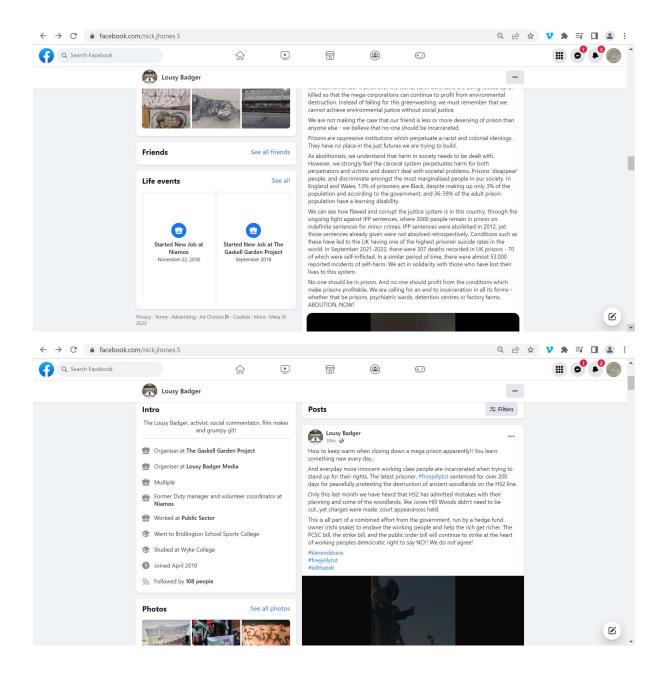




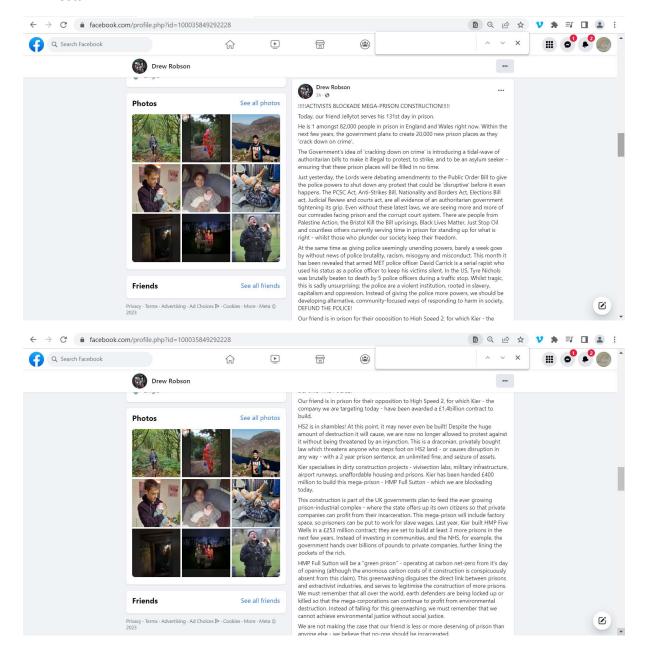
Lousy Badger Posts

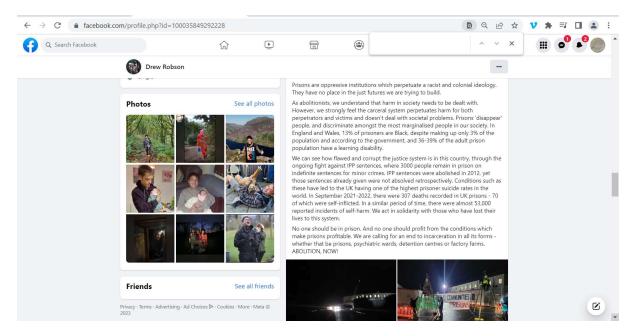




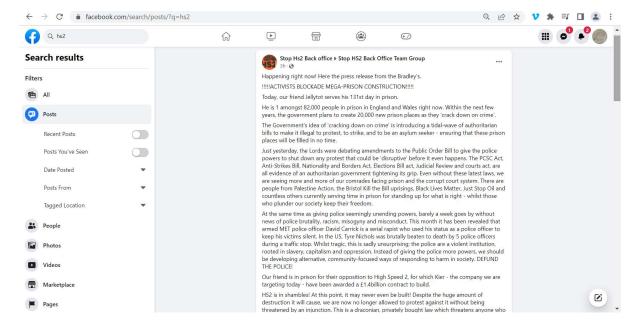


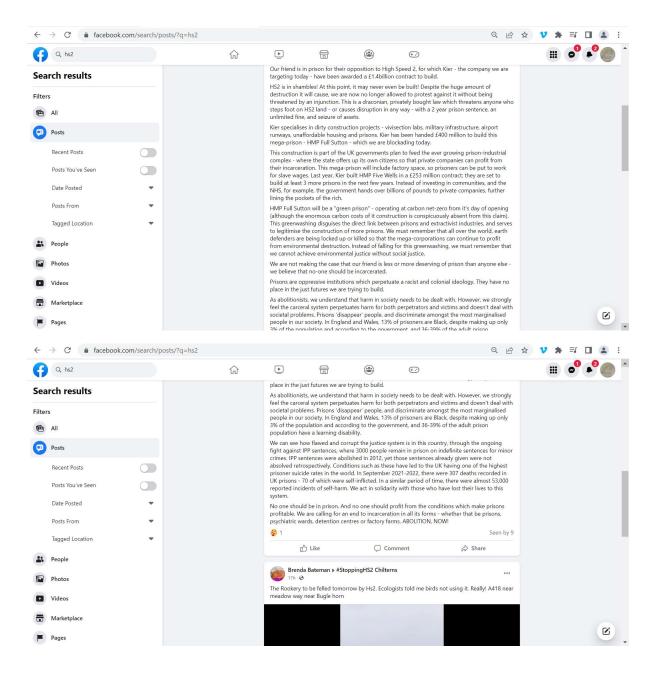
D17 Posts





Stop HS2 Back Office Posts

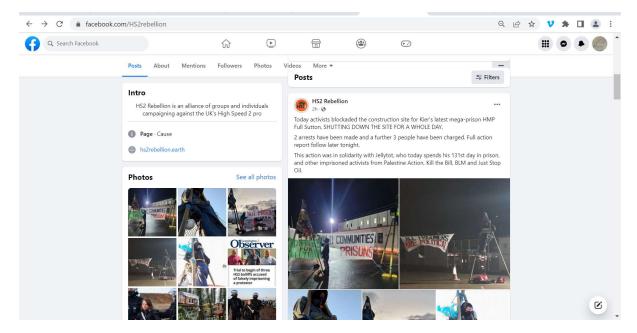




Construction News Article showing Josie Argyle (Gin Ger) and D20 on tripods



HS2 Rebellion short post



https://www.dailymail.co.uk/news/article-11697845/HS2-Rebellion-shuts-construction-HMP-Sutton-electric-prison.html



HS2 Rebellion protesters shut down construction of Britain's first allelectric prison HMP Full Sutton in solidarity with jailed tunneller

- · HS2 Rebellion protesters shut down construction of UK's first all-electric prison
- The prison is being constructed by the same group working on the HS2



PUBLISHED: 21:20, 31 January 2023 | UPDATED: 21:33, 31 January 2023

















HS2 Rebellion protesters today shut down construction of **Britain's first all-electric prison** in 'solidarity' with imprisoned activists and to take action against 'greenwashing'.

The group said two people were arrested and a further three charged during the demonstration, which suspended any work at HMP Full Sutton today.

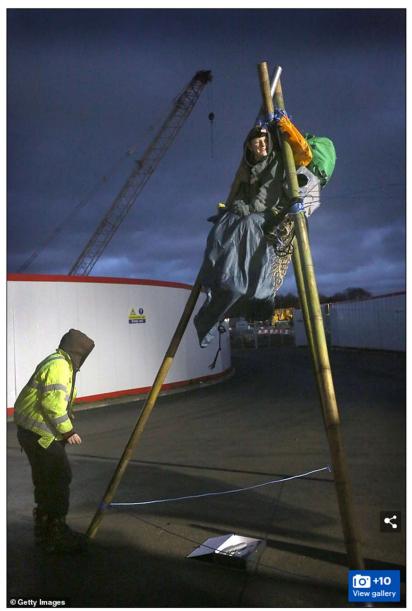
Pictures show demonstrators climbing onto tripods and holding banners which read: 'Build communities not prisons'.

Police were on the scene attempting to encourage the protesters down from their posts and maintain order.

Another sign read: 'All prisoners are political'.



The group said two people were arrested and a further three charged during the demonstration, which suspended any work at HMP Full Sutton today



Pictured: A protester sits on top of a tripod to block access to construction workers

The action was double pronged; to stand against the construction of a new prison facility, and in solidarity with imprisoned activists.

A group spokesperson said ahead of the demonstration: 'Our friend is in prison for protesting against HS2... More and more activists in the UK are serving jail time.

'Solidarity with: Palestinian action, Kill the Bill, Black Lives Matter, Just Stop Oil and all other activists in prison.'

The construction company behind the HMP Full Sutton development, Kier, was also awarded the contract for the second stage of the beleaguered HS2.

'Kier ends here,' the HS2 Rebellion spokesperson said. 'HS2 is a £200 billion megaproject destroying 108 ancient woodlands. Kier profits from building the HS2 and prisons among other things.'



Protesters fly a banner saying Build Communities Not Prisons over the construction site



Pictured: One of the protesters is arrested after coming down from a tripod

The Government earlier refused to deny the reports that **HS2 might be delayed or** may never reach Euston.

Delays to the high-speed rail project due soaring inflation mean the redeveloped Euston station may not open until 2038 and could be axed completely.

Phase One of HS2 involves the railway being built between London and Birmingham, with the line extended from the West Midlands to Crewe in Phase 2a.

Phase 2b will connect Crewe to Manchester and the West Midlands to the East Midlands.

Meanwhile the HMP Full Sutton development is scheduled for a 2025 opening date and will house 1,400 inmates.





A group spokesperson said ahead of the demonstration: 'Our friend is in prison for protesting against HS2... More and more activists in the UK are serving jail time



HS2 Rebellion protesters today shut down construction of Britain's first all-electric prison in 'solidarity' with imprisoned activists and to take action against 'greenwashing'

The first of its kind in the UK, it will be equipped with solar panels and heat pumps is set to use 78 per cent less energy than **London**'s HMP Wormwood Scrubs.

And while it's being advertised as a way to reduce emissions amid an energy crisis, HS2 Rebellion activists have labelled it as nothing more than 'greenwashing'.

'They do not include the environmental cost of construction. There can be no environmental justice without social justice.

'Greenwashing prisons perversely supports the prison industrial complex... Prisons create problems in society rather than solving them.

'Incarceration and policing are rooted in slavery and disproportionately target black, migrant, working class, neurodivergent groups... further marginalising vulnerable people.

'Prisons are unnecessarily cruel. We stand in solidarity with all those incarcerated.'



Protesters hold a banner in honour of a fellow HS2 protester, who was imprisoned



The group say they stand 'in solidarity with all prisoners', while holding this sign describing all prisoners as 'political'

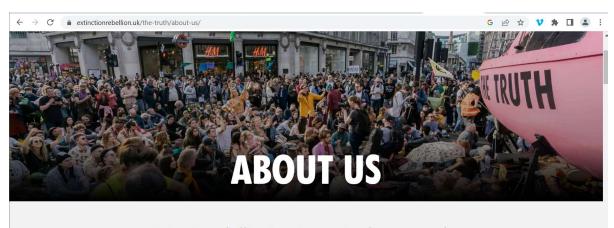


Police officers were on the scene for the protest today

Rising Up (Screenshot from 2019)

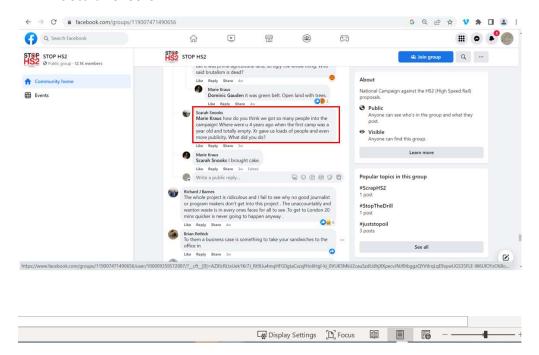


XR About Us

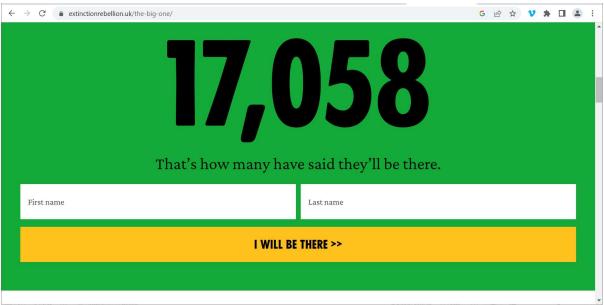


Extinction Rebellion is an international movement that uses non-violent civil disobedience in an attempt to halt mass extinction and minimise the risk of social collapse.

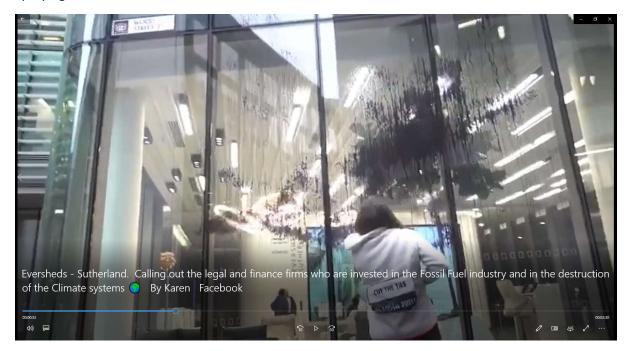
XR Links Scarah Snooks



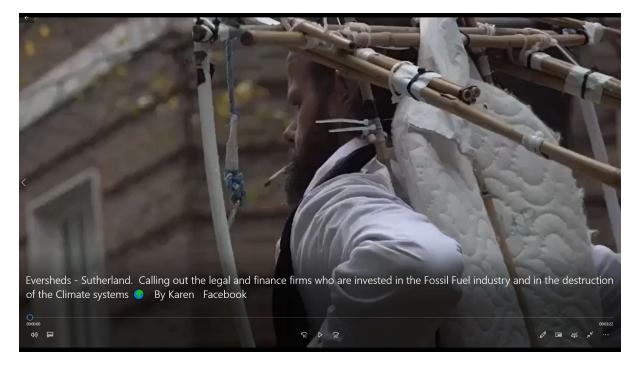




Spraying Black Paint



D39 Elephant Outfit



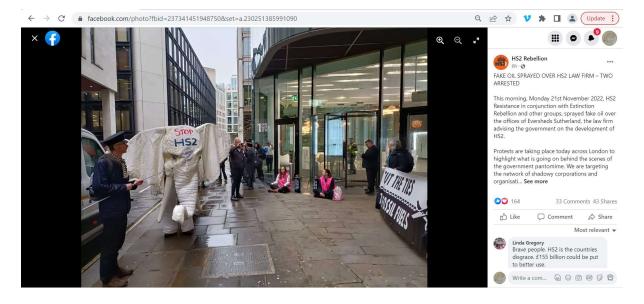
Dorethea Hackman at Eversheds Sutherland



D36 Eversheds Sutherland



HS2 Rebellion Post Eversheds Sutherland



Eversheds Sutherland LLP 28 Feb 23









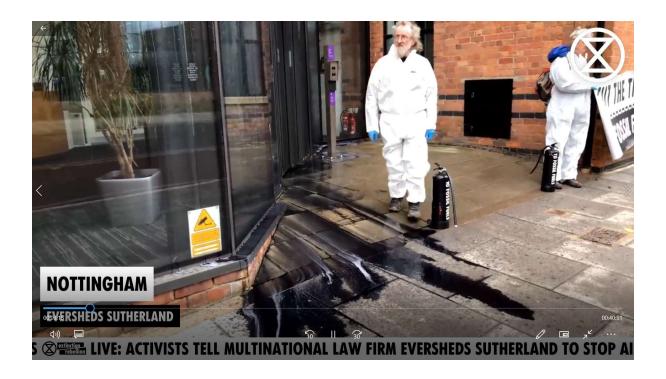
141











Photograph of Eversheds Sutherland Cardiff Office damage:





Activists from Extinction Rebellion are taking part in nonviolent direct actions in Birmingham, Cardiff, London and Nottingham to demand the law firm cut the ties to companies such as Esso (ExxonMobil) and High Speed 2 (HS2). These companies are actively taking part in the destruction of nature and enabling further burning of fossil fuels and Eversheds Sutherland are aiding them to continue this work uninterrupted. The protesters, as part of the Cut The Ties campaign, are demanding Eversheds cut the ties with these companies.

The action is part of the 100 days countdown to 'Unite To Survive' starting on 21 April. 100,000 people will gather at the Houses of Parliament to tell the government they have had enough of the inadequate leadership, corruption, and blatant disregard for the wellbeing of the people they are meant to serve. XR will be calling for an end to the fossil fuel era and a citizens' assembly to ensure a fair transition for people and planet.

Be at Parliament for #UniteToSurvive from #21April and come #ChooseYourFuture: https://extinctionrebellion.uk/the-big-one

#CutTheTies



31 comments 71 shares



Plan and manage roadworks

- Home
- Applications and works
- Inspections
- FPN
- Registered reinstatements
- Comments
- Section 81
- Section 74
- Section 58
- Map

BETA This is a new service - your feedback (/feedback) will help us to improve it.

<u>steve.randall@eiffagekier-hs2.team (/user/c3RldmUucmFuZGFsbEBlaWZmYWdla2llci1oczludGVhbQ==)(Sign out)</u> (/logout)



USRN details: 01400061 - OXFORD ROAD, STONE View on map (/location-map?

work_reference_number=TA014-AC-BC-EKFB-3303B)

Location details: Footway, Carriageway, Verge, 480515, 212768

Road type: Carriageway type 2 (2.5 to 10 MSA)

Application details Reference: TA014-AC-BC-EKFB-3303B-01

Application status: Closed

Work status: Completed View works record (/works/TA014-AC-BC-EKFB-3303B?backToWorkRecord=true)

Highway Authority: Buckinghamshire Council (/organisations/0440)

Primary contact: HS2 LTD (/organisations/7347)

146

13/03/2023, 10:32

Workstream: 014 - EK

Works description: Deveg works Works category: HS2 (Highway)

Actions

View latest permit change (/works/TA014-AC-BC-EKFB-3303B/permits/TA014-AC-BC-EKFB-3303B-

01#change request 1 date created)

Go to works record to add comments or files (/works/TA014-AC-BC-EKFB-3303B#file_header)

Go to works history (/works/TA014-AC-BC-EKFB-3303B/history)

<u>Link to a Section 81 or Unattributed works (/works/TA014-AC-BC-EKFB-3303B/permits/TA014-AC-BC-EKFB-3303B-01/link-section-81)</u>

<u>Add ancillary information (/works/TA014-AC-BC-EKFB-3303B/permits/TA014-AC-BC-EKFB-3303B-01/add-ancillary-information/map)</u>

Activity

HS2 works type

Highway works

Act limit

Outside limit

Consultation end/requested response date

06/02/2023

Activity type

Works for rail purposes

Response to COVID-19

No

Excavation planned

No

Was an excavation carried out?

No

Is lane rental applicable?

No

Collaborative working

No

Attachment(s)

<u>3303 - Closure point.pdf (/files/6596155)</u>, <u>2191-004.pdf (/files/6596156)</u>, <u>2191-003.pdf (/files/6596157)</u>, <u>2191-005.pdf (/files/6596158)</u>, <u>2191- EASTBOUND DIVERSION ROUTE.pdf (/files/6596159)</u>, <u>3303 - Westbound Diversion Route.pdf (/files/6596160)</u>, <u>2191-002.pdf (/files/6596161)</u>

Traffic management

Highest traffic management type

Road closure

Footway closure

No

Footpath closure

No

Dates

Proposed start

05/02/2023 08:00

Proposed end

05/02/2023 19:00

Actual start

05/02/2023 08:00

Actual end

05/02/2023 19:00

Duration

0 working days (1 calendar days)

Reasonable period end date

05/02/2023

Additional information

Additional works information

Early consent requested. this is to replace the previous approved consent under ref EKFB 3083. Works are Subject to Section 61 Approval for the out of hours working. Pre-aped on the 06 Jan 23. Blue Lights will be permitted through the closure however there may be up to a 5 to 10 min wait due to nature of the works and to clear works for access through. There may be a requirement to close the footway for safety reasons.

Works reference number

TA014-AC-BC-EKFB-3303B

Project reference number

Not provided

Secondary contact

Daniel Turner

Secondary contact number

07557 564 059

Secondary contact email

Daniel.Turner@EKFB.com

Additional contact

Kazim Meraj

Additional contact number

07741298116

Additional contact email

kazim.meraj@ekfb.com

Notify user 1 email

hs2consents@buckinghamshire.gov.uk

Notify user 2 email

lesley.hewitt@buckinghamshire.gov.uk

Application changes

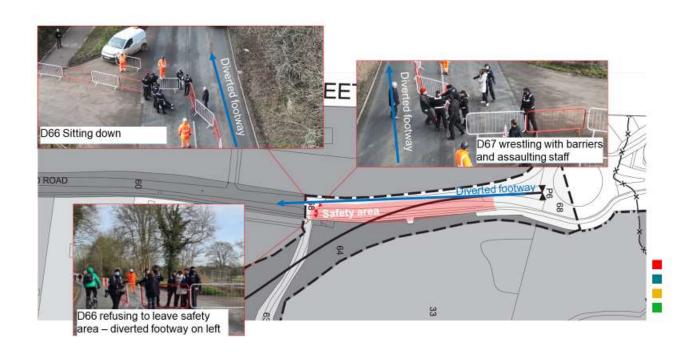
Date submitted	Change reference	Туре	Status
30/01/2023 - 12:57	TA014-AC-BC-EKFB-3303B-01-CR-03 (/works/TA014-AC-BC-EKFB-3303B/permits/TA014-AC-BC-EKFB-3303B-01/change-requests/TA014-AC-BC-EKFB-3303B-01-CR-03)	Promoter imposed change	Applied
26/01/2023 - 10:21	TA014-AC-BC-EKFB-3303B-01-CR-02 (/works/TA014-AC-BC-EKFB-3303B/permits/TA014-AC-BC-EKFB-3303B-01/change-requests/TA014-AC-BC-EKFB-3303B-01-CR-02)	Promoter imposed change	Applied
09/01/2023 - 16:11	TA014-AC-BC-EKFB-3303B-01-CR-01 (/works/TA014-AC-BC-EKFB-3303B/permits/TA014-AC-BC-EKFB-3303B-01/change-requests/TA014-AC-BC-EKFB-3303B-01-CR-01)	Promoter imposed change	Applied

Assessment decision:

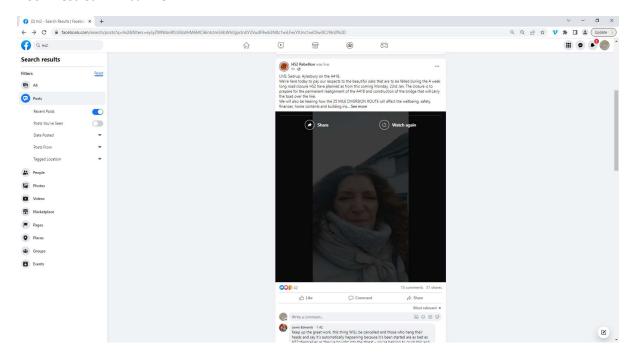
Granted

Note

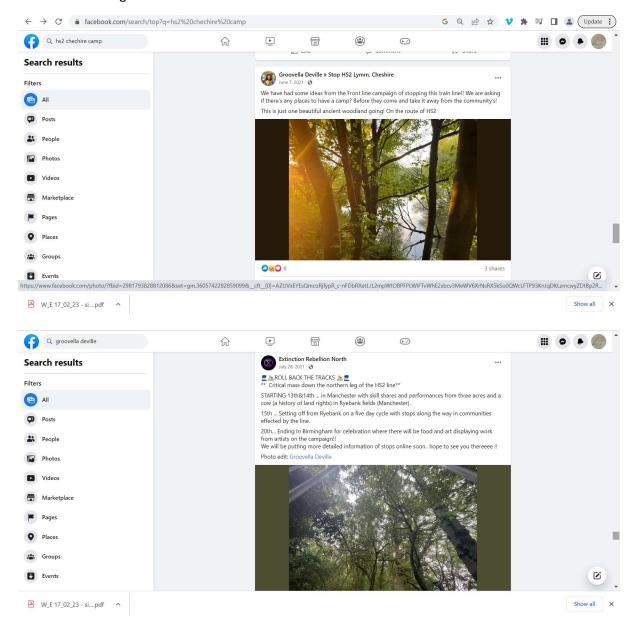
This submission is made by the Contractor on behalf of and as agent for the Nominated Undertaker. HS2 Ltd authorises the contractor to submit the application for consultation or, as required, consent of the highway authority. Contractor must obtain acceptance from HS2 before submission to the highway authority



D66 Livestream 22 Jan 23

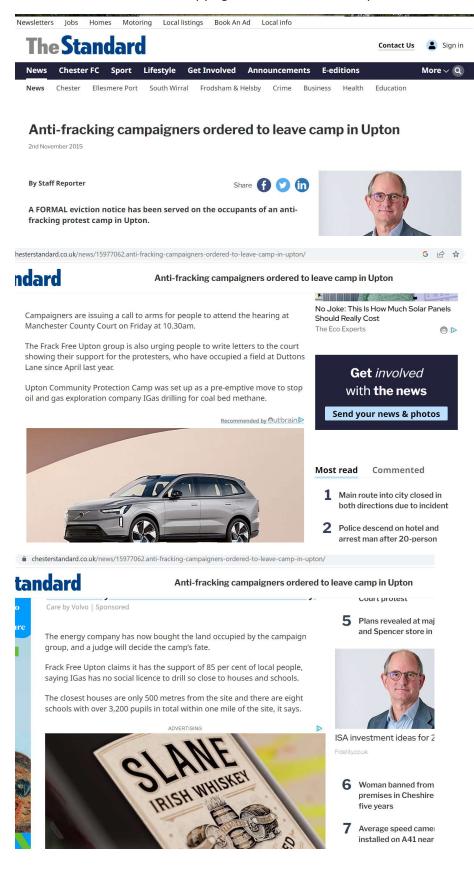


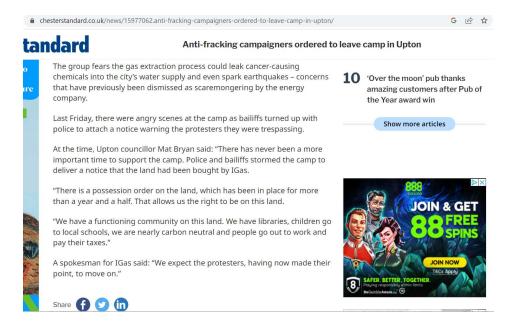
Phase 2b Scouting Ahead





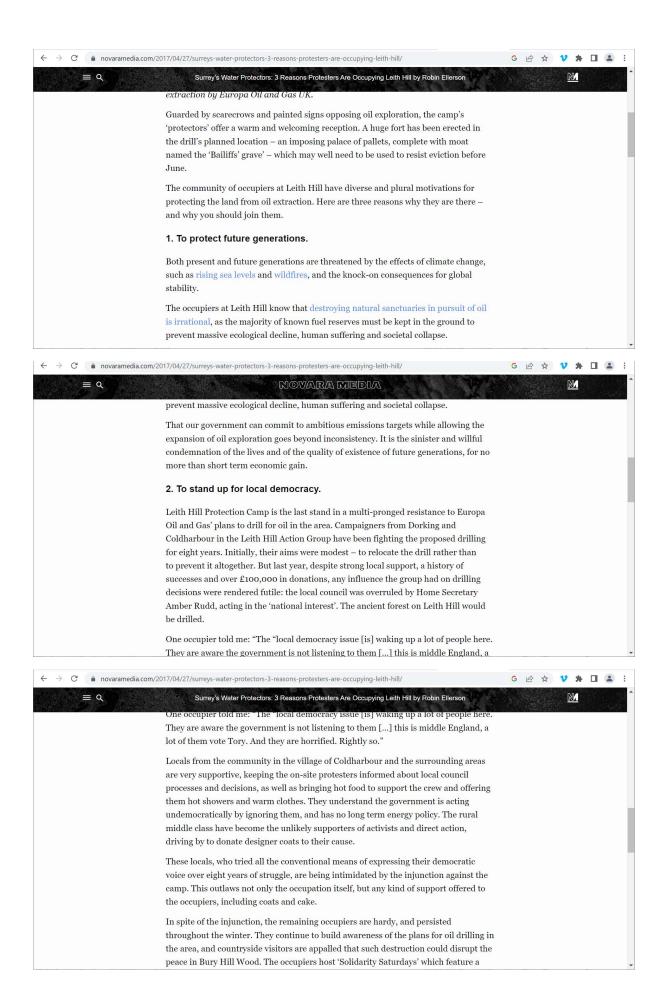
Anti Oil and Gas Activists Occupying Land Before Works – Upton and Leith Hill

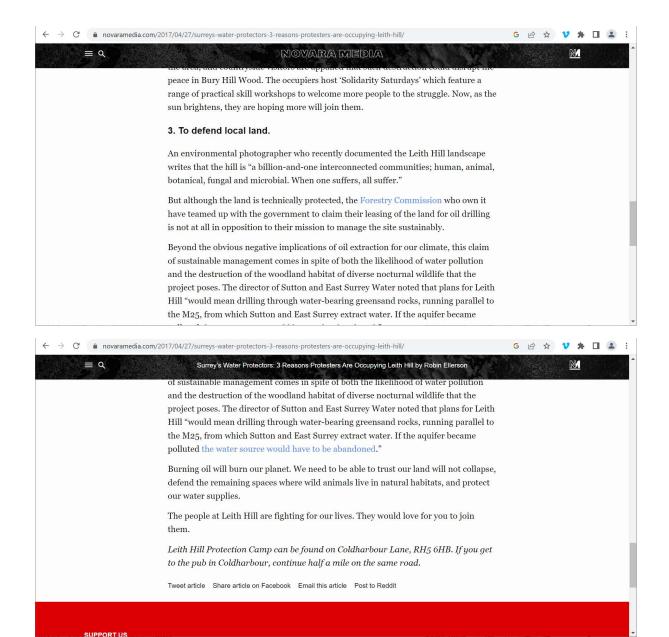




Leith Hill Surrey







Geographical Plot of Incidents in 2022

The image shows the geographical dispersal of protestor incidents reported on HORACE in 2022



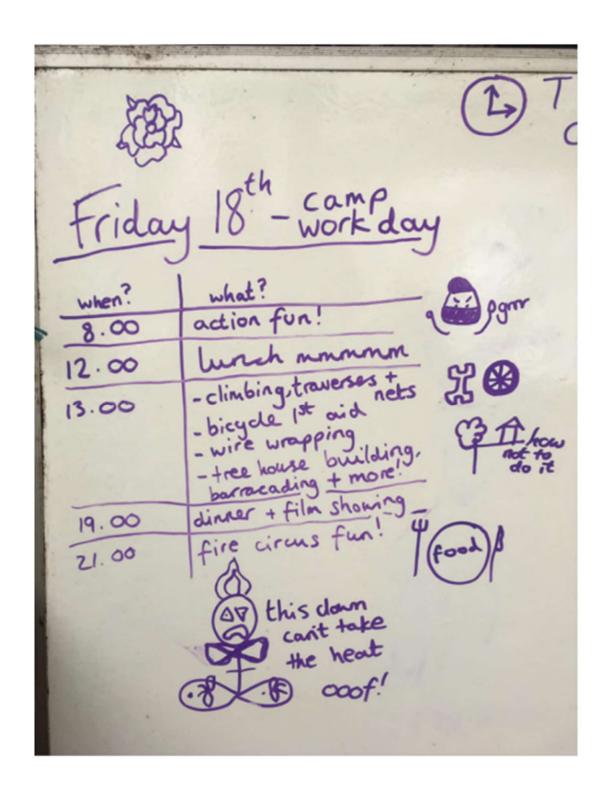
https://www.facebook.com/groups/119007471490656/user/100005018382282

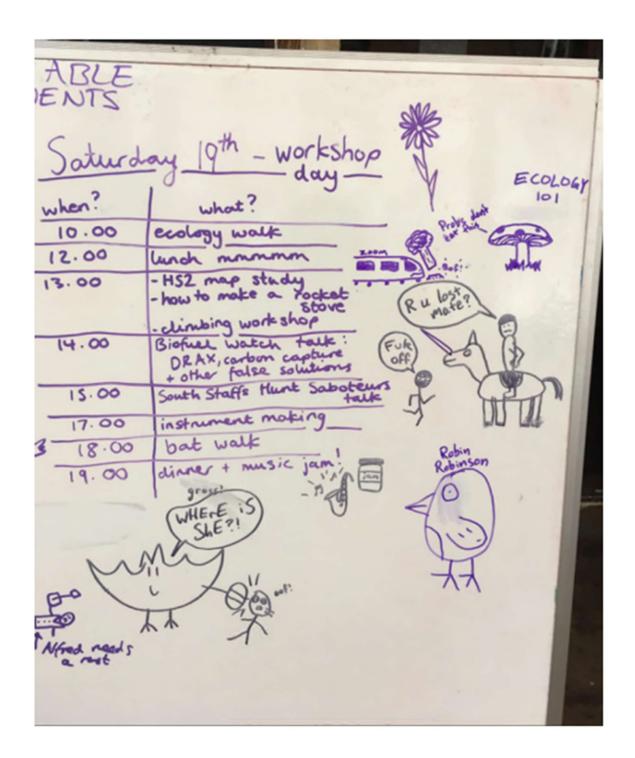


Bluebell Woods Protection Camp Facebook page on 16.03.2022

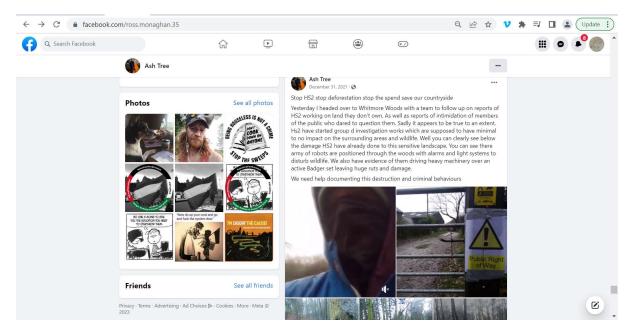
(https://www.facebook.com/Bluebell-Woods-Protection-Camp-102443345283393)



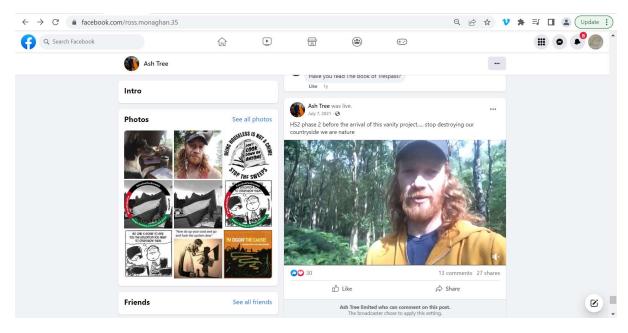




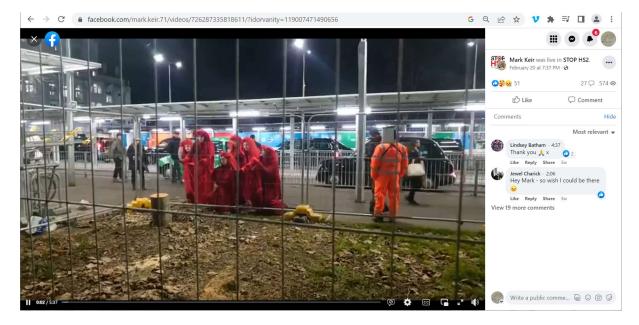
31 December 2021 - Video from Whitmore Woods



7 July 21 – Video is Whitmore Woods

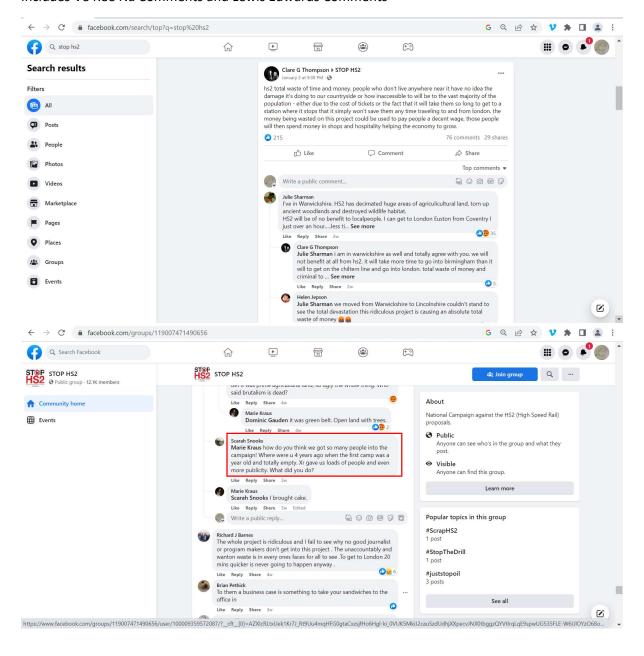


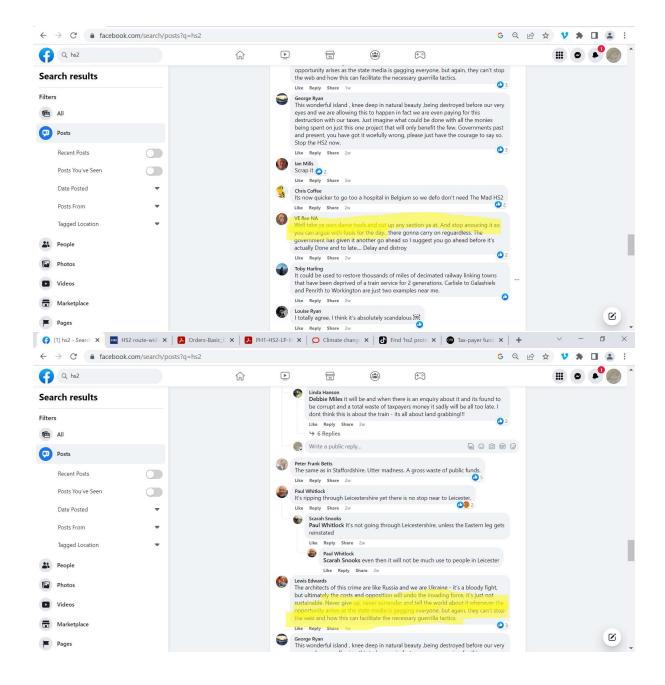
D36 Euston 20 Feb 23



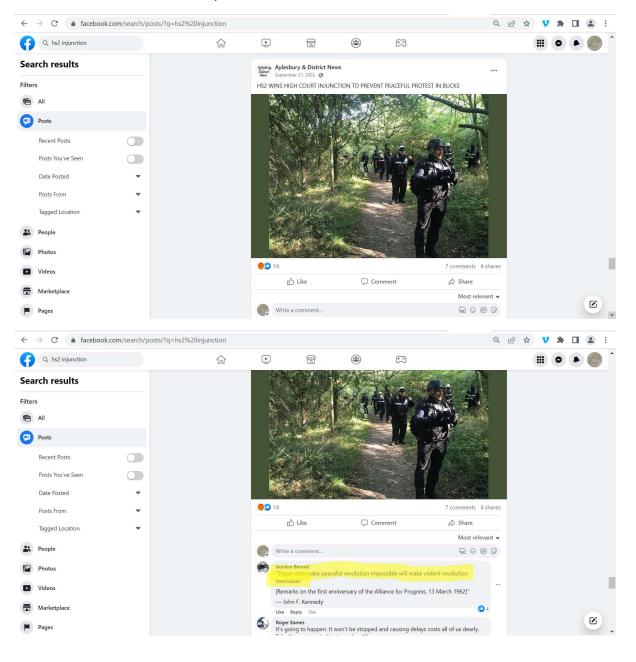
Claire G Thompson Thread 2 Jan 23

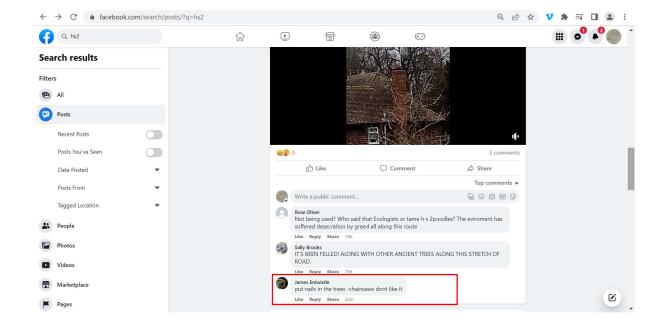
Includes Ve Ree Na Comments and Lewis Edwards Comments



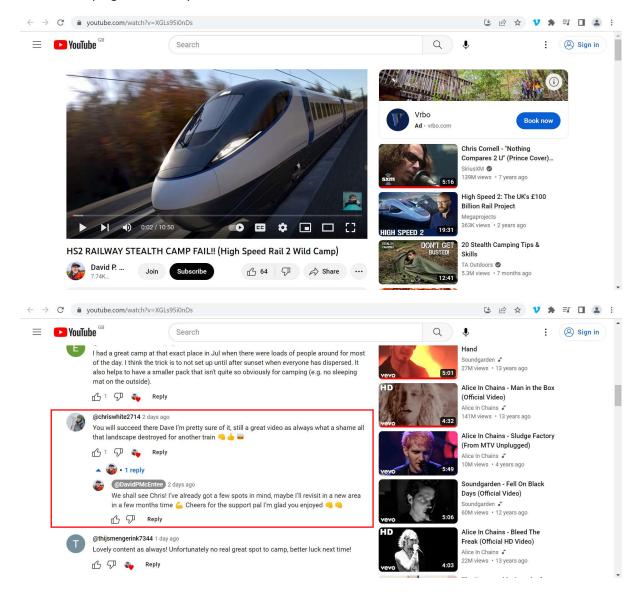


Gordon Bennett Comments 21 September 22





Stealth Camping 26 February 22

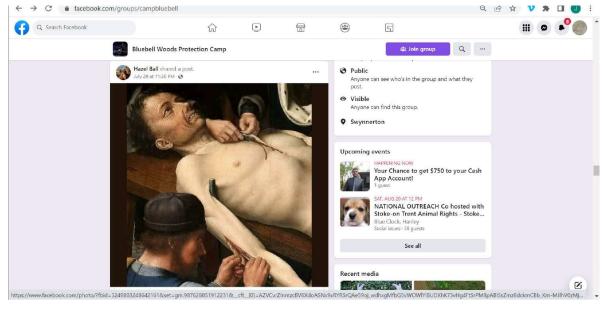


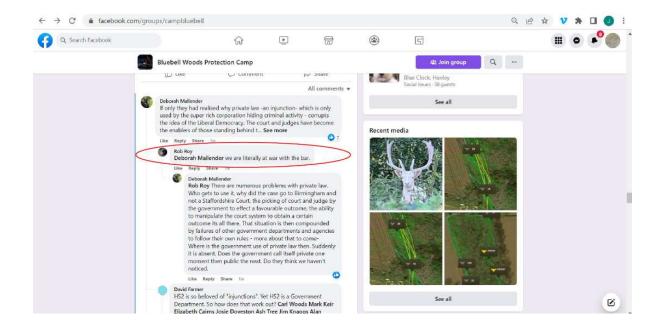
Bluebell Woods Protection Camp Group Posts

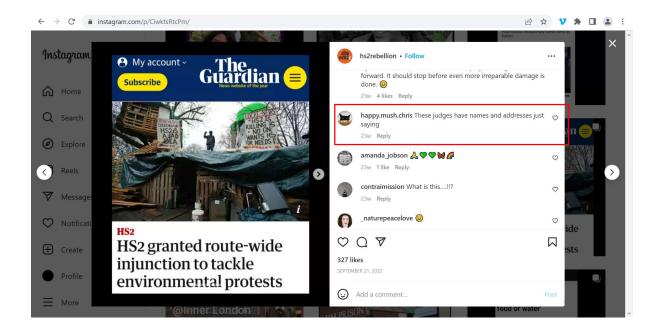
10 August 2022

- Posts follow the imprisonment of protestors following the committal proceedings relating to the occupation of the Cash's Pit Land
- A reference is made being at war with the Bar
- Initial post relates to the historical skinning of a judge

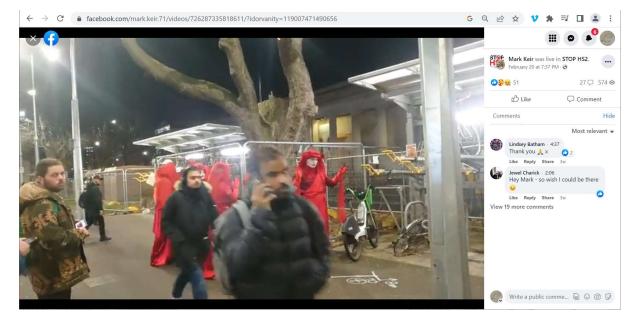






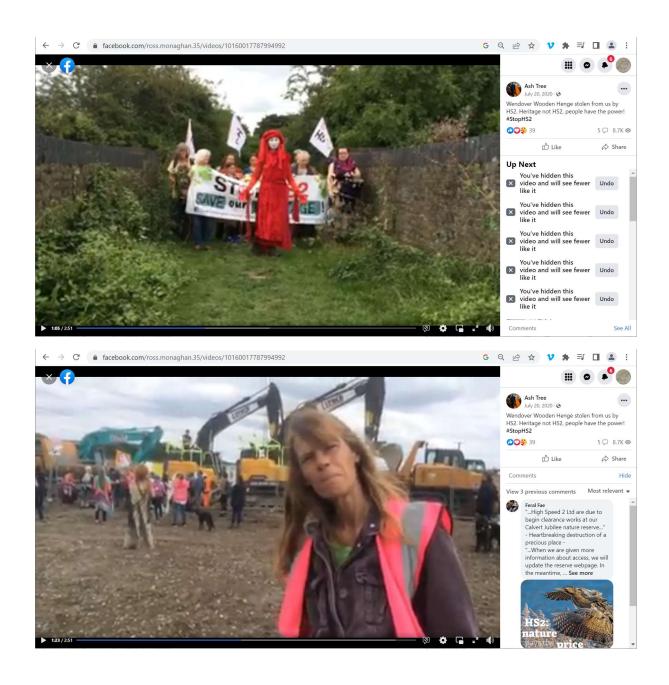


D36 Stream, Former D55 and Red Rebels at Euston Square Gardens 20 Feb 23

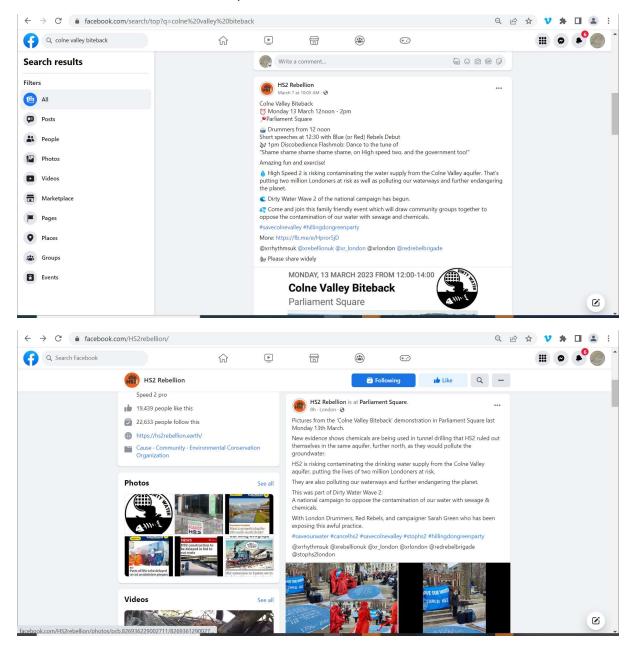


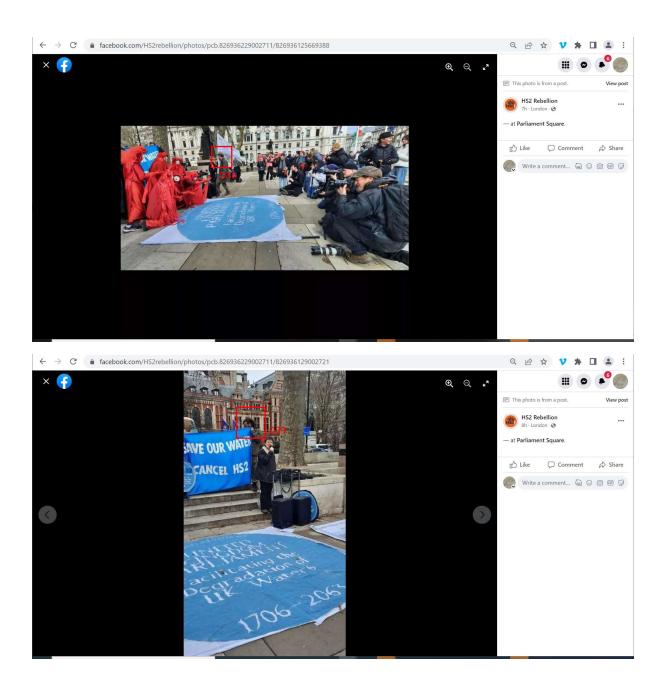
Red Rebel Events

Wendhenge Protest 20.07.20



Sarah Green, D36, D39 at Colne Valley Bite Back Demonstration 13 Mar 23





On behalf of: Applicants/Claimants J.Dobson 1st statement of witness

1st statement of witness Exhibits: JD5 and JD6 Date: 27 March 2023

Claim No. QB-2022-BHM-000044

IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY Between:

(1) HIGH SPEED TWO (HS2) LIMITED (2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

-and-

- (1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND KNOWN AS LAND AT CASH'S PIT, STAFFORDSHIRE SHOWN COLOURED ORANGE ON PLAN A ANNEXED TO THE ORDER DATED 11 APRIL 2022 ("THE CASH'S PIT LAND")
- (2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND ACQUIRED OR HELD BY THE CLAIMANTS IN CONNECTION WITH THE HIGH SPEED TWO RAILWAY SCHEME SHOWN COLOURED PINK, AND GREEN ON THE HS2 LAND PLANS AT https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings ("THE HS2 LAND") WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES
- (3) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS
- (4) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS
- (5) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE)

AND 58 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM

Defendants

EXHIBIT JD6 TO THE WITNESS STATEMENT OF JAMES DOBSON

All videos are at: https://vimeo.com/showcase/exhibit-JD6

INDEX TO EXHIBIT JD6

All videos are at: https://vimeo.com/showcase/exhibit-JD6

Video Number	Date	Description	Duration	Source URL
Video 1	23.03.2022	D17 at Closepit Plantation	00:08:17	https://www.facebook.com/10003584929 2228/videos/332646708928457
Video 2	06.10.2022	D66 and D67 at Aylesbury Ecological Area	00:11:44	Body worn camera footage
Video 3	21.11.2022	Action against Eversheds Clip 1	00:06:09	https://www.facebook.com/XRebellionU K/videos/652476849707618
Video 4	21.11.2022	Action against Eversheds Clip 2	00:06:34	https://www.facebook.com/XRebellionU K/videos/652476849707618
Video 5	21.11.2022	Action against Eversheds Clip 3	00:02:04	https://www.facebook.com/XRebellionU K/videos/652476849707618
Video 6	21.11.2022	Action against Eversheds Clip 4	00:02:04	https://www.facebook.com/XRebellionU K/videos/652476849707618
Video 7	21.11.2022	Action against Eversheds Clip 5	00:01:24	https://www.facebook.com/XRebellionU K/videos/652476849707618
Video 8	25.11.2022	HS2 Rebellion Montage of action against Eversheds	00:03:22	https://www.facebook.com/photo?fbid=2 37341451948750&set=a.2302513859910 90
				https://www.facebook.com/STOP.HS2/videos/817254309553667
Video 9	28.02.2023	Action against Eversheds	00:44:06	https://www.facebook.com/XRebellionU K/videos/168796375505347
Video 10	22.01.2023	D66 and D67 at A418	00:33:08	URL removed following HS2 Rebellion hack

Video Number	Date	Description	Duration	Source URL
Video 11	05.02.2023	D66 and D67 at A418	00:07:51	https://www.facebook.com/caroline.thom sonsmith/videos/485412460460956/?idor vanity=384792308986381 https://www.facebook.com/caroline.thom sonsmith/videos/699724868367001/?idor vanity=384792308986381 https://www.facebook.com/caroline.thom sonsmith/videos/1641966312888710/?ido rvanity=384792308986381 https://www.facebook.com/caroline.thom sonsmith/videos/1589764861471826/?ido rvanity=384792308986381 https://www.youtube.com/watch?v=zafR KmeXf-M
Video 12	07.07.2021	D5 at Whitmore Woods	00:08.05	https://www.facebook.com/ross.monagha n.35/videos/10161057827499992
Video 13	31.12.2021	D5 at Whitmore Woods	00:05:11	https://www.facebook.com/ross.monagha n.35/videos/465863348539189
Video 14	26.02.2023	Stealth Camping	00:10:50	https://www.youtube.com/watch?v=XGL s95i0nDs

EXHIBIT JG1

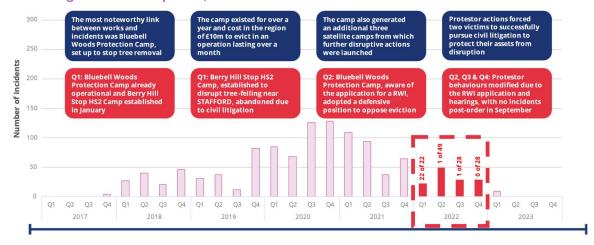
Statistical Impact of the Injunction

The graph illustrates the volume of protestor actions against HS2 Phase One and Phase Two from the point of being made aware of the application up to January 2023



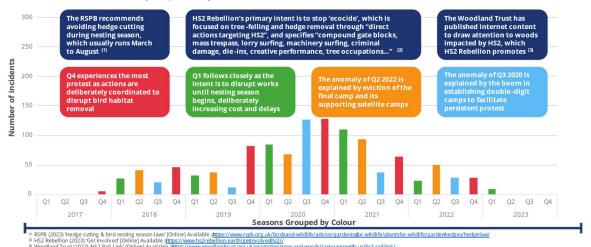
Correlation between Works and Incidents

The graph illustrates the correlation between vegetation related works being protested against, and vegetation-related protest, on HS2 Phase One and Phase Two in 2022

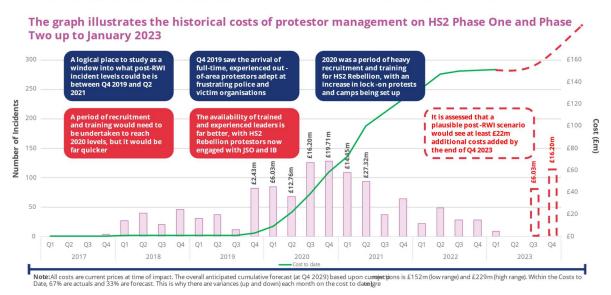


Seasonality of Protest

The graph illustrates the impact of protestrelated actions on HS2 by seasonality, on HS2 Phase One and Phase Two up to January 2023



Forecasted Costs if RWI is Not Renewed



https://www.facebook.com/profile.php?id=100008144808673

Facebook post by D16 on 11.03.2023 at 23:24hrs



RENEW OPPOSITION TO HS2 IN RESPONSE TO FURTHER DELAYS AND COST INCREASES

Conference regards the news of further delays of HS2, announced by written statement on 9th March 2023 as indicative of a hopelessly mismanaged and out of control project. When HS2 was first announced exactly thirteen years ago, the cost of Phase 1 was set at £17bn. As of Thursday the rampantly out of control costs, for not even half of the project, stand at £71,000,000,000, just to get from London to Birmingham. When HS2 was first announced in 2010, HS2 was set to be the most expensive railway in the history of the world and it now works out at £507,000,000 per mile of HS2, over four times the original cost.

After over a decade of saying delays would add costs to HS2, the Government are now saying delaying HS2 will save costs and after 13 years, they need 'more time' to get the Euston station right.

We believe now is the perfect time for GPEW to redouble opposition to the HS2 project and demand an immediate cessation of all works pending a full, independent review of Phase 1, and a public inquiry into the apparent fraudulent means utilised to pass the first two Bills (Phase 1, Phase 2a) through Parliament, and the continued dishonesty regarding time scale, finances and environmental damage.

MK Greens Against HS2.



EXHIBIT JAD13



IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY

BEFORE MR JUSTICE RITCHIE ON 28 JULY 2022

BETWEEN:

(1) HIGH SPEED TWO (HS2) LIMITED (2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

Dofondants

- and -

(18) WILLIAM HAREWOOD (AKA SATCHEL / SATCHEL BAGGINS)
(31) RORY HOOPER
(33) ELLIOT CUCIUREAN (AKA JELLYTOT)
(61) DAVID BUCHAN (AKA DAVID HOLLIDAY)
(62) LEANNE SWATERIDGE (AKA FLOWERY ZEBRA)
(64) STEFAN WRIGHT
(65) LIAM WALTERS

	Defendants
	-
ORDER	
	•

UPON the Claimants' application by application notice dated 8 June 2022 ("Committal Application") to commit the Defendants for contempt for breach of the Order of Mr Justice Cotter dated 11 April 2022 ("Cotter Order");

AND UPON Mr Justice Ritchie at a hearing on 14 June 2022 making an order sealed on 15 June 2022 setting directions for the determination of the Committal Application ("Directions Order");

AND UPON the Directions Order joining D64 and D65 as defendants to the proceedings;

AND UPON hearing Mr Fry and Mr Brett, counsel for the Claimants, Ms Johnson, counsel for D18, Mr Wagner, counsel for D33 and D65, Mr Greenhall, counsel for D31 and D62 at a hearing on 25-28 July 2022, and D61 in person at that hearing on 27 July 2022 only;

AND UPON D61 not attending the first two days of the hearing on 25-26 July 2022 and D64 not attending the hearing at all, and the court determining, in accordance with the Directions Order, that it would proceed to determine the Application in their absence;

AND UPON D62 giving undertaking signed on 25 July 2022 to the Court which the Court has received and approved on 28 July 2022;

AND UPON D31 giving an undertaking on 25 July 2022 to the Court which the Court has received and approved on 28 July 2022;

AND UPON D18 undertaking to publish a formal apology and statement on social media in the terms read out to the Court by counsel on his behalf;

AND UPON the Court being satisfied to the criminal standard that the breaches of the Cotter Order alleged by the Claimants were in fact committed by D18, and D65, namely:

In respect of D18, he:

- wilfully breached on each day from 10 May 2022 to 25 June 2022
 paragraph 4(a) of the Cotter Order by remaining on the Cash's Pit
 Land and being present on the Cash's Pit Land and failing to remove
 himself from the land.
- 2. wilfully breached on each day from 10 May 2022 to 25 June 2022 paragraph 4(b)(i) of the Cotter Order by being present on the Cash's Pit Land with the effect of delaying and hindering the First Claimant by obstructing and impeding the activities undertaken by the First Claimant's contractors and subcontractors to gain vacant possession of the Cash's Pit Land in connection with the HS2 Scheme.

- 3. wilfully breached on each day from 10 May 2022 to 25 June 2022 paragraph 4(c)(i) of the Cotter Order by failing immediately to leave the tunnel which he occupies.
- 4. wilfully breached paragraph 4(c)(i) of the Cotter Order on 10 May 2022 by re-entering the tunnel at 18:49 having left the tunnel shortly before.
- 5. wilfully breached paragraph 4(c)(i) of the Cotter Order on 10 May 2022 by re-entering the tunnel at 19:38 having left the tunnel shortly before.
- 6. wilfully breached paragraph 4(b)(ii) of the Cotter Order on 10 May 2022 at 19:51 by turning a surveillance camera installed by the First Claimant's contractors away from the mouth of the tunnel, preventing them from monitoring the activities of those within the tunnel. This action constitutes an interference with activity on the Cash's Pit Land with the effect of delaying and hindering the First Claimant by interfering with the activities undertaken by the Claimant's contractors and subcontractors to gain vacant possession of the Cash's Pit Land in connection with the HS2 Scheme.
- 7. wilfully breached paragraph 4(c)(i) of the Cotter Order on the night of 10 May 2022 or morning of 11 May 2022 by re-entering the tunnel after having moved the surveillance camera.

In respect of D65, he:

- 1. wilfully breached on each day from 10 May 2022 to 18 June 2022 paragraph 4(a) of the Cotter Order by remaining on the Cash's Pit Land and being present on the Cash's Pit Land and failing to remove himself from the land.
- 2. wilfully breached on each day from 10 May 2022 to 18 June 2022 paragraph 4(b)(i) of the Cotter Order by being present on the Cash's Pit Land within a

tunnel, with the effect of delaying and hindering the First Claimant by obstructing and impeding the activities undertaken by the First Claimant's contractors and subcontractors to gain vacant possession of the Cash's Pit Land in connection with the HS2 Scheme.

3. wilfully breached on each day from 10 May 2022 to 18 June 2022 paragraph 4(c)(i) of the Cotter Order by failing immediately to leave the tunnel which he occupies.

4. wilfully breached paragraph 4(c)(i) of the Cotter Order on 10 May 2022: having left the tunnel at approximately 19:28 hours, he re-entered the tunnel at some point that same evening or on the morning of 11 May 2022 after D18 moved the surveillance camera.

AND UPON the Court being satisfied to the criminal standard that the breaches of the Cotter Order alleged by the Claimants were in fact committed such that D61 and D64 were in contempt of court, and imposed sanctions in respect of those breaches in orders made on 27 July 2022;

AND UPON the Court making an order on 26 July 2022 in respect of an issue rasied/application made by D33 in which provision for D33 to pay the Claimants' costs of that issue/application was made ("D33 Order");

IT IS ORDERED THAT:

Contempt

- 1. The Committal Application so far it relates to D31 and D62 is dismissed;
- 2. D18 and D65 are in contempt of court for breach of the Cotter Order;

Sanction

3. D18 (William Harewood):

- a. Be committed to HM Prison Birmingham or such other of Her Majesty's Prisons as may be selected for a period of 184 days under a warrant of committal issued pursuant to this Order; AND
- b. The committal of D18 to prison under paragraph (a) above shall be suspended for a period of 24 months on the following terms:

"D18 shall not:

- (i) Enter or remain upon HS2 Land; or
- (ii) Obstruct or otherwise interfere with the free movement of vehicles, equipment, or persons accessing or egressing from HS2 Land; or
- (iii) Interfere with any fence or gate on or at the perimeter of HS2 Land;

where such conduct has the effect of damaging and/or delaying and/or hindering the Claimants, their agents, servants, contractors, sub-contractors, group companies, licensees, invitees and/or employees.

In this condition, HS2 land means all the land acquired or held by the Claimants in connection with the High Speed 2 Railway Scheme shown coloured pink and green on the plans which are available electronically on the HS2 Proceedings website at: https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings." AND

- c. Shall pay to HM Courts & Tribunals Service a fine of £3,000 within 28 days.
- 4. D65 (Liam Walters):
 - a. Be committed to HM Prison Birmingham or such other of Her Majesty's Prisons as may be selected for a period of 156 days under a warrant of committal issued pursuant to this Order; AND

b. The committal of D65 to prison under paragraph (a) above shall be suspended for a period of 24 months on the following terms:

"D65 shall not:

- (i) Enter or remain upon HS2 Land; or
- (ii) Obstruct or otherwise interfere with the free movement of vehicles, equipment, or persons accessing or egressing from HS2 Land; or
- (iii) Interfere with any fence or gate on or at the perimeter of HS2 Land;

where such conduct has the effect of damaging and/or delaying and/or hindering the Claimants, their agents, servants, contractors, sub-contractors, group companies, licensees, invitees and/or employees.

In this condition, HS2 land means all the land acquired or held by the Claimants in connection with the High Speed 2 Railway Scheme shown coloured pink and green on the plans which are available electronically on the HS2 Proceedings website at: https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings." AND

c. Shall pay to HM Courts & Tribunals Service a fine of £2,000 within 28 days.

Consequentials

- 5. D18, D61 and D65 and each of them may apply under CPR Rule 81.10 to discharge this order.
- 6. D18, D61 and D65 and each of them have the right to appeal.
- 7. The court before which any appeal must be brought is the Court of Appeal, Civil Division.
- 8. Any Appellant's Notice must be filed at the Court of Appeal by 4pm on 17 August 2022.

9. A transcript of the judgment given at this hearing will be published on the website of the

judiciary of England and Wales.

Costs

10. D18, D61, and D65 shall each pay the Claimants £12,486, being one-seventh of the

Claimants' cost of and incidental to the Committal Application incurred to date (not

including the costs for which provision is made in the D33 Order) summarily assessed in

the sum of £87,405.

Service

11. Personal service of this Order is dispensed with in accordance with CPR Rule 81.9. In

place of personal service:

a. This Order will be deemed served on D18, D31, D62, and D65 when sent by

the Court by email to Robert Lizar Solicitors;

b. The Court will provide a copy of this Order to HM Prison Service and direct

that HM Prison Service serve it on D61.

BY THE COURT

MADE ON 28 JULY 2022



IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY

MR JUSTICE RITCHIE

Between:

(1) HIGH SPEED TWO (HS2) LIMITED

(2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

-and-

(D31) RORY HOOPER

Defendant

D31 FINAL ORDER AND UNDERTAKINGS

PENAL NOTICE

If you the within named Defendant disobey the undertakings set out in this order or instruct others to do the acts which you have undertaken not to do, 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 Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE DEFENDANT

This order prohibits you from doing the acts set out in paragraph 4 below. You should read it very carefully.

UPON the Claimants' application by an Application Notice dated 25 March 2022 for interim injunctive relief

AND UPON Mr. Justice Cotter making an order dated 11 April 2022 granting that interim injunctive relief

AND UPON the Claimants' application by an Application Notice dated 8 June 2022 that D31 (Rory Hooper) be found in contempt of court for breaches of the Order of Mr. Justice Cotter ("the Contempt Application")

AND UPON the parties having agreed to an order in the terms set out below

AND UPON D31 (Rory Hooper):

1

- a) accepting that:
 - a. he is a Cash's Pit Defendant as defined in the Order of Mr. Justice Cotter; and
 - b. the alternative service provisions of that order insofar as they relate to D31 were complied with;
- b) admitting that his actions in:
 - a. entering and remaining upon the Cash's Pit Land and failing to remove himself from the Cash's Pit Land; and
 - b. (i) entering and being present on the Cash's Pit Land; and
 - (ii) interfering with works, construction or activity on the Cash's Pit Land, which was in both cases conduct that had the effect of damaging and/or delaying and/or hindering the Claimants by obstructing, impeding or interfering with the activities undertaken in connection with the HS2 Scheme by them or by contractors, sub-contractors, suppliers or any other party engaged by the Claimants at the Cash's Pit Land;

was conduct that was contrary to terms 4(a), 4(b)(i) and 4(b)(ii) of the Order of Mr Justice Cotter

c) apologising to the Court for the acts contrary to the terms of the Order

AND UPON D31 (Rory Hooper) giving undertakings to the Court as set out below

IT IS ORDERED THAT:

- 1. The Contempt Application as against (D31) Rory Hooper only is dismissed.
- 2. There be no order for costs between the parties.
- 3. Service of this Order may be effected, as an alternative, by electronic means by email to D31's solicitors at nhall@robertlizar.com and such service shall be deemed to be good and sufficient service on D31.

UNDERTAKINGS TO THE COURT

In this Order the "HS2 Land" means all of the land acquired or held by the Claimants in connection with the High Speed 2 Railway Scheme shown coloured pink and green on the plans which are available electronically on the HS2 Proceedings website at:

https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings.

4. D31 (Rory Hooper) undertakes to the Court promising not to do any of the following where such conduct has the effect of damaging and/or delaying and/or hindering the Claimants. their agents, servants, contractors, sub-contractors, group companies, licensees. invitees and/or employees:

a. Entering or remaining upon the HS2 Land;

b. Obstructing or otherwise interfering with the free movement of vehicles, equipment or persons accessing or egressing the HS2 Land; or

c. interfering with any fence or gate on or at the perimeter of the HS2 Land.

AND TO BE BOUND BY THESE PROMISES UNTIL 11.59PM ON 25 JULY 2024.

5. D31 (Rory Hooper)'s promises at paragraph 4 do not prevent D31 (Rory Hooper) from:

a. Exercising his rights over any open public right of way over the HS2 Land; or

b. Exercising his lawful rights over any public highway.

STATEMENT

I understand the undertakings that I have given, and 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:

D31 - RORY HOOPER

Date: 28/07/2022

We consent to an order in these terms

And from UK LAP

DLA Piper (UK) LLP

Solicitors for the Claimant

Date: 28/7/2022



IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY

MR JUSTICE RITCHIE

QB-2022-BHM-000044

Between:

(1) HIGH SPEED TWO (HS2) LIMITED

(2) THE SECRETARY OF STATE FOR TRANSPORT

-and-

Claimants

(D62) LEANNE SWATERIDGE (AKA FLOWERY ZEBRA)

Defendant

D62 FINAL ORDER AND UNDERTAKINGS

PENAL NOTICE

If you the within named Defendant disobey the undertakings set out in this order or instruct others to do the acts which you have undertaken not to do, 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 Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE DEFENDANT

This order prohibits you from doing the acts set out in paragraph 4 below. You should read it very carefully.

UPON the Claimants' application by an Application Notice dated 25 March 2022 for interim injunctive relief

AND UPON Mr. Justice Cotter making an order dated 11 April 2022 granting that interim injunctive relief

AND UPON the Claimants' application by an Application Notice dated 8 June 2022 that D62 (Leanne Swateridge) be found in contempt of court for breaches of the Order of Mr. Justice Cotter ("the Contempt Application")

AND UPON the parties having agreed to an order in the terms set out below

AND UPON D62 (Leanne Swateridge)

- a) asserting that she was not a Cash's Pit Defendant as defined in the Order of Mr. Justice Cotter, but subject to that denial accepting that she was otherwise validly served with, understood and (by her actions in entering and remaining upon the Cash's Pit Land and failing to remove herself from the Cash's Pit Land) breached the Order of Mr. Justice Cotter; and
- b) apologising to the Court for the acts contrary to the terms of the Order

AND UPON D62 (Leanne Swateridge) giving undertakings to the Court as set out below

IT IS ORDERED THAT:

- 1. The Contempt Application as against (D62) Leanne Swateridge only is dismissed.
- 2. There be no order for costs between the parties.
- 3. Service of this Order may be effected, as an alternative, by electronic means by email to D62's solicitors at nhall@robertlizar.com and such service shall be deemed to be good and sufficient service on D62.

UNDERTAKINGS TO THE COURT

In this Order the "HS2 Land" means all of the land acquired or held by the Claimants in connection with the High Speed 2 Railway Scheme shown coloured pink and green on the plans which are available electronically on the HS2 Proceedings website at:

https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings.

- 4. D62 (Leanne Swateridge) undertakes to the Court promising not to do any of the following where such conduct has the effect of damaging and/or delaying and/or hindering the Claimants, their agents, servants, contractors, sub-contractors, group companies, licensees, invitees and/or employees:
 - a. Entering or remaining upon the HS2 Land;
 - b. Obstructing or otherwise interfering with the free movement of vehicles, equipment or persons accessing or egressing the HS2 Land; or
 - c. interfering with any fence or gate on or at the perimeter of the HS2 Land.

AND TO BE BOUND BY THESE PROMISES UNTIL 11.59PM ON 25 JULY 2024,

- 5. D62 (Leanne Swateridge)'s promises at paragraph 4 do not prevent D62 (Leanne Swateridge) from:
 - a. Exercising her rights over any open public right of way over the HS2 Land; or

b. Exercising her lawful rights over any public highway.

STATEMENT

I understand the undertakings that I have given, and 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.

D62 – LEANNE SWATERIDGE

Date: 26.07. 2022

We consent to an order in these terms

Vi thit clan

DLA Piper (UK) LLP

Solicitors for the Claimant

Date: 26 /07 / 2022

And home We Had



IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY

BEFORE MR JUSTICE RITCHIE

BETWEEN:

(1) HIGH SPEED TWO (HS2) LIMITED (2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

- and -

(61) DAVID BUCHAN (AKA DAVID HOLLIDAY)

Defendant

ORDER FOR COMMITTAL

UPON the Claimants' application by application notice dated 8 June 2022 ("Committal Application") to commit the Defendants for contempt for breach of the Order of Mr Justice Cotter dated 11 April 2022 ("Cotter Order");

AND UPON Mr Justice Ritchie at a hearing on 14 June 2022 making an order sealed on 15 June 2022 setting directions for the determination of the Committal Application ("Directions Order");

AND UPON hearing Mr Fry and Mr Brett, counsel for the Claimants, and D61 in person at a hearing on 25-27 July 2022;

AND UPON D61 not attending the first two days of the hearing on 25-26 July 2022 and the court determining, in accordance with the Directions Order, that it would proceed to determine the Application in his absence;

AND UPON the Court being satisfied to the criminal standard that the breaches of the Cotter Order alleged by the Claimants were in fact committed by D61 namely that he:

- wilfully breached paragraph 4(a) of the Cotter Order on Wednesday 20 April 2022
 by entering and remaining on the Cash's Pit Land. D61 was seen next to and
 entering a large wooden structure that has been erected by activists on the Cash's
 Pit Land. D61 was informed by the First Claimant's security contractors that he
 was on land subject to a High Court injunction and refused to leave the Cash's Pit
 Land.
- 2. wilfully breached paragraph 4(a) of the Cotter Order on Wednesday 20 April 2022 by entering and remaining on the Cash's Pit Land. He had left the Cash's Pit Land to use a latrine situated to the west and re-entered the land at 16:08.
- 3. wilfully breached paragraph 4(a) of the Cotter Order on 26 April 2022 by entering and remaining on the Cash's Pit Land. D61 was seen by the First Claimant's security contractors approaching the Cash's Pit Land. D61 proceeded to enter the Cash's Pit Land. D61 was informed by the First Claimant's security contractors that he was on land subject to a High Court injunction and refused to leave the Cash's Pit Land.
- 4. wilfully breached paragraph 4(a) of the Cotter Order on 10 May 2022 by entering (on or prior to 10 May 2022) and remaining on the Cash's Pit Land. D61 was found by the Claimants' security contractors during the eviction process in a structure on the Cash's Pit Land. D61 was walked off the Cash's Pit Land.
- 5. wilfully breached paragraph 4(a) of the Cotter Order on 28 May 2022 by entering the Cash's Pit Land from the south. He was intercepted, detained, and arrested.

IT IS ORDERED THAT:

Contempt

1. D61 is in contempt of court for breach of the Cotter Order;

Sanction

- 2. D61 (David Buchan):
 - a. Be committed to HM Prison Birmingham or such other of Her Majesty's Prisons as may be selected for a period of 100 days under a warrant of committal issued pursuant to this Order; AND
 - b. Shall pay to HM Courts & Tribunals Service a fine of £1,500 within 28 days.

Consequentials

- 3. D61 may apply under CPR Rule 81.10 to discharge this order.
- 4. D61 has the right to appeal.
- 5. The court before which any appeal must be brought is the Court of Appeal, Civil Division.
- 6. Any Appellant's Notice must be filed at the Court of Appeal by 4pm on 17 August 2022.
- 7. A transcript of the judgment given at this hearing will be published on the website of the judiciary of England and Wales.

BY THE COURT

Dated 27 July 2022



IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY

BEFORE MR JUSTICE RITCHIE ON 27 JULY 2022

BETWEEN:

(1) HIGH SPEED TWO (HS2) LIMITED (2) THE SECRETARY OF STATE FOR TRANSPORT

	<u>Claimants</u>
- and -	
(64) STEFAN WRIGHT	<u>Defendant</u>
COMMITTAL ORDER	

UPON the Claimants' application by application notice dated 8 June 2022 ("Committal Application") to commit inter alia the Defendant ("D64") for contempt for breach of the Order of Mr Justice Cotter dated 11 April 2022 ("Cotter Order");

AND UPON Mr Justice Ritchie at a hearing on 14 June 2022 making an order sealed on 15 June 2022 setting directions for the determination of the Committal Application ("Directions Order");

AND UPON the Directions Order joining D64 as defendant to the proceedings;

AND UPON hearing Mr Fry and Mr Brett, counsel for the Claimants at a hearing on 25-28 July 2022;

AND UPON D64 not attending the hearing on 25-27 July 2022 and the Court determining, in accordance with the Directions Order, that it would proceed to determine the Application in his absence;

AND UPON the Court being satisfied to the criminal standard that the breaches of the Cotter Order alleged by the Claimants were in fact committed by D64, namely that he:

- 1. wilfully breached on each day from 10 May 2022 to 25 June 2022 paragraph 4(a) of the Cotter Order by remaining on the Cash's Pit Land and being present on the Cash's Pit Land and failing to remove himself from the land.
- 2. wilfully breached on each day from 10 May 2022 to 25 June 2022 paragraph 4(b)(i) of the Cotter Order by being present on the Cash's Pit Land within a tunnel, with the effect of delaying and hindering the First Claimant by obstructing and impeding the activities undertaken by the First Claimant's contractors and subcontractors to gain vacant possession of the Cash's Pit Land in connection with the HS2 Scheme.
- 3. wilfully breached on each day from 10 May 2022 to 25 June 2022 paragraph 4(c)(i) of the Cotter Order by failing immediately to leave the tunnel which he occupies.
- 4. wilfully breached paragraph 4(c)(i) of the Cotter Order on 10 May 2022: having left the tunnel at approximately 19:47 hours to assist in lowering supplies into the tunnel, he re-entered the tunnel at some point that same evening or on the morning of 11 May 2022 after D18 moved the surveillance camera.

IT IS ORDERED THAT:

Contempt

1. D64 is in contempt of court for breach of the Cotter Order;

Sanction

- 2. D64 (Stefan Wright):
 - a. Pursuant to a warrant of committal issued under this Order, be committed to HM
 Prison Birmingham or such other of Her Majesty's Prisons as may be selected for a period of 332 days from the date of his apprehension or surrender; AND
 - b. Shall pay to HM Courts & Tribunals Service a fine of £3,000 within 28 days of the date of his apprehension or surrender.
- 3. Pursuant to CPR Rule 81.9(4), a power of arrest shall attach to this Order and to the warrant of committal issued under paragraph 2(a) above.

Consequentials

- 4. D64 may apply under CPR Rule 81.10 to discharge this order.
- 5. D64 has the right to appeal.
- 6. The court before which any appeal must be brought is the Court of Appeal, Civil Division.
- 7. Any Appellant's Notice must be filed at the Court of Appeal by 4pm on 17 August 2022.
- 8. A transcript of the judgment given at this hearing will be published on the website of the judiciary of England and Wales.

Costs

9. D64 shall pay the Claimants £12,486, being one-seventh of the Claimants' cost of and incidental to the Committal Application to date (not including the costs for which provision is made in the D33 Order) summarily assessed in the sum of £87,405.

Service

10. A copy of this Order will be served personally on D64 by the police on his arrest or surrender, or as soon as reasonably practicable following arrest or surrender.

BY THE COURT

MADE ON 27 JULY 2022

Claim No. QB-2022-BHM-000044 IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION





(1) HIGH SPEED TWO (HS2) LIMITED (2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

Defendants

- and -

(18) WILLIAM HAREWOOD (AKA SATCHEL / SATCHEL BAGGINS) (31) RORY HOOPER (33) ELLIOT CUCIUREAN (AKA JELLYTOT) (61) DAVID BUCHAN (AKA DAVID HOLLIDAY) (62) LEANNE SWATERIDGE (AKA FLOWERY ZEBRA) (64) STEFAN WRIGHT (65) LIAM WALTERS

ORDER

BEFORE Mr. Justice Ritchie, sitting at the Royal Courts of Justice, the Strand, London on 5 September 2022.

UPON the Claimants' application by application notice dated 8 June 2022 ("Committal Application") to commit the Defendants for contempt for breach of the Order of Mr Justice Cotter dated 11 April 2022 ("Cotter Order");

AND UPON the Court finding D61 in contempt of court and sentencing him to 100 days imprisonment and a fine of £1,500 by an order made on 27 July 2022;

AND UPON D61's application dated 19 August 2022 to purge his contempt being heard before Mr Justice Ritchie on the 5th day of September 2022 and such application being granted;

AND UPON D61 giving an undertaking to the Court and the Claimant in the following terms:

1. not to do any of the following where such conduct has the effect of damaging and/or

delaying and/or hindering the Claimants, their agents, servants, contractors, sub-contractors, group companies, licensees, invitees and/or employees:

- a. Enter or remain upon the HS2 Land;
- b. Obstruct or otherwise interfere with the free movement of vehicles, equipment or persons accessing or egressing the HS2 Land; or
- c. Interfere with any fence or gate on or at the perimeter of the HS2 Land

And to be bound by these promises until 11:59 pm on 5th September 2024:

IT IS ORDERED THAT:

- (1) D61's Contempt is discharged; and
- (2) D61 is to be released from custody forthwith.
- (3) No order is made for costs.

Dated the 5th of September 2022



IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY

BEFORE MR JUSTICE RITCHIE ON 23 SEPTEMBER 2022

BETWEEN:

(1) HIGH SPEED TWO (HS2) LIMITED (2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

- and -

(18) WILLIAM HAREWOOD (AKA SATCHEL / SATCHEL BAGGINS)
(31) RORY HOOPER
(33) ELLIOT CUCIUREAN (AKA JELLYTOT)
(61) DAVID BUCHAN (AKA DAVID HOLLIDAY)
(62) LEANNE SWATERIDGE (AKA FLOWERY ZEBRA)
(64) STEFAN WRIGHT
(65) LIAM WALTERS

	Defendants
	-
ORDER	
	•

UPON the Claimants' application by application notice dated 8 June 2022 ("Committal Application") to commit the Defendants for contempt for breach of the Order of Mr Justice Cotter dated 11 April 2022 ("Cotter Order").

AND UPON Mr Justice Ritchie at a hearing on 14 June 2022 making an order sealed on 15 June 2022 setting directions for the determination of the Committal Application ("Directions Order").

AND UPON hearing Mr Fry and Mr Brett, counsel for the Claimants, Ms Johnson, counsel for D18, Mr Wagner, counsel for D33 and D65, Mr Greenhall, counsel for D31 and D62 at a hearing on 25-28 July 2022, and D61 in person at that hearing on 27 July 2022 only.

AND UPON the Court being satisfied to the criminal standard that the breaches of the Cotter Order alleged by the Claimants were in fact committed by D33, namely that D33:

- 1. wilfully breached on each day from 10 May 2022 to 25 June 2022 paragraph 4(a) of the Cotter Order by remaining on the Cash's Pit Land and being present on the Cash's Pit Land and failing to remove himself from the land.
- 2. wilfully breached on each day from 10 May 2022 to 25 June 2022 paragraph 4(b)(i) of the Cotter Order by being present on the Cash's Pit Land within a tunnel, with the effect of delaying and hindering the First Claimant by obstructing and impeding the activities undertaken by the First Claimant's contractors and subcontractors to gain vacant possession of the Cash's Pit Land in connection with the HS2 Scheme.
- 3. wilfully breached on each day from 10 May 2022 to 25 June 2022 paragraph 4(c)(i) of the Cotter Order by failing immediately to leave the tunnel which he occupies.
- 4. wilfully breached paragraph 4(c)(i) of the Cotter Order on 10 May 2022: having left the tunnel at approximately 19:28 hours, he re-entered the tunnel at some point that same evening or on the morning of 11 May 2022 after D18 moved the surveillance camera.

AND UPON the Court making an order on 26 July 2022 in respect of an issue raised/application made by D33 in which provision for D33 to pay the Claimants' costs of that issue/application was made ("D33 July Costs Order").

AND UPON the Court having adjourned the proceedings in respect of D33 by order dated 28 July 2022 for filing and service of further evidence prior to the determination of sanction.

AND UPON the Court allowing D33's application that part of the hearing on 28 July 2022 and part of the hearing on 22 and 23 September 2022 should take place in private ("the Private Hearings") pursuant to CPR Rule 39.2 and CPR Rule 81.8 so that the Court could consider certain asserted personal and private medical information ("the Private Information").

AND UPON hearing Mr Fry and Mr Brett, counsel for the Claimants, and Mr Wagner, counsel for D33 at a hearing on 22 and 23 September 2022.

AND UPON the Court hearing evidence from Peter Pratt consultant psychologist and another witness and from D3 in private hearing.

AND UPON D33's application dated 20 September 2022 further to adjourn the sanctions hearing.

IT IS ORDERED THAT:

Contempt

1. D33 is in contempt of court for breach of the Cotter Order.

Adjournment application

2. D33's application for a further adjournment is dismissed.

Sanction

- 3. D33 shall:
 - a. Be committed to HM Prison Birmingham for a period of 268 days under a warrant of committal issued pursuant to this Order; AND
 - b. Shall pay to HM Courts & Tribunals Service a fine of £3,000 within 28 days.

Consequentials

- 4. D33 may apply under CPR Rule 81.10 to discharge this order.
- 5. D33 has a right to appeal.
- 6. The court before which any appeal must be brought is the Court of Appeal, Civil Division.
- 7. The time for any appeal on liability and/or sanction will run from the date of the sanction judgment, which is 23 September 2022.

Costs

8. D33 shall pay the Claimants (in addition to the costs already ordered in the D33 July costs Order):

- a. £12,272, being one-seventh of the Claimants' costs of and incidental to the Committal Application up to and including 28 July 2022 (but not including the costs for which provision is made in the D33 Order) summarily assessed in the sum of £85,904.50; AND
- b. £6,000, being a proportion of the Claimant's costs of and incidental to the Committal Application incurred between 29 July 2022 and 23 September inclusive, summarily assessed in the sum of £18,000.

Protective measures relating to the Private Information

- 9. Until further order, it is prohibited for any person to report or publish:
 - a. The content of any part of the Private Hearings;
 - b. D33's asserted Private Information provided at the Private Hearings;
 - c. Information which could reasonably lead to the discovery of D33's asserted Private Information provided at the Private Hearings.
- 10. In accordance with CPR Rule 5.4C(2), save for the Claimants and D33, no other person may obtain from the Court any document, or part of any document filed in these proceedings (including but not limited to application notices, written submissions, skeleton arguments, and court correspondence) which contains D33's asserted Private Information save with permission of the Court, all such applications to be reserved to Mr Justice Ritchie.

Ritchie J

MADE ON 23 SEPTEMBER 2022



IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY

BEFORE MR JUSTICE RITCHIE ON 14 JUNE 2022

BETWEEN:

(1) HIGH SPEED TWO (HS2) LIMITED (2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

- and -

(18) WILLIAM HAREWOOD (AKA SATCHEL / SATCHEL BAGGINS)
(31) RORY HOOPER
(33) ELLIOT CUCIUREAN (AKA JELLYTOT)
(61) DAVID BUCHAN (AKA DAVID HOLLIDAY)
(62) LEANNE SWATERIDGE (AKA FLOWERY ZEBRA)

Defendants

(64) STEFAN WRIGHT (65) LIAM WALTERS

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DIRECTIONS ORDER

UPON the Claimants' Application of 8 June 2022 for the committal of the Defendants, D18, D31, D33, D61, D62, D64, and D65 for contempt for breach of the order of Mr Justice Cotter dated 11 April 2022 (the "**Application**")

AND UPON the Claimants' Application for the joinder of D64 and D65 as Defendants to the proceedings

AND UPON Her Honour Judge Kelly on 9 June 2022 ordering an urgent Directions Hearing to be listed on 14 June 2022

AND UPON the Court hearing submissions from Counsel for the Claimants at the Directions Hearing on 14 June 2022

AND UPON the Court being satisfied that the affidavits in paragraphs 3(a) – (c) below were served on the Defendants (apart from D31 and D61) on 9 and 13 June 2022

AND UPON the Court reminding the Defendants herein of their entitlement to apply for legal aid and urging them to do so

IT IS ORDERED PURSUANT TO CPR RULE 81.7:

Parties

- 1. Mr Stefan Wright is joined to the proceedings as the 64th Defendant.
- 2. Mr Liam Walters is joined to the proceedings as the 65th Defendant.

Amendments to Application

- 3. The Claimants have leave to rely on the Affidavits of:
 - a) Karl Harrison dated 9 June 2022;
 - b) Julie Amber Dilcock dated 9 June 2022; and
 - c) Adam Jones dated 12 June 2022.
- 4. The Claimants have leave to amend the Application Notice and Statement of Case dated 8 June 2022, to insert references to the Affidavits listed at paragraph 3 above provided that any such amended Application Notice and/or Statement of Case is filed not later than 4pm on 17 June 2022 and served in accordance with paragraph 5 below.

Alternative Service

5. Pursuant to CPR rules 6.15 and 6.27, personal service is dispensed with and the Claimants are permitted, in addition or in the alternative to the methods of service permitted under CPR rule 81.5, to serve the Defendants with the Application, and any other documents in

these proceedings including this Order (the "Documents"):

Post

a) Where an address used by a Defendant is known by the Claimants currently (see Appendix 1 for the list of known service addresses), whether the Defendant resides there or not, by posting a copy of the Documents together with a covering letter through the letterbox of the address (or by leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact that the package contains documents related to an application for committal for contempt of court. If the premises do not have a letterbox, or mailbox, or the package will not fit through the letterbox, a package may be left next to the main or front door and a notice may be affixed to the front door marked with a notice drawing the recipient's attention to the fact that the package contains documents related to an application for committal for contempt of court; or

Electronic Means

b) By sending an email to an email address; or a direct message on a social media platform; which a Defendant is known by the Claimants to have used within the past 6 months (see Appendix 1 for the list of known service details), notifying them of the Application and either (i) attaching the Documents, or (ii) providing a web link at which the Defendant can access the Documents; or

Service on the Unauthorised Tunnel Occupiers

c) For D18, D33, D64 and D65 whom the Claimants believe are in current occupation of a tunnel on the Cash's Pit Land, by lowering a single copy of the Documents into the tunnel; and

Lawyers

d) Serving by email any solicitor or public access instructed counsel acting for a particular Defendant (whether or not authorisation to accept service has been given to that lawyer):

- i) in these proceedings; or
- ii) in respect of D33, the solicitors acting for that Defendant in proceedings with Claim No. CA-2021-000657.
- 6. Service effected pursuant to paragraph 5 above shall be proven by a certificate of service and service shall be deemed effective on the date on which the certificate of service is filed.
- 7. The steps undertaken to date by the Claimants to serve the Application on D18, D33, D62, D64 and D65, as set out in the Certificates of Service dated 10 and 13 June 2022 shall be good and proper service, and D18, D33, D62, D64 and D65 shall be deemed served on 13 June 2022.

Defendants Addresses

8. Pursuant to CPR rule 6.23(1), each of the Defendants shall, not later than 4pm on 20 June 2022, provide to the Court and the Claimants' solicitors a postal address and/or an email address at which they may be served with documents relating to these proceedings.

Future Service

- 9. Service of any document after 4pm on 20 June 2022 (including documents filed in accordance with paragraphs 3 and 4 above) shall be validly effected by:
 - a) Sending it to an address or an email address provided by a Defendant pursuant to paragraph 8; or
 - b) Where a Defendant has not complied with paragraph 8, by one of the methods set out in paragraph 5.
- 10. The Claimants shall serve this Order as provided for in paragraph 5.

Factual evidence

11. If any Defendant wishes to rely on evidence at the hearing, he/she/they must file and serve

any such evidence not later than 4pm on 27 June 2022. Such evidence may only be admissible in the hearing of the Application ("Committal Hearing") if the Defendant has complied with paragraph 8 above.

- 12. If so advised, the Claimants may file and serve evidence in reply not later than 4pm on 4 July 2022.
- 13. No evidence, other than evidence filed in compliance with the paragraphs above, shall be admitted save with leave of the Court granted on an application made under CPR Part 23.
- 14. In particular, a person who has not submitted a witness statement or affidavit in accordance with the timescales set out herein shall not be permitted to address the Court, save with leave granted on an application made under CPR Part 23.

Committal Hearing

- 15. The Committal Hearing shall be listed for 4 days, starting on 25 July 2022 before a High Court Judge.
- 16. The Defendants and each of them shall attend the Committal Hearing in person.
- 17. If the Court is satisfied that the Defendants or each of them have been served in accordance with this Order, the Court will proceed to determine the Application at the Committal Hearing notwithstanding the failure to attend of any of the Defendants.
- 18. The evidence set out in the affidavits and witness statements filed by the parties shall stand as evidence in chief at the Committal Hearing.
- 19. The Claimants and the Defendants shall file with the Court and serve on each other bundles containing their evidence and any authorities on which they wish to rely no later than 5pm on 15 July 2022.
- 20. The parties shall file and serve any skeleton argument on each other and the court by 5pm on 21 July 2022.

21. Costs reserved.

NOTE:

Communications with the Court and the Claimants

22. All communications to the Court about this Order (which should quote the case number) should be sent to:

Birmingham District Registry

Civil Justice Centre

Priory Courts

33 Bull Street

Birmingham

B4 6DW

E: qb.birmingham@justice.gov.uk

T: 0121 681 4441

F: 01264 785 131

DX: 701987 Birmingham 7

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

DLA PIPER UK LLP

1 St Paul's Place

Sheffield

S1 2JX

E: HS2Injunction@governmentlegal.gov.uk

T: 0114 283 3312

DX: 708580 Sheffield 10

Ref: RXS/380900/378

BY THE COURT

APPENDIX 1 – POSTAL AND ELECTRONIC DETAILS FOR SERVICE

(to be redacted on service of this order)

No.	Defendant	Address
D31	Rory Hooper	
D33	Elliot Cuciurean	
D61	David Buchan	
D62	Leanne Swateridge	



Written questions, answers and statements

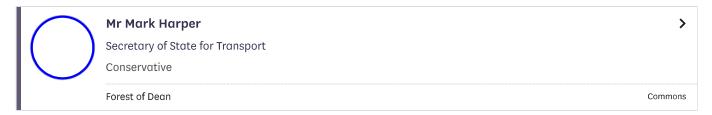
UK Parliament > Business > Written questions, answers and statements > Find written statements > HCWS625

Transport Update

Statement made on 9 March 2023

Statement UIN HCWS625

Statement made by



Statement

During this Parliament there has been a step change in public investment in infrastructure. The Autumn Statement protected the public capital budget at record levels, meaning government will invest over £600 billion over the next five years. The Chancellor has announced over £40bn of capital investment in transport across the next two financial years, which will drive significant improvements to rail and roads right across our country.

Since agreeing this programme, we have seen headwinds from inflation, triggered by the impact of Putin's illegal war in Ukraine, as well as supply chain disruption as the global economy recovers from the effects of Covid-19.

These headwinds have made it difficult to deliver on our capital programmes, and we recognise that some schemes are going to take longer than expected. Refocusing our efforts will allow us to double down on delivering the rest of our capital programme. This will place our transport investments on a sustainable footing and allow us to support the Government's priorities of halving inflation, growing the economy and reducing debt.

In terms of major road investments, Road Investment Strategy (RIS) 2 schemes will continue to progress. The A27 Arundel and A5036 Princess Way in Liverpool both face a range of challenges including environmental considerations and ongoing scope and design changes to ensure stakeholders' views are fully considered. As a result, these schemes will be deferred to RIS 3 (covering 2025 – 2030). Other schemes earmarked for RIS 3 will continue to be developed, in line with the statutory process, but for consideration for inclusion during RIS 4 (beyond 2030). Given many of these schemes were previously expected towards the end of RIS 3, this extra time will help ensure better planned and efficient schemes can be deployed more effectively.

To date we have spent over £800m on planning the Lower Thames Crossing. It is one of the largest planning applications ever, and it is important we get this right. We remain committed to the Lower Thames Crossing, and the Development Consent Order process will be an important opportunity to consult further to ensure there is an effective and deliverable plan. In order to allow time for this process, and given wider pressures on RIS, we will look to rephase construction by 2 years.

In rail, HS2 is making good progress, and we have already spent over £20 billion delivering Phase One between London and the West Midlands, supporting 2,500 businesses and creating over 29,000 jobs. The Government is prioritising HS2's initial services between Old Oak Common in London and Birmingham Curzon Street to provide delivery of passenger benefits as soon as possible. We remain committed to delivering HS2 services to Euston, and will address affordability pressures to ensure the overall spending profile is

manageable. We will therefore take the time to ensure we have an affordable and deliverable station design, delivering Euston alongside high-speed infrastructure to Manchester. We continue to take the High Speed Rail (Crewe – Manchester) Bill through Parliament, and the Crewe-to-Manchester section will also form the foundations for improved rail services in the North through Northern Powerhouse Rail.

The Government is committed to delivering HS2 Phase 2a between Birmingham and Crewe. We have seen significant inflationary pressure and increased project costs, and so we will rephase construction by two years, with an aim to deliver high-speed services to Crewe and the North West as soon as possible after accounting for the delay in construction. Work continues on progressing commitments made in the Integrated Rail Plan to develop HS2 East, the proposed route for HS2 services between the West and East Midlands, and to consider the most effective way to take HS2 trains to Leeds. HS2 continues to represent a very significant investment into our national infrastructure, levelling up communities right across our country, providing a net-zero alternative to car travel and domestic flights, and training a skilled workforce for the UK's future construction industry.

We remain committed to supporting all forms of transport and have invested over £850m in active travel between 2020/21 and 2022/23. Despite the need to deliver efficiency in all areas of our budget, we will still commit to spend at least a further £100m capital into active travel over the remainder of the spending period, as part of a total of around £3bn investment in active travel over this Parliament, including from City and Region Sustainable Transport settlements and National Highways. We will review these levels as soon as practically possible.

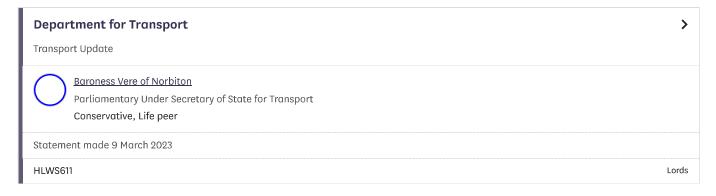
These are the difficult but responsible decisions we are taking, that put the priorities of the British people first, in controlling inflation and reducing government debt. They continue our record investment into our national infrastructure, which will continue to play a vital role in growing our economy and delivering long-term prosperity.

Statement from

Department for Transport	ď

Linked statements

This statement has also been made in the House of Lords



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On behalf of: Applicants/Claimants
J.A Dilcock
12th statement of witness
Exhibits: JAD14
Date:17 April 2023

Claim No. QB-2022-BHM-000044

IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION BIRMINGHAM DISTRICT REGISTRY

Between:

(3) HIGH SPEED TWO (HS2) LIMITED (4) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

-and-

- (6) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND KNOWN AS LAND AT CASH'S PIT, STAFFORDSHIRE SHOWN COLOURED ORANGE ON PLAN A ANNEXED TO THE ORDER DATED 11 APRIL 2022 ("THE CASH'S PIT LAND")
- (7) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND ACQUIRED OR HELD BY THE CLAIMANTS IN CONNECTION WITH THE HIGH SPEED TWO RAILWAY SCHEME SHOWN COLOURED PINK, AND GREEN ON THE HS2 LAND PLANS AT https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings ("THE HS2 LAND") WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES
- (8) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS
- (9) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS
- (10) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE)

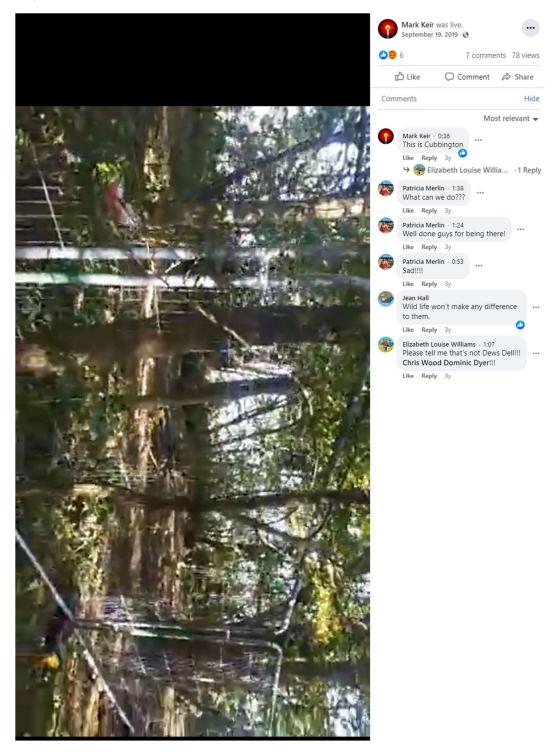
AND 58 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM

Defendants

EXHIBIT JAD14 TO THE TWELFTH WITNESS STATEMENT OF JULIE AMBER DILCOCK

The documents in this Exhibit are at: https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings

https://www.facebook.com/markkeir77/videos/2671888262843451



https://www.facebook.com/markkeir77

Facebook post by the Fourth Defendant on 5 January 2018:



Video taken by Fourth Defendant on 11 January 2018 (51 seconds long) and posted on Facebook (URL: https://www.facebook.com/markkeir77/videos/1778239532208333/):



Video shows works to move fencing at the North Compound entrace. The Fourth Defendant speculates that the works may be designed to widen the entrance. At 19 seconds into the video he says:

"Erm, but we have that in hand. We can, we've got enough people actually to stop both sides of this gate or block both sides of this gate"

Video taken by the Fourth Defendant on 11 January 2018 (36 seconds long) and posted on Facebook (URL: https://www.facebook.com/markkeir77/videos/1778311765534443/):



Fourth Defendant describes how the Third Defendant and another female have entered the compound. At 28 seconds in he says: "Anything we can do to slow them up and stop them" and then laughs.

Video taken by Fourth Defendant on 11 January 2018 (51 seconds long) and posted on Facebook (URL: https://www.facebook.com/markkeir77/videos/1778365175529102/):



Video is taken after the trespass and obstruction incidents that have taken place that day.

Transcript:

Fourth Defendant: "There we are, we're all back safe and sound, all back safe and sound. The police were very pleasant and very polite. They did want us, they don't want us, er, stopping the traffic, but, well I guess, they're going to have to wish on that one. Erm, but at the moment, er, oooh, lots of big, heavy machinery moving down the hill here. I wonder why that is? They're obviously going to start works down this end."

Eighth Defendant: (shouts) "Go for it! You have an hour!" (Defendants laugh)

Eighth Defendant: (shouts) "You have an hour to finish!" (Defendants laugh)

Fourth Defendant: (shouts) "And we've got our whole lives!" (Defendants laugh)



IN THE HIGH COURT OF JUSTICE BUSINESS AND PROPERTY COURTS PROPERTY, TRUSTS AND PROBATE LIST (ChD)

PT-2018-000098

Before: David Holland QC (sitting as a deputy judge of the High

Court)

On: 13th, 14th and 16th May 2019

BETWEEN:

(1) THE SECRETARY OF STATE FOR TRANSPORT
(2) HIGH SPEED TWO (HS2) LTD

Claimants/Applicants

-and-

- (1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANT(S) ON LAND AT HARVIL ROAD, HAREFIELD IN THE LONDON BOROUGH OF HILLINGDON SHOWN COLOURED GREEN, BLUE AND PINK AND EDGED IN RED ON THE PLANS ANNEXED TO THE AMENDED CLAIM FORM
- (2) PERSONS UNKNOWN SUBSTANTIALLY INTERFERING WITH THE PASSAGE BY THE CLAIMANTS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES OR EMPLOYEES WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT BETWEEN THE PUBLIC HIGHWAY AT HARVIL ROAD, HAREFIELD IN THE LONDON BOROUGH OF HILLINGDON SHOWN COLOURED ORANGE AND THE LAND AT HARVIL ROAD SHOWN COLOURED GREEN, BLUE AND PINK AND EDGED IN RED ON THE PLANS ANNEXED TO THE AMENDED_CLAIM FORM
 - (3) SARAH GREEN
 - (4) MARK KEIR
 - (5) GRAHAM MARSH
 - (6) SOFIA KAZI
 - (7) THORN RAMSAY
 - (8) VAIDA ROBERT MORDECHAI

Defendants / Respondents

ORDER

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.

UPON the Claimants' application by Application Notice dated 25 April 2019 ("the **Application**")

AND UPON the Claimants withdrawing their application to add Laura (aka Lora) Hughes as the Ninth Defendant to these proceedings

AND UPON hearing: (i) Tom Roscoe, counsel for the Claimants; (ii) the Third Defendant, Sarah Green, in person: (iii) Paul Powlesland, counsel for the Fourth Defendant; and (iv) the Eighth Defendant, Vajda Robert Mordechaj, in person, and Sarah Green, Mark Keir and Vajda Robert Mordechaj being present in Court upon the making of this Order

AND UPON the Court accepting the Claimants' undertaking that the Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the court finds that the Defendant ought to be compensated for that loss

AND UPON the Claimants confirming that this Order is not intended to prohibit continued occupation of the "Protestor Encampment" on Harvil Road, marked on the Plan annexed to this order ("the **Plan**")

AND UPON the Claimants confirming that they were not seeking their costs of the hearing on 13th, 14th and 16th May 2019 against any named defendant

IT IS ORDERED THAT:

Amendment & Parties

1. The Claimants have permission: (i) to amend the names of the First and Second Defendants to the form set out in the heading to this Order; and (ii) to amend the Claim Form in these proceedings to the form of the draft Amended Claim Form appended to the Application.

- 2. The Third to Eight Defendants be removed as parties, with no order as to costs of the proceedings against them.
- 3. The said amendments and additional and removal of parties shall take effect immediately, and further service of the Amended Claim Form is dispensed with.

Service by Alternative Method

4. Pursuant to CPR r. 6.27, the steps that the Claimant has taken to bring the Application to the attention of the Defendants, as outlined in the Fourth Witness Statement of Ms Julie Dilcock dated 8 May 2019 shall amount to good and proper service of the proceedings on the Defendants and each of them.

Injunctions

- 5. Upon service of this Order in accordance with paragraphs 10 to 14 below, the injunctions at paragraphs 2 to 4 of the Order of this Court in these proceedings dated 19 February 2018 shall be discharged and shall be replaced with the injunctions at paragraphs 6 to 9 below.
- 6. With immediate effect, and save in exercise of a right to pass and repass over public footpaths or bridleways crossing the land and save for passage over the lane known as and marked on the Plan annexed to this order ("the Plan") as Dews Lane, the First Defendant and each of them are forbidden, without the consent of the First or Second Claimant, from entering or remaining upon "Land at Harvil Road", being the land shaded green, blue and pink and outlined red on the Plan ("the Harvil Road Site"). Further:
 - 6.1 This paragraph of this Order shall, for the avoidance of doubt, apply to the splays, or bell-mouth areas, for access and egress between the Harvil Road Site and the public highway at the vehicular entrances marked on the Plan as "West Gate 3 Entrance", "North Compound Entrance" and "South Compound Entrance" ("the Vehicular Entrances").
 - 6.2 For the purposes of this Order the areas of concrete hard standing immediately adjacent to the main carriageway of the pubic highway at each of the Vehicular Entrances shall **NOT** be treated as part of the

Harvil Road Site, but the areas of the bell-mouths between that concrete hard standing and the gates at the Vehicular Entrances **SHALL** be treated as part of the Harvil Road Site and covered by this paragraph of the Order.

- 6.3 The Claimants shall seek, so far as reasonably practicable, to demark that boundary by some physical line or mark or other feature on the ground.
- 7. With immediate effect, the Second Defendant and each of them are forbidden from substantially interfering with the Claimants' and/or their agents', servants', contractors', sub-contractors', group companies', licensees', invitees' or employees' access to (or egress from) the Harvil Road Site (or any part of it) from (or to) the public highway at Harvil Road, Harefield in the London Borough of Hillingdon.
- 8. For the purposes of paragraph 7, acts of substantial inference shall include (but not necessarily be limited to):
 - 8.1 climbing onto or underneath vehicles;
 - 8.2 attaching persons or objects to vehicles;
 - 8.3 standing, sitting or lying in front of vehicles;
 - 8.4 attaching persons to other persons or objects so as to create an obstruction of the public highway or the splay or bell-mouth areas at the Vehicular Entrances:
 - 8.5 attaching persons or objects to the gates at the Vehicular Entrances.
- 9. The orders at paragraphs 6 to 8 above shall:
 - 9.1 apply to the individuals who were formerly the Third to Eighth Defendants if and to the extent that their actions bring them within the descriptions of the First and/or Second Defendants; and
 - 9.2 remain in effect until trial or further order or, if earlier, a long-stop date of 1 June 2020.

Service of the Order

- 10. Pursuant to CPR r. 6.27 and r. 81.8 service of this Order on the First and Second Defendants shall be dealt with as follows:
 - 10.1 The Claimants shall affix sealed copies of this Order in transparent envelopes to posts, gates, fences and hedges at conspicuous locations around the Harvil Road Site, including at and opposite the Vehicular Entrances.
 - 10.2 The Claimants shall position signs, no smaller than A3 in size, advertising the existence of this order and providing the Claimant's solicitors contact details in case of requests for a copy of the order or further information in relation to it.
 - 10.3 The Claimants shall also leave sealed copies of this Order at the protestor campsite marked on the Plan.
 - The Claimants shall further advertise the existence of this order in a prominent location on the websites: (i) https://hs2inhillingdon.commonplace.is/; and (ii) https://www.gov.uk/government/organisations/high-speed-two-limited, together with a link to download an electronic copy of this Order.
- 11. The taking of such steps shall be good and sufficient service of this Order on the First and Second Defendants and each of them.
- 12. This Order shall be deemed served on those Defendants the date that the last of the above steps is taken, and shall be verified by a certificate of service.
- 13. The Claimants shall from-time-to-time (and no less frequently than every 28 days) confirm that copies of the orders and signs referred to at paragraphs 5.1 and 5.2 remain in place and legible, and, if not, shall replace them as soon as reasonably practical.
- 14. The Court will provide sealed copies of this Order to the Claimants' solicitors for service (whose details are set out below).

Further directions

- 15. No Defendant shall be required to file an acknowledgment of service. Further:
 - 15.1 Any Defendant (or individual who does or may by their future acts or conduct fall within the definition of the First or Second Defendant) who wishes to contest the claim as amended shall file and serve on the Claimant's solicitor an acknowledgement of service on the Claimant's solicitors (whose details are set out below) and a witness statement outlining their interest in this matter and the nature of or grounds for that contest by 4pm on 13 June 2019.
 - 15.2 In the case of an individual who is not already named as a Defendant, that person must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.
- 16. 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 Claimants' solicitors immediately (and in any event not less than 48 hours before the hearing of any such application).
- 17. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.
- 18. In the event that any acknowledgments of service or applications are filed or served pursuant to paragraph 15 above, the Claimants shall notify the Court in writing and seek the listing of a directions hearing.
- 19. The Claimants have liberty to apply to extend or vary this Order or for further directions.
- 20. Save as provided for above, the Claim be stayed generally with liberty to restore.

Costs

21. There shall be no order as to the costs of these proceedings to date.

22. If the Claimants intend to seek a costs order against any person in respect of any future applications in these proceedings or any future hearing, then they shall seek to give reasonable advance notice of that fact to that person.

Communications with the Court

23. All communications to the Court about this Order (which should quote the case number) should be sent to:

Court Manager
High Court of Justice
Chancery Division
Rolls Building
7 Rolls Building
Fetter Lane
London
EC4A 1NL

The telephone number is 020 7947 7501. The officer are open weekdays 10.00am to 4.30pm.

The out of hours telephone number (for urgent business only) is 020 7947 6260.

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

Eversheds Sutherland (International) LLP of:

1 Callaghan Square Cardiff CF10 5BT

DX: 33016 Cardiff Tel: 020 7497 9797

Ref: DILCOCJ/335547-000045

AND UPON the Fourth Defendant's application, made orally by Mr Powlesland, for permission to appeal

- 25. Permission to appeal is refused
- 26. This order will be served by the Claimant on the Defendants

Service of the order

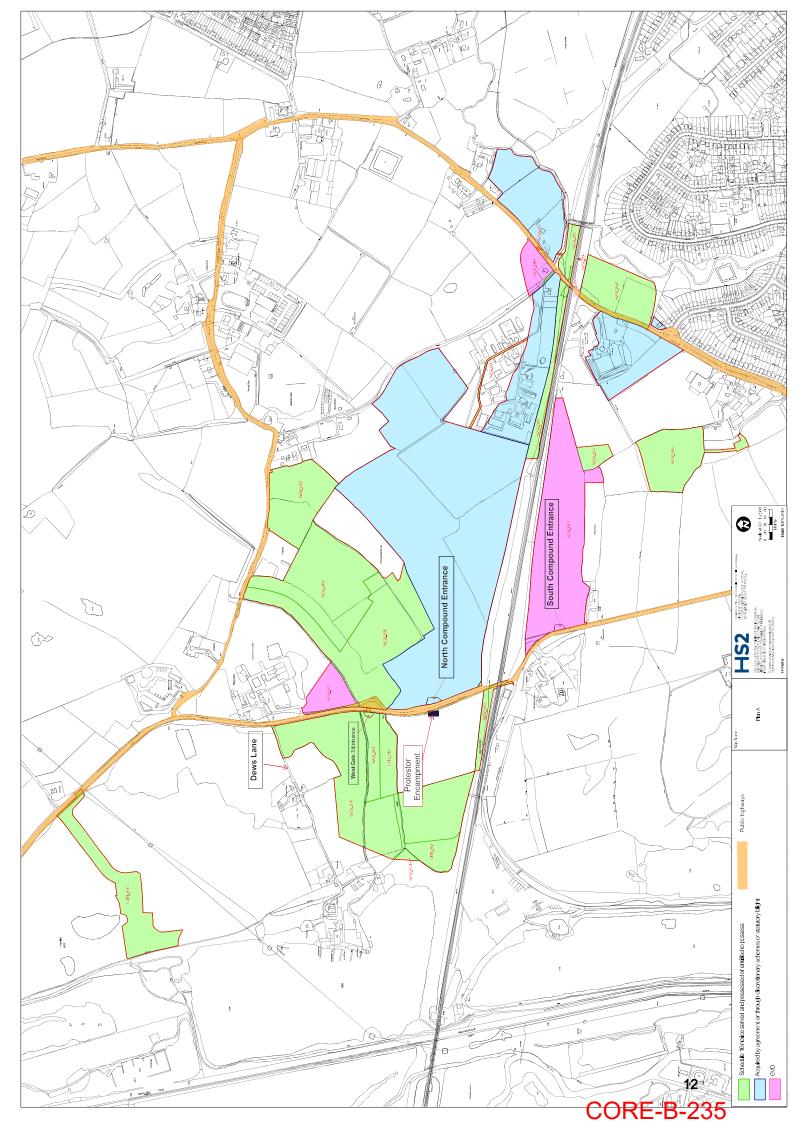
The Court has provided a sealed copy of this order to the serving party:

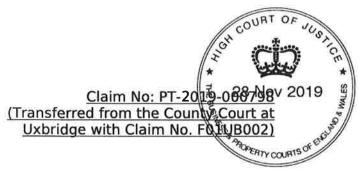
Eversheds Sutherland (International) LLP of:

1 Callaghan Square Cardiff CF10 5BT

DX: 33016 Cardiff Tel: 020 7497 9797

Ref: DILCOCJ/335547-000045





IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS
OF ENGLAND AND WALES
PROPERTY, TRUSTS AND PROBATE LIST (ChD)

PT-2019-000798

Mr David Holland QC (Sitting as a Deputy Judge of the High Court)

Dated this 28th November 2019

BETWEEN:

HIGH SPEED TWO (HS2) LTD

Claimant

and

(1)PERSONS UNKNOWN (2)MARK KEIR (3)SARAH GREEN (4)ALAN LOFTING

Defendants

ORDER

UPON the Claimant's claim for possession dated 3 September 2019 under claim number F01UB002 ("the Possession Claim") against the First Defendant.

AND UPON an order in the County Court at Uxbridge dated 16 September 2019 (i) adding the Second, Third and Fourth Defendants as Defendants to the Possession Claim, (ii) transferring the Possession Claim from the County Court at Uxbridge to the High Court, and (iii) adjourning the Possession Claim generally with liberty to restore.

AND UPON the Claimant's application by application notice dated 30 September 2019 to restore the Possession Claim and for an order for possession and a declaration

AND UPON hearing Jonathan Chew, Counsel for the Claimant, Paul Powlesland, Counsel for the Second Defendant and the Third and Fourth Defendants appearing in person on 16 October 2019

AND UPON HEARING Ms Laura Hughes in person in respect of her denial of allegations made about her in the Claimant's witness evidence but neither (i) joining Ms Hughes as a party nor (ii) making a finding in respect of the said allegations.

AND UPON READING the N244 application, Claim Form, Particulars of Claim, First and Second Witness Statements of Sean Robert Armstrong, the First Witness Statement of Robert William McCrae and the Certificate of Service of Mark Seymour dated 10 September 2019, the Certificate of Service of Mark Seymour dated 14 October 2019 and the Certificate of Service of Raymond Finch dated 14 October 2019

AND UPON the Court giving judgment at a hearing on 28 November 2019

IT IS ORDERED THAT:-

- 1. The claim be restored.
- 2. The Claimant does recover possession forthwith of land at and adjacent to Dews Farm, Harvil Road, Harefield, Uxbridge, Hillingdon as shown edged red on the plan attached to this Order ("the Land").
- 3. There be no order as to the costs of these proceedings.
- 4. Pursuant to CPR r.6.27, the Claimant shall serve a copy of this Order upon the Defendants as follows:
 - 4.1. on the First Defendant by delivering to and leaving sealed copies of this Order on parts of the Land such that they are visible to those occupying it and at Harvil Road Wild Life Protection Camp, UB9 6JW;
 - 4.2. on the Second Defendant by post or hand delivery to 31 Winnock Road, West Drayton, UB7 7RH;
 - 4.3. on the Third Defendant by post or hand delivery to 73 Iver Lane, Cowley, Uxbridge, UB8 2JE; and
 - 4.4. on the Fourth Defendant by leaving a copy addressed to him at Harvil Road, Wild Life Protection Camp, UB9 6JW (or such other address as shall be notified to the Claimant's solicitors in writing in advance).

Service of the Order

The Court has provided sealed copies of this Order to the Claimant's solicitors for service whose details are:

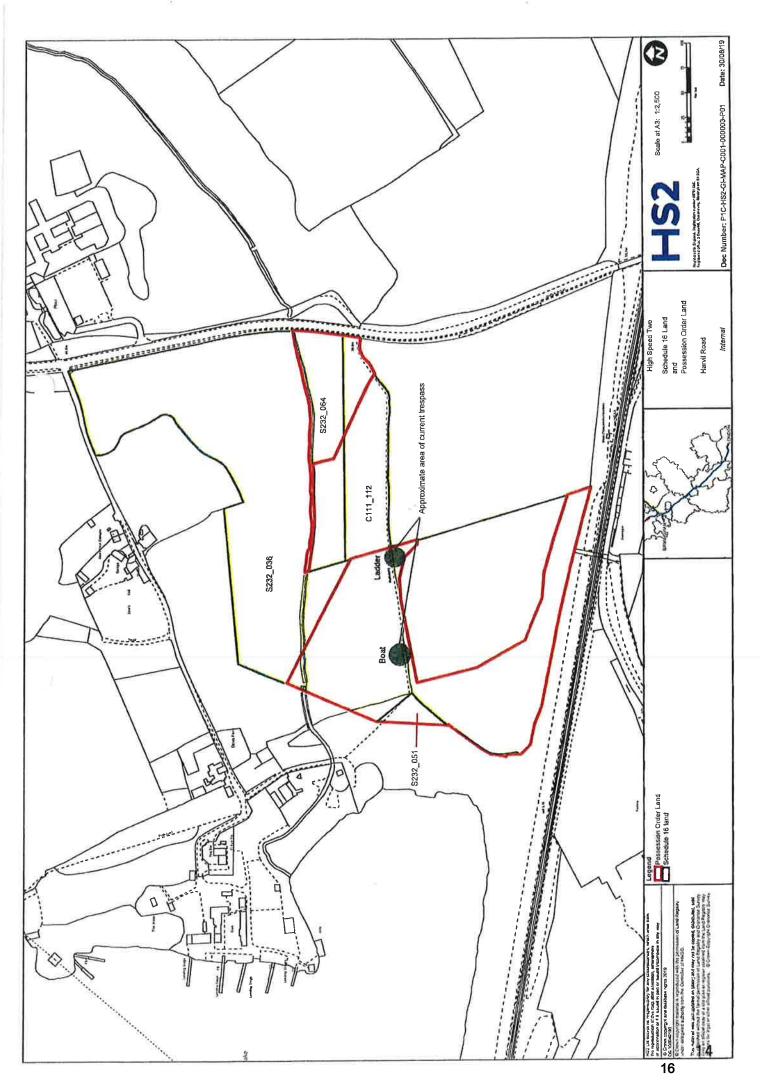
Eversheds Sutherland (International) LLP:

1 Callaghan Square, Cardiff, CF10 5BT

DX: 33016 Cardiff

Tel: 020 7497 9797

Ref: JENKINSW/335547-000116



D36 trespassing 11.11.2017





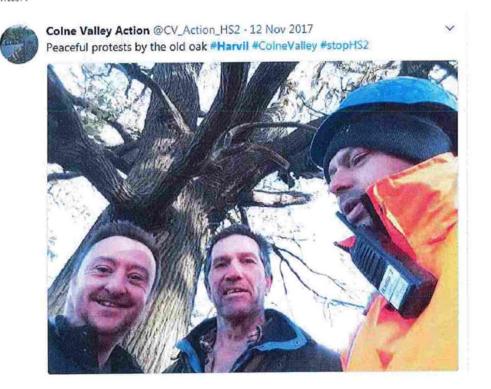
Lizzy @LifebyLizzy · 11 Nov 2017

Peaceful sit in #Harvil Road, Harefield @saveColneValley protestors entered the site in protest at the woodland being felled without the mitigation we believe should be in place for the environment or the community engagement that should have happened in advance #HS2 #Trees



D36 Trespassing 12.11.2017

Photograph of the Fourth Defendant and a male person unknonwn trespassing that was posted on Twitter:



D36 Trespassing and obstructing access 04.12.2017

Mark Keir Retweeted

Jenny Jones © @GreenJennyJones · 4 Dec 2017

Meeting the people who are trying to prevent destruction of some beautiful Hillingdon countryside with once-protected nature reserves. #VictimsofHS2 @saveColneValley Check out the petition and please sign!

CANCEL HS2 IMMEDIATELY

www.pelilon.parl.anient.s.b.

13 Stop HS2 Retweeted



Jenny Jones [®] @GreenJennyJones · 4 Dec 2017 Supporting the Harvil Road protectors of Hillingdon's very special water meadows and green spaces. No! to #HS2 @saveColneValley @TheGreenParty



D36 Obstructing Access and Egress at Harvil Road 09.01.2018



We are out there again, this time low loader and traffic control are inside. Come help us keep them there!



Video taken by Fourth Defendant (2mins 3 seconds long) and uploaded to Facebook (URL: https://www.facebook.com/markkeir77/videos/1776033322428954/):



The video opens with the Fourth Defendant saying: "well we're here at the main compound just waiting for a low loader to come out with a digger that's going to go down to the Harvil Rd Site, erm – we are hopefully going to stop him"

 $\label{likelihood} \begin{tabular}{ll} Video livestreamed by Fourth Defendant (18mins and 3 seconds long) and uploaded to Facebook (URL: https://www.facebook.com/markkeir77/videos/1776036395761980/): \end{tabular}$



Video taken by Fourth Defendant (2mins and 18 seconds long) and uploaded to Facebook (URL: https://www.facebook.com/markkeir77/videos/1776065302425756/):



Video shows low loader reversing away from the gates having been prevented from leaving by the trespassers.

Fourth Defendant (at 1min and 37 seconds into the video) says: (laughs) "We could hold them in there forever! Fantastic!"

D36 Trespassing and Obstructing Access 10.01.2018

Video livestreamed by Fourth Defendant (24 seconds long) and uploaded to Facebook (URL: https://www.facebook.com/markkeir77/videos/1777179692314317/):



Transcript:

Fourth Defendant: "Just making sure that you all know what's happening. We are still here, still waiting, errr, the police have been called they're coming up, but as far as we are concerned we are definitely on private property, erm, so, yeah, trespass, but not, er, obstructing the highway. Ok, er, I'll be back when something starts happening"

 $\label{linear_property} \begin{tabular}{ll} Video livestreamed by Fourth Defendant (23 seconds long) and uploaded to Facebook (URL: https://www.facebook.com/markkeir77/videos/1777196802312606/): \end{tabular}$



Transcript:

Fourth Defendant: "Just for anybody who is interested, the one thing that would really help here is lots more bodies and it would make it much, much more difficult for anything else to happen today. Please come down and help. Bye."

13 Save the Coine Valley Retweeted



Colne Valley Action @CV_Action_HS2 - Jan 10

More #DirectAction being taken today against #HS2. Contractors have now fenced protesters in.





Lizzy @LifebyLizzy · Jan 10

Protestors have entered the compound at #Harvil Road and are currently staging a sit in #StopHS2 #HS2 facebook.com/markkeir77/vid... working on getting us a working YouTube account.



Lizzy @LifebyLizzy · Jan 10

See the fun and games at #Harvil Road here! facebook.com/colne.valley.7... no Police yet as at the moment still being treated as a civil matter. Interesting barrier work! #StopHS2 Shout out to these brave peaceful protestors! #HS2



Lizzy @LifebyLizzy · Jan 10

Just spoken to our fenced in protestors. Great spirits. Latest is fish and chips on their way lol #StopHS2 plenty of teal #HS2

D36 Trespassing in Harvil Rd site bellmouth 11.01.2018



Colne Valley Action @CV_Action_HS2 · Jan 11

A message from the brave campaigners at #Harvil. The camp needs more people willing to stand up for what they believe. It will be too late to take #DirectAction when HS2 destruction reaches your town further along the line. Come to the beautiful Colne Valley now to #StopHS2

Video taken by the Fourth Defendant (1min and 41 seconds long) and posted on Facebook (URL: https://www.facebook.com/markkeir77/videos/1778213108877642/):



At 58 seconds into the video the Third Defendant says: "I can get in anywhere Mordechaj"

Video taken by Fourth Defendant on 11 January 2018 (51 seconds long) and posted on Facebook (URL: https://www.facebook.com/markkeir77/videos/1778239532208333/):

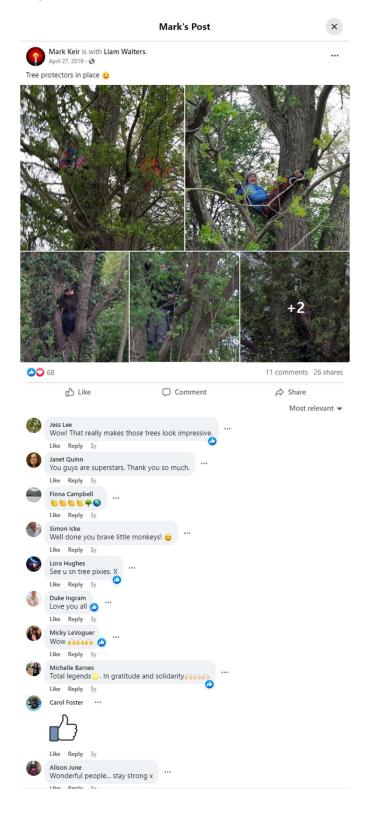


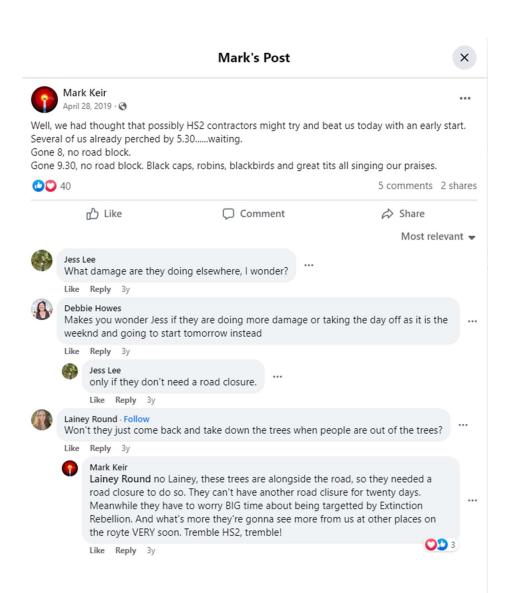
Video shows works to move fencing at the North Compound entrace. The Fourth Defendant speculates that the works may be designed to widen the entrance. At 19 seconds into the video he says:

"Erm, but we have that in hand. We can, we've got enough people actually to stop both sides of this gate or block both sides of this gate"

27.04.2019 to 28.04.2019 – trespass and obstruction of de-vegetation works

https://www.facebook.com/markkeir77





09.09.2019 and 26.09.2019 - boat camp trespass

https://www.facebook.com/markkeir77/videos/2653412138024397









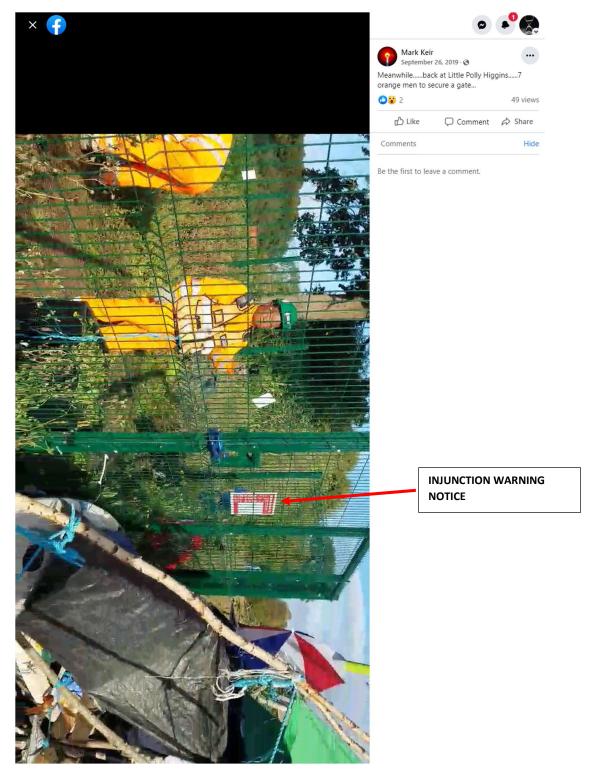




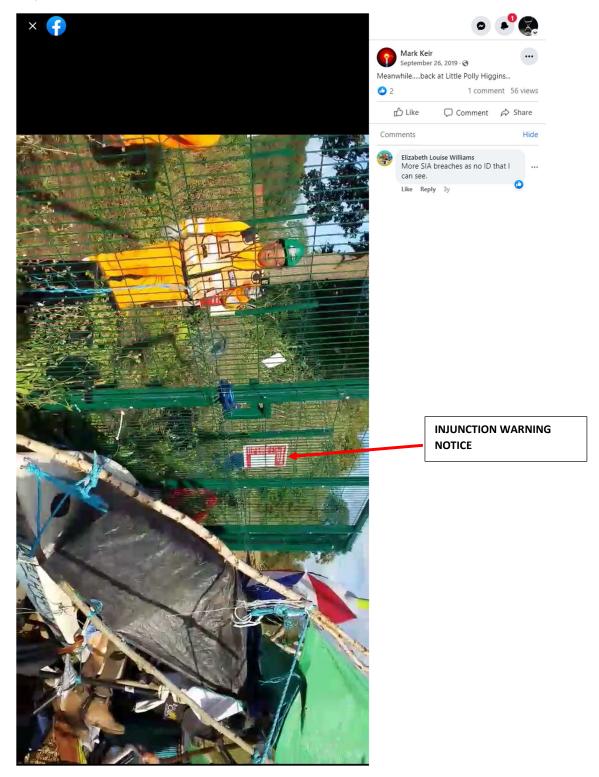


INJUNCTION WARNING NOTICE

https://www.facebook.com/markkeir77/videos/2685940944771516



https://www.facebook.com/markkeir77/videos/2685910001441277



D36 Trespass and obstruction of access – lock-on at Harvil Road





D36 Lock-on at West Gate 3 on 19.11.2019 and Boat Camp 09.09.19 locations plotted onto Plan A to the May 2019 Harvil Road Injunction

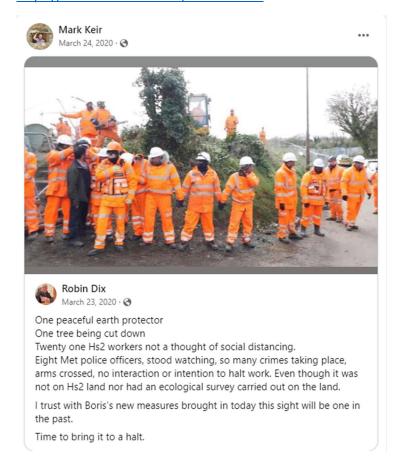


Obstruction of vehicular access by slow-walking on 11.02.2020



D36 obstruction and trespass late March 2020 to early April 2020

https://www.facebook.com/mark.keir.71



https://www.youtube.com/watch?v=daTwsvRSGPU





https://www.facebook.com/caroline.thomsonsmith



HS2 security descend on one lone peaceful protestor taking morning walk at Harvil road today. No social distancing. Is this essential work?! All these men!! This is where our NHS money is going!!! Call HS2 complaints line on 02079444908

Tell them to shut the whole thing down now! These workers are using public transport that our key workers rely on. They take the tube to Uxbridge then the U9 to Harvil Road compound. Crammed into reduced services with NHS staff travelling to Harefield Heart Hospital 1 mile further on!!!!!

Please share this image.



2 comments 2 shares

https://www.facebook.com/mark.keir.71



...



Sarah Green ▶ #StoppingHS2 Chilterns

March 26, 2020 · 🚱





Robin Dix March 26, 2020 · 🚱

And still it continues today total and utter disregard for covid 19 virus.

One protester.

Twelve security guards from various parts of the country all becoming extremely physical, no ppe, no social distancing, putting their lives and the lives of the country at risk through spreading this deadly virus.

https://www.facebook.com/robin.dix.505



https://www.youtube.com/watch?v=DZLqE9TdFPs











November 2020 - Pledge of Non Payment

https://twitter.com/tuesday_earth/status/1325520790268370945



PLEDGE OF NON - PAYMENT

7th November 2020

We are actively declaring a Pledge of Non - Payment.

This is against the order of costs in the case
"The Harvil Road site Injunction" for HS2 Ltd and Secretary of State for Transport" ordered by Judge David Holland QC (Claim no. PT - 2018 - 000098).

We are declaring our conscientious objection to paying costs ordered against us in a pledge of non-payment.

We are in a position where we feel compelled to challenge the costs decision due to what we believe is a breach of human rights and in which a private corporation hand in hand with the government can purchase their own laws and use them to silence our freedom of expression and right to defence in court. We have been named on this injunction on the basis of evidence which was limited, dubious and/or simply unfounded. In court, this evidence and our defence were not given proper deliberation and we feel has not been fairly considered.

At the end of the hearing on June 22nd & 23rd 2020 Judge David Holland QC ordered an interim injunction with a second hearing to last 4 days commencing 24th August 2020 and stated he would need evidence to support some of the defendants' statements, at which point Tom Roscoe for HS2 Ltd stated "if any further evidence is presented we will be seeking costs". We feel this was a direct threat simply saying "stay silent or we will use money as power".

They have further proved this by only seeking costs from the 14 people who spoke out of the 33 named defendants. Judge David Holland QC said in his costs decision "I very much doubt whether in making any order for costs, I will deter any of the 14 named defendants from coming to court to state their case in future". Clearly the judge has insight to costs being used as a deterrent. We feel that an order of costs against us in this way is a direct threat using money as an attempt at intimidation on peaceful, innocent and ordinary people to demand them to stay silent.

This is something we can not do.

HS2 ltd is committing unmitigated and horrendous acts of ecocide, water pollution, violence, thuggery and corruption, with impunity and contempt for existing environmental protection law.

We will continue to protest and expose their crimes throughout our campaign to Stop HS2.

This injunction and similar injunctions are being used as a means for corporations and the government to avoid scrutiny, a scrutiny which is evidently needed. We believe much work carried out by HS2 has bypassed legality where people have not been there to scrutinise over the vast HS2 ltd landgrab where they are desecrating the countryside.

We believe also that our peaceful and legal protests are all the more valid because HS2 has consistently avoided democratic scrutiny in any other guise. A project that will cost approximately one third of our annual national budget has not been scrutinised properly in Parliament nor with democratic procedure. This injunction has not yet gone to trial, and interim orders and extensions are now granted totalling around 5 years.

We oppose costs where we have been named on an injunction with limited or no evidence. None of the defendants have been convicted of a criminal offence in relation to opposing HS2. All we have done is exercise our democratic and human rights.

This pledge of non-payment is to conscientiously object to costs and to expose that development corporations can use big money in the pockets of the government against the little people by abusing the use of injunctions and then seek to recoup costs only as a method of punishment and intimidation for doing nothing more than envoking our human rights article 11, right to assembly and association, and article 10, freedom of expression, by speaking in court.

Our defence statements that established human rights breaches and criminal acts happening on the injuncted land meant nothing in a property and business civil court where the judge seeks only to protect a land owner and not to deliberate moral justice.

Corporations such as HS2 ltd are in violation of human rights and environmental due diligence. Using injunctions in this way is not to protect the landowner but is a tool to silence and intimidate anyone who vocally opposes them and seeks to expose their criminal activity.

This injunction has not yet been properly tested, has not been tried. Much evidence is yet to be uncovered and justice has not yet been seen. There has been no proper questioning of the Claimants position. This cannot be a valid time to throw claims of £42,000 costs at a group of peaceful, honest and brave people.

We are committed to the defence of democracy, human rights and social justice.

This is for the children's future. Especially the children who today are already in and being further led into an impoverished state and will have to manage the consequences of the failings of our actions as their future.

A world destroyed by the climate, destroyed by money.

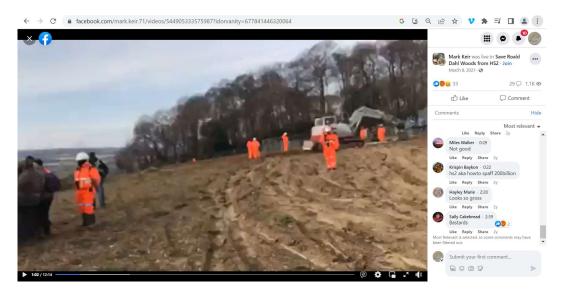
Signed -

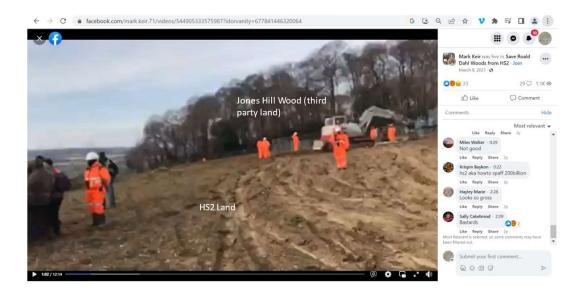
Hayley Pitwell
Mark Keir
Vajda Robert Mordechaj
Iain Oliver
Ella Dorton
Sam Goggin
Karl Collins
Elliott Cuciurean
Scott Breen
Sebastian Roblyn Maxey
Wiktoria Zieniuk
Dr Larch Maxey
Samantha Smithson

7th November 2020

D36 and Others Trespass at Jones Hill Wood 08.03.2021

D36 Livestream from HS2 Land between Bowood Lane and Jones Hill Wood 08.03.2021:

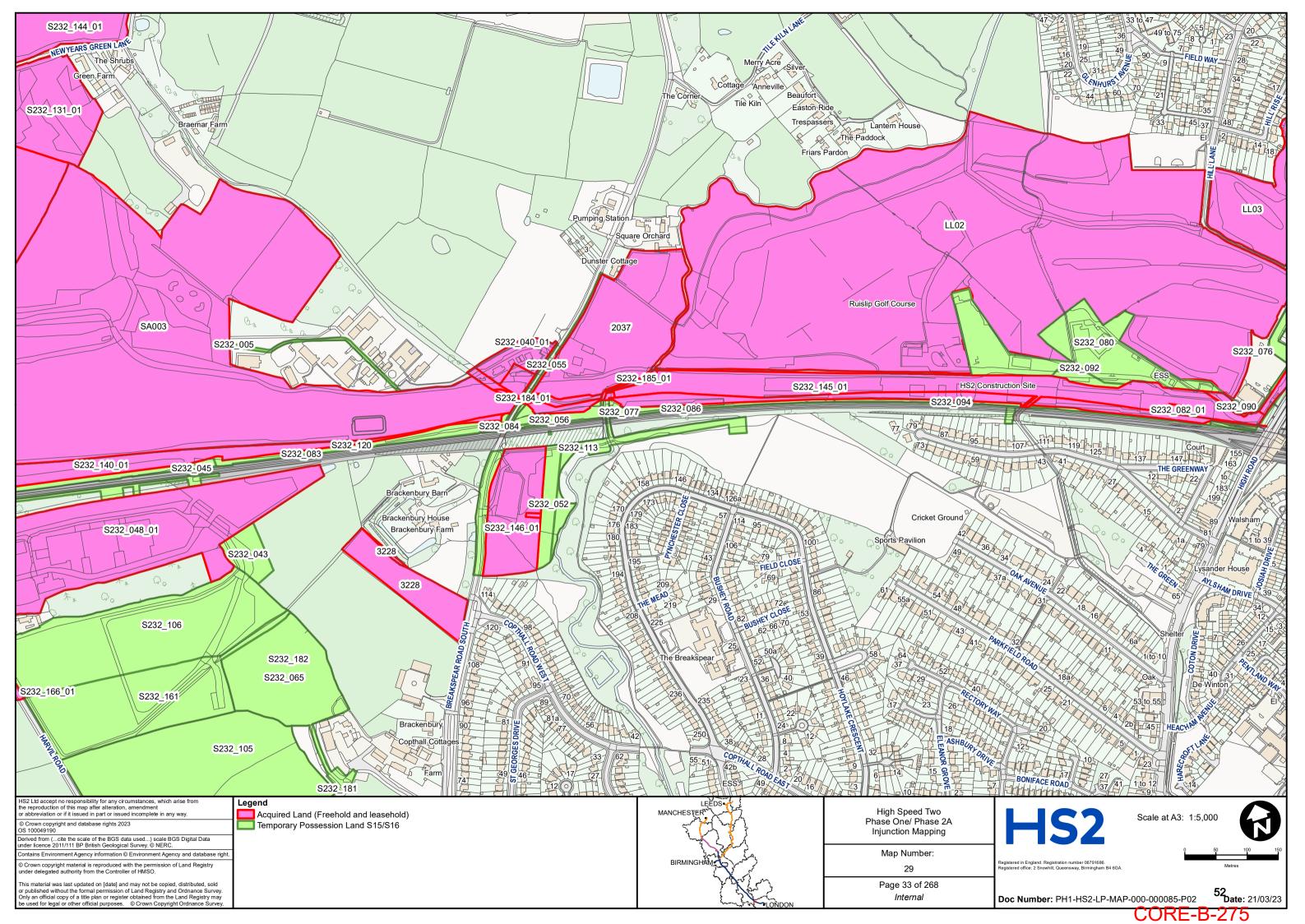


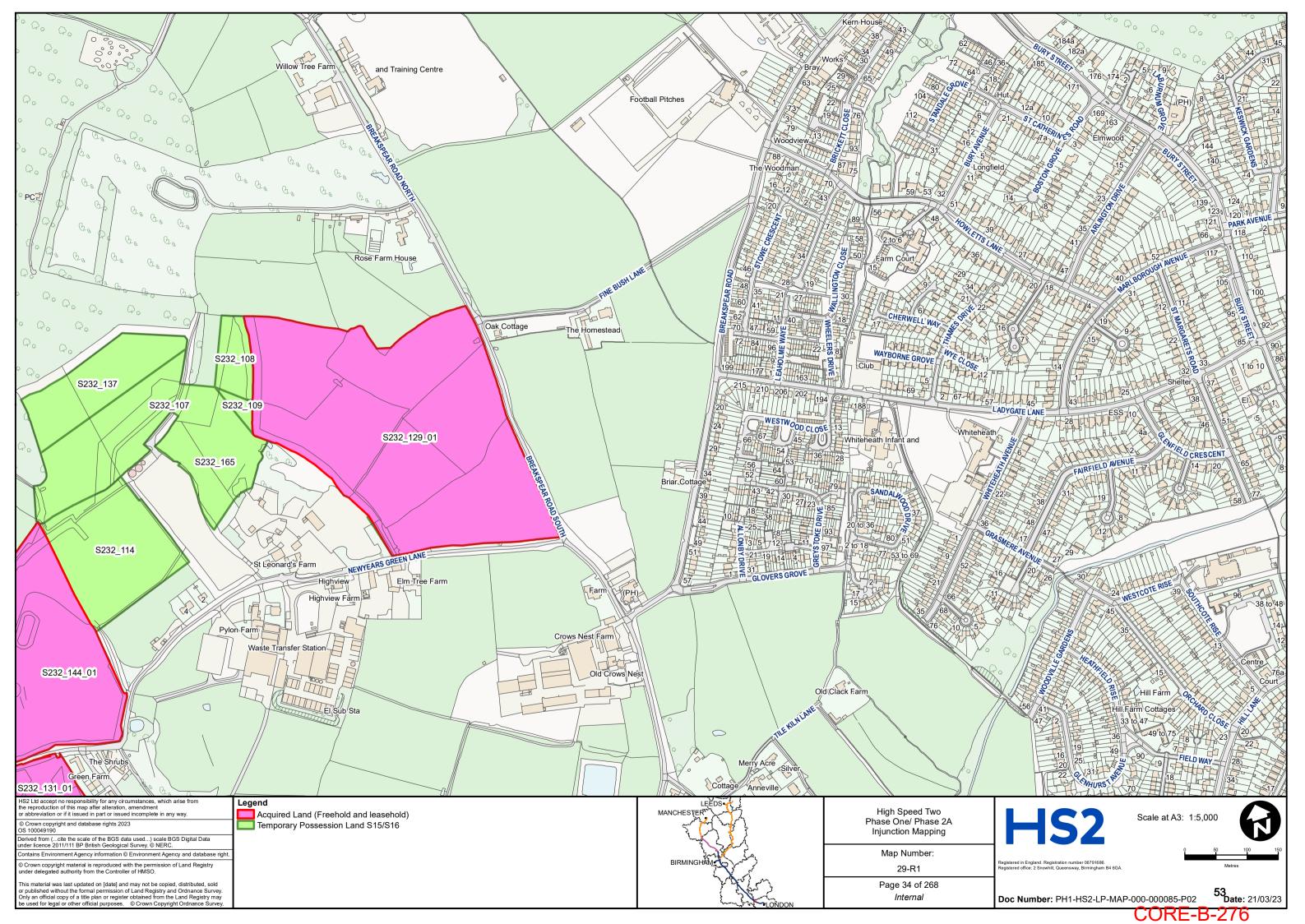


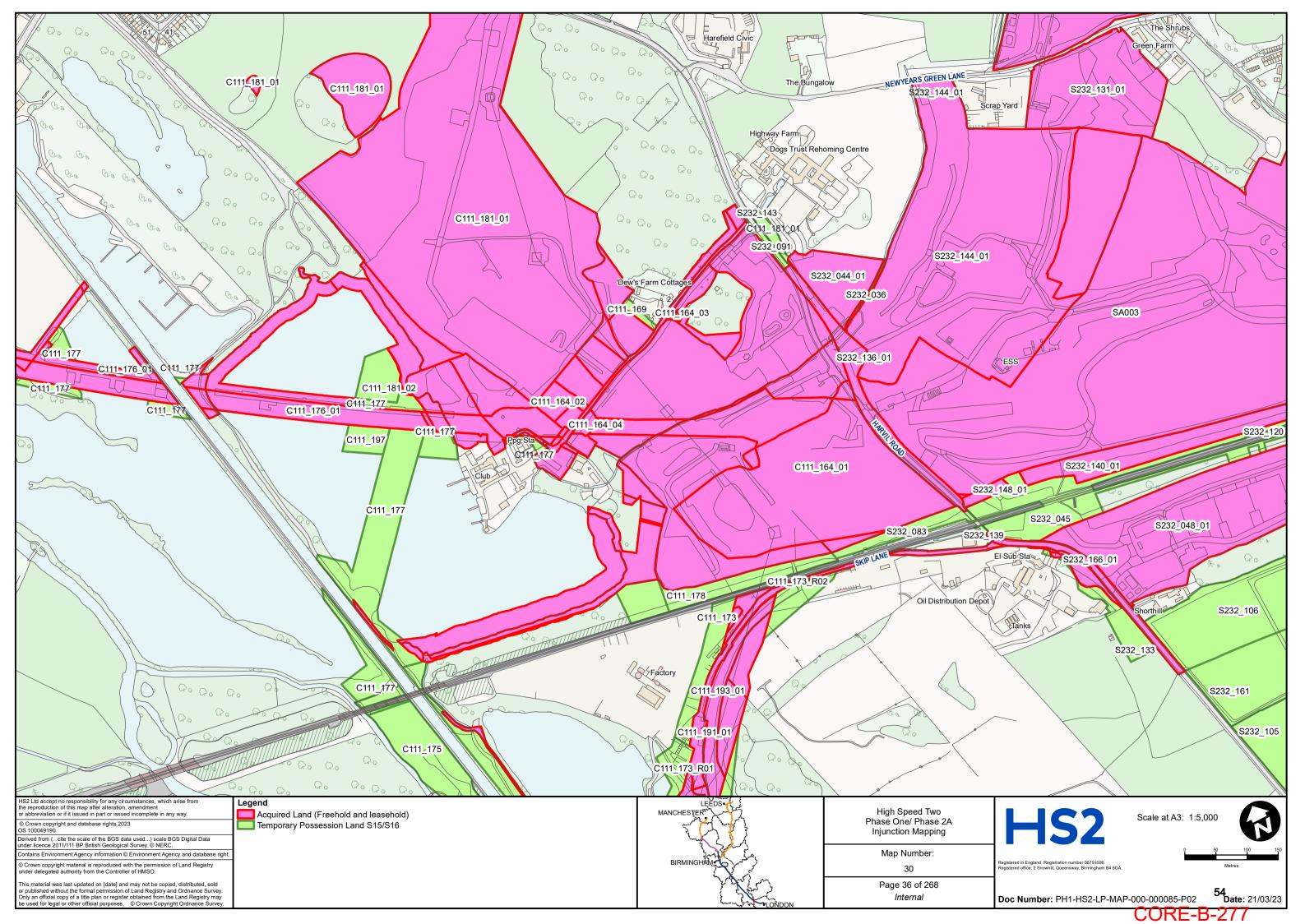
At 00:01:10 D36 is asked to move by security "as this is HS2 land"

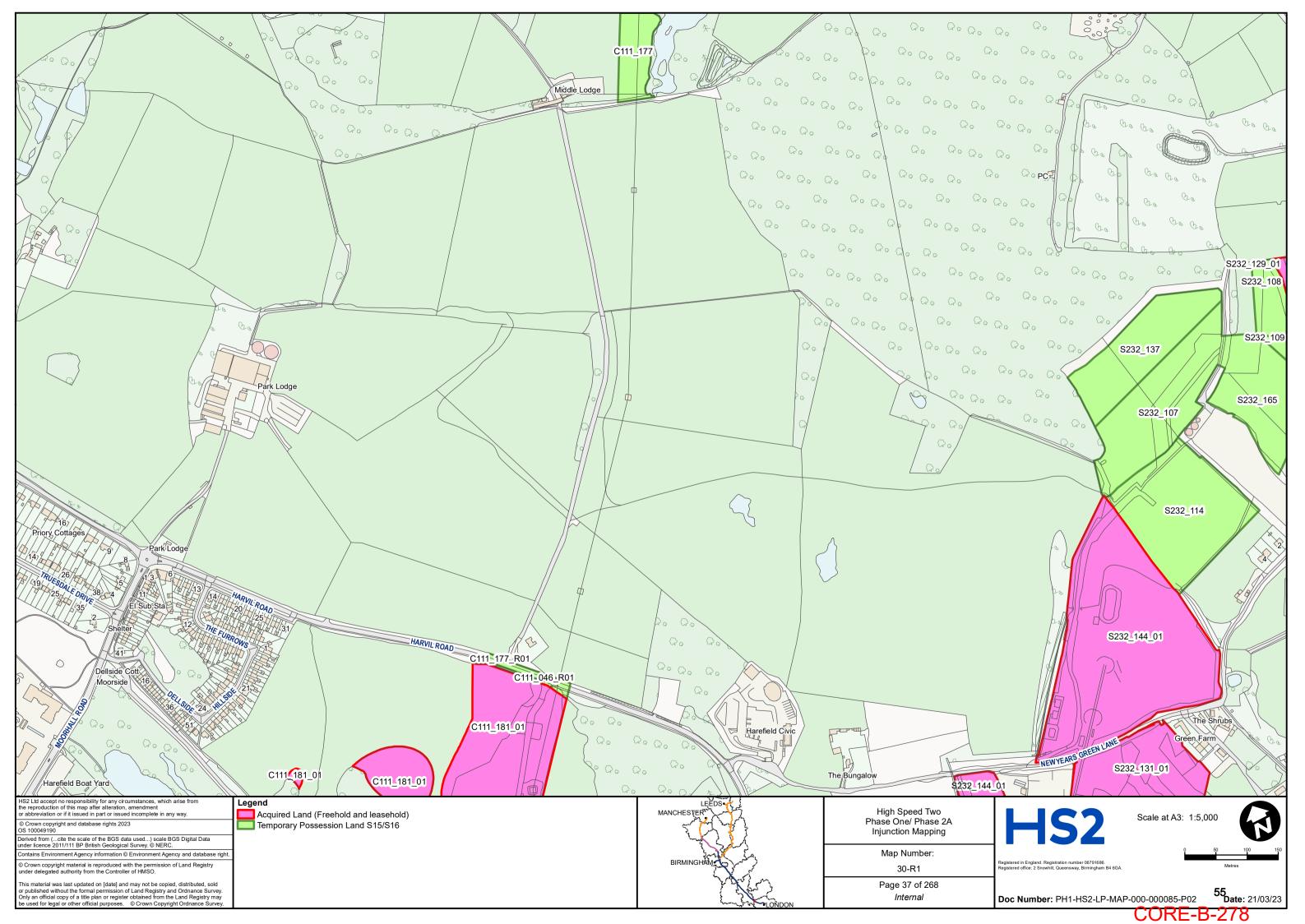
D36 Location Plotted from viewpoint using JHW as a reference point 08.03.2021

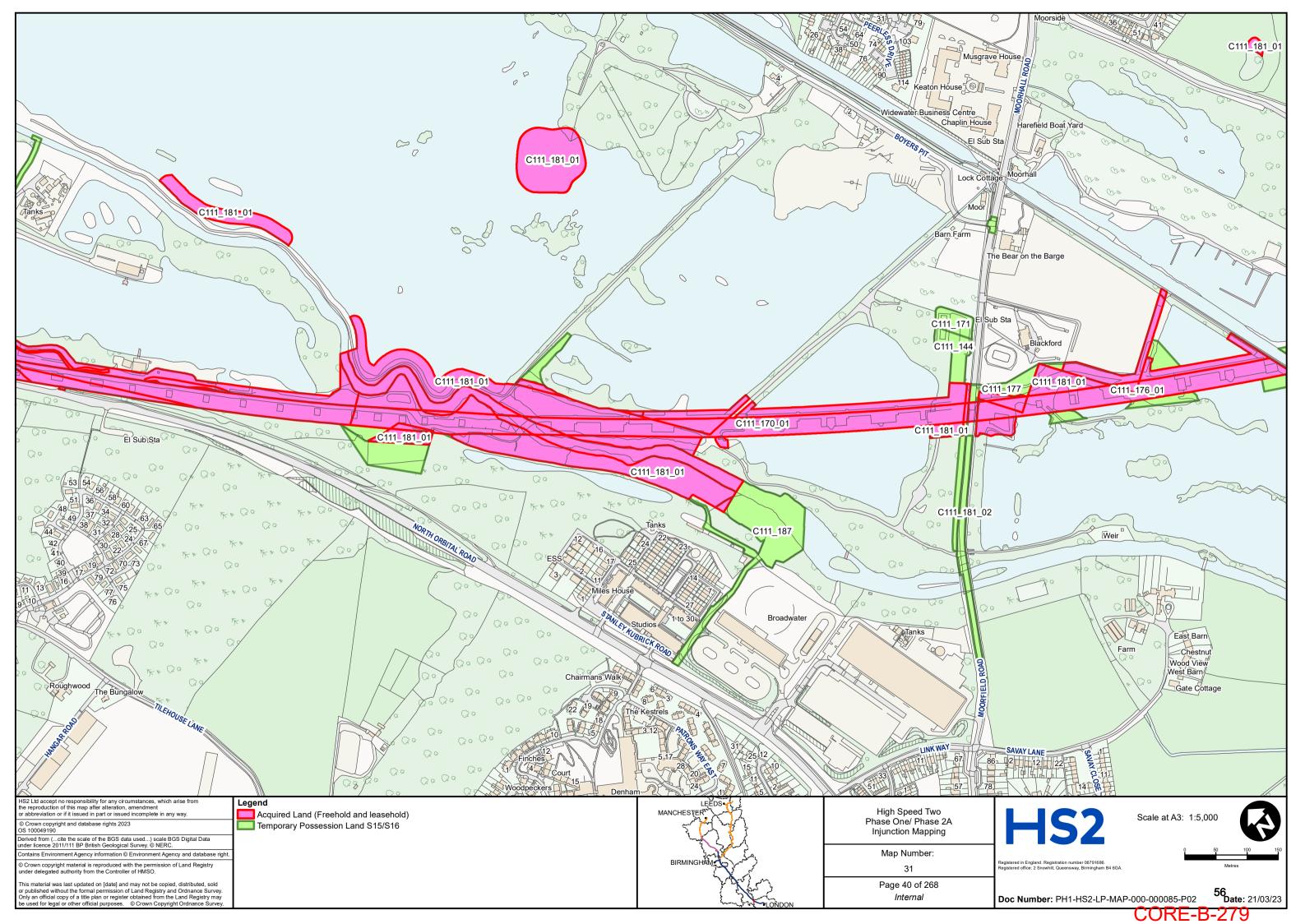


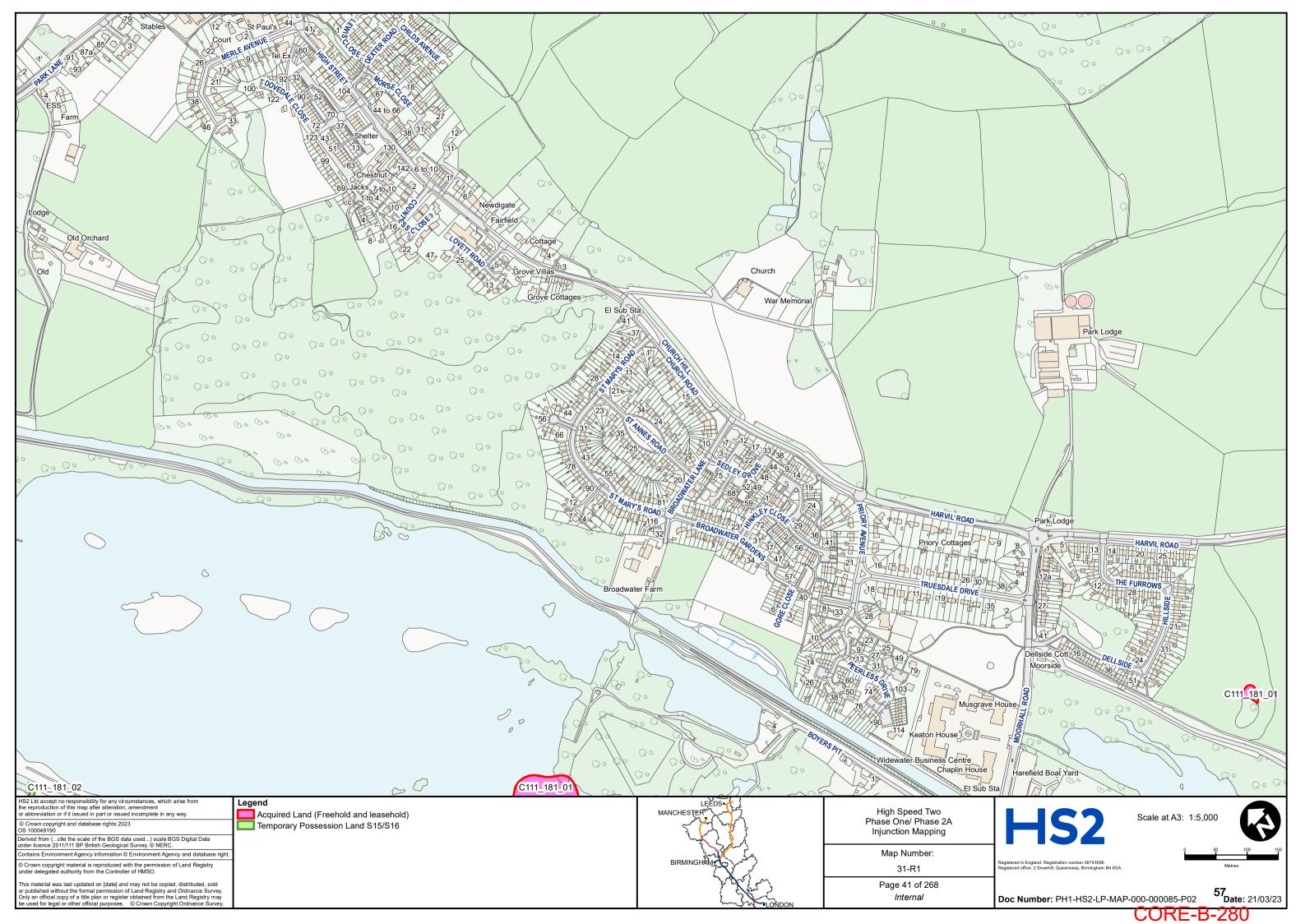


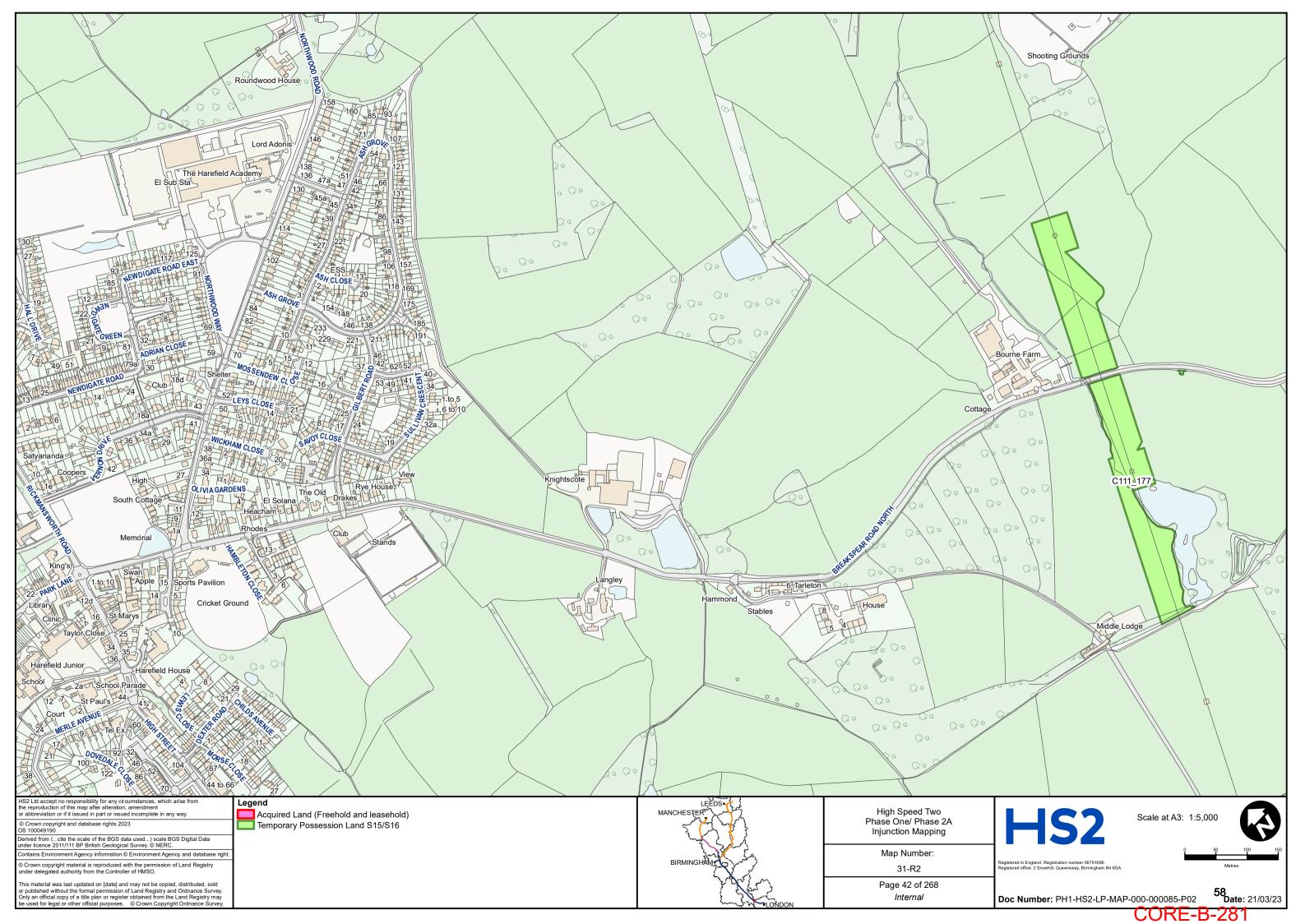












The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number AGL547359

Edition date 02.08.2021

- This official copy shows the entries on the register of title on 13 APR 2023 at 15:35:45.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 13 Apr 2023.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Wales Office.

A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

HILLINGDON

- 1 (02.08.2021) The Leasehold land demised by the lease referred to below which lies within the area shown edged with red on the plan of the above Title filed at the Registry and being Land at Clack Lane, Ruislip.
- 2 (02.08.2021) The title includes any legal easements granted by the registered lease but is subject to any rights that are granted or reserved by the lease and affect the registered land.
- 3 (02.08.2021) The land tinted blue on the title plan has the benefit of the following rights reserved by a Transfer of 11, 13 and 15 Harwell Close dated 8 September 1988 made between (1) The Mayor and Burgesses of the London Borough of Hillingdon (Transferor) and (2) Stride Ahead Limited (Transferee):-
 - "Except and Reserving to the Transferor for the benefit of the estate owner or owners for the time being of the retained land and the occupiers thereof
 - (a) The right at any time or times hereafter to erect or suffer to be erected any buildings or other erections and to alter any buildings or other erections now standing or hereafter to be erected on any part of the retained land with such windows and openings for light and air and in such manner in all respects as they may think fit without any consent whatsoever on the part of the Transferee or its successors in title being required or any right on its part to object thereto or claim compensation on the ground of interference with the access of light or air to any buildings now erected or to be erected on the land hereby transferred or otherwise and no windows or lights now existing or which may hereafter be placed in any such first mentioned buildings or the access of light or air thereto shall at any time hereafter being any manner stopped up obstructed or interfered with by the Transferee or its successors in title

A: Property Register continued

(c) the right to connect to and full right of passage and running of water and soil through all drains and sewers now or within twenty one years hereafter in on or under or belonging to the land hereby transferred with the right to enter upon the land hereby transferred to connect."

NOTE: The land tinted blue on the title plan comprises part of the retained land referred to.

4 (02.08.2021) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:

Date : 28 July 2021

Term : 10 years from and including 1 September 2019 to and

excluding 1 September 2029

Parties : (1) The Mayor and Burgesses of the London Borough of

Hillingdon

(2) High Speed Two (HS2) Limited

NOTE: The lease comprises also other land.

- 5 (02.08.2021) The Lease prohibits or restricts alienation.
- 6 (02.08.2021) The landlord's title is registered.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (02.08.2021) PROPRIETOR: HIGH SPEED TWO (HS2) LIMITED (Co. Regn. No. 0679186) of Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA.

C: Charges Register

This register contains any charges and other matters that affect the land.

1 (02.08.2021) The parts of the land affected thereby are subject to the rights granted by a Deed dated 5 August 1975 made between (1) The Mayor Aldermen and Burgesses of the London Borough of Hillingdon and (2) The Eastern Electricity Board.

NOTE: Copy filed under MX167539.

2 (02.08.2021) The parts of the land affected thereby are subject to the rights granted by a Deed dated 18 August 1987 made between (1) The Mayor and Burgesses of the London Borough of Hillingdon and (2) British Gas Plc.

The said Deed also contains restrictive covenants by the grantor.

NOTE: Copy filed under AGL197257.

3 (02.08.2021) The parts of the land tinted blue on the title plan affected thereby are subject to the rights granted by a Deed dated 5 February 1993 made between (1) The Mayor and Burgesses of the London Borough of Hillingdon and (2) Stride Ahead Limited.

NOTE: Copy filed under AGL197152.

End of register

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number AGL560820

Edition date 22.03.2022

- This official copy shows the entries on the register of title on 13 APR 2023 at 16:08:14.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 13 Apr 2023.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Wales Office.

A: Property Register

.

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

HILLINGDON

- (22.03.2022) The Leasehold land demised by the lease referred to below which lies within the area shown edged with red on the plan of the above Title filed at the Registry and being Land on the north-east side of Clack Lane, Ruislip.
- (22.03.2022) The title includes any legal easements granted by the registered lease but is subject to any rights that are granted or reserved by the lease and affect the registered land.
- 3 (22.03.2022) The land has the benefit of the following rights reserved by a Transfer of 11, 13 and 15 Harwell Close dated 8 September 1988 made between (1) The Mayor and Burgesses of the London Borough of Hillingdon (Transferor) and (2) Stride Ahead Limited (Transferee):-

"Except and Reserving to the Transferor for the benefit of the estate owner or owners for the time being of the retained land and the occupiers thereof

(a) The right at any time or times hereafter to erect or suffer to be erected any buildings or other erections and to alter any buildings or other erections now standing or hereafter to be erected on any part of the retained land with such windows and openings for light and air and in such manner in all respects as they may think fit without any consent whatsoever on the part of the Transferee or its successors in title being required or any right on its part to object thereto or claim compensation on the ground of interference with the access of light or air to any buildings now erected or to be erected on the land hereby transferred or otherwise and no windows or lights now existing or which may hereafter be placed in any such first mentioned buildings or the access of light or air thereto shall at any time hereafter being any manner stopped up obstructed or interfered with by the Transferee or its successors in title

(c) the right to connect to and full right of passage and running of

A: Property Register continued

water and soil through all drains and sewers now or within twenty one years hereafter in on or under or belonging to the land hereby transferred with the right to enter upon the land hereby transferred to connect."

NOTE: The land in this title comprises part of the retained land referred to.

4 (22.03.2022) The land has the benefit of the following rights reserved by a Conveyance of 122 Sharps Lane dated 9 September 1988 made between (1) The Mayor and Burgesses of the London Borough of Hillingdon (Vendor) and (2) Gary Michael Collins and Jeffrey Frederick Gold (Purchasers):-

"EXCEPT AND RESERVED those matters contained or referred to in the First Schedule hereto for the benefit of ... the estate owner or owners for the time being of the retained land and the occupiers thereof.

THE FIRST SCHEDULE

(1) The right at any time or times hereafter to erect or suffer to be erected any buildings or other erections and to alter any buildings or other erections now standing or hereafter to be erected on any part of the retained land with such windows and openings for light and air and in such manner in all respects as they may think fit without any consent whatsoever on the part of the purchasers or their successors in title being required or any right on their part to object thereto or claim compensation on the ground of interference with the access of light or air to any buildings now erected or to be erected on the property or otherwise and no windows or light now existing or which may hereafter be placed in any such first mentioned buildings or the access or light or air thereto shall at any time hereafter be in any manner stopped up obstructed or interfered with by the Purchasers or their successors in title.

.

(3) The right to connect to and full right of passage and running of water and soil through all drains and sewers now or within twenty one years hereafter in or under or belonging to the property with the right to enter upon the property to connect".

NOTE: The land in this title comprises part of the retained land referred to.

5 (22.03.2022) Short particulars of the lease(s) (or under-lease(s))

under which the land is held: Date : 28 July 2021

Term : 10 years from and including 1 September 2019 to and

excluding 1 September 2029

Parties : (1) The Mayor and Burgesses of the London Borough of

Hillingdon

(2) High Speed Two (HS2) Limited

NOTE: The lease comprises also other land.

- 6 (22.03.2022) The Lease prohibits or restricts alienation.
- 7 (22.03.2022) The landlord's title is registered.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (22.03.2022) PROPRIETOR: HIGH SPEED TWO (HS2) LIMITED (Co. Regn. No. 0679186) of Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA.

Title number AGL560820

C: Charges Register

This register contains any charges and other matters that affect the land.

1 (22.03.2022) A Conveyance of the freehold estate in the land tinted pink on the title plan and other land dated 16 June 1910 made between (1) Emma Maria Carr and (2) William Garner contains restrictions but neither the original deed nor a certified copy or examined abstract thereof was produced on first registration.

By a Conveyance of the freehold estate in the land in this title and other land dated 12 February 1936 made between (1) Stanley Lewis Day and (2) The County Council of the Administrative County of Middlesex the said restrictions were expressed to be released in the following terms:

"THE Vendor for himself and all other persons claiming through or under him so far (if at all) as he can do so hereby releases the Council from all obligations to perform and observe the restrictions above referred to and from all liability to the Vendor and such other persons in respect of such restrictions"

End of register

HIGH SPEED RAIL (LONDON - WEST MIDLANDS) ACT 2017

HIGH SPEED RAIL (LONDON - WEST MIDLANDS) GENERAL VESTING DECLARATION No. 853

This GENERAL VESTING DECLARATION is executed on by the Secretary of State for Transport ("the Authority"). 26TH JANUARY 2022

WHEREAS:

- On 23 February 2017 the High Speed Rail (London West Midlands) Act 2017 ("the High (1) Speed Rail Act") received Royal Assent authorising the Authority to acquire the land specified in the Schedule hereto.
- Section 4(1) of the High Speed Rail Act authorises the Authority to acquire compulsorily (2)so much of the land within the limits of the High Speed Rail Act as may be required for Phase One purposes¹.
- Section 4(4) of the High Speed Rail Act provides that the Compulsory Purchase (Vesting (3)Declarations) Act 1981 ("the 1981 Act") applies as if the High Speed Rail Act were a compulsory purchase order and paragraph 32 of Schedule 6 to the High Speed Rail Act provides that the 1981 Act shall have effect subject to the modifications specified in that paragraph.
- Notice pursuant to section 3A³ of the 1981 Act was first published on 07 January 2022. (4)That notice included the particulars specified in section 3A(3) of the 1981 Act.

NOW THIS DEED WITNESSETH that, in exercise of the powers conferred on it by section 4 of the 1981 Act, the Authority hereby declares:-

The land described in the Schedule hereto (being part of the land authorised to be acquired by the High Speed Rail Act) and more particularly delineated and shown coloured pink on the plan annexed hereto, together with the right to enter upon and take possession of the land, shall vest in the Authority as from the end of the period of 3 months from the date on which the service of notices required by section 64 of the 1981 Act is completed.

For the purposes of Section 2(2) of the 1981 Act, the specified period in relation to the land comprised in this declaration is one year and one day.

1

66

¹ Phase One Purposes has meaning given by section 67 of the High Speed Rail Act

² Paragraph 3 as substituted by section 11 of, and paragraph 6 of Schedule 14 to, the High Speed Rail Act.

³ Section 3A of the 1981 Act as inserted by paragraph 3(a) of Schedule 6 to the High Speed Rail Act as substituted by section 11 of, and paragraphs 6 and 7 of Schedule 14 to, that Act.

⁴ Section 6 as modified by paragraph 3(c) of Schedule 6 to the High Speed Rail Act, as substituted by section 11 of, and paragraph 6 of Schedule 14 to, that Act

SCHEDULE

Buckinghamshire

(1) Plot No.	(2) Description		
65454	All interests in 171616.7 square metres, or thereabouts, of river, bed and banks thereof (Bear Brook), agricultural land, woodland, hedgerows, drain and public footpath (SBH/27/1) (Calley Farm)		
65503	All interests in 3195.2 square metres, or thereabouts, of agricultural land (Calley Farm)		
65546	All interests in 2413.2 square metres, or thereabouts, of woodland (Hartween Estate)		
65631	All interests in 11057.0 square metres, or thereabouts, of public road, verges, drain, footway, hedgerow and access splays (Oxford Road)		
65658	All interests in 387.1 square metres, or thereabouts, of public road, verge, footway and woodland (Oxford Road)		
65665	All interests in 522.6 square metres, or thereabouts, of public road and verges (Oxford Road)		
65678	All interests in 1216.3 square metres, or thereabouts, of woodland (Hartwe House Spa)		
65685	All interests in 2152.3 square metres, or thereabouts, of woodland (Hartwe House Spa)		
65688	All interests in 6157.0 square metres, or thereabouts, of woodland (Andrew Way)		
65701	All interests in 2246.2 square metres, or thereabouts, of agricultural land and woodland (Whaddon Hill Farm)		
65708	All interests in 45682.6 square metres, or thereabouts, of agricultural land, woodland, watercourse, hedgerow and public bridleway (SBH/2/4) (Whaddon Hill Farm)		
65709	All interests in 9622.9 square metres, or thereabouts, of agricultural land (Whaddon Hill Farm)		
65710	All interests in 330.4 square metres, or thereabouts, of river, sluice, bed an banks thereof (River Thame)		
65711	All interests in 120283.1 square metres, or thereabouts, of agricultural land woodland, hedgerows, ponds and drains (Putlowes Farm)		
65712	All interests in 83238.5 square metres, or thereabouts, of agricultural land, hedgerows, drain, water course and access track (Putlowes Farm)		
65715	All interests in 14182.6 square metres, or thereabouts, of agricultural land, woodland and drain (Fleet Marston Farm)		
65717	All interests in 47029.0 square metres, or thereabouts, of agricultural land, woodland, drain and public footpaths (FMA/2/1 and WAD/6/4) (Putlowes Farm)		
65742	All interests in 819.0 square metres, or thereabouts, of woodland and drain (Fleet Marston Farm)		
69287	All interests in 270411.1 square metres, or thereabouts, of river, bed and banks thereof (Bear Brook), golf course, woodland, drains, ponds, public bridleway (SBH/2/4) and public footpath (SBH/32/1) (Aylesbury Park Golf Club)		
70146	All interests in 671.8 square metres, or thereabouts, of agricultural land, woodland and public bridleway (FMA/1/1) (Putlowes Farm)		
70147	All interests in 613.9 square metres, or thereabouts, of agricultural land and		

	public bridleway (FMA/1/1) (Putlowes Farm)		
70148	All interests in 228.5 square metres, or thereabouts, of hedgerow and public bridleway (FMA/1/1) (Putlowes Farm)		
70149	All interests in 415.5 square metres, or thereabouts, of woodland, hedgerd and public bridleway (FMA/1/1) (Putlowes Farm)		
70559	All interests in 108868.3 square metres, or thereabouts, of agricultural land hedgerow and access track (Calley Farm)		
70560	All interests in 402.3 square metres, or thereabouts, of access track carrying public footpath (SBH/34/1) (Calley Farm)		
70563	All interests in 536.8 square metres, or thereabouts, of access track (Hartwell Estate)		
71829	All interests in 274.5 square metres, or thereabouts, of public road, verges and access splay (Oxford Road)		
71831	All interests in 3163.2 square metres, or thereabouts, of agricultural land, woodland and hedgerow (Whaddon Hill Farm)		

IN WITNESS WHEREOF the Secretary of State for Transport has hereunto set its corporate seal on the day in the year first written above.

The **CORPORATE SEAL** of the SECRETARY OF STATE FOR TRANSPORT hereunto affixed to this deed is authenticated by

Authorised Signatory

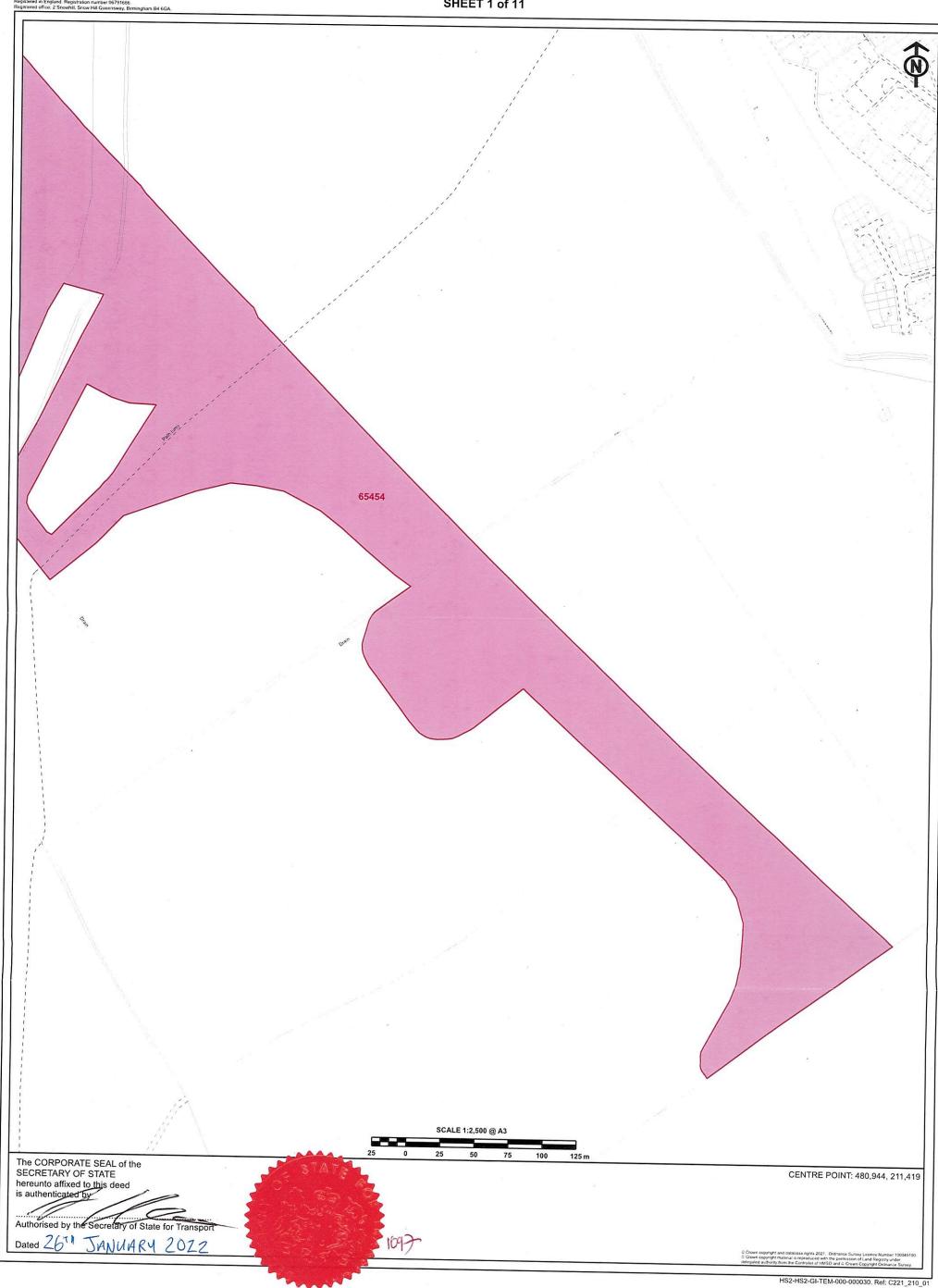
Dated: 26TH JANUARY 2022



SEAL REF DIT GP/1097



HIGH SPEED RAIL (LONDON – WEST MIDLANDS) ACT 2017 GENERAL VESTING DECLARATION No. 853 SHEET 1 of 11





HIGH SPEED RAIL (LONDON – WEST MIDLANDS) ACT 2017 GENERAL VESTING DECLARATION No. 853 SHEET 2 of 11



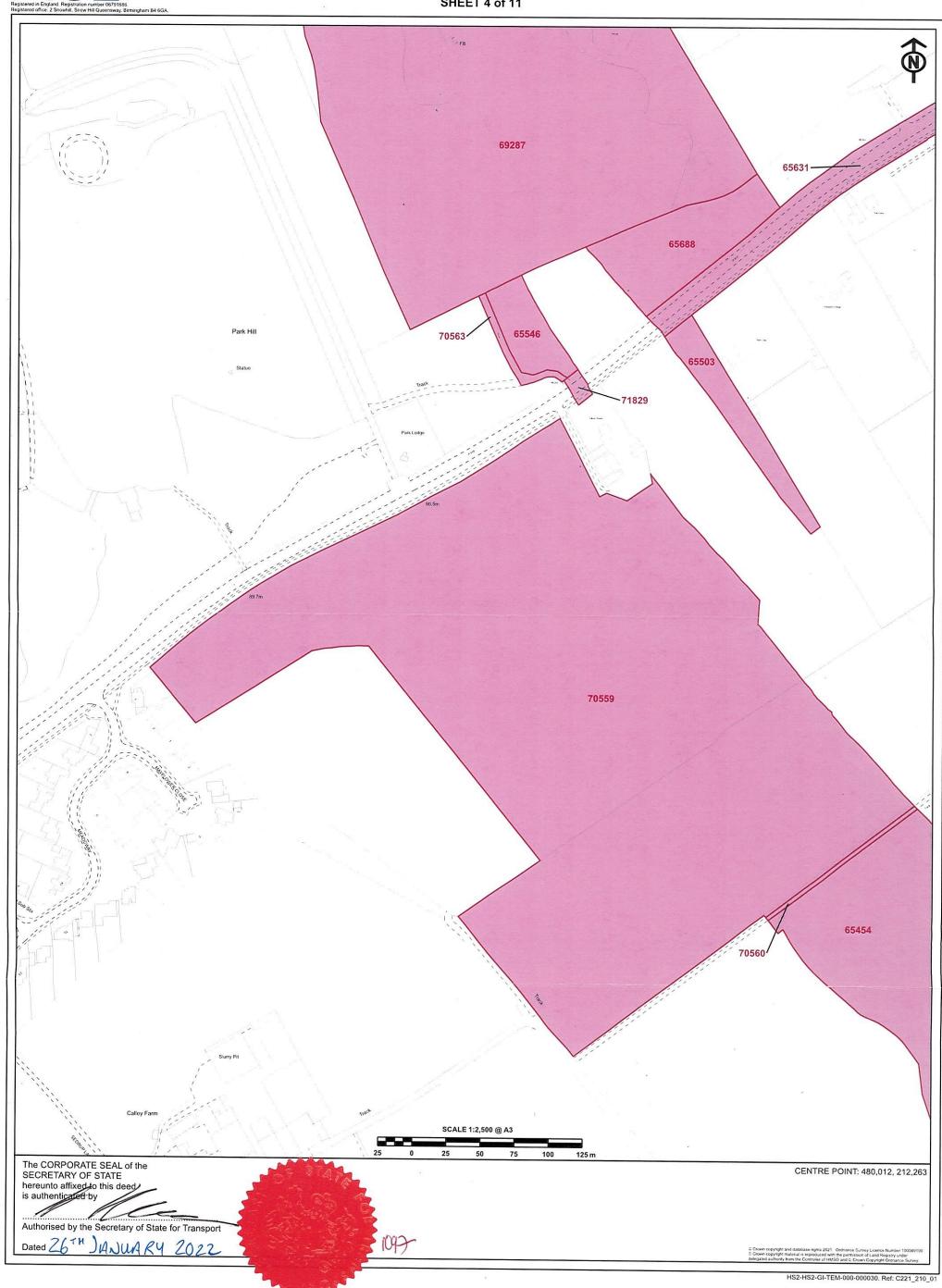


HIGH SPEED RAIL (LONDON – WEST MIDLANDS) ACT 2017 GENERAL VESTING DECLARATION No. 853 SHEET 3 of 11



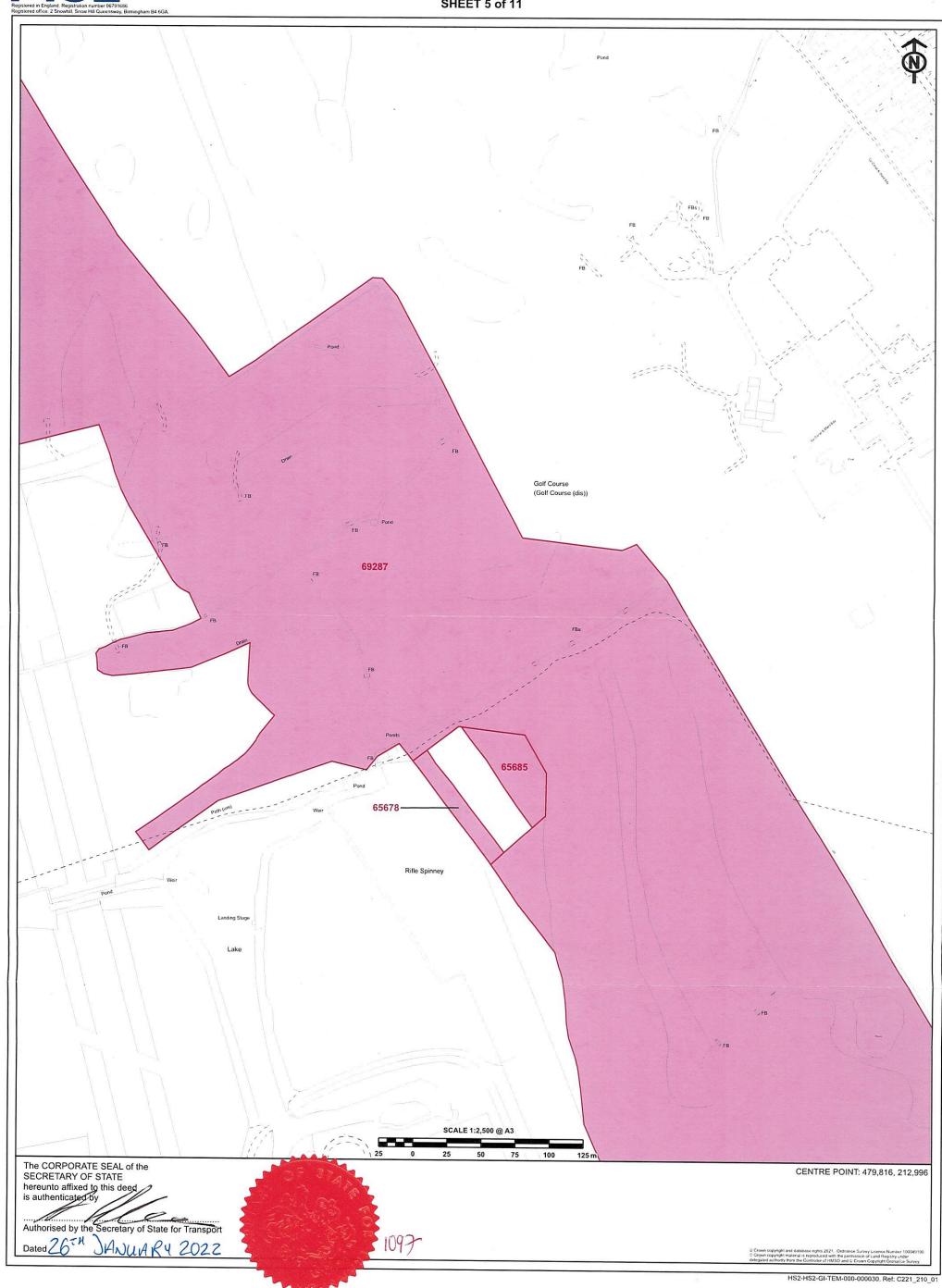


HIGH SPEED RAIL (LONDON – WEST MIDLANDS) ACT 2017 GENERAL VESTING DECLARATION No. 853 SHEET 4 of 11





HIGH SPEED RAIL (LONDON – WEST MIDLANDS) ACT 2017 GENERAL VESTING DECLARATION No. 853 SHEET 5 of 11



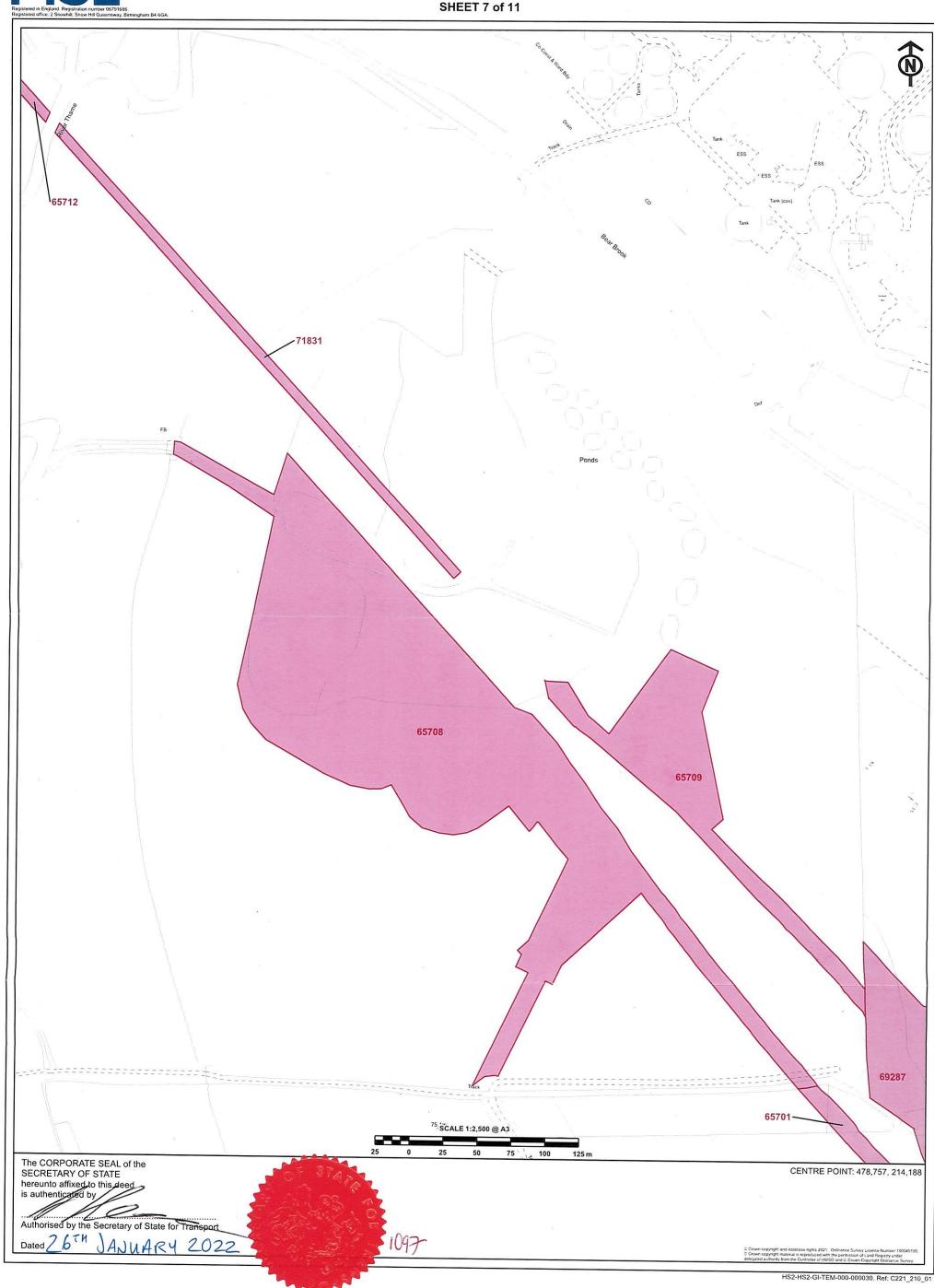


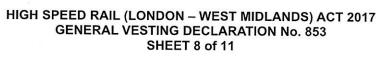
HIGH SPEED RAIL (LONDON – WEST MIDLANDS) ACT 2017 GENERAL VESTING DECLARATION No. 853 SHEET 6 of 11

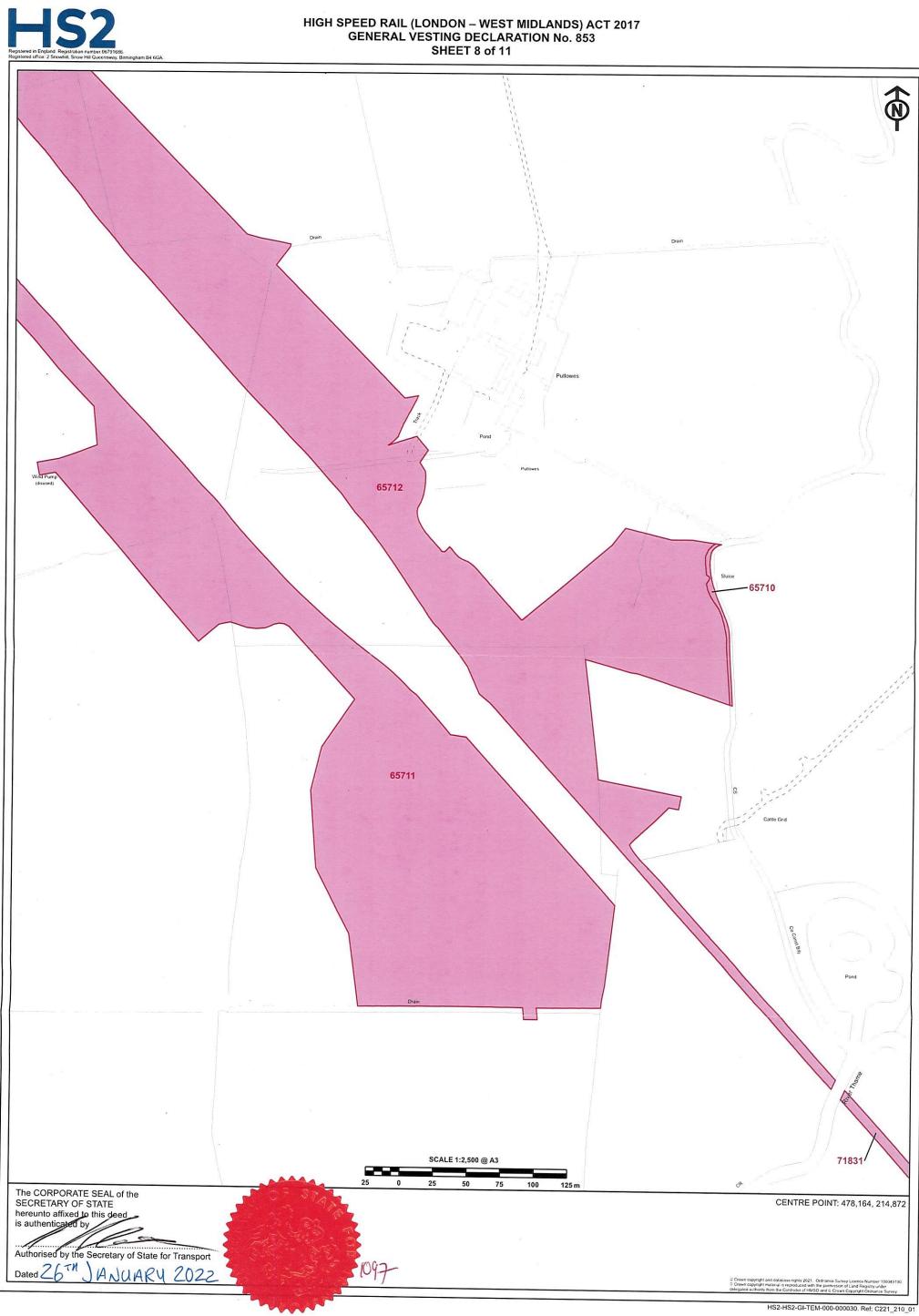




HIGH SPEED RAIL (LONDON – WEST MIDLANDS) ACT 2017 GENERAL VESTING DECLARATION No. 853 SHEET 7 of 11

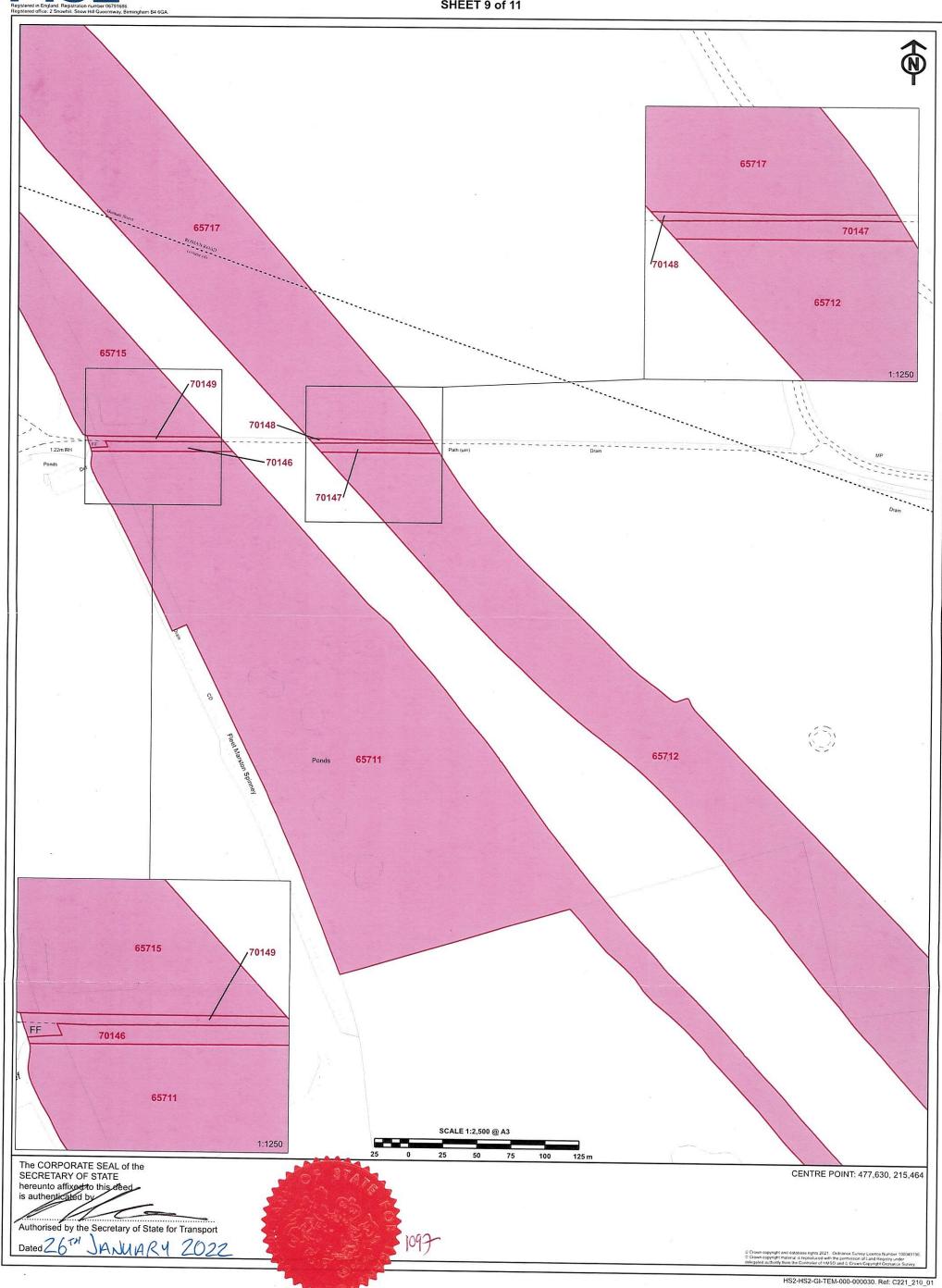






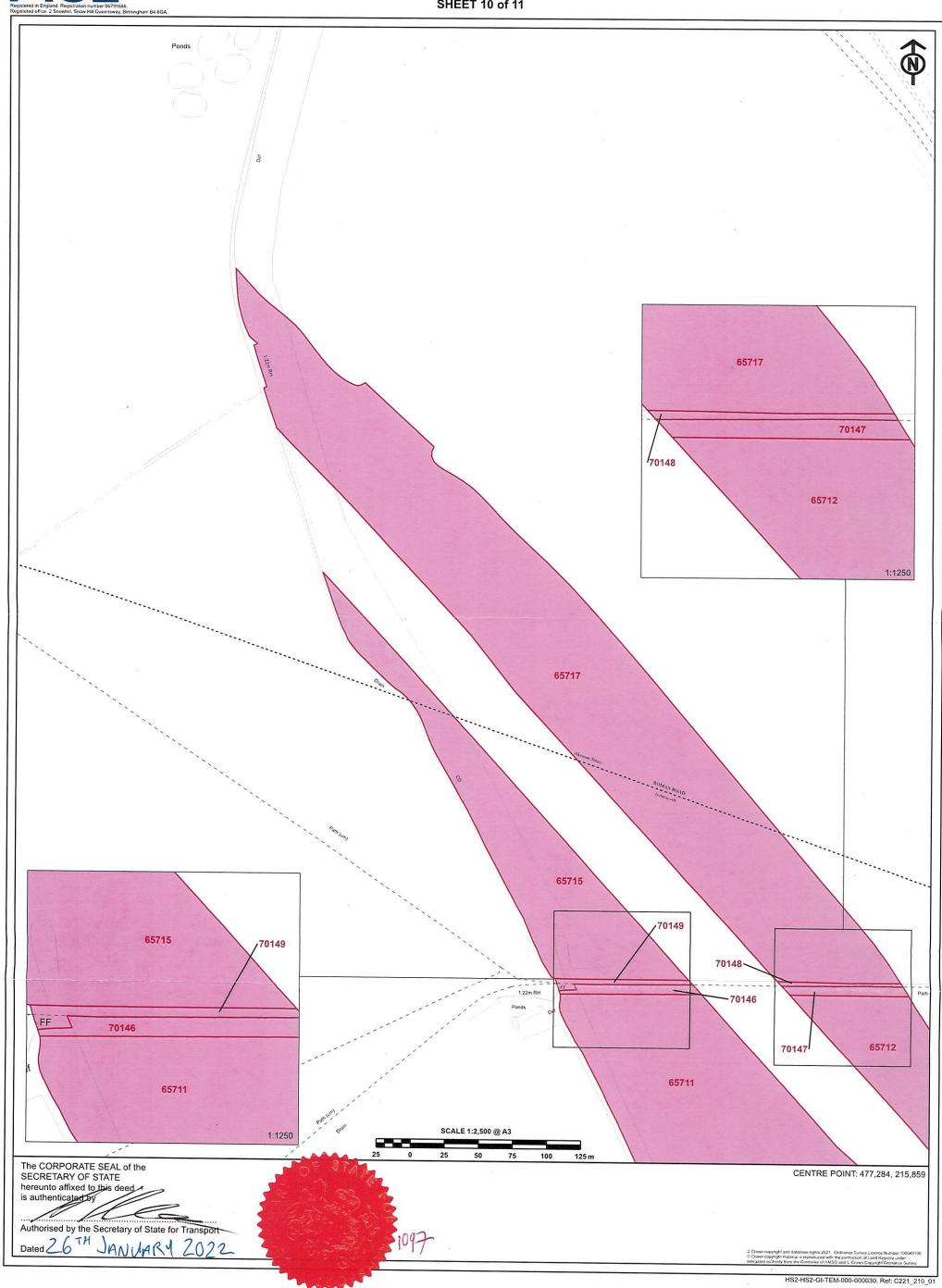


HIGH SPEED RAIL (LONDON – WEST MIDLANDS) ACT 2017 GENERAL VESTING DECLARATION No. 853 SHEET 9 of 11



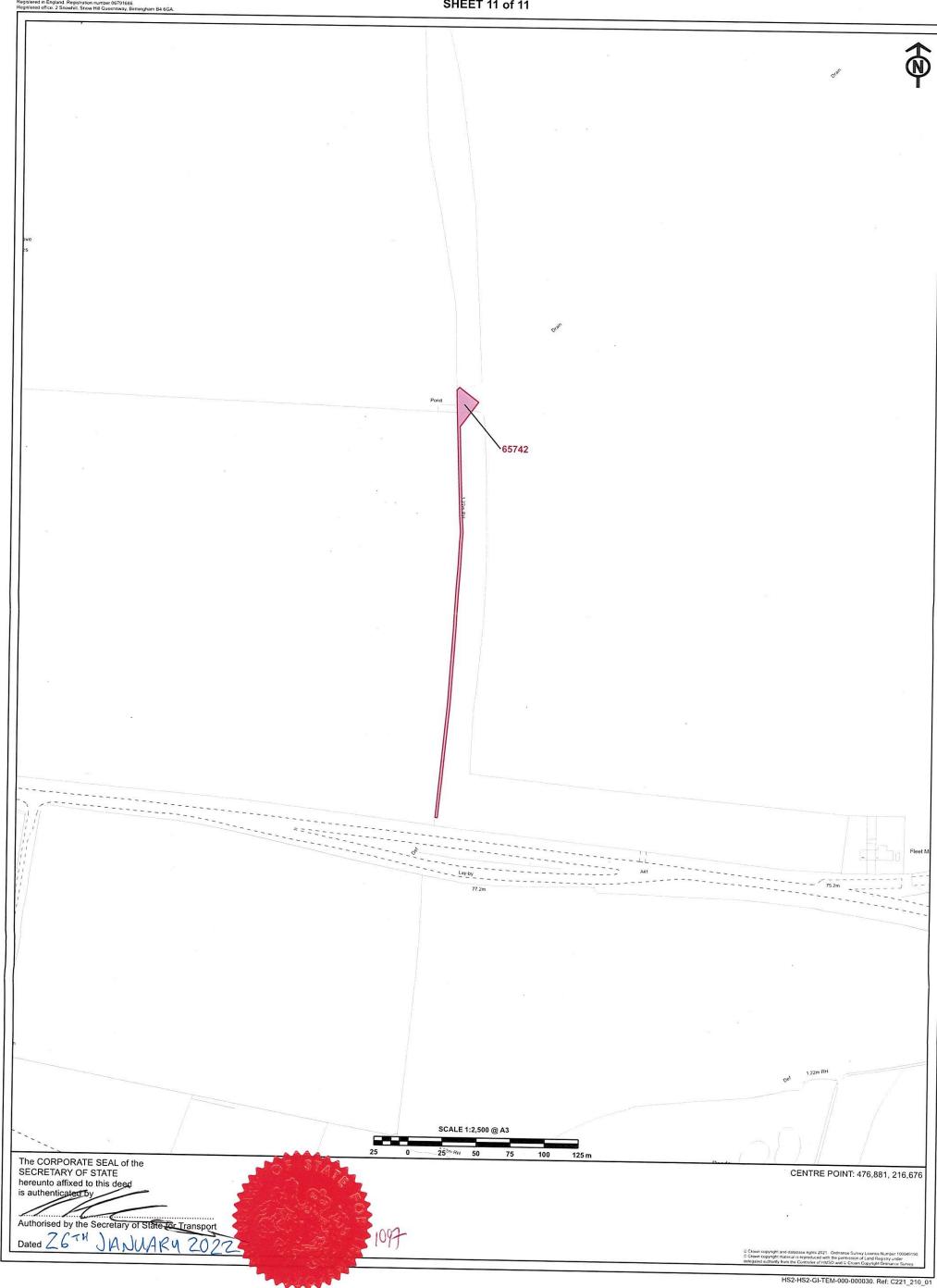


HIGH SPEED RAIL (LONDON – WEST MIDLANDS) ACT 2017 GENERAL VESTING DECLARATION No. 853 SHEET 10 of 11





HIGH SPEED RAIL (LONDON – WEST MIDLANDS) ACT 2017 GENERAL VESTING DECLARATION No. 853 SHEET 11 of 11



Mary Barraclough

From: HS2Injunction
Sent: 06 April 2023 20:22
To: Mark Keir; HS2Injunction

Subject: FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Item shared

with you: "Request to Vary.pdf" [DLAP-UKMATTERS.FID6569426]

Attachments: Request to Vary.pdf

Dear Mr Keir

Please see our email below timed at 19:01 today which we are re-sending to you due to having received a bounce-back.

We have removed the attachment which made the email exceed your email server's size limit (being the Judgment of Knowles J) and have instead inserted a link to that attachment within the body of the email below.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction <HS2Injunction@dlapiper.com>

Sent: 06 April 2023 19:01

To: Mark Keir ; HS2Injunction <HS2Injunction@dlapiper.com>

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Item shared with you: "Request to

Vary.pdf" [DLAP-UKMATTERS.FID6569426]

Dear Mr Keir

We refer to your submission of yesterday titled 'Request to Vary' (as attached), which we note was copied to the Court and to D6 (James Knaggs) and D66 (Caroline Thomson-Smith).

We note your suggestion that your submissions for the Review Hearing on 16 May 2023 will be substantial, like your submissions before Knowles J in May 2022 (which ran to circa 3000 pages), primarily on the basis of your view that the case requires evidence from over 10 years to be presented to the Court. In this regard we would refer you specifically to the following paragraphs of the Judgment of Knowles J ("Judgment") (a copy of which is available for reference here):

- Paragraphs 14 to 26 which address the fact that HS2 is the culmination of a democratic process and being built under specific powers granted by Parliament. The scheme was preceded by extensive consultation and detailed consideration in Parliament. In particular, we would refer you to paragraph 21 where Knowles J explicitly acknowledged yet disagreed with your submissions in this regard.
- Paragraph 70 where Knowles J reiterated in relation to your submissions that he was 'not concerned with the merits of HS2. Parliament has decided that question'.

- Paragraph 160 where Knowles J set out that 'the HS2 scheme is specifically authorised by the HS2 Acts...Parliament decided that the project was in the public interest'.
- Paragraph 183(a) where it is again highlighted by Knowles J that Parliament approved HS2.

The abovementioned paragraphs of the Judgment clearly demonstrate that the Judge has already made a finding that the HS2 Scheme has been authorised by Parliament, and that the Court is not therefore concerned with the rights or wrongs of the HS2 Scheme. Whilst the evidence filed by you in May 2022 was considered by Knowles J prior to him handing down the Judgment, his Judgment makes clear that any material relating to the merits of the HS2 Scheme is irrelevant to the issues which the Court is tasked with considering in relation to the Injunction Order.

At the Review Hearing, the Court will be considering the Injunction Order, and primarily whether to continue and/or extend and/or vary it. The Court will once again not be considering the merits of the HS2 Scheme. In line with paragraph 12 of the Directions Order, any statement of case and evidence upon which you seek to rely at the Review Hearing with a view to seeking to amend (including discharge) the Injunction Order or opposing the applications made by the Claimants should therefore seek to address those issues rather than the HS2 Scheme generally.

In relation to your comments that the Injunction Order of Knowles J was handed down in September not May; that the annual review should therefore take place in September; and that you had no idea there would be an annual review requirement prior to that date, the Injunction Order here clearly states at paragraph 15 that the Order will be reconsidered at a hearing to be listed on approximately a yearly basis between 15 and 31 May. You have therefore been on notice that the Review Hearing would be listed during that window since the Injunction Order was made on 20 September 2022.

As advised in our email to you timed at 17:37 on 31 March 2023 (and our earlier email of 27 March 2023 timed at 14:56), all documents relevant to the Review Hearing have been served on you (and all other currently Named Defendants) in accordance with the Directions Order, that is, by the Claimants uploading the same to: https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings.

In terms of the length of time afforded to you (and other Named Defendants) for filing and serving any evidence upon which you seek to rely in opposition to the applications made by the Claimants (the deadline for which being 4 pm on 11 April 2023), that deadline has been decided by the Court (not by the Claimants) as per paragraph 12 of the Directions Order which was served on you by email timed at 21:38 on 16 March 2023.

As the Court highlighted in its email to you timed at 14:48 yesterday, paragraph 25 of the Directions Order sets out the steps that need to be taken if a person wishes to apply to have the Directions Order set aside or varied. A formal application notice is required, but in any event, any such application needed to have been made within 7 days after the date on which the Directions Order was served on you (so by no later than 23 March 2023).

It is not within the Claimants' gift to grant you an additional period of time within which to prepare and file any submissions you wish to make in response to the Claimants' application.

Yours faithfully

DLA Piper UK LLP

From: Mark Keir (via Google Drive)

Sent: 05 April 2023 17:42

To: HS2Injunction < HS2Injunction@dlapiper.com>

Cc: qb.birmingham@justice.gov.uk;

Subject: Item shared with you: "Request to Vary.pdf"

EXTERNAL

2

Mark	k Keir shared an item	
Requ	Mark Keir () has shared the following item: Please find attached re Directions Order to QB-2022-BHM-000044	
This emai	il grants access to this item without logging in. Only forward it to people you trust.	
Ора		
You have i	LC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA received this email because shared a file or folder in Google Drive with you.	