

N244

# Application notice

For help in completing this form please read the notes for guidance form N244Notes.

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<b>Name of court</b> High Court of Justice  Business and Property Court  Property Trusts and Probate List		<b>Claim no.</b> PT-2022-000326
<b>Fee account no.</b> (if applicable)	<b>Help with Fees – Ref. no.</b> (if applicable)	
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<b>Warrant no.</b> (if applicable)		
<b>Claimant's name</b> (including ref.) (1) Essar Oil (UK) Limited; (2) Stanlow Terminals Limited; (3) Infranorth Limited		
<b>Defendant's name</b> (including ref.) See Continuation Sheet		
<b>Date</b>	5 May 2023	

1. What is your name or, if you are a legal representative, the name of your firm?

Squire Patton Boggs (UK) LLP

2. Are you a  Claimant  Defendant  Legal Representative

Other (please specify)

If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?

The Claimants seek an order in the terms set out in paragraph 1 of the draft order attached.

In summary, the Claimants seek an order granting the Claimants relief from sanctions for failing to comply with CPR 7.4(1)(b) in respect of service of the Particulars of Claim in these proceedings.

4. Have you attached a draft of the order you are applying for?  Yes  No

5. How do you want to have this application dealt with?  at a hearing  without a hearing

at a remote hearing

6. How long do you think the hearing will last?  Hours  Minutes

Is this time estimate agreed by all parties?  Yes  No

7. Give details of any fixed trial date or period

N/A

8. What level of Judge does your hearing need?

Deputy Judge or High Court Judge

9. Who should be served with this application?

See draft order

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

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

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

If necessary, please continue on a separate sheet.

We will be relying on the attached Fourth Witness Statement of David Christopher Holland dated 3 May 2023.

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

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

No

## Statement of Truth

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

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

### Signature



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

### Date

Day

05

Month

05

Year

2023

### Full name

David Christopher Holland

### Name of applicant's legal representative's firm

Squire Patton Boggs (UK) LLP

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

Partner

Applicant's address to which documents should be sent.

Building and street

6 Wellington Place

Second line of address

Town or city

Leeds

County (optional)

Postcode

L S 1 4 A P

If applicable

Phone number

0113 284 7000

Fax phone number

DX number

Your Ref.

DH4/ESS.036-0023

Email

david.holland@squirepb.com

IN THE HIGH COURT OF JUSTICE

Claim No: PT-2022-000326

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

PROPERTY TRUSTS AND PROBATE LIST

BETWEEN:

- (1) ESSAR OIL (UK) LIMITED
- (2) STANLOW TERMINALS LIMITED
- (3) INFRANORTH LIMITED

Claimants

- and -

(1) PERSONS UNKNOWN WHO IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN ENTER OR REMAIN, WITHOUT THE FIRST CLAIMANT’S CONSENT, ON THE FIRST CLAIMANT’S LAND AT STANLOW MANUFACTURING COMPLEX, ELLESMERE PORT, CH65 4HB SHOWN EDGED RED (SAVE FOR THE AREAS HATCHED BLUE AND ORANGE) ON THE ATTACHED ‘STANLOW PLAN’

(2) PERSONS UNKNOWN WHO IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN OBSTRUCT OR OTHERWISE INTERFERE WITH THE FIRST CLAIMANT’S ACCESS OVER AND ALONG THE ROAD SECTION SHOWN SHADED YELLOW ON THE ATTACHED ‘STANLOW PLAN’

(3) PERSONS UNKNOWN WHO IN CONNECTION WITH THE ‘EXTINCTION REBELLION CAMPAIGN’ OR THE ‘JUST STOP OIL CAMPAIGN’ OBSTRUCT THE VEHICULAR ENTRANCE AND EXIT TO STANLOW MANUFACTURING COMPLEX, ELLESMERE PORT, CH65 4HB, WHICH ARE SHOWN MARKED “A”, “B” AND “C” ON THE ATTACHED ‘STANLOW PLAN’

(4) PERSONS UNKNOWN WHO IN CONNECTION WITH THE ‘EXTINCTION REBELLION’ CAMPAIGN OR THE ‘JUST STOP OIL’ CAMPAIGN ENTER OR REMAIN, WITHOUT THE SECOND CLAIMANT’S CONSENT, ON THE SECOND CLAIMANT’S LAND AT (A) STANLOW MANUFACTURING COMPLEX, ELLESMERE PORT, CH65 4HB SHOWN HATCHED BLUE ON THE ATTACHED ‘STANLOW PLAN’ (B) TRANMERE OIL TERMINAL, ST PAUL’S ROAD, BIRKENHEAD SHOWN EDGED BLUE ON THE ATTACHED ‘TRANMERE PLAN’

(5) PERSONS UNKNOWN WHO IN CONNECTION WITH THE ‘EXTINCTION REBELLION CAMPAIGN’ OR THE ‘JUST STOP OIL CAMPAIGN’ OBSTRUCT THE VEHICULAR ENTRANCE AND EXIT TO TRANMERE OIL TERMINAL, ST

**PAUL'S ROAD, BIRKENHEAD WHICH IS SHOWN MARKED "A" ON THE  
'TRANMERE PLAN'**

**(6) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION  
REBELLION' CAMPAIGN OR THE 'JUST STOP OIL' CAMPAIGN ENTER OR  
REMAIN, WITHOUT THE THIRD CLAIMANT'S CONSENT, ON THE THIRD  
CLAIMANT'S LAND AT NORTHAMPTON OIL TERMINAL, 25 ST JAMES MILL  
ROAD, NORTHAMPTON NN5 5JN SHOWN EDGED RED (SAVE FOR THE AREAS  
EDGED BLUE) ON THE ATTACHED 'NORTHAMPTON PLAN'**

**(7) PERSONS UNKNOWN WHO IN CONNECTION WITH THE 'EXTINCTION  
REBELLION CAMPAIGN' OR THE 'JUST STOP OIL CAMPAIGN' OBSTRUCT  
THE VEHICULAR ENTRANCES OR EXITS TO NORTHAMPTON OIL  
TERMINAL, 25 ST JAMES MILL ROAD, NORTHAMPTON NN5 5JN SHOWN  
MARKED WITH AN "A" ON THE ATTACHED 'NORTHAMPTON PLAN'**

**Defendants**

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**CONTINUATION SHEET**

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