



- c. body-worn or vehicle camera footage.
4. The Claimant shall make any request in terms of paragraphs 3a, 3b and/or 3c above within 21 days of receipt of any documents disclosed pursuant to paragraph 1 of this Order.
5. Subject to the conditions of paragraph 6 below, the Respondent shall give disclosure of any documents and/or data described in paragraphs 3a, 3b and/or 3c as soon as reasonably practicable (and in any event within 28 days) following the receipt of a request made by the Claimant in accordance with paragraph 4 above.
6. In the event that the Respondent, acting reasonably, considers that the provision of any of the documents and/or data named within paragraph 3 may prejudice any ongoing criminal investigation or fall within the category of Public Interest Immunity ("PII"), the Respondent has the right to withhold provision of the documents and/or data or redact these accordingly, until such time (that is considered reasonable) when disclosure of the documents and/or data, will no longer prejudice any criminal investigation.
7. The Claimant agrees to meet the reasonable and proper costs of the Respondent in relation to compliance with the terms of this Order, if demanded, to be assessed if not agreed.
8. Without the permission of the Court, the Claimant shall make no use of any document disclosed by virtue of paragraphs 1 - 5 of this Order, other than one or more of the following uses:
  - a. applying to name and join any person as a named defendant to these proceedings and to serve the said person with any document in these proceedings;
  - b. investigating, formulating and pleading and prosecuting any claim within these proceedings arising out of any alleged disruptive protest at any of the Claimant's sites which are (or become) the subject of these proceedings;
  - c. use for purposes of formulating, pleading and prosecuting any application for committal for contempt of court against any person for breach of any order made within these proceedings.
9. Until further order, the address and address for service of any person who is added as a defendant to these proceedings shall be redacted in any copy of any document which is served other than by means of it being sent directly to that person or their legal representative.
10. A sealed copy of this Order shall be served by the Claimant/Applicant on the Respondent.

Dated this [            ] day of [            ] 2023

### **Service of this Order**

The Court has provided a sealed copy of this Order to solicitors for the Claimant/Applicant:

Eversheds Sutherland (International) LLP

Bridgewater Place

Water Lane

Leeds

LS11 5BZ

(Ref: OLDFIEA/SHELL)