

First Witness Statement
Party: Claimant
Exhibit: RL1
Date: 9 October 2024
Claim No: QB-2022-001420

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BETWEEN

SHELL U.K. OIL PRODUCTS LIMITED

Claimant

- and -

**PERSONS UNKNOWN DAMAGING, AND/OR BLOCKING THE USE OF OR ACCESS TO ANY
SHELL PETROL STATION IN ENGLAND AND WALES, OR TO ANY EQUIPMENT OR
INFRASTRUCTURE UPON IT, BY EXPRESS OR IMPLIED AGREEMENT WITH OTHERS, IN
CONNECTION WITH PROTEST CAMPAIGNS WITH THE INTENTION OF
DISRUPTING THE SALE OR SUPPLY OF FUEL TO OR FROM THE SAID STATION**

First Defendant

Louis McKechnie

Second Defendant

Louise Harris

Third Defendant

Callum Goode

Fourth Defendant

Christopher Ford

Fifth Defendant

Sean Jordan

(also known as Sean Irish, John Jordan, John Michael Jordan and Sean O'Rourke)

Sixth Defendant

Emma Ireland

Seventh Defendant

Charles Philip Laurie

Eighth Defendant

Michael Edward Davies also previously known as Michael Edward Jones

Ninth Defendant

Tessa-Marie Burns (also known as Tez Burns)

Tenth Defendant

Simon Reding

Eleventh Defendant

Kate Bramfit

Twelfth Defendant

Margaret Reid

Thirteenth Defendant

David Nixon

Fourteenth Defendant

Samuel Holland

Fifteenth Defendant

First Witness Statement of Rachel Lindberg

I, **Rachel Lindberg** of Eversheds Sutherland (International) LLP ("**Eversheds Sutherland**") of Water Lane, Leeds LS11 5DR **WILL SAY AS FOLLOWS**:

1. INTRODUCTION

- 1.1 I am a senior associate at Eversheds Sutherland and have conduct of this matter on behalf of the Claimant in the subject proceedings under the supervision of Alison Judith Oldfield (partner at Eversheds Sutherland).
- 1.2 Unless I state otherwise, the facts in this statement are within my knowledge and true. Where the facts are not within my knowledge, they are true to the best of my knowledge and belief, and I identify the source of my knowledge.
- 1.3 References to page numbers in this statement are to page numbers in **Exhibit RL1**.
- 1.4 The purpose of this short witness statement is to update the Court as to the status of investigations carried out by Surrey Police Force in respect of the Seventh, Eighth, Ninth and Tenth Defendants.
- 1.5 As set out in paragraph 2.7 of the Claimant's Re-Amended Particulars of Claim, Surrey Police Force has previously confirmed that the Seventh, Eighth, Ninth and Tenth Defendants were arrested in connection with the protest incident that occurred on 24 August 2022 (further details of which are set out in paragraph 2.5 of the Claimant's Re-Amended Particulars of Claim) and were subsequently granted conditional bail before being released under investigation in February 2023.
- 1.6 I wrote to Weightmans LLP ("**Weightmans**") who are the solicitors acting on behalf of Surrey Police Force on 12 March 2024 to (amongst other things) obtain an update on the investigation status of the Seventh to Tenth Defendants, including whether or not a trial date had been set. **[1-2/RL1]**

- 1.7 On 14 March 2024, Weightmans responded by email to confirm that there was a trial date of 12 August 2024 set down, but was not able to confirm whether it related to the Seventh to Tenth Defendants. **[3-5/RL1]**
- 1.8 On 19 September 2024, I wrote to Weightmans to obtain an update as to the outcome of the 12 August 2024 trial. **[6/RL1]**
- 1.9 On 1 October 2024, Weightmans confirmed by email that the trial (which included the Seventh to Tenth Defendants) had been vacated and relisted for 11 – 22 August 2025. No further information was provided. **[7/RL1]**
- 1.10 I responded to Weightmans by email on 3 October 2024, querying whether Surrey Police Force had any further information as to why the trial date was moved. **[9/RL1]**.
- 1.11 On 7 October 2024, Weightmans confirmed that Surrey Police do not have any further information setting out why the trial was vacated and relisted. **[10/RL1]**

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone 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.

R. Lindberg
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Rachel Lindberg

Dated: 9 October 2024