**Claim No: QB-2022-001241 (“Haven Claim”)**

**Claim No: QB-2022-001259 (“Tower Claim”)**

**Claim No: QB-2022-001420 (“Petrol Stations Claim”)**

**IN THE HIGH COURT OF JUSTICE**

**KINGS BENCH DIVISION**

**B E T W E E N :**

1. **Shell U.K. Limited**

**Claimant: (QB-2022-001241)**

1. **Shell International Petroleum Company Limited**

**Claimant (QB-2022-001259)**

1. **SHELL U.K. OIL PRODUCTS LIMITED**

**Claimant (QB-2022-001420)**

**- and –**

**PERSONS UNKNOWN AND ORS**

**[more fully described in the Relevant Claim Form]**

**Defendants**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**SUMMARY OF WITNESS EVIDENCE**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

|  |  |  |  |
| --- | --- | --- | --- |
| **STATEMENT**  | **CONTENT** | **DATE**  | **REFERENCE**  |
| **Current Review**  |
| Pritchard Gamble 2  | Evidence of continued risk and in support of renewal at all three sites  | 14.03.24 | Core Bundle 1/ tab 6 / p.227 |
| Ben Austin  | Evidence of continued risk and in support of renewal at Shell Petrol Stations  | 14.03.24  | Core Bundle 1 / tab 4 / p.50 |
| Oldfield 2 | General statement including reference to evidence in support of renewal application  | 19.04.23 | Previous Service Bundle 4 / tab 28 / p. 2267 |
| **April 2023 Review – led to *Orders of Hill J* dated 23.5.23** [Core Bundle 1: tab 8 / p.1020 (Haven); tab 9, p.1031(Tower); tab 10, p. 1042 (Petrol Stations)]  |
| Pritchard Gamble 1 | Evidence of continued risk and in support of renewal at all three sites | 30.03.23 | Previous Renewal Bundle 1/ tab 39/ p. 3063 |
| Fay Lashbrook  | Evidence in support of renewal at Shell Haven  | 30.03.23  | Previous Renewal Bundle 2/ tab 41/ p.4044 |
| Keith Garwood  | Evidence in support of renewal at Shell Tower  | 30.03.23 | Previous Renewal Bundle 2 / tab 43 /p. 4339 |
| Ben Austin  | Evidence in support of renewal at Shell Petrol Stations  | 30.03.23 | Previous Renewal Bundle 3 / tab 45 /p. 4457 |
| **Original Injunction Applications in April and May 2022, led to *Orders of**** ***Sweeting J dated 15.4.22*** (Haven) and (Tower) [Misc. Bundle 2 / tabs 107, 108]
* ***Bennathan J dated 3.5.22*** (Haven) and (Tower) [Misc. Bundle 2 / tabs 110, 111]
* ***McGowan J dated 5.5.22***(Petrol Stations)[Misc. Bundle 2 / tab 112]
* ***Johnson J******dated 17.5.22***(Petrol Stations) [Misc. Bundle 2 / tab 113]
 |
| Austin  | Evidence in support of continuation of injunction at Shell Petrol Stations for hearing on return date  | 10.05.22  | Previous Renewal Bundle 4 / tab 47/ p. 4785 |
| Austin  | Evidence in support of injunction at Shell Petrol Stations  | 03.05.22  | Previous Renewal Bundle 4 / tab 48/ p. 4879 |
| Emma Pinkerton  | Evidence in support of initial Injunctions for Tower and Haven  | 04/22  | Previous Renewal Bundle 5 / tab 61/ p. 5126 |
| Pinkerton  | Evidence in support of initial Injunctions for Tower and Haven  | 14.04.22  | Previous Renewal Bundle 7 / tab 63/5317 |
| Garwood  | Evidence in support of continuation of injunction at Shell Tower for hearing on return date  | 22.04.22  | Previous Renewal Bundle 5 / tab 55/ p. 4967 |
| Garwood  | Evidence in support of initial injunction at Shell Tower  | 14.04.22  | Previous Renewal Bundle 7 / tab 65/ p. 5454 |
| Brown  | Evidence in support of continuation of injunction at Shell Haven for hearing on return date  | 22.04.22  | Previous Renewal Bundle 5 / tab 53/p. 4930 |
| Brown  | Evidence in support of initial injunction at Shell Haven  | 13.04.22  | Previous Renewal Bundle 7 / tab 67/ p. 5547 |
| **Evidence of Service**  |
| Oldfield 9 | Service of Notice of hearing, AJO8 and Hearing/Supplemental Bundle  | 15.04.24  | Supplemental Bundle / tab 16 / p. 472 |
| Oldfield 8 | Service of Pritchard Gamble 2, Austin 4, Oldfield 7, Re-Amended Claim Form, PoC, Order of Soole J. Evidence in support of application for retrospective endorsement of steps taken to effect service and for a variation of service provisions in Petrol Stations Claim.  | 11.04.24  | Supplemental Bundle / tab 10 / p. 68 |
| Oldfield 7 | Service of Soole J Order 13/3/24 | 14.03.24  | Previous Service Bundle 1 / tab 16 / p. 1083 |
| Oldfield 6  | Service of April 2023 Orders of Hill J  | 12.03.24  | Previous Service Bundle 1 / tab 16 / p. 18 / p. 1148 |
| Oldfield 3  | Dealing with 50% threshold of notices for deemed service at Petrol Stations  | 10.10.23  | Previous Service Bundle 2 / tab 24 / p.1758 |
| Pinkerton  | Further evidence of service of application docs and proceedings in Petrol Stations claim | 10.05.22  | Previous Service Bundle 7 / tab 35/ p.3016 |
| Pinkerton  | Evidence of service of proceedings and any Order at Shell Petrol Stations  | 03.05.22 | Previous Renewal Bundle 5 / tab 51/ p.4919 |
| Pinkerton  | Evidence of service of documents following grant of injunction for Shell Tower  | 22.04.22  | Previous Renewal Bundle 5 / tab 59/ p.5086 |
| Pinkerton  | Evidence of service of documents following grant of injunction for Shell Haven  | 22.04.22  | Previous Renewal Bundle 5 / tab 57/ p.5045 |
| **Evidence of other matters**  |
| Oldfield 5  | Chronology of steps to progress matter to trial, for joinder and directions to trial  | 07.03.24  | Previous Service Bundle 1 / tab 20 / p.1488 |
| Oldfield 4 | In support of joinder and directions for trial  | 12.02.24  | Previous Service Bundle 2 / tab 22 / p. 1639 |
| Oldfield 3  | In support of police disclosure  | 19.04.23 | Previous Service Bundle 4 / tab 26/ p. 2017 |
| Oldfield 1 | Deals with ownership of sites (March 2023) | 29.03.23  | Previous Service Bundle 6 / tab 30 / p. 2616 |
| Pinkerton  | Police disclosure application for all Sites  | 06.10.22  | Previous Service Bundle 7 / tab 33 / p. 2962 |