

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

Exhibit RL1 to the First Witness Statement of Rachel Lindberg

This is Exhibit **RL1** referred to in the first witness statement of **Rachel Lindberg** on behalf of the Claimant.

Signed: *R. Lindberg*

Name: Rachel Lindberg

Dated: 9 October 2024

Weightmans LLP
100 Old Hall Street
Liverpool
L3 9QJ

Date: 12 March 2024
Our Ref: 356009-000001
Email: shell.service@eversheds-sutherland.com

BY EMAIL ONLY TO joanna.carty@weightmans.com

Dear Weightmans LLP

Shell U.K Oil Products Limited v Persons Unknown (Claim No: QB-2022-0001420)

As you are aware, we act for the Claimant in the above proceedings. You act on behalf of the Chief Constable of Surrey Police and we refer to our previous correspondence in relation to these proceedings and, specifically your letters dated 6 July 2023 and 14 July 2023 (copies of which we have enclosed for ease of reference).

Our client has now made its application to join certain individuals to proceedings and that application was part-heard at a hearing before Soole J yesterday (11 March 2024). The hearing has been adjourned until Friday at 3pm and the Judge has asked our client to provide updated particulars of claim in anticipation of joining certain individuals to the proceedings.

Our client is therefore in the process of updating its particulars of claim. In order to assist with that process, it would greatly assist if you/your client is able to provide an update / clarification as to the following matters:

1. April 2022 – Cobham

- 1.1 In your letter 14 July 2023, you confirmed that Mr Goode and Mr Ford (amongst others) were convicted. Please could you confirm:
- 1.1.1 the offence(s) that Mr Goode and Mr Ford were convicted of (we suspect the offence is aggravated trespass based on the custody records already provided but would be grateful for your / your client's specific confirmation on this point);
 - 1.1.2 whether they pleaded guilty; and
 - 1.1.3 details of the sentences handed down.

2. August 2022 – Cobham

- 2.1 Your letter dated 6 July 2023 helpfully provided an update as to the investigation status of those individuals connected with the incident at Cobham on 24 August 2022.
- 2.2 Accordingly, we should be grateful for any update in respect of the investigation status (i.e. whether a trial date has been set) in respect of each of the following individuals:
- 2.2.1 Emma Ireland

cloud_uk\225350054\1\lindber

Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales (number OC304065), registered office One Wood Street, London EC2V 7WS. Authorised and regulated by the Solicitors Regulation Authority (SRA number 383181). A list of the members' names and their professional qualifications is available for inspection at the above office.

Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities under Eversheds Sutherland. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.

- 2.2.2 Charles Philip Laurie
- 2.2.3 Michael Davies
- 2.2.4 Tessa-Marie Burns

With apologies for the urgency, but our client has been asked by the Judge to submit its proposed amended particulars of claim by 4pm Thursday 14 March 2024. It would be very much appreciated if the above could be provided by close of play tomorrow (**13 March 2024**) if at all possible.

Yours faithfully

Eversheds Sutherland (International) LLP

Eversheds Sutherland (International) LLP

Lindberg, Rachel

From: Lindberg, Rachel <RachellLindberg@eversheds-sutherland.com>
Sent: 19 September 2024 12:24
To: Joanna Carty
Cc: Oldfield, Alison; Lindberg, Rachel
Subject: FW: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-0001420) [ES-CLOUD_UK.FID11570719]
Attachments: Letter to Weightmans 19 September 2024 - update on criminal trials.pdf; Letter to Weightmans 12 March 2024 requesting update for Amending PoC.pdf

This message originated from outside our organisation and was sent to Joanna Carty. The sender name was Lindberg, Rachel and the sender's email address was rachellindberg@eversheds-sutherland.com

Dear Jo

Please see attached correspondence.

Kind regards

Rachel Lindberg | Associate | Real Estate Dispute Resolution | Eversheds Sutherland

E: RachellLindberg@eversheds-sutherland.com

T: +44 113 200 4093

[Rachel Lindberg | LinkedIn](#)

www.eversheds-sutherland.com

Eversheds Sutherland

Client Commitment. Innovative Solutions. Global Service.

From: Joanna Carty <Joanna.Carty@Weightmans.com>
Sent: Thursday, March 14, 2024 8:09 AM
To: Lindberg, Rachel <RachellLindberg@eversheds-sutherland.com>
Subject: RE: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-0001420)

Dear Rachel,

Further to our email correspondence, my client has reviewed and can confirm the following:

April 2022 –Cobham

GOODE– ‘Obstruct / disrupt person engaged in a lawful activity’

12 month Conditional Discharge

Costs to the Court £226

FORD– ‘Obstruct / disrupt person engaged in a lawful activity’

Fine – £100

Costs to the court– £119

They cannot see from their systems whether the two individuals pleaded guilty or not.

August 2022 – Cobham

There is a trial date of the 12th August 2024 but they can't confirm whether it relates to the four individuals as the system just details the trial rather than the individuals who are being dealt with. This more detailed information is likely to be with the CPS and as such we won't be able to clarify the information requested within the current timescales.

Kind regards

Jo

Joanna Carty
Principal Associate
Weightmans LLP

My pronouns are: She/her



Tel: 0116 253 9747 /ext 128908

DDI: 0116 242 8908

joanna.carty@weightmans.com

<https://www.weightmans.com>

146 specialism rankings and 453 individual rankings in Chambers and Legal 500



Please note that our central postal address for all offices is 100 Old Hall Street, Liverpool, L3 9QJ.

Please consider our environment and send correspondence by email where possible. Only if absolutely necessary send correspondence by hard copy. Also consider whether you need to print this message.

If you are serving proceedings via the Damages Claim Portal please ensure you use dcp@weightmans.com as the defendant solicitor's email address.

For all other types of proceedings we will accept service of proceedings electronically if proceedings are sent to serviceofproceedings@weightmans.com

"Weightmans" is the collective name under which Weightmans LLP and Weightmans (Scotland) LLP provide legal and other services to clients.

Weightmans LLP is a limited liability partnership registered in England & Wales with registered number OC326117 and its registered office at 100 Old Hall Street, Liverpool L3 9QJ. A full list of members is available at the registered office. The term "partner", if used, denotes a member of Weightmans LLP or a senior employee of Weightmans LLP with equivalent standing and qualifications. Authorised and regulated by the Solicitors Regulation Authority. SRA number:

463329. This email is CONFIDENTIAL and LEGALLY PRIVILEGED. If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone. Please contact the sender if you believe you have received this email in error. More information about Weightmans LLP can be found at www.weightmans.com including details of all members.

Fair Processing Notice

Weightmans process personal data for the purposes of our business in providing our services and as part of the claims resolution process and/or in connection with assisting detection/ prevention of fraud. We also process personal data in anonymised form for statistical and/or insurance and/or legal advice purposes. For further information about how Weightmans process data please see our website privacy notice at www.weightmans.com/privacy-notice
Pour voir ce pied de page en français, cliquez [ici](#)
Para ver este pie de página en español, haga clic [aquí](#)

Cyber crime and fraud alert

Please be aware that we do not send notifications of changes to our bank details by email. Fraudsters have been impersonating law firms and some clients of law firms have been tricked into forwarding monies to them. If you receive an email that appears to come from us, providing different bank details to the ones we supplied at the outset of the matter or indicating a change in our bank details, please contact the fee earner dealing with your matter by telephone immediately. Do not reply to the email or act on any information contained in it. We will not accept responsibility if you transfer money into an incorrect account. Nothing in this email can be considered to create a binding contract

Terms and conditions of business

Our standard terms of business apply to every retainer we enter into. They can be accessed on our website at <https://www.weightmans.com/media/m4dhyjwo/weightmans-terms-conditions.pdf>

This email is sent for and on behalf of Eversheds Sutherland (International) LLP

Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales, (number OC304065), registered office One Wood Street, London, EC2V 7WS. Registered VAT number GB820704559. A list of names of the members (who are referred to as "partners") together with a list of those non-members who are designated as partners and their professional qualifications is available for inspection at the above office. Eversheds Sutherland (International) LLP is authorised and regulated by the Solicitors Regulation Authority (SRA number 383181) and governed by the SRA Standards and Regulations (see <https://www.sra.org.uk/solicitors/standards-regulations>). Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. Each Eversheds Sutherland entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Eversheds Sutherland entity. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.

Confidentiality: This email and its attachments are intended solely for the person to whom they are addressed, are strictly confidential and may contain privileged information. If they have come to you in error you must not copy or show them to anyone; please reply to this email and highlight the error to the sender and then immediately delete the message. Unless expressly agreed in writing, Eversheds Sutherland (International) LLP accepts no liability to persons other than clients of the firm in respect of the contents of emails or attachments.

We process your personal data in accordance with our Privacy Notice, www.eversheds-sutherland.com/privacy. If you have any queries or would like to exercise any of your rights in relation to your personal data, please contact dataprotectionoffice@eversheds-sutherland.com.

Cybercrime notification: Our bank account details will NOT change during the course of a transaction. Please speak to us before transferring any money. We will not take responsibility if you transfer money to an incorrect bank account. If you receive an email from Eversheds Sutherland (International) LLP requesting your bank details or purporting to amend our bank details, please contact us, or your solicitor, as appropriate, by telephone immediately to clarify.

www.eversheds-sutherland.com

Weightmans LLP
100 Old Hall Street
Liverpool
L3 9QJ

Date: 19 September 2024
Our Ref: 356009-000001
Email: shell.service@eversheds-sutherland.com

BY EMAIL ONLY TO joanna.carty@weightmans.com

Dear Weightmans LLP

Shell U.K Oil Products Limited v Persons Unknown (Claim No: QB-2022-0001420)

As you are aware, we act for the Claimant in the above proceedings. You act on behalf of the Chief Constable of Surrey Police and we refer to previous correspondence in relation to these proceedings and, specifically our letter of 12 March 2024 and your email of 14 March 2024 timed at 8:09am (copies of which we have enclosed for ease of reference).

The above proceedings are listed for final hearing in a two-day window from 21 October 2024. In order to prepare for the final hearing, our client is considering whether it needs to submit further witness evidence to update the Court on the outcome of the investigation status of the following individuals:

- 1.1.1 Emma Ireland
- 1.1.2 Charles Philip Laurie
- 1.1.3 Michael Davies
- 1.1.4 Tessa-Marie Burns

You will recall that a trial date of 12 August 2024 was set (albeit we appreciate that your client's system did not detail which individuals the trial related to). Given that date has now passed, is your client able to confirm the outcome of the trials / provide any further update as to the status of the investigation for each of the above individuals?

We should be grateful if this information could be provided within 14 days of this letter (i.e. by no later than 3 October 2024), if at all possible.

Yours faithfully

Eversheds Sutherland (International) LLP

Eversheds Sutherland (International) LLP

cloud_uk\232972041\1\lindber

Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales (number OC304065), registered office One Wood Street, London EC2V 7WS. Authorised and regulated by the Solicitors Regulation Authority (SRA number 383181). A list of the members' names and their professional qualifications is available for inspection at the above office.

Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities under Eversheds Sutherland. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.

Lindberg, Rachel

From: Joanna Carty <Joanna.Carty@Weightmans.com>
Sent: 01 October 2024 16:38
To: Lindberg, Rachel
Cc: Oldfield, Alison
Subject: RE: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-0001420) [ES-CLOUD_UK.FID11570719]
Attachments: FW Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-0001420) [ES-CLOUD_UK.FID11570719]

Dear Rachel,

Further to your attached correspondence my client has confirmed that the trial on 12 August 2024 (which included Emma Ireland, Charles Philip Laurie, Michael Davies and Tessa – Marie Burns) was vacated and relisted for 11 –22 August 2025.

Kind regards

Jo

Joanna Carty
Principal Associate
Weightmans LLP

My pronouns are: She/her



Tel: 0116 253 9747 /ext 128908

DDI: 0116 242 8908

joanna.carty@weightmans.com

<https://www.weightmans.com>

146 specialism rankings and 453 individual rankings in Chambers and Legal 500



Please note that our central postal address for all offices is 100 Old Hall Street, Liverpool, L3 9QJ.

Please consider our environment and send correspondence by email where possible. Only if absolutely necessary send correspondence by hard copy. Also consider whether you need to print this message.

If you are serving proceedings via the Damages Claim Portal please ensure you use dcp@weightmans.com as the defendant solicitor's email address.

For all other types of proceedings we will accept service of proceedings electronically if proceedings are sent to serviceofproceedings@weightmans.com

"Weightmans" is the collective name under which Weightmans LLP and Weightmans (Scotland) LLP provide legal and other services to clients.

Weightmans LLP is a limited liability partnership registered in England & Wales with registered number OC326117 and its registered office at 100 Old Hall Street, Liverpool L3 9QJ. A full list of members is available at the registered office. The term "partner", if used, denotes a member of Weightmans LLP or a senior employee of Weightmans LLP with equivalent standing and qualifications. Authorised and regulated by the Solicitors Regulation Authority. SRA number: 463329. This email is CONFIDENTIAL and LEGALLY PRIVILEGED. If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone. Please contact the sender if you believe you have received this email in error. More information about Weightmans LLP can be found at www.weightmans.com including details of all members.

Fair Processing Notice

Weightmans process personal data for the purposes of our business in providing our services and as part of the claims resolution process and/or in connection with assisting detection/ prevention of fraud. We also process personal data in anonymised form for statistical and/or insurance and/or legal advice purposes. For further information about how Weightmans process data please see our website privacy notice at www.weightmans.com/privacy-notice

Pour voir ce pied de page en français, cliquez [ici](#)

Para ver este pie de página en español, haga clic [aquí](#)

Cyber crime and fraud alert

Please be aware that we do not send notifications of changes to our bank details by email. Fraudsters have been impersonating law firms and some clients of law firms have been tricked into forwarding monies to them. If you receive an email that appears to come from us, providing different bank details to the ones we supplied at the outset of the matter or indicating a change in our bank details, please contact the fee earner dealing with your matter by telephone immediately. Do not reply to the email or act on any information contained in it. We will not accept responsibility if you transfer money into an incorrect account. Nothing in this email can be considered to create a binding contract

Terms and conditions of business

Our standard terms of business apply to every retainer we enter into. They can be accessed on our website at <https://www.weightmans.com/media/m4dhyjwo/weightmans-terms-conditions.pdf>

Lindberg, Rachel

From: Lindberg, Rachel
Sent: 03 October 2024 09:26
To: Joanna Carty
Cc: Oldfield, Alison; Lindberg, Rachel
Subject: RE: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-0001420) [ES-CLOUD_UK.FID11570719]

Dear Jo

Many thanks indeed for the below. Does your client have any further information as to why the trial was vacated and relisted?

Thanks

Kind regards

Rachel Lindberg | Senior Associate | Real Estate Dispute Resolution | Eversheds Sutherland

E: RachelLindberg@eversheds-sutherland.com

T: +44 113 200 4093

[Rachel Lindberg | LinkedIn](#)

www.eversheds-sutherland.com

Eversheds Sutherland

Client Commitment. Innovative Solutions. Global Service.

Lindberg, Rachel

From: Joanna Carty <Joanna.Carty@Weightmans.com>
Sent: 07 October 2024 16:33
To: Lindberg, Rachel
Subject: RE: Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-0001420) [ES-CLOUD_UK.FID11570719]
Attachments: RE Shell U.K. Oil Products Limited v Persons Unknown (QB-2022-0001420) [ES-CLOUD_UK.FID11570719]

Hi Rachel,

I have received a response from my client and there isn't anything they can see from their systems setting out why the trial was vacated and relisted. I can only assume therefore that the reason is on the CPS file which my client wouldn't have access to.

Kind regards

Jo

Joanna Carty
Principal Associate
Weightmans LLP

My pronouns are: She/her



Tel: 0116 253 9747 /ext 128908

DDI: 0116 242 8908

joanna.carty@weightmans.com

<https://www.weightmans.com>

146 specialism rankings and 453 individual rankings in Chambers and Legal 500



Please note that our central postal address for all offices is 100 Old Hall Street, Liverpool, L3 9QJ.

Please consider our environment and send correspondence by email where possible. Only if absolutely necessary send correspondence by hard copy. Also consider whether you need to print this message.

If you are serving proceedings via the Damages Claim Portal please ensure you use dcp@weightmans.com as the defendant solicitor's email address.

For all other types of proceedings we will accept service of proceedings electronically if proceedings are sent to serviceofproceedings@weightmans.com

"Weightmans" is the collective name under which Weightmans LLP and Weightmans (Scotland) LLP provide legal and other services to clients.

Weightmans LLP is a limited liability partnership registered in England & Wales with registered number OC326117 and its registered office at 100 Old Hall Street, Liverpool L3 9QJ. A full list of members is available at the registered office. The term "partner", if used, denotes a member of Weightmans LLP or a senior employee of Weightmans LLP with equivalent standing and qualifications. Authorised and regulated by the Solicitors Regulation Authority. SRA number: 463329. This email is CONFIDENTIAL and LEGALLY PRIVILEGED. If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone. Please contact the sender if you believe you have received this email in error. More information about Weightmans LLP can be found at www.weightmans.com including details of all members.

Fair Processing Notice

Weightmans process personal data for the purposes of our business in providing our services and as part of the claims resolution process and/or in connection with assisting detection/ prevention of fraud. We also process personal data in anonymised form for statistical and/or insurance and/or legal advice purposes. For further information about how Weightmans process data please see our website privacy notice at www.weightmans.com/privacy-notice

Pour voir ce pied de page en français, cliquez [ici](#)

Para ver este pie de página en español, haga clic [aquí](#)

Cyber crime and fraud alert

Please be aware that we do not send notifications of changes to our bank details by email. Fraudsters have been impersonating law firms and some clients of law firms have been tricked into forwarding monies to them. If you receive an email that appears to come from us, providing different bank details to the ones we supplied at the outset of the matter or indicating a change in our bank details, please contact the fee earner dealing with your matter by telephone immediately. Do not reply to the email or act on any information contained in it. We will not accept responsibility if you transfer money into an incorrect account. Nothing in this email can be considered to create a binding contract

Terms and conditions of business

Our standard terms of business apply to every retainer we enter into. They can be accessed on our website at <https://www.weightmans.com/media/m4dhyjwo/weightmans-terms-conditions.pdf>