

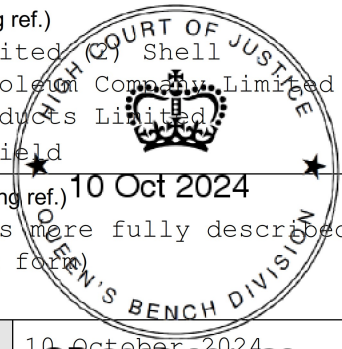
N244

Application notice

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

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

| | | |
|---|---|--|
| Name of court High Court Of Justice King's Bench Division | | Claim no. QB-2022-001241/ 001259/001420 |
| Fee account no. (if applicable) | Help with Fees – Ref. no. (if applicable) | |
| | H W F - [] [] [] - [] [] [] | |
| Warrant no. (if applicable) | | |
| Claimant's name (including ref.) (1) Shell U.K. Limited (2) Shell International Petroleum Company Limited (3) Shell U.K. Oil Products Limited 356009.000001/Oldfield | | |
| Defendant's name (including ref.) Persons Unknown (as more fully described in the relevant claim form) | | |
| Date | 10 October 2024 QB-2022-001420 | |



Sub Event ID: 116

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

Eversheds Sutherland (International) LLP

2. Are you a Claimant Defendant Legal Representative

Other (please specify)

If you are a legal representative whom do you represent?

Claimants

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

1. The Claimants to continue to have permission to serve documents by alternative means pursuant to CPR6.15, CPR 6.27 and CPR 81.4(c) in accordance with the terms of previous orders granted in each of these proceedings
 2. To grant the Claimant in QB-2022-001420 permission to remove the Third Defendant (Harris) from proceedings pursuant to CPR r.19(4)(1), (11) and upon the Third Defendant having provided an undertaking that she will not breach the terms of the injunction.
 3. The Claimant in QB-2022-001420 be granted permission to amend the Re-Amended Claim Form and Re-Amended Particulars of Claim to strike out Ms Harris as the Third Defendant.

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

To be considered at the final hearing currently listed to take place for 1.5 days on 21/22 October 2024

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

Defendants in each claim

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

Please see Schedule of email addresses in draft order provided with this application

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.

1. The Claimants have been given permission to serve documents in these proceedings by alternative means. The Claimants apply for continued permission to serve documents by those alternative means (including any final injunction order) and in a manner that is consistent with previous orders of the Court.

2. On 26 September 2026 the Third Defendant (Harris) in the claim QB-2022-001420 provided a signed undertaking confirming that she will not engage in conduct that will breach the terms of the injunction. A copy of the signed undertaking is at Annex 1 to this application. The Claimant accordingly seeks to remove the Third Defendant from the claim.

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

Alison Oldfield

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

10

Month

10

Year

2024

Full name

Alison Oldfield

Name of applicant's legal representative's firm

Eversheds Sutherland (Intl) 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

Bridgewater Place, Water Lane

Second line of address

Town or city

Leeds

County (optional)

Postcode

L S 1 1 5 D R

If applicable

Phone number

020 7497 9797

Fax phone number

020 7919 4919

DX number

DX 12027 Leeds - 27

Your Ref.

356009.000001/Oldfield

Email