



Claim Form

Re-amended pursuant to the order of the Honourable
Mr Justice Soole dated 30 June 2026

You may be able to issue your claim online which
may save time and money. Go to www.moneyclaims.service.gov.uk/make-claim to find out more.

In the

High Court of Justice
King's Bench Division

Fee Account no.

PBA 0087211

Help with Fees - Ref no. (if applicable)

H W F - - - - -

For court use only

Claim no.

KB-2024-002317

Issue date

Claimant(s) name(s) and address(es) including postcode

- (1) LEEDS BRADFORD AIRPORT LIMITED of Leeds Bradford Airport, Whitehouse Lane,
Leeds, United Kingdom, LS19 7TU
(2) LONDON LUTON AIRPORT OPERATIONS LIMITED of Percival House 134 Percival
Way, London Luton Airport, Luton, United Kingdom, LU2 9NU
(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED of Woolsington, Newcastle Upon
Tyne, NE13 8BZ
(4) NIAL SERVICES LIMITED of Unit 1, Prestwick Industrial Est., Ponteland,
Newcastle Upon Tyne, NE20 9DA

Defendant(s) name and address(es) including postcode

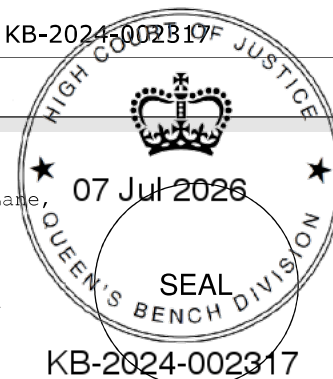
Please refer to Schedule 1 attached to the Claim Form

Brief details of claim

The Claimants seek an injunction to restrain the Defendants from acts of trespass
and/or private nuisance and/or public nuisance on the land edged red on Plans 1-3.

Value

This is a non-monetary claim



Date of Issue:
16-07-2024

Defendant's
name and
address
for service
including
postcode

£

Amount claimed	
Court fee	626.00
Legal representative's costs	TBC
Total amount	

Claim no.	
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You must indicate your preferred County Court Hearing Centre for hearings here
(see notes for guidance)

King's Bench Division, The Royal Courts of Justice, Strand, London WC2A 2LL

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

Does, or will, your claim include any issues under the Human Rights Act 1998?

- ☒ Yes
☐ No

Claim no.	
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Particulars of Claim

☒ attached

☐ to follow

Statement of truth

Note: you are reminded that a copy of this claim form must be served on all other parties.

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 this claim form and any attached sheets are true.
- ☒ **The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

Signature



- ☐ Claimant
- ☐ Litigation friend (where claimant is a child or protected party)
- ☒ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

7

Month

July

Year

2026

Full name

Alexander James Wright

Name of claimant's legal representative's firm

Eversheds Sutherland (Intl) LLP

If signing on behalf of firm or company give position or office held

Legal Director

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

Two New Bailey, 6 Stanley Street

Second line of address

Town or city

Salford

County (optional)

Postcode

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If applicable

Phone number

020 7497 9797

DX number

DX 14344 Manchester

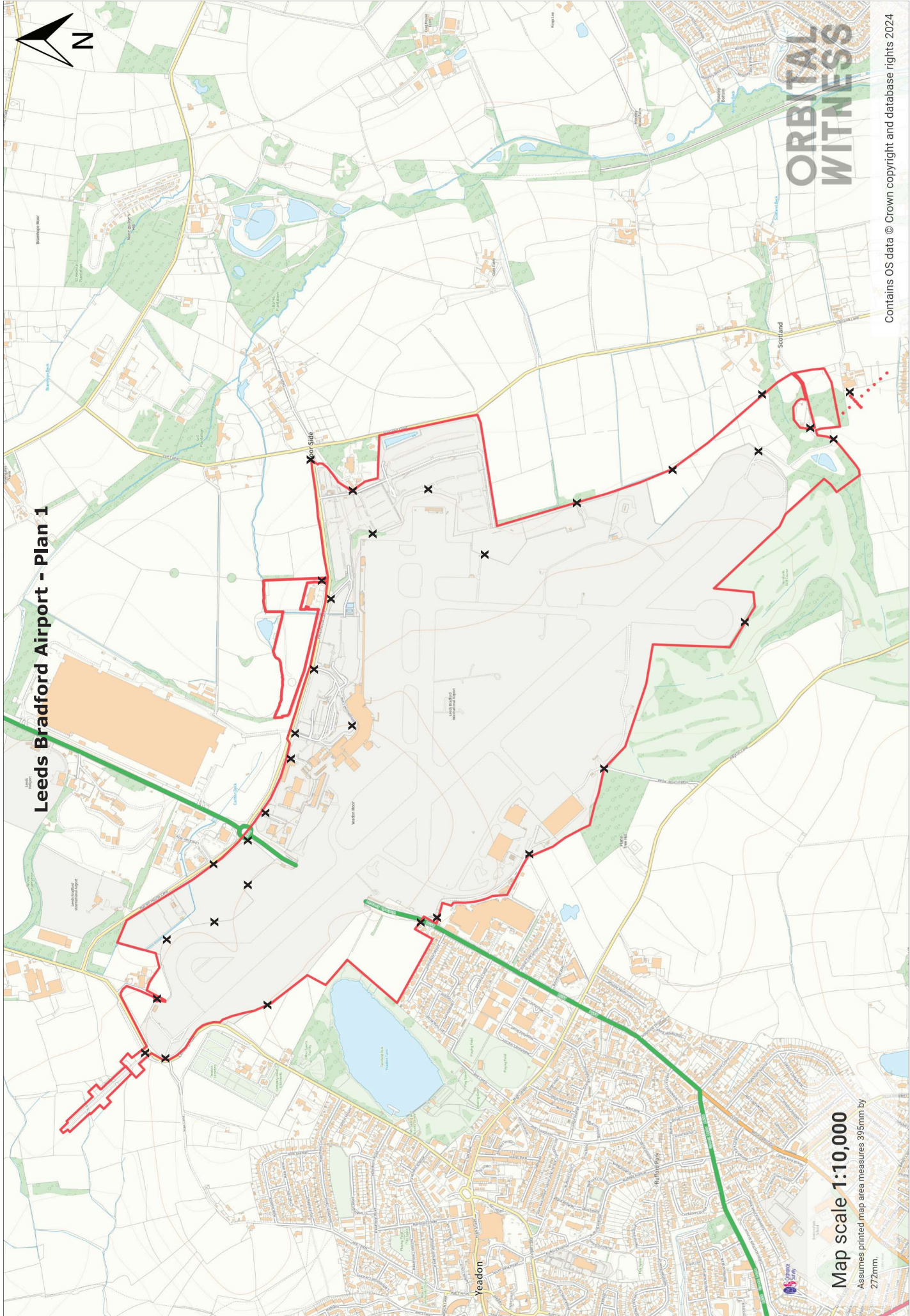
Your Ref.

WRIGHTAX/292659.000057

Email

SCHEDULE 1 TO THE CLAIM FORM

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST~~ING~~ ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)
- (2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST~~ING~~ ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT LONDON LUTON AIRPORT SHOWN EDGED RED ON PLAN 2 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)
- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST~~ING~~ ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM ~~OR ON ANY FLIGHT THEREFROM~~ (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT OR WEALTH INEQUALITY ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR THE TAKE BACK POWER CAMPAIGN OR OTHERWISE)



Leeds Bradford Airport - Plan 1

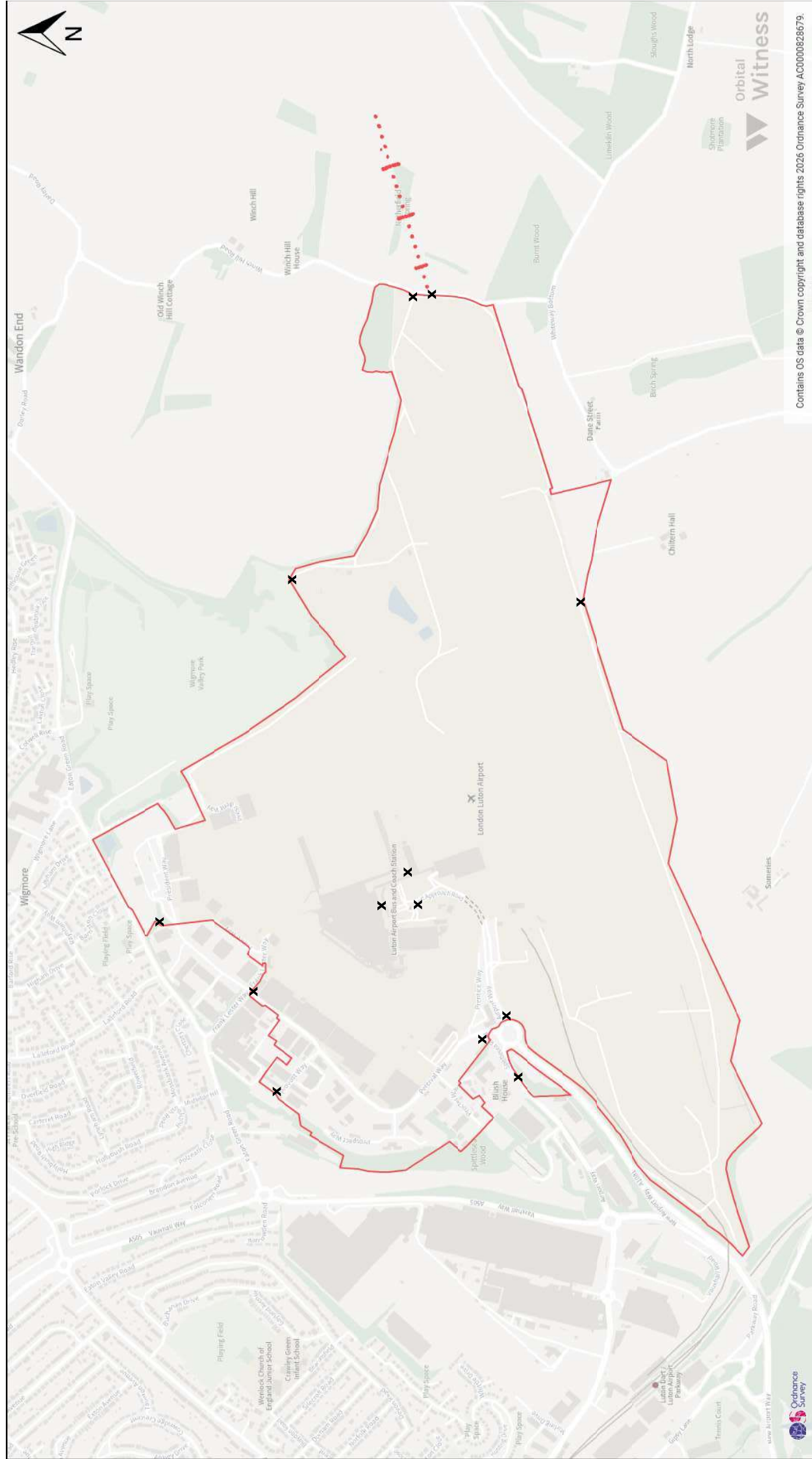
ORBITAL
WITNESS

Map scale 1:10,000

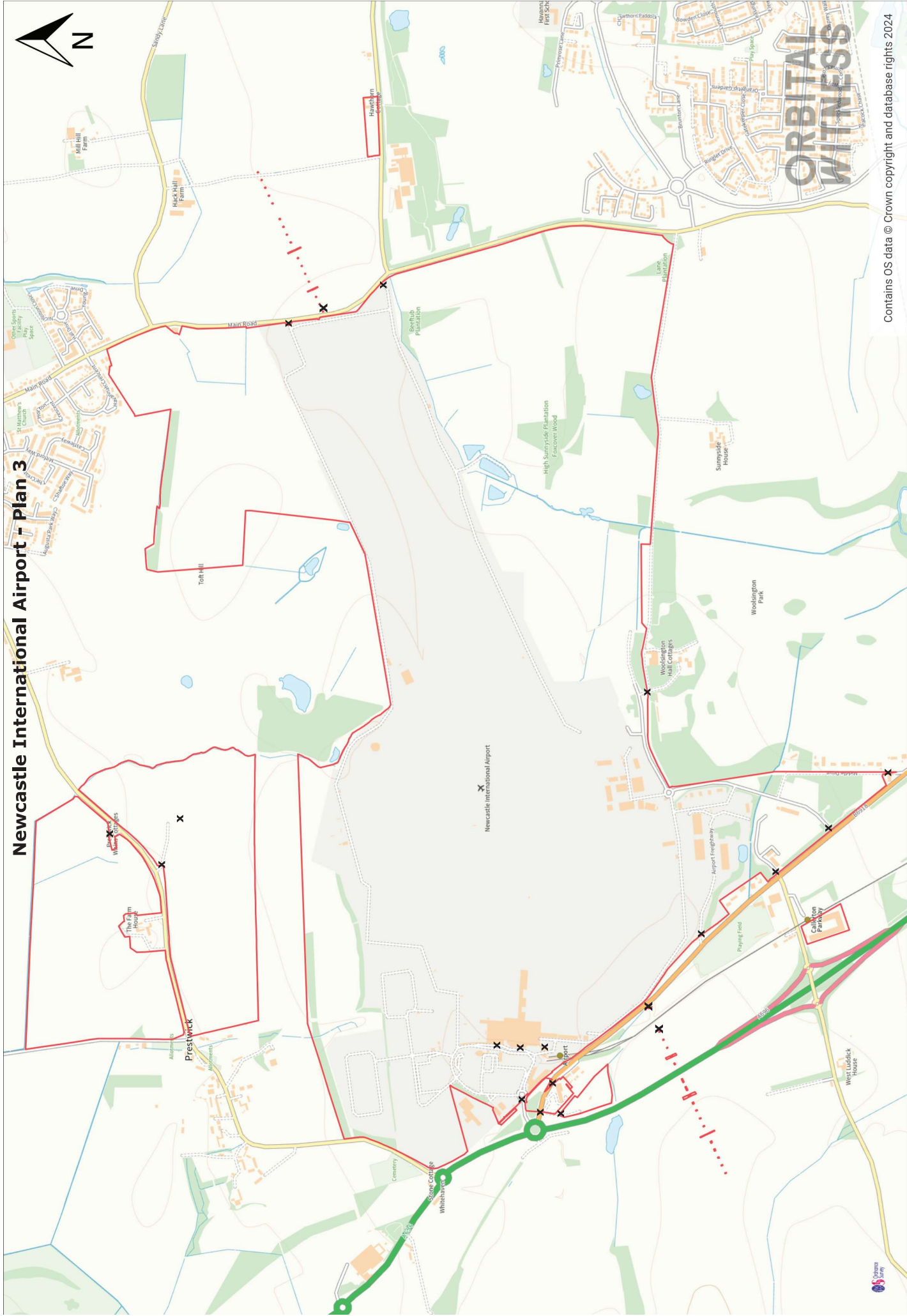
Assumes printed map area measures 395mm by 272mm.

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London Luton Airport - Plan 2



Newcastle International Airport - Plan 3



ORBITAL
WITNESS