

AS VARIED BY COURT OF APPEAL ORDER DATED 3 APRIL 2019

**IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION**

B E T W E E N



HC-2017-002125

(1) INEOS UPSTREAM LIMITED

First Claimant/Applicant

(2) INEOS 120 EXPLORATION LIMITED

Second Claimant/Applicant

(3) INEOS PROPERTIES LIMITED

Third Claimant/Applicant

(4) INEOS INDUSTRIES LIMITED

Fourth Claimant/Applicant

(5) JOHN BARRIE PALFREYMAN

Fifth Claimant/Applicant

(6) ALAN JOHN SKEPPER

Sixth Claimant/Applicant

(7) JANETTE MARY SKEPPER

Seventh Claimant/Applicant

(8) STEVEN JOHN SKEPPER

Eighth Claimant/Applicant

(9) JOHN AMBROSE HOLLINGWORTH

Ninth Claimant/Applicant

(10) LINDA KATHARINA HOLLINGWORTH

Tenth Claimant/Applicant

and

**(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE
CLAIMANT(S) ON LAND AND BUILDINGS SHOWN SHADED RED ON THE PLANS ANNEXED TO
THE AMENDED CLAIM FORM**

First Defendant/Respondent

(2) PERSONS UNKNOWN INTERFERING WITH THE FIRST AND SECOND CLAIMANTS' RIGHTS TO PASS AND REPASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER PRIVATE ACCESS ROADS ON LAND SHOWN SHADED ORANGE ON THE PLANS ANNEXED TO THE AMENDED CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANT(S)

Second Defendant/Respondent

~~**(3) PERSONS UNKNOWN INTERFERING WITH THE RIGHT OF WAY ENJOYED BY THE CLAIMANT(S) AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS, FAMILY MEMBERS AND FRIENDS OVER LAND SHOWN SHADED PURPLE ON THE PLANS ANNEXED TO THE AMENDED CLAIM FORM**~~

Third Defendant/Respondent

~~**(4) PERSONS UNKNOWN PURSUING ANY COURSE OF CONDUCT SUCH AS AMOUNTS TO HARASSMENT OF THE CLAIMANTS AND / OR ANY THIRD PARTY CONTRARY TO THE PROTECTION FROM HARASSMENT ACT 1997 WITH THE INTENTION SET OUT IN PARAGRAPH 10 OF THE ORDER**~~

Fourth Defendant/Respondent

~~**(5) PERSONS UNKNOWN COMBINING TOGETHER TO COMMIT THE UNLAWFUL ACTS AS SPECIFIED IN PARAGRAPH 10 OF THE ORDER WITH THE INTENTION SET OUT IN PARAGRAPH 10 OF THE ORDER**~~

Fifth Defendant/Respondent

(6) JOSEPH BOYD

Sixth Defendant/Respondent

(7) JOSEPH CORRÉ

Seventh Defendant/Respondent

ORDER

If you the within-named Defendants or any of you, disobey this order you may be held to be in contempt of Court and may be imprisoned, fined or have your assets seized.

IMPORTANT

You should read the terms of the Order very carefully. You are advised to consult a Solicitor as soon as possible.

UPON hearing Leading Counsel for the Claimants and Leading Counsel for the Sixth Defendant and Leading Counsel and Counsel for the Seventh Defendant

AND UPON the grant of various interim injunctions by Order of Mr Justice Morgan first without notice on the 28 July 2017 and then at an inter partes hearing on 20 September 2017 ("**the Interim Order**")

AND UPON the Claimants unilaterally adding the Seventh Defendant to the Claim on 12 September 2017 following receipt of his Application dated 6 September 2017

AND UPON hearing the 3 Applications listed in Schedule 1

AND UPON the Fourth Claimant providing a cross undertaking to the Defendants that if the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Fourth Claimant will comply with any order the Court may make

AND UPON the Orders at paragraphs 1 to 8 ~~40~~ (inclusive) being made against the First ~~and~~ Second ~~Third and Fifth~~ Defendants alone, it being accepted that the Orders at paragraphs 1 to 8 ~~40~~ (inclusive) may extend to the Sixth and Seventh Defendants if their actions bring them within the descriptions of the First ~~and~~ Second ~~Third and Fifth~~ Defendants

AND UPON the Claimants having confirmed to the Court that they make no allegations of tortious conduct or of likely tortious conduct on the part of the Seventh Defendant

~~**AND UPON** the Claimants undertaking that they will only add the name of a contractor or sub-contractor to the website referred to in paragraph 10 of this Order where they have entered into contractual arrangements with the individual or entity, or intend to enter into contractual arrangements with the individual or entity and that they will remove the name of any contractor or sub-contractor from that website once those contractual arrangements have ceased or where there is no longer any intention to enter into contractual arrangements. See supplemental Schedule 22 attached to this Order for the list of the relevant group companies, contractors and sub-contractors as at the date of this Order.~~

IT IS ORDERED THAT:

Site 1

1. With immediate effect, and until trial or further order, the First Defendant and each of them are forbidden from entering or remaining upon land and buildings on the south side of Dronfield Road, Eckington, Sheffield registered at the Land Registry under title number DY359067, shown for illustration purposes shaded red on the plan annexed to Schedule 4 ("**Site 1**"), and/or from causing damage to, or removing equipment from, Site 1 without the consent of the First Claimant and Fifth Claimant until trial or further order.

Site 2

2. With immediate effect, and until trial or further order, and save in exercise of a right to pass and repass over public footpaths or bridleways crossing the land, the First Defendant and each of them are forbidden from entering or remaining upon land and buildings known as Carr Farm, Winney Lane, Harthill, Sheffield registered at the Land Registry under title number SYK581320, shown for illustration purposes shaded red on the plan annexed to Schedule 5 ("**Site 2**"), and/or from causing damage to, or removing equipment from, Site 2 without the consent of the First Claimant, the Sixth, Seventh and Eighth Claimants.

Site 3

3. With immediate effect and until trial or further order:
 - 3.1 the First Defendant and each of them are forbidden from entering or remaining upon land and buildings known as Four Topped Oak, Farnworth Road, Penketh, Warrington, WA5 2TU as more particularly described by a lease dated 20 March 2009 made between (1) Love Brothers Limited and (2) Nexen Exploration U.K. Limited registered at the Land Registry under title number CH585084, shown for illustration purposes shaded red on the plan annexed to Schedule 6 ("**Site 3**"), and/or from causing damage to, or removing equipment from, Site 3 without the written consent of the First Claimant until trial or further order.
 - 3.2 the Second Defendant and each of them are forbidden from substantially interfering with the First Claimant's rights to pass and re-pass with or without vehicles, materials and equipment over any private access roads on the land adjoining Site 3 (the "**Land Adjoining Site 3**"), shown shaded orange on the plan annexed to Schedule 6 of the Order, including any passing bays and splays for access and egress between Site 3 and the public highway until trial or further order.

Site 4

4. With immediate effect, and until trial or further order,;
 - 4.1 the First Defendant and each of them are forbidden from entering or remaining upon land and buildings known as land for a Wellhead Site, Givenhead Head Farm, Ebberston, Snailton, North Yorkshire as more particularly described by a lease dated 8 September 2011 made between (1) R E Gwilliam and S E Gwilliam and (2) Moorland Exploration Limited registered at the Land Registry under title number NYK391789, shown for illustration purposes shaded red on the plan annexed to Schedule 7 ("**Site 4**"), and/or from causing damage to, or removing equipment from, Site 4 without the consent of the Second Claimant until trial or further order.
 - 4.2 the Second Defendant and each of them are forbidden from substantially interfering with the Second Claimant's right to enter upon, pass over and across with or without contractors, surveyors or others and with or without motor or other vehicles, plant, apparatus or materials any private access roads on the land adjoining Site 4 (the "**Land Adjoining Site 4**"), shown shaded orange on the plan annexed to Schedule 7 of the Order, in order to access and egress from Site 4 until trial or further order.

Site 5

5. With immediate effect, and until trial or further order, the First Defendant and each of them are forbidden from entering or remaining upon land and buildings known as Hawkslease, Chapel Lane, Lyndhurst SO43 7FG registered at the Land Registry under title number HP335262, shown for illustration purposes shaded red on the plan annexed to Schedule 8 ("**Site 5**"), without the consent of the Third Claimant until trial or further order.

Site 6

6. With immediate effect, and until trial or further order, the First Defendant and each of them are forbidden from entering or remaining upon land and buildings known as 38 Hans Crescent, London, SW1Z 0LZ as more particularly described by a lease dated 1 November 2004 made between (1) Ropemaker Knightsbridge Limited and (2) Barclays Bank Plc registered at Land Registry under BGL52268, shown for illustration purposes shaded red on the plan annexed to Schedule 9 ("**Site 6**"), without the consent of the Fourth Claimant until trial or further order.

Site 7

7. With immediate effect, and until trial or further order, and save in exercise of a right to pass and repass over public footpaths or bridleways crossing the land, the First Defendant and each of them are forbidden from entering or remaining upon land and buildings on the south side of Woodsetts Road, Woodsetts, Rotherham, South Yorkshire registered at the Land Registry under title number SYK362483 and land on the west side of Lindrick Road, Woodsetts, Worksop, South Yorkshire registered at Land Registry under title number SYK574844, shown for illustration purposes shaded red on the plan annexed to Schedule 10 ("**Site 7**"), and/or from causing damage to, or removing equipment from, Site 7 without the consent of the First Claimant, Ninth Claimant and Tenth Claimant until trial or further order.

Site 8

8. With immediate effect, and until trial or further order, the First Defendant and each of them are forbidden from entering or remaining upon land and buildings known as Anchor House, 15-19 Britten Street as more particularly described by a lease dated 18 July 2017 made between (1) Cadogan Estates Limited and (2) INEOS Industries Limited shown for illustration purposes shaded red on the plan annexed to Schedule 11 ("**Site 8**"), without the consent of the Fourth Claimant until the trial or further order.

The Exclusion Zones

- ~~9. With immediate effect, and until trial or further order, in relation to exclusion zones, shown shaded purple on the plans annexed to Schedules 4, 5, 6, 7, 10 and 11 of the Order (the "**Exclusion Zones**"), such zones comprising the primary access ways to Sites 1-4, 7 and 8 (as defined in Schedule 2 of the Order) and public footpaths or bridleways over Sites 2 and 7, the Third Defendant and each of them are forbidden from:~~
- ~~(a) blocking the highway with persons or things when done with a view to slowing down or stopping the traffic, and with the intention of causing inconvenience and delay to the Claimants and/or their visitors;~~
 - ~~(b) slow walking in front of vehicles with the object of slowing them down, and with the intention of causing inconvenience and delay to the Claimants and/or their visitors;~~
 - ~~(c) climbing onto vehicles;~~
 - ~~(d) otherwise, unreasonably and/or without lawful authority or excuse, preventing the Claimants and/or their visitors from access to, or egress from, any of the Sites;~~
 - ~~(e) otherwise, unreasonably and/or without lawful authority or excuse, obstructing the highway, with the intention of causing inconvenience and delay to the Claimants and/or their visitors.~~

The Supply Chain

- ~~10. With immediate effect, and until trial or further order, the Fifth Defendant and each of them be restrained from combining together to commit any of the following offences or unlawful acts:~~
- ~~(a) pursuing any course of conduct, with a view to compelling another person to abstain from doing or to do any act which that person has a legal right to do or abstain from doing, wrongfully and without legal authority, such as amounts to an offence under section 241(1) of the Trade Union and Labour Relations (Consolidation) Act 1992;~~
 - ~~(b) pursuing any course of conduct that amounts to criminal damage pursuant to section 1 of the Criminal Damage Act 1971, or theft pursuant to section 1 of the Theft Act 1968;~~
 - ~~(c) obstructing the free passage along a public highway, or the access to or from a public highway, by:~~
 - ~~(i) blocking the highway with persons or things when done with a view to slowing down or stopping the traffic, and with the intention of causing inconvenience and delay;~~
 - ~~(ii) slow walking in front of vehicles with the object of slowing them down, and with the intention of causing inconvenience and delay;~~
 - ~~(iii) climbing onto vehicles;~~
 - ~~(iv) otherwise, unreasonably and/or without lawful authority or excuse, obstructing the highway, with the intention of causing inconvenience and delay.~~
 - ~~(d) causing anything to be done on or over a road, or that which interferes with a motor vehicle, trailer or cycle, or interferes (directly or indirectly) with traffic equipment, in such circumstances that it would be obvious to a reasonable person that to do so would be dangerous;~~

~~in each case with the intention of damaging the Claimants by obstructing, impeding or interfering with the lawful activities undertaken by the Claimant(s) (whether carried out by themselves or by their employees or by group companies) or by obstructing, impeding or interfering with the lawful activities undertaken by contractors or sub-contractors engaged by the Claimants in connection with the Claimants' searching or boring for or getting any mineral oil or relative hydrocarbon and natural gas existing in its natural condition in strata. A list of the group companies, contractors and sub-contractors covered by this paragraph of this order appears at Schedule 22. This list of group companies, contractors and sub-contractors may be updated by way of publication at <https://www.ineos.com/businesses/ineos-shale/injunction/>, with the Order applying to said group companies, contractors and sub-contractors from the date of publication.~~

IT IS FURTHER ORDERED THAT

11. Subject to paragraphs 12 and 13 below, this Order shall be served by the Claimants on the Defendants.
12. Pursuant to CPR 6.15 and 6.27 notice and service of this Order shall be given to the First **and** ~~Second to Third~~ Defendants, in respect of:
 - (a) **Site 1:** by affixing the form of notice set out in Schedule 12 (in no smaller than A3 format in size) in clearly visible locations (including at entranceways, access points,

gates and in any gaps between fences or hedgerows) around Site 1 ~~and the Exclusion Zones~~. Such service is to be good and sufficient service.

- (b) **Site 2:** by affixing the form of notice set out in Schedule 13 (in no smaller than A3 format in size) in clearly visible locations (including at entranceways, access points, gates and in any gaps between fences or hedgerows) around Site 2 ~~and the Exclusion Zone~~. Such service is to be good and sufficient service;
- (c) **Site 3:** by affixing the form of notice set out in Schedule 14 (in no smaller than A3 format in size) in clearly visible locations (including at entranceways, access points, gates and to the perimeter fencing) around Site 3 ~~and the Exclusion Zones~~. Such service is to be good and sufficient service;
- (d) **Site 4:** by affixing the form of notice set out in Schedule 15 (in no smaller than A3 format in size) in clearly visible locations (including at entranceways, access points, gates and to the perimeter fencing) around Site 4, ~~the Exclusion Zones~~ and the Land Adjoining Site 4. Such service is to be good and sufficient service;
- (e) **Site 5:** by affixing the form of notice set out in Schedule 16 (in no smaller than A3 format in size) in clearly visible locations (including at entranceways, access points, doors and / or windows) around Site 5. Such service is to be good and sufficient service;
- (f) **Site 6:** by affixing the form of notice set out in Schedule 17 (in no smaller than A3 format in size) in clearly visible locations (including at entranceways, access points, gates and / or doors around Site 6. Such service is to be good and sufficient service;
- (g) **Site 7:** by affixing the form of notice set out in Schedule 18 (in no smaller than A3 format in size) in clearly visible locations (including at entranceways, access points, gates and in any gaps between fences or hedgerows) around Site 7 ~~and the Exclusion Zone~~. Such service is to be good and sufficient service;
- (h) **Site 8:** by affixing the form of notice set out in Schedule 19 (in no smaller than A3 format in size) in clearly visible locations (including at entranceways, access points, doors and / or windows) around Site 8 ~~and the Exclusion Zones~~. Such service is to be good and sufficient service; and

the said documents will be deemed to be served on the date of such affixation to the said locations, such date to be verified by a certificate of service, such service to be effected within 7 days of this Order.

13. Pursuant to CPR 6.15 and 6.27 notice and service of this Order shall be given to the First ~~and~~ Second ~~Third and Fifth~~ Defendants by providing notice in the form set out in Schedule 20 to the potentially interested parties listed at Schedule 21 of the Order. Such notice will be effected by:

- (i) e-mail to the organisations and groups as identified and specified at Schedule 21 (or, where e-mail is not available, by private message or equivalent electronic facility (including, for the avoidance of doubt, by sending the aforementioned notice by attachment or by reference to a weblink, to a contact form on the organisation or group's website, by Tweet to the organisation or group's Twitter page, by direct Facebook message to the administrators / moderators of the organisation or group's Facebook page and / or by a post on the organisation or group's Facebook page) to the organisations and groups listed at Schedule 21); and

- (ii) posting this Order on the First Claimant's website (being <http://www.ineos.com/businesses/ineos-shale/>) and posting on and/or providing a weblink to this Order, the Claim Form and the Application Notice dated 26 July 2017 on the First Claimant's corporate social media account (https://twitter.com/ineos_shale?lang=en);

within 7 days of this Order. The said documents will be deemed to be served on the date such electronic communication is made and/or effected, such date to be verified by a certificate of service, and such service shall constitute good and sufficient service.

14. Until service of this Order has been completed in accordance with paragraphs 11 to 13 above, the Interim Order shall remain in full force and effect save that reference to the Further Hearing in paragraphs 1 to 8 of the Interim Order shall be read and construed as the date of service of this Order pursuant to paragraphs 12 to 13 of this Order.
15. The application made by the Claimants in respect of the Fourth Defendant is dismissed, but the Claimants are given permission to apply in the future for an injunction against harassment expressed in clear and precise terms specifying the matters which are restrained by such an order if the Claimants can demonstrate that there is a need for such an order in addition to this Order.
16. Save in relation to the question of costs, there shall be no order in respect of the Sixth Defendant's application dated 6 September 2017 and the Seventh Defendant's application dated 6 September 2017.

DIRECTIONS

17. A directions hearing to be listed subject to Counsels' convenience within 3 months or within 28 days of the resolution of any application for permission to appeal and/or appeal hearing, whichever is the later.

COMMUNICATIONS WITH THE COURT

18. All communications about this Order should be sent to:

Court Manager
High Court of Justice
Chancery Division
Rolls Building
7 Rolls Building
Fetter Lane
London
EC4A 1NL

The telephone number is 020 7947 7501. The offices are open weekdays 10.00 a.m. to 4.30 p.m.

Out of hours telephone number is 020 7947 6260

19. Name and address of Claimants' legal representatives

Fieldfisher LLP,
Riverbank House,
2 Swan Lane,
London

EC4R 3TT

Telephone: 020 7861 4000

Fax: 020 7488 0084

Out of hours telephone number: 07711 088057

Reference: OTD/64340.000002

SERVICE OF THE ORDER

The Court has provided a sealed copy of this Order to the Claimants at:

Fieldfisher LLP
Riverbank House,
2 Swan Lane,
London
EC4R 3TT

Reference: OTD/64340.000002

SCHEDULE 1

1. Claimants' application dated 31 July 2017;
2. Sixth Defendant's application dated 6 September 2017; and
3. Seventh Defendant's application dated 6 September 2017.

SCHEDULE 2

THE SITES

Brambleymoore ("Site 1")

The freehold land on the south side of Dronfield Road, Eckington, Sheffield registered at the Land Registry under title number DY359067.

Harthill ("Site 2")

The freehold land known as Carr Farm, Winney Lane, Harthill, Sheffield registered at the Land Registry under title number SYK581320.

Doe Green Well Site ("Site 3")

The leasehold land known as Four Topped Oak, Farnworth Road, Penketh, Warrington, WA5 2TU as more particularly described by a lease dated 20 March 2009 made between (1) Love Brothers Limited (2) Nexen Exploration U.K. Limited registered at the Land Registry under title number CH585084.

Ebberston Prospect (Moorland site) / Ebberston South 1 ("Site 4")

The leasehold land known as land for a Wellhead Site, Givenhead Head Farm, Ebberston, Snailton, North Yorkshire as more particularly described by a lease dated 8 September 2011 made between (1) R E Gwilliam and S E Gwilliam and (2) Moorland Exploration Limited registered at the Land Registry under title number NYK391789.

Hawkslease, Lyndhurst, Hampshire ("Site 5")

The freehold land known as Hawkslease, Chapel Lane, Lyndhurst SO43 7FG registered at the Land Registry under title number HP335262.

38 Hans Crescent, London ("Site 6")

The leasehold land known as 38 Hans Crescent, London, SW1Z 0LZ as more particularly described by a lease dated 1 November 2004 made between (1) Ropemaker Knightsbridge Limited and (2) Barclays Bank Plc registered at Land Registry under title number BGL52268 and a further lease dated 25 September 2015 and made between (1) Carraig Mor S.A.R.L, (2) INEOS Industries Limited and (3) INEOS AG.

Woodsetts ("Site 7")

The freehold land on the south side of Woodsetts Road, Woodsetts, Rotherham, South Yorkshire registered at the Land Registry under title number SYK362483 and land on the west side of Lindrick Road, Woodsetts, Worksop, South Yorkshire registered at the Land Registry under title number SYK574844.

Anchor House ("Site 8")

The leasehold land known as Anchor House, 15-19 Britten Street as more particularly described by a lease dated 18 July 2017 made between (1) Cadogan Estates Limited and (2) INEOS Industries Limited.

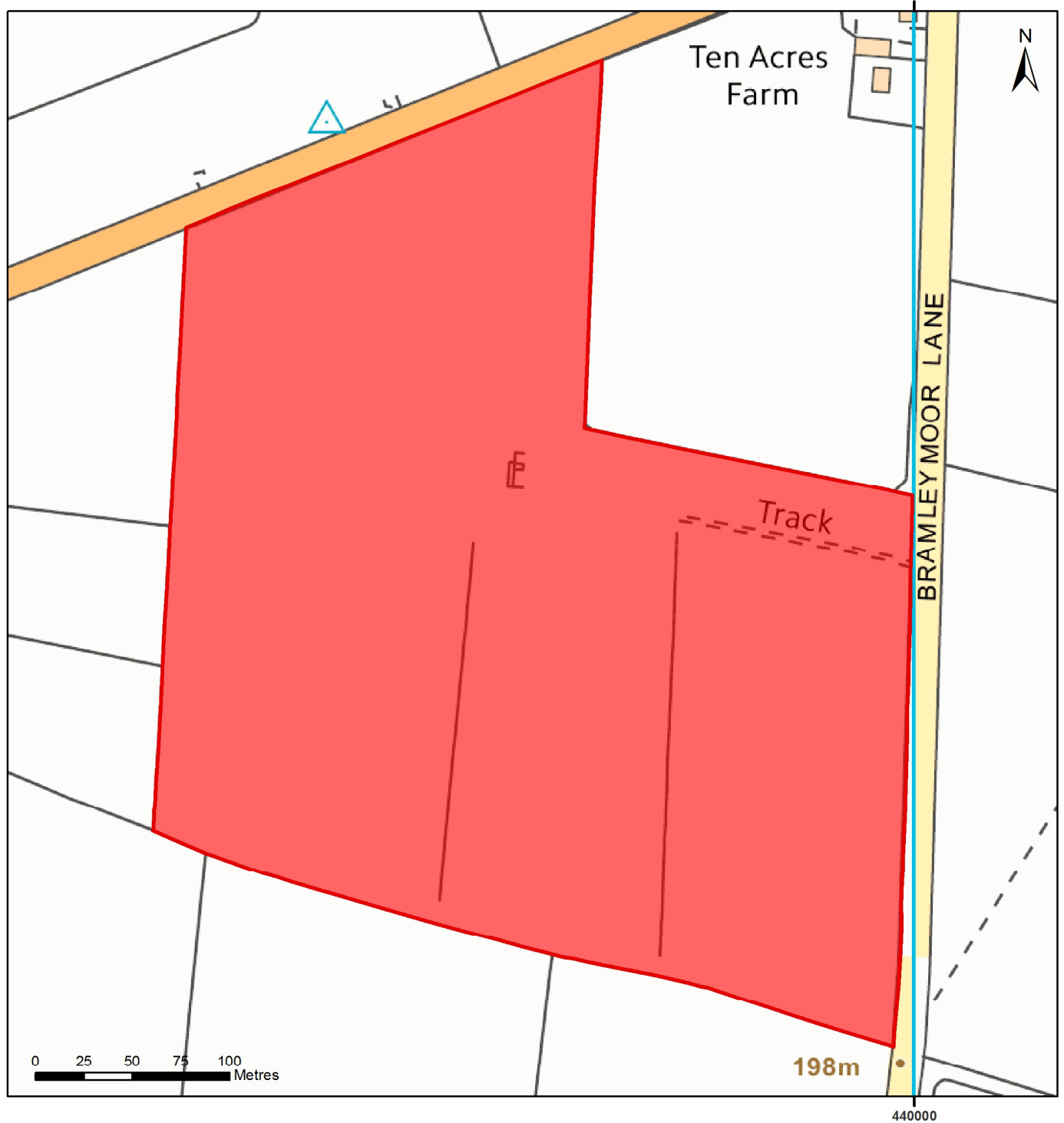
(together, the "Sites")

SCHEDULE 3

1. On the making of this Order, the Claimants undertake as follows:
 - 1.1 once in every three months to inspect the perimeter of the Sites, the Land Adjoining Site 3 ~~and the Land Adjoining Site 4, and the Exclusion Zones~~, to ensure that any notices affixed to the perimeter of the Sites pursuant to paragraph 13 of this Order remain so affixed and, if not, to replace the notice and affix a duplicate notice in its place as soon as practicable; and
 - 1.2 subject to the Defendant(s) providing their name(s) and address(es) for service and proof of identity when making such a request to make available to the Defendant(s) upon written application to the Claimant's solicitors, Fieldfisher LLP (either in writing at their said offices or by email to IneosTeam@fieldfisher.com and in either case quoting reference OTD/INEOS), using an encrypted online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafter and in either case within two clear working days from the first working day on which such written application is received.

SCHEDULE 4

Plan of *Bramley Moor* ("**Site 1**")

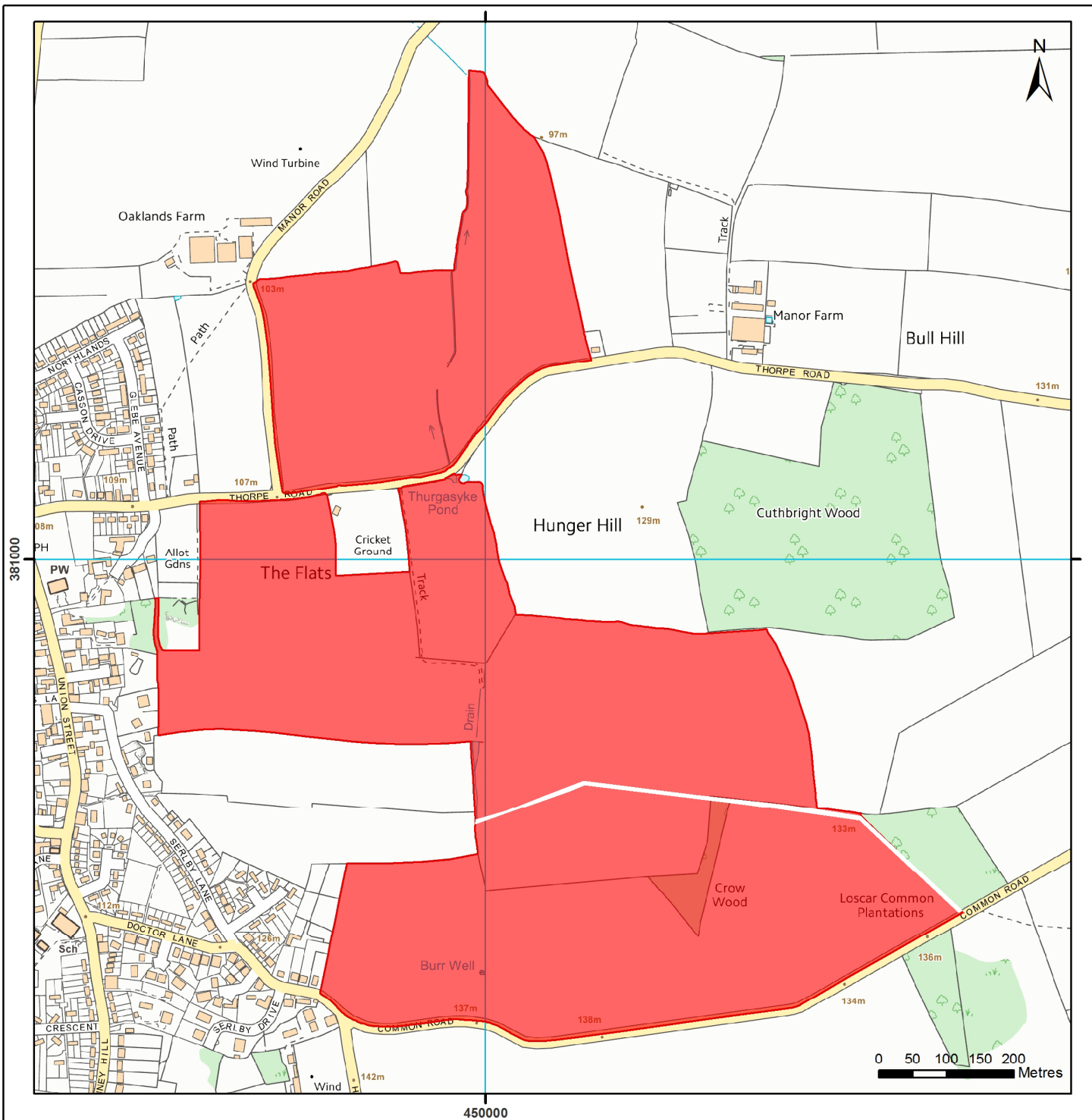


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The freehold land on the south side of Dronfield Road, Eckington, Sheffield registered at the Land Registry under title number DY359067.

SCHEDULE 5

Plan of *Harthill* ("**Site 2**")

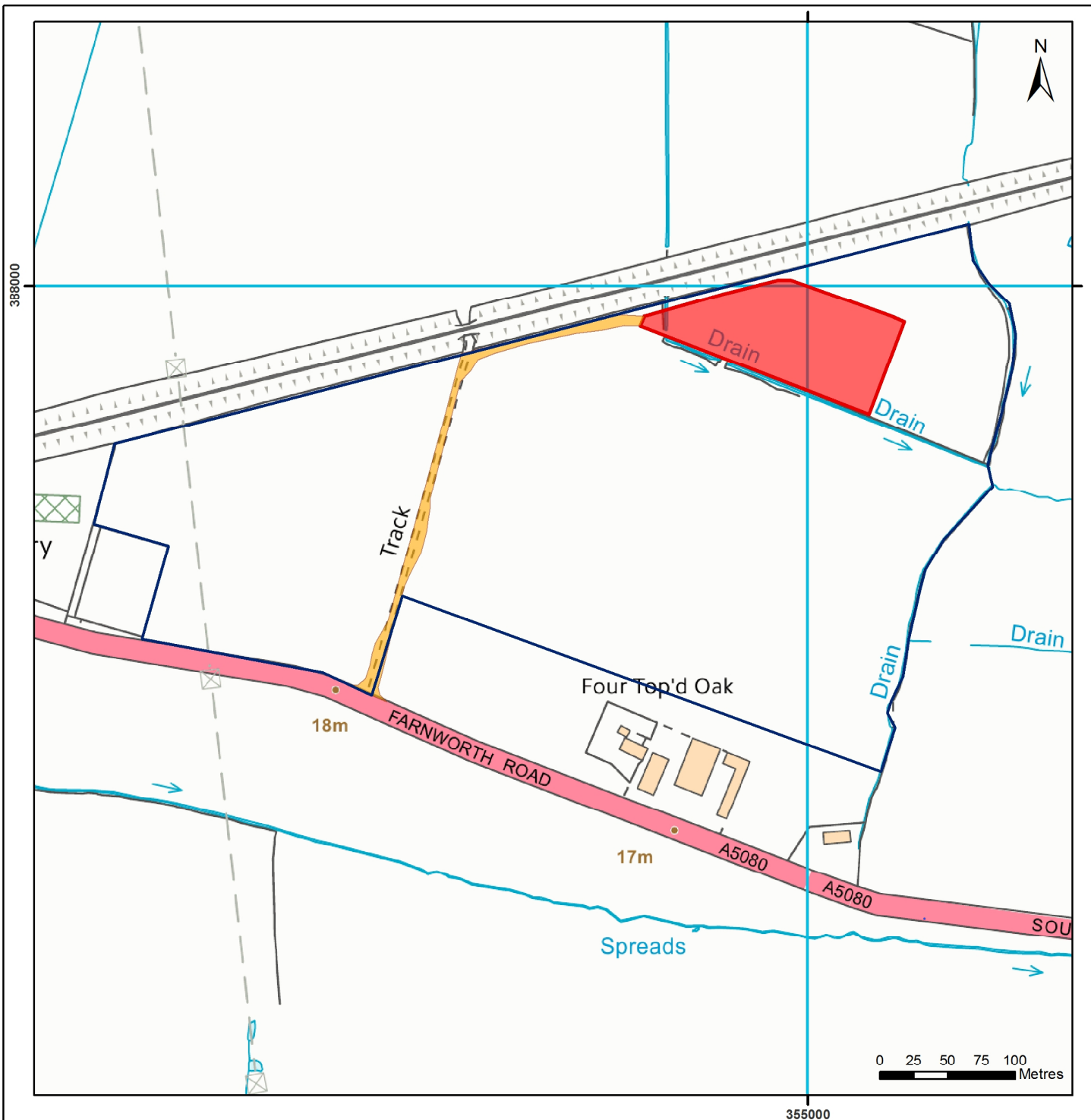


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The freehold land known as Carr Farm, Winney Lane, Harthill, Sheffield registered at the Land Registry under title number SYK581320.

SCHEDULE 6

Plan of *Doe Green Well Site* ("**Site 3**")

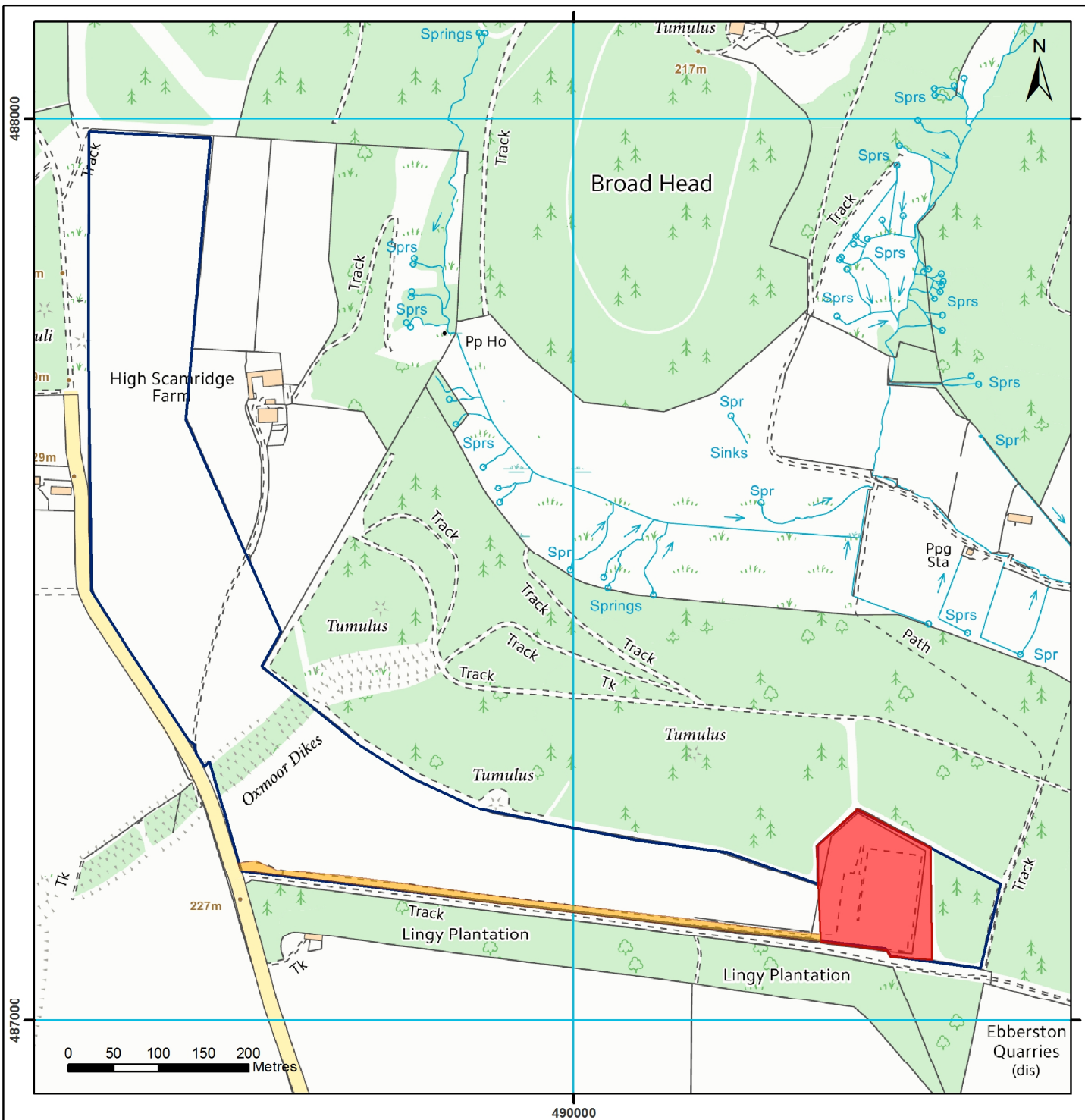


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The leasehold land known as Four Topped Oak, Farnworth Road, Penketh, Warrington, WA5 2TU as more particularly described by a lease dated 20 March 2009 made between (1) Love Brothers Limited (2) Nexen Exploration U.K. Limited registered at the Land Registry under title number CH585084.

SCHEDULE 7

Plan of *Ebberston Prospect (Moorland site) / Ebberston South 1* ("**Site 4**")

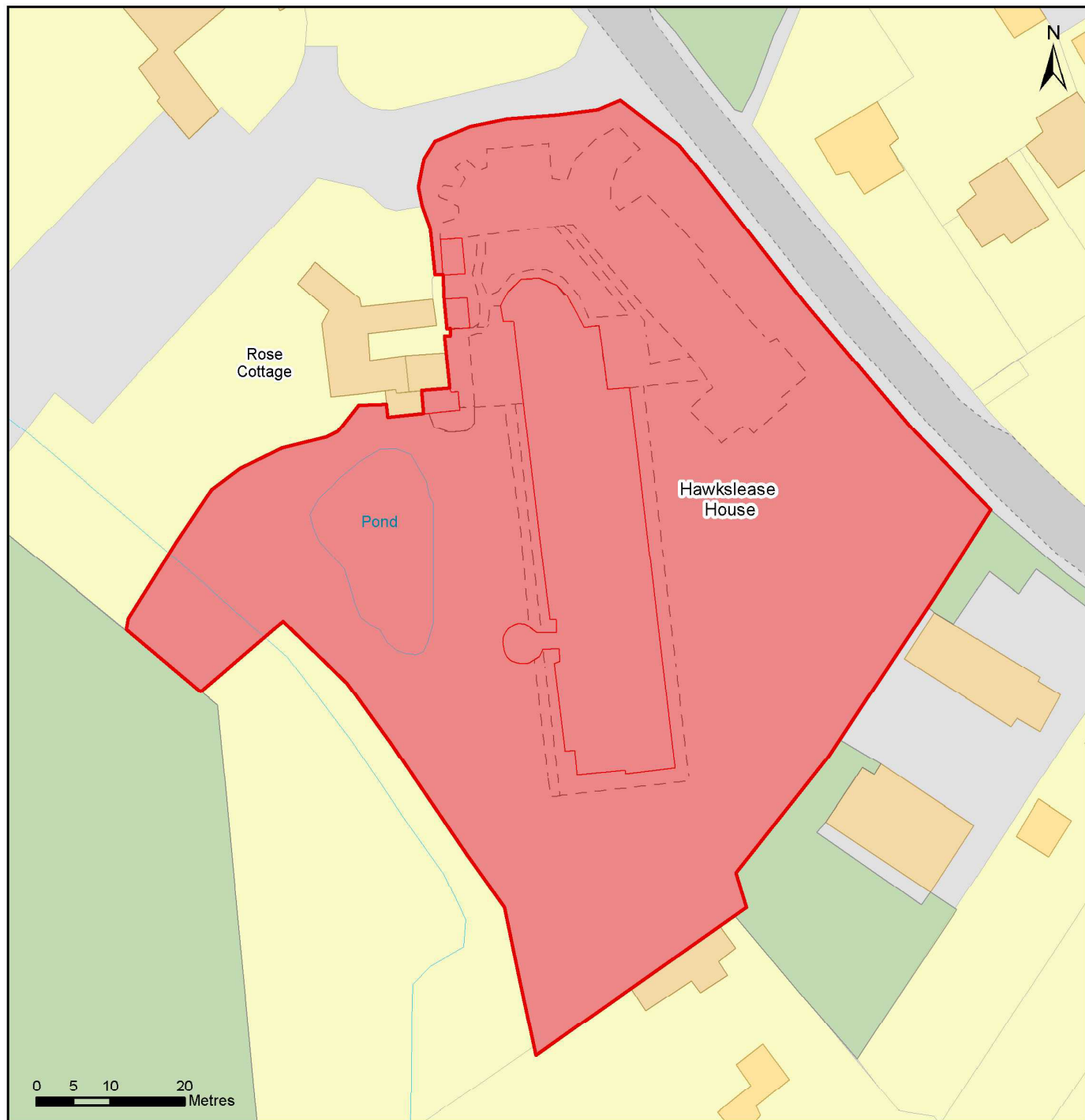


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The leasehold land known as land for a Wellhead Site, Givenhead Head Farm, Eberston, Snailton, North Yorkshire as more particularly described by a lease dated 8 September 2011 made between (1) R E Gwilliam and S E Gwilliam and (2) Moorland Exploration Limited registered at the Land Registry under title number NYK391789.

SCHEDULE 8

Plan of *Hawkslease, Lyndhurst, Hampshire* ("**Site 5**")

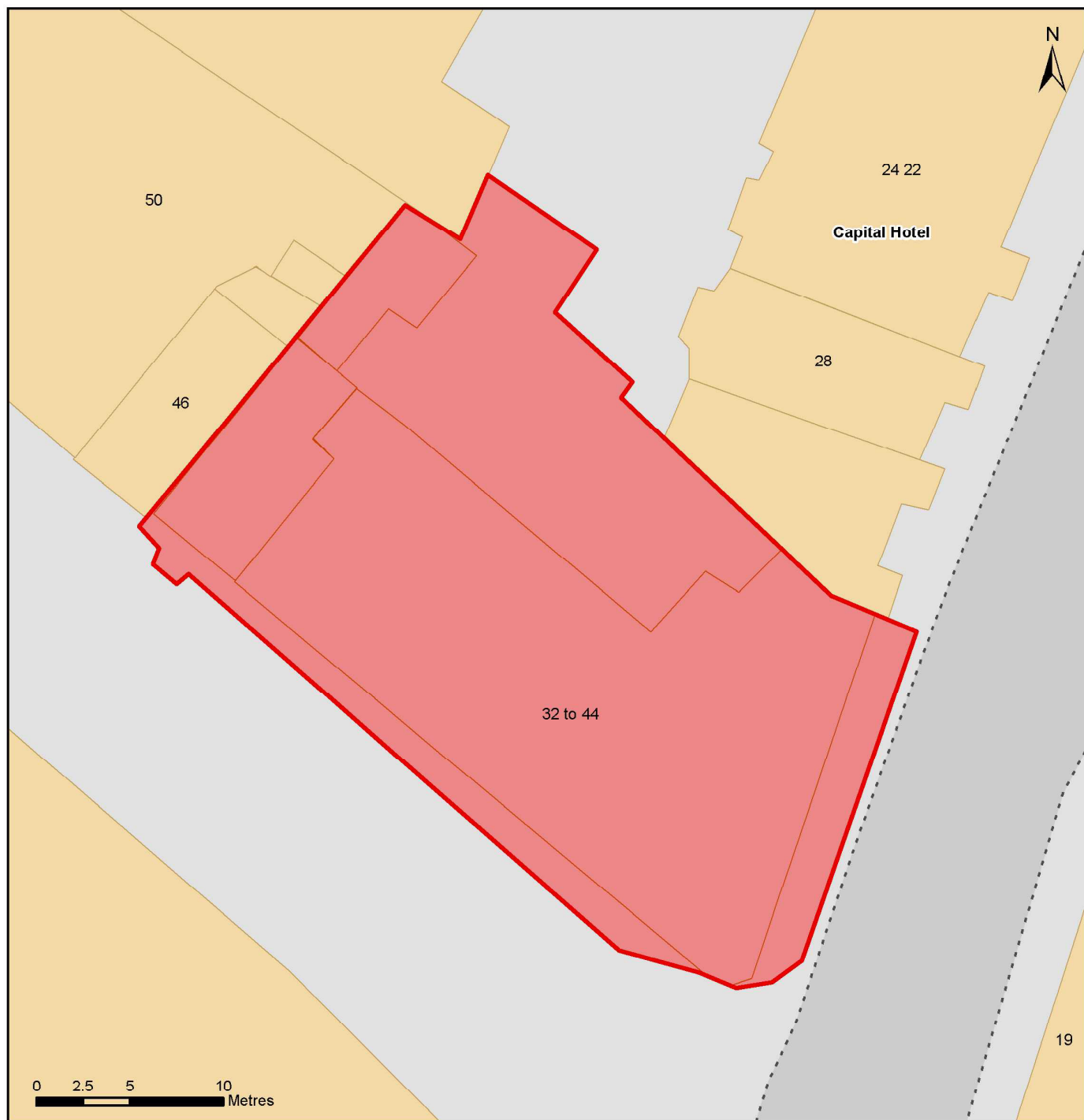


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The freehold land known as Hawkslease, Chapel Lane, Lyndhurst SO43 7FG registered at the Land Registry under title number HP335262.

SCHEDULE 9

Plan of 38 *Hans Crescent, London* ("**Site 6**")

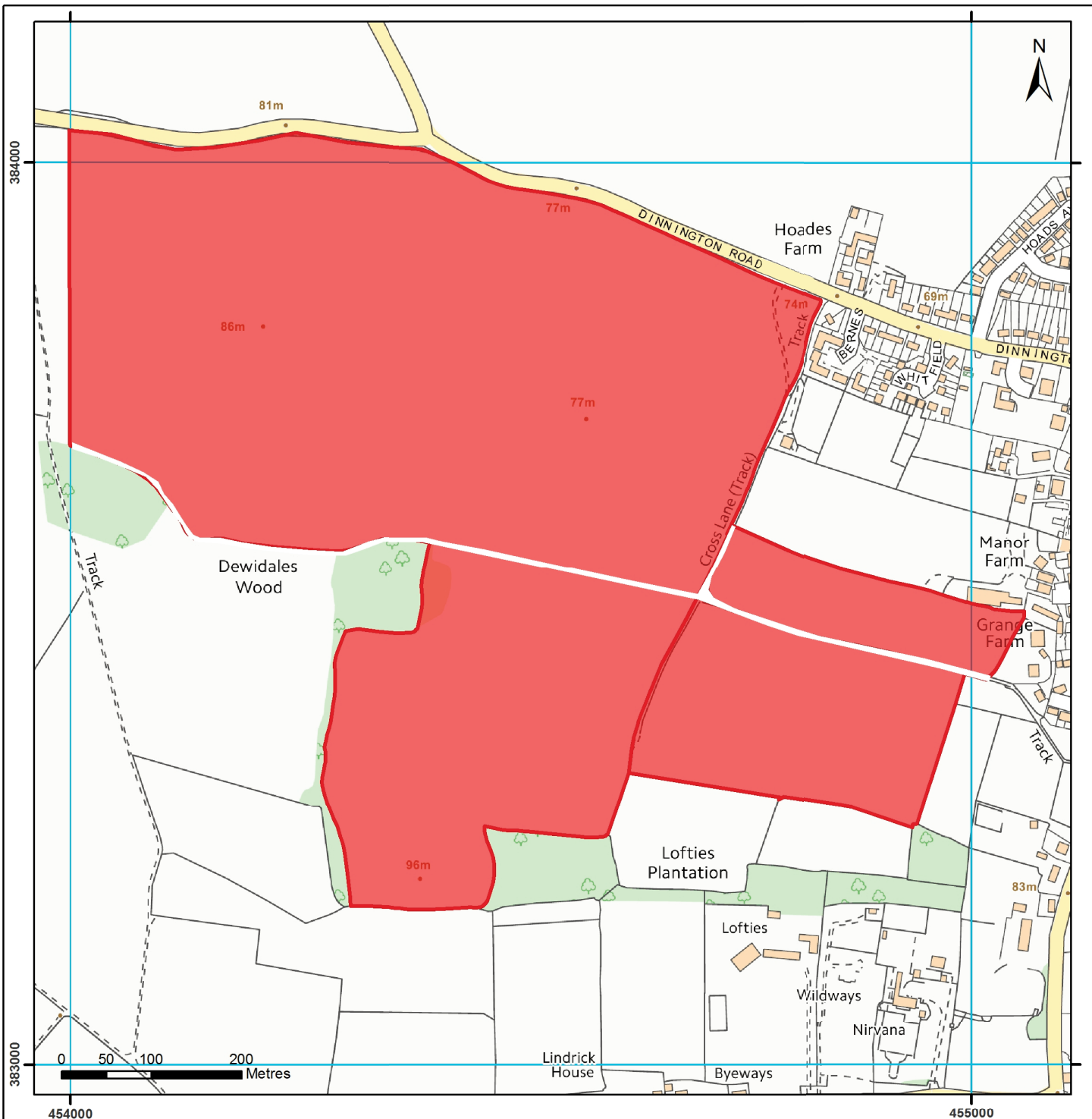


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The leasehold land known as 38 Hans Crescent, London SW1Z 0LZ as more particularly described by a lease dated 1 November 2004 made between (1) Ropemaker Knightsbridge Limited and (2) Barclays Bank Plc registered at Land Registry under BGL52268 and a further lease dated 25 September 2015 and made between (1) Carraig Mor S.A.R.L, (2) INEOS Industries Limited and (3) INEOS AG.

SCHEDULE 10

Plan of *Woodsetts* ("**Site 7**")

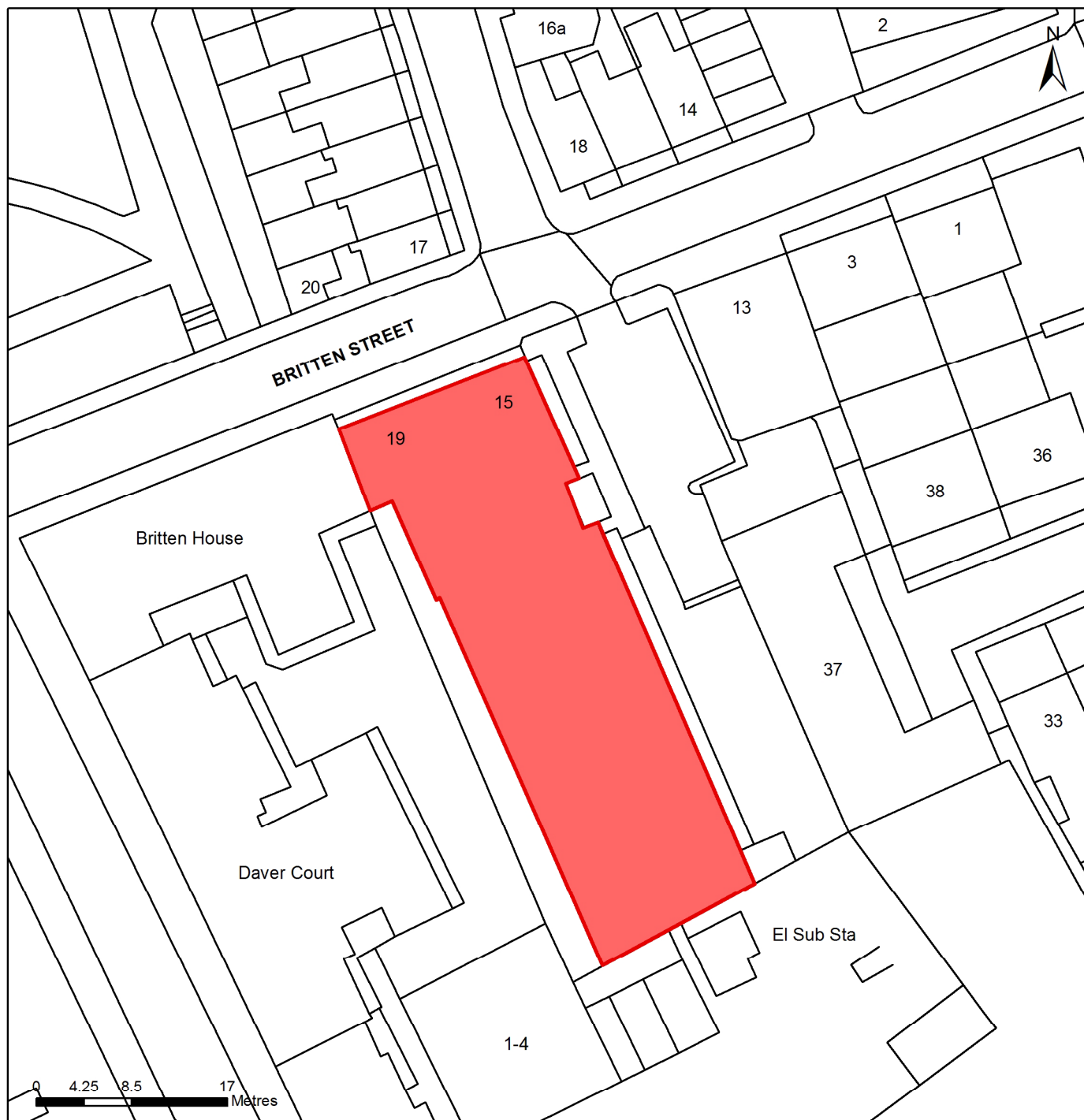


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The freehold land on the south side of Woodsetts Road, Woodsetts, Rotherham, South Yorkshire registered at the Land Registry under title number SYK362483 and land on the west side of Lindrick Road, Woodsetts, Worksop, South Yorkshire registered at the Land Registry under title number SYK574844.

SCHEDULE 11

Plan of *Anchor House* ("**Site 8**")



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The leasehold land known as Anchor House, 15-19 Britten Street as more particularly described by a lease dated 18 July 2017 made between (1) Cadogan Estates Limited and (2) INEOS Industries Limited.

SCHEDULE 12

SEE ATTACHED NOTICE AND SERVICE OF ORDER IN NO SMALLER THAN A3
FORMAT

The freehold land on the south side of Dronfield Road, Eckington, Sheffield registered at the Land
Registry under title number DY359067.

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 12 DECEMBER 2017

A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW

TO: PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT IN THE ORDER (THE "DEFENDANTS")

FROM: (1) INEOS UPSTREAM LIMITED AND (5) JOHN BARRIE PALFREYMAN AND OTHERS (THE "CLAIMANTS")

IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

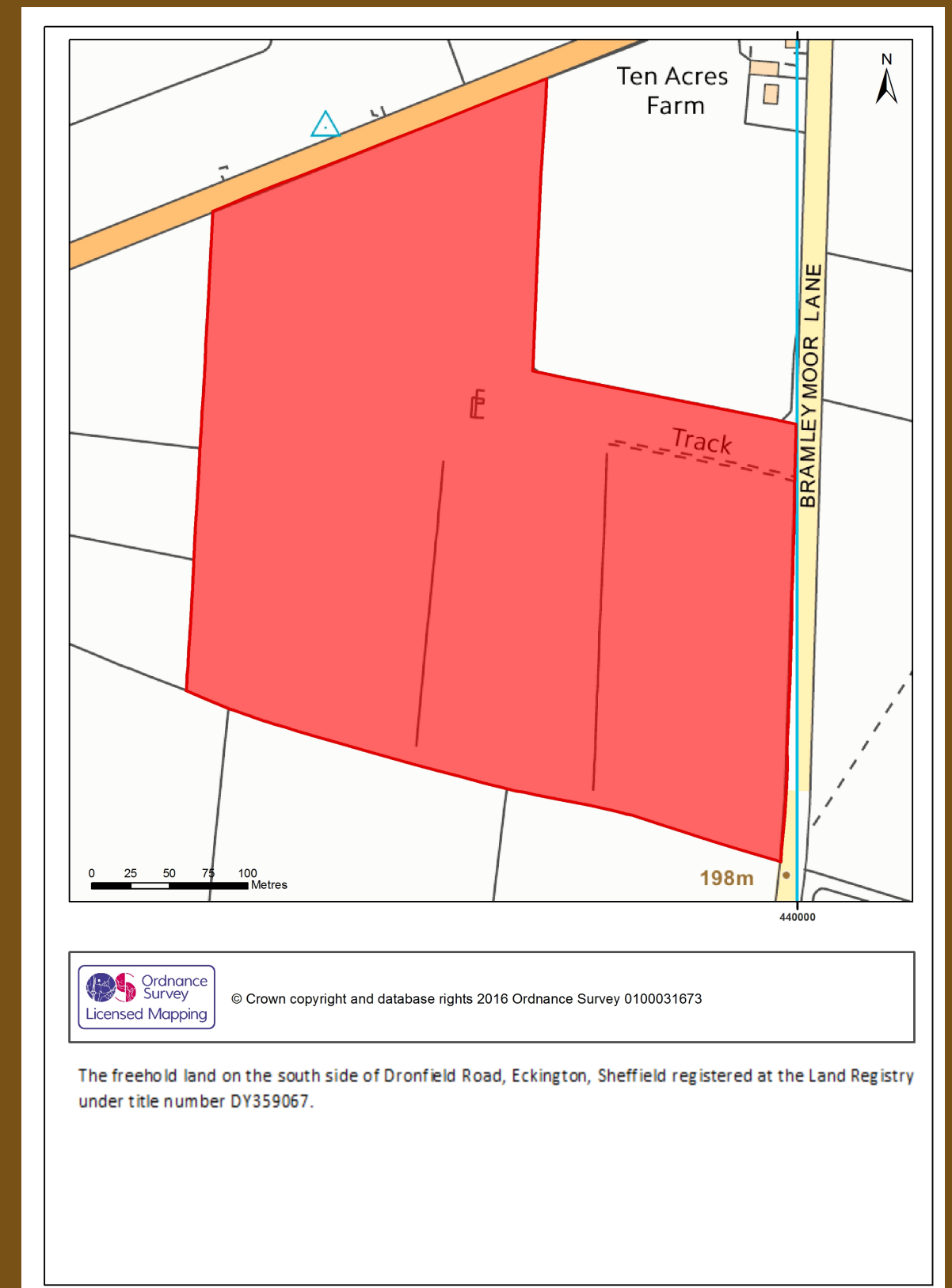
THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") AND / OR FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN, WITHOUT THE CONSENT OF THE CLAIMANT(S)

REFERENCES TO 'THE CLAIMANT' OR 'CLAIMANT(S)' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND ALSO THE FIFTH CLAIMANT'S FAMILY MEMBERS AND FRIENDS

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (Ref: HC-2017-002125) (details found at <https://courtribunalfinder.service.gov.uk/courts/rolls-building>).

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: IneosTeam@fieldfisher.com). Subject to the Defendant (s) providing their name(s), address(es) and proof of identity when making a written request to the Claimants' solicitor (quoting reference OTD/INEOS), the Claimant will promptly make available to the Defendant(s) the Court documents, witness evidence and exhibits via an online file hosting service.

Weblink to: Order dated 12 December 2017 (as varied by an Order dated 3 April 2019), Application Notice dated 31 July 2017 and Amended Claim Form can be found at <https://www.ineos.com/businesses/ineos-shale/injunction/>



SCHEDULE 13

SEE ATTACHED NOTICE AND SERVICE OF ORDER IN NO SMALLER THAN A3
FORMAT

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 12 DECEMBER 2017

A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW

TO: PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT IN THE ORDER (THE "DEFENDANTS")

FROM: (1) INEOS UPSTREAM LIMITED, (6) ALAN JOHN SKEPPER , (7) JANETTE MARY SKEPPER, (8) STEVEN JOHN SKEPPER AND OTHERS (THE "CLAIMANTS")

IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

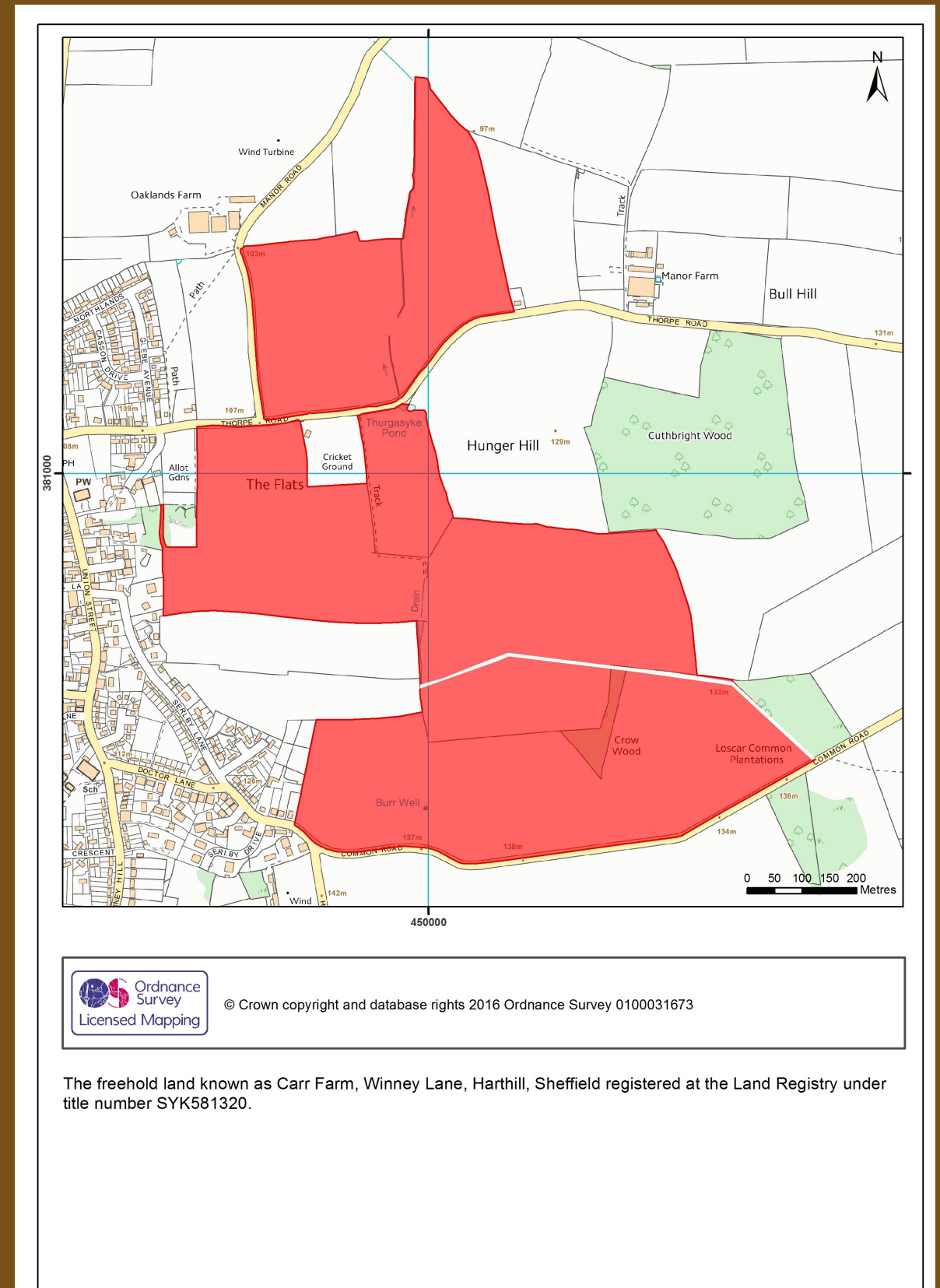
THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") , SAVE IN EXERCISE OF A RIGHT TO PASS AND REPASS OVER PUBLIC FOOTPATHS OR BRIDLEWAYS CROSSING THE LAND, WITHOUT THE CONSENT OF THE CLAIMANT(S) AND/OR FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN WITHOUT THE CONSENT OF THE CLAIMANT(S)

REFERENCES TO 'THE CLAIMANT' OR 'CLAIMANT(S)' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND ALSO THE SIXTH, SEVENTH AND EIGHTH CLAIMANTS' FAMILY MEMBERS AND FRIENDS

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (Ref: HC-2017-002125)(details found at <https://courtribunalfinder.service.gov.uk/courts/rolls-building>).

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: IneosTeam@fieldfisher.com). Subject to the Defendant(s) providing their name(s), address(es) and proof of identity when making a written request to the Claimants' solicitor (quoting reference OTD/INEOS), the Claimant will promptly make available to the Defendant(s) the Court documents, witness evidence and exhibits via an online file hosting service.

Weblink to: Order dated 12 December 2017 (as varied by an Order dated 3 April 2019), Application Notice dated 31 July 2017 and Amended Claim Form can be found at <https://www.ineos.com/businesses/ineos-shale/injunction/>



SCHEDULE 14

SEE ATTACHED NOTICE AND SERVICE OF ORDER IN NO SMALLER THAN A3
FORMAT

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 12 DECEMBER 2017

A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW

TO: PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST AND SECOND DEFENDANT IN THE ORDER (THE "DEFENDANTS")

FROM: (1) INEOS UPSTREAM LIMITED AND OTHERS (THE "CLAIMANTS")

IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM:

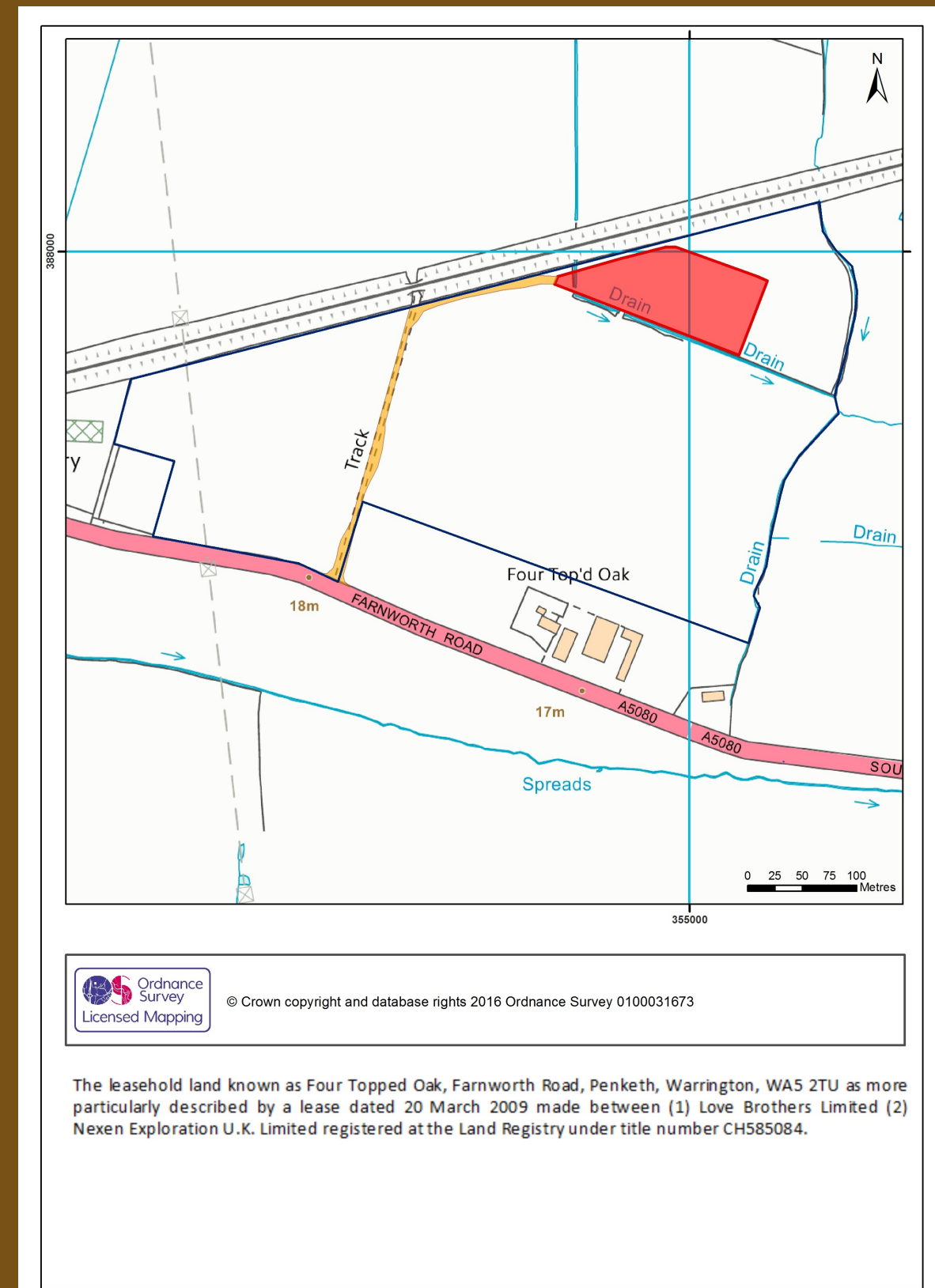
- ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") AND / OR FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN, WITHOUT THE CONSENT OF THE CLAIMANT; AND
- SUBSTANTIALLY INTERFERING WITH ANY PRIVATE RIGHTS ENJOYED BY THE CLAIMANT TO PASS AND RE-PASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER THE LAND SHADED ORANGE ON THE PLAN, INCLUDING ANY PASSING BAYS AND SPLAYS FOR ACCESS AND EGRESS BETWEEN THE LAND SHADED RED ON THE PLAN AND THE PUBLIC HIGHWAY

REFERENCES TO 'THE CLAIMANT' OR 'CLAIMANT(S)' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS AND CONSULTANTS

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (Ref: HC-2017-002125) (details found at <https://courtribunalfinder.service.gov.uk/courts/rolls-building>).

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: IneosTeam@fieldfisher.com). Subject to the Defendant(s) providing their name (s), address(es) and proof of identity when making a written request to the Claimants' solicitor (quoting reference OTD/ INEOS), the Claimant will promptly make available to the Defendant(s) the Court documents, witness evidence and exhibits via an online file hosting service.

Weblink to: Order dated 12 December 2017 (as varied by an Order dated 3 April 2019), Application Notice dated 31 July 2017 and Amended Claim Form can be found at <https://www.ineos.com/businesses/ineos-shale/injunction/>



SCHEDULE 15

SEE ATTACHED NOTICE AND SERVICE OF ORDER IN NO SMALLER THAN A3
FORMAT

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 12 DECEMBER 2017

A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW

TO: PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST AND SECOND DEFENDANT IN THE ORDER (THE "DEFENDANTS")

FROM: (2) INEOS 120 EXPLORATION LIMITED AND OTHERS (THE "CLAIMANTS")

IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM:

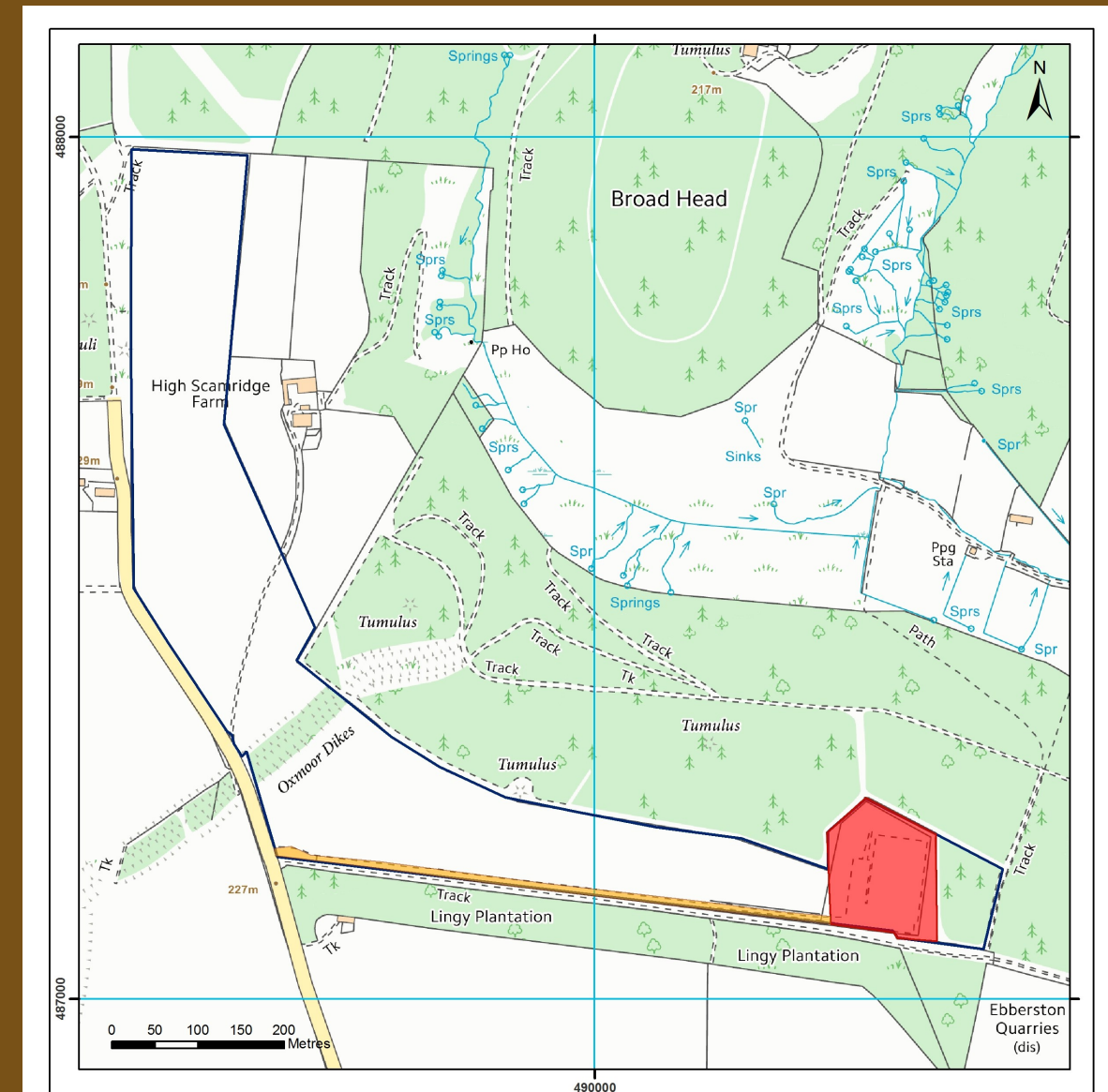
- ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") AND / OR FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN, WITHOUT THE CONSENT OF THE CLAIMANT; AND
- SUBSTANTIALLY INTERFERING WITH ANY PRIVATE RIGHTS ENJOYED BY THE CLAIMANT TO PASS AND RE-PASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER THE LAND SHADED ORANGE ON THE PLAN, INCLUDING ANY PASSING BAYS AND SPLAYS FOR ACCESS AND EGRESS BETWEEN THE LAND SHADED RED ON THE PLAN AND THE PUBLIC HIGHWAY

REFERENCES TO 'THE CLAIMANT' OR 'CLAIMANT(S)' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS AND CONSULTANTS

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (Ref: HC-2017-002125) (details found at <https://courtribunalfinder.service.gov.uk/courts/rolls-building>).

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: IneosTeam@fieldfisher.com). Subject to the Defendant(s) providing their name(s), address(es) and proof of identity when making a written request to the Claimants' solicitor (quoting reference OTD/INEOS), the Claimant will promptly make available to the Defendant(s) the Court documents, witness evidence and exhibits via an online file hosting service.

Weblink to: Order dated 12 December 2017 (as varied by an Order dated 3 April 2019), Application Notice dated 31 July 2017 and Amended Claim Form can be found at <https://www.ineos.com/businesses/ineos-shale/injunction/>



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The leasehold land known as land for a Wellhead Site, Givenhead Head Farm, Ebberston, Snailton, North Yorkshire as more particularly described by a lease dated 8 September 2011 made between (1) R E Gwilliam and S E Gwilliam and (2) Moorland Exploration Limited registered at the Land Registry under title number NYK391789.

SCHEDULE 16

SEE ATTACHED NOTICE AND SERVICE OF ORDER IN NO SMALLER THAN A3
FORMAT

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 12 DECEMBER 2017

A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW

TO: PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT IN THE ORDER (THE "DEFENDANTS")

FROM: (3) INEOS PROPERTIES LIMITED AND OTHERS (THE "CLAIMANTS")

IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

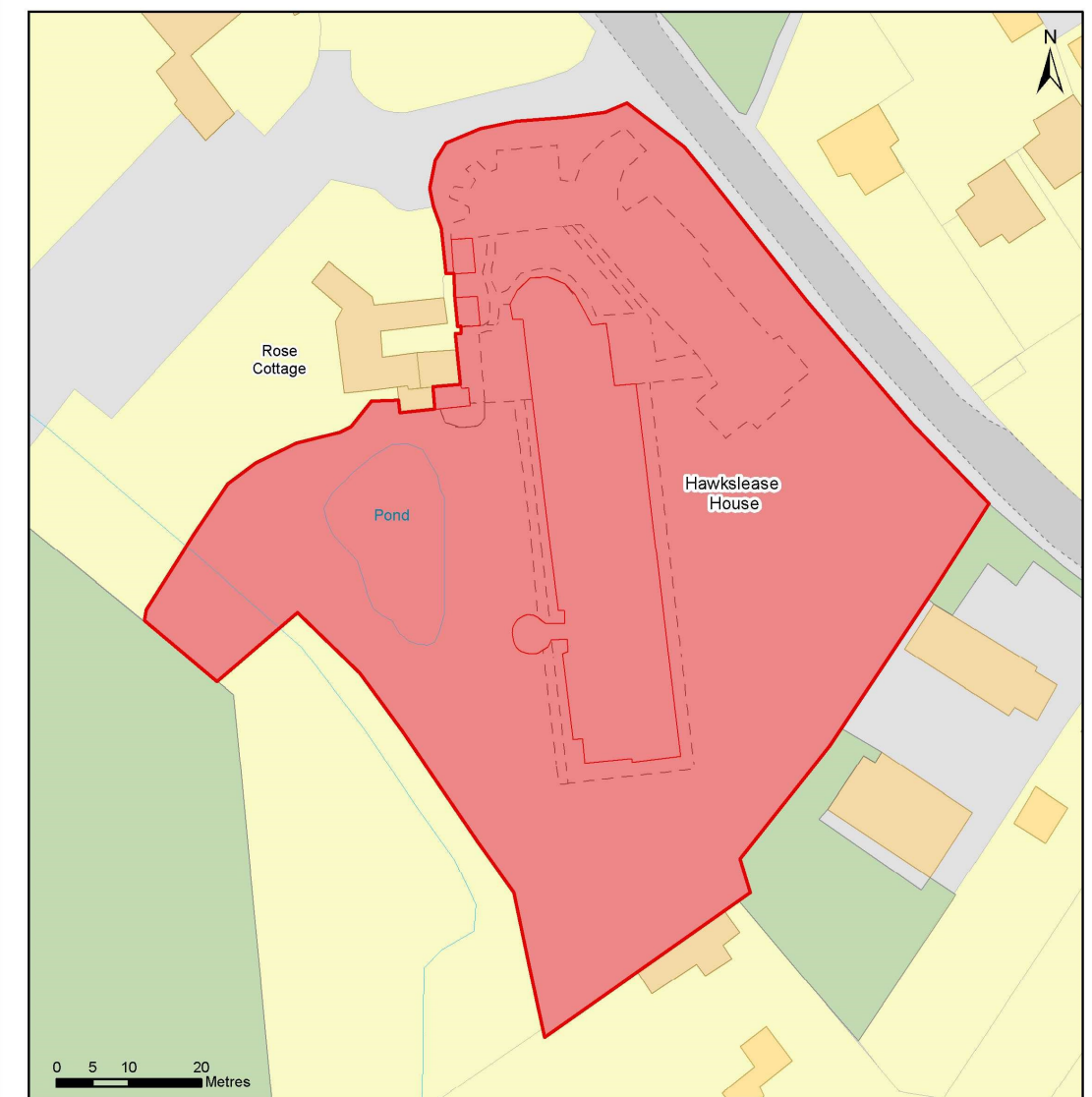
THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") WITHOUT THE CONSENT OF THE CLAIMANT.

REFERENCES TO 'THE CLAIMANT' OR 'CLAIMANT(S)' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS AND CONSULTANTS

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (Ref: HC-2017-002125)(details found at <https://courtribunalfinder.service.gov.uk/courts/rolls-building>).

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: IneosTeam@fieldfisher.com). Subject to the Defendant(s) providing their name(s), address(es) and proof of identity when making a written request to the Claimants' solicitor (quoting reference OTD/INEOS), the Claimant will promptly make available to the Defendant(s) the Court documents, witness evidence and exhibits via an online file hosting service.

Weblink to: Order dated 12 December 2017 (as varied by an Order dated 3 April 2019), Application Notice dated 31 July 2017 and Amended Claim Form can be found at <https://www.ineos.com/businesses/ineos-shale/injunction/>



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The freehold land known as Hawkslease, Chapel Lane, Lyndhurst SO43 7FG registered at the Land Registry under title number HP335262.

SCHEDULE 17

SEE ATTACHED NOTICE AND SERVICE OF ORDER IN NO SMALLER THAN A3
FORMAT

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 12 DECEMBER 2017

A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW

TO: PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT IN THE ORDER (THE "**DEFENDANTS**")

FROM: (4) INEOS INDUSTRIES LIMITED AND OTHERS (THE "**CLAIMANTS**")

IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

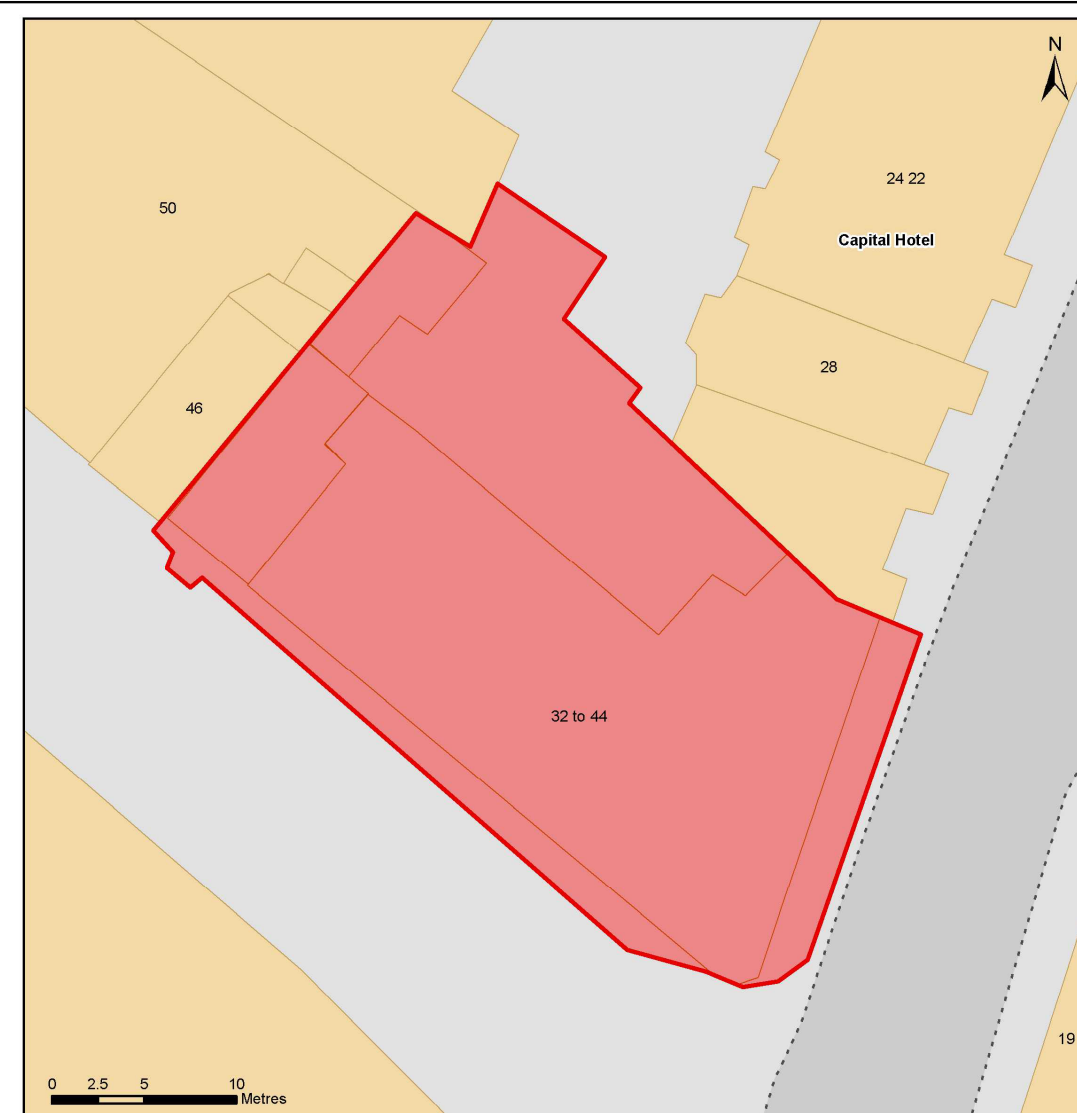
THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") WITHOUT THE CONSENT OF THE CLAIMANT.

REFERENCES TO 'THE CLAIMANT' OR 'CLAIMANT(S)' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS AND CONSULTANTS

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (Ref: HC-2017-002125)(details found at <https://courtribunalfinder.service.gov.uk/courts/rolls-building>).

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: IneosTeam@fieldfisher.com). Subject to the Defendant(s) providing their name(s), address(es) and proof of identity when making a written request to the Claimants' solicitor (quoting reference OTD/INEOS), the Claimant will promptly make available to the Defendant(s) the Court documents, witness evidence and exhibits via an online file hosting service.

Weblink to: Order dated 12 December 2017 (as varied by an Order dated 3 April 2019), Application Notice dated 31 July 2017 and Amended Claim Form can be found at <https://www.ineos.com/businesses/ineos-shale/injunction/>



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The leasehold land known as 38 Hans Crescent, London SW1Z 0LZ as more particularly described by a lease dated 1 November 2004 made between (1) Ropemaker Knightsbridge Limited and (2) Barclays Bank Plc registered at Land Registry under BGL52268 and a further lease dated 25 September 2015 and made between (1) Carraig Mor S.A.R.L, (2) INEOS Industries Limited and (3) INEOS AG.

SCHEDULE 18

SEE ATTACHED NOTICE AND SERVICE OF ORDER IN NO SMALLER THAN A3
FORMAT

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 12 DECEMBER 2017

A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW

TO: PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT IN THE ORDER (THE "DEFENDANTS")

FROM: (1) INEOS UPSTREAM LIMITED, (9) JOHN AMBROSE HOLLINGWORTH, (10) LINDA KATHARINA HOLLINGWORTH AND OTHERS (THE "CLAIMANTS")

IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

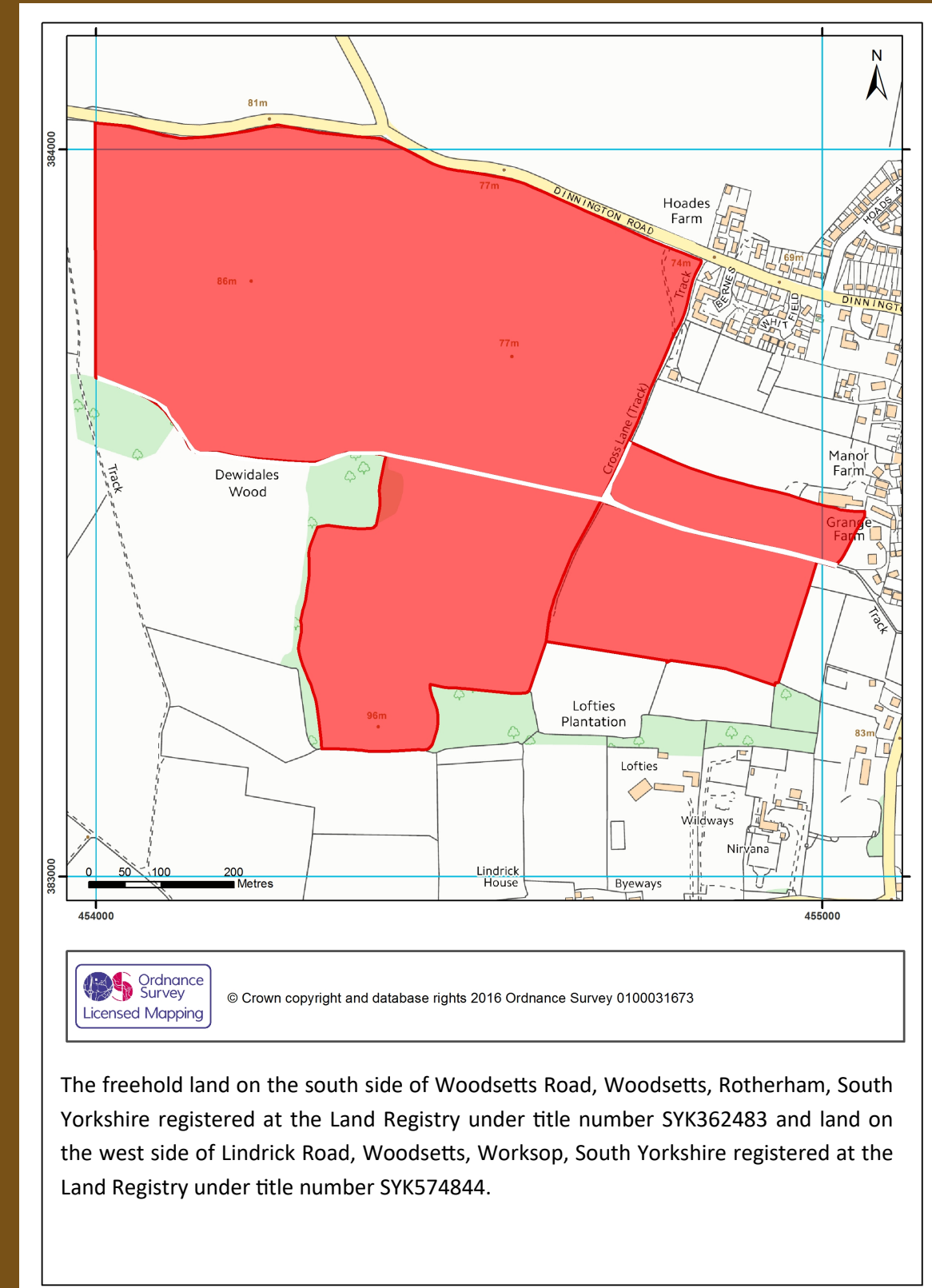
THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN"), SAVE IN EXERCISE OF A RIGHT TO PASS AND RE-PASS OVER PUBLIC FOOTPATHS OR BRIDLEWAYS CROSSING THE LAND, WITHOUT THE CONSENT OF THE CLAIMANT(S) AND/OR FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN WITHOUT THE CONSENT OF THE CLAIMANT(S)

REFERENCES TO 'THE CLAIMANT' OR 'CLAIMANT(S)' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND ALSO THE NINTH AND TENTH CLAIMANTS' FAMILY MEMBERS AND FRIENDS

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (Ref: HC-2017-002125) (details found at <https://courtribunalfinder.service.gov.uk/courts/rolls-building>).

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: IneosTeam@fieldfisher.com). Subject to the Defendant(s) providing their name(s), address(es) and proof of identity when making a written request to the Claimants' solicitor (quoting reference OTD/INEOS), the Claimant will promptly make available to the Defendant(s) the Court documents, witness evidence and exhibits via an online file hosting service.

Weblink to: Order dated 12 December 2017 (as varied by an Order dated 3 April 2019), Application Notice dated 31 July 2017 and Amended Claim Form can be found at <https://www.ineos.com/businesses/ineos-shale/injunction/>



SCHEDULE 19

SEE ATTACHED NOTICE AND SERVICE OF ORDER IN NO SMALLER THAN A3
FORMAT

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 12 DECEMBER 2017

A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW

TO: PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT IN THE ORDER (THE "DEFENDANTS")

FROM: (4) INEOS INDUSTRIES LIMITED AND OTHERS (THE "CLAIMANTS")

IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

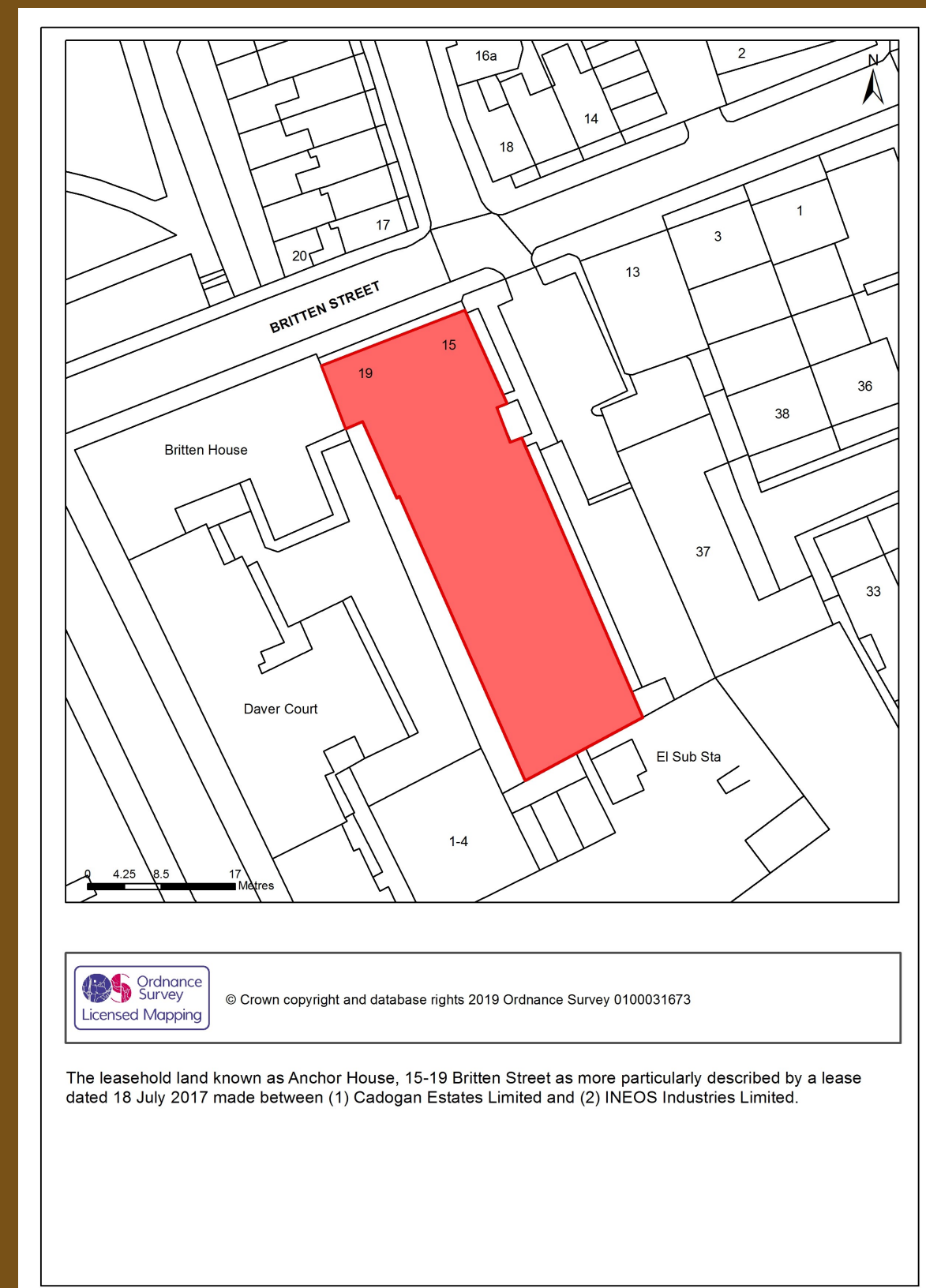
THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") WITHOUT THE CONSENT OF THE CLAIMANT(S)

REFERENCES TO 'THE CLAIMANT' OR 'CLAIMANT(S)' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS AND CONSULTANTS

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (Ref: HC-2017-002125) (details found at <https://courtribunalfinder.service.gov.uk/courts/rolls-building>).

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: IneosTeam@fieldfisher.com). Subject to the Defendant (s) providing their name(s), address(es) and proof of identity when making a written request to the Claimants' solicitor (quoting reference OTD/INEOS), the Claimant will promptly make available to the Defendant(s) the Court documents, witness evidence and exhibits via an online file hosting service.

Weblink to: Order dated 12 December 2017 (as varied by an Order dated 3 April 2019), Application Notice dated 31 July 2017 and Amended Claim Form can be found at <https://www.ineos.com/businesses/ineos-shale/injunction/>



SCHEDULE 20

SEE NOTICE AND SERVICE OF ORDER IN NO SMALLER THAN A4 FORMAT

~~**HIGH COURT INJUNCTION IN FORCE**~~
~~**HIGH COURT CLAIM NO: HC-2017-002125**~~

~~**NOTICE OF HIGH COURT INJUNCTION ORDER DATED 12 DECEMBER 2017**~~
~~**A COPY OF THE ORDER CAN BE FOUND VIA THE WEBLINK LISTED BELOW**~~

~~**TO: PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIFTH DEFENDANTS IN THE ORDER (THE "DEFENDANTS")**~~

~~**FROM: (1) INEOS UPSTREAM LIMITED, (2) INEOS 120 EXPLORATION LIMITED, (3) INEOS PROPERTIES LIMITED, (4) INEOS INDUSTRIES LIMITED, (5) JOHN BARRIE PALFREYMAN, (6) ALAN JOHN SKEPPER, (7) JANETTE MARY SKEPPER, (8) STEVEN JOHN SKEPPER, (9) JOHN AMBROSE HOLLINGWORTH, AND (10) LINDA KATHARINA HOLLINGWORTH (THE "CLAIMANTS")**~~

~~**IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**~~

~~**THIS INJUNCTION PROHIBITS:**~~

- ~~**1. THE DEFENDANTS AND EACH OF THEM FROM COMBINING TOGETHER TO COMMIT ANY OF THE FOLLOWING OFFENCES OR UNLAWFUL ACTS:**~~
 - ~~**• PURSUING ANY COURSE OF CONDUCT, WITH A VIEW TO COMPELLING ANOTHER PERSON TO ABSTAIN FROM DOING OR TO DO ANY ACT WHICH THAT PERSON HAS A LEGAL RIGHT TO DO OR ABSTAIN FROM DOING, WRONGFULLY AND WITHOUT LEGAL AUTHORITY, SUCH AS AMOUNTS TO AN OFFENCE UNDER SECTION 241(1) OF THE TRADE UNION AND LABOUR RELATIONS (CONSOLIDATION) ACT 1992;**~~
 - ~~**• PURSUING ANY COURSE OF CONDUCT THAT AMOUNTS TO CRIMINAL DAMAGE OR THEFT;**~~
 - ~~**• OBSTRUCTING THE FREE PASSAGE ALONG A HIGHWAY, OR THE ACCESS TO OR FROM A PUBLIC HIGHWAY, BY:**~~
 - ~~**○ BLOCKING THE HIGHWAY WITH PERSONS OR THINGS WHEN DONE WITH A VIEW TO SLOWING DOWN OR STOPPING THE TRAFFIC, AND WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS AND/OR THEIR VISITORS;**~~
 - ~~**○ SLOW WALKING IN FRONT OF VEHICLES WITH THE OBJECT OF SLOWING THEM DOWN, AND WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS AND/OR THEIR VISITORS;**~~
 - ~~**○ CLIMBING ONTO VEHICLES;**~~
 - ~~**○ OTHERWISE, UNREASONABLY AND/OR WITHOUT LAWFUL AUTHORITY OR EXCUSE, OBSTRUCTING THE HIGHWAY, WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS AND/OR THEIR VISITORS.**~~
 - ~~**• WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY, INCLUDING (BUT NOT LIMITED TO) BY WALKING IN FRONT OF VEHICLES WITH THE OBJECT OF SLOWING THEM DOWN, BLOCKING THE HIGHWAY WITH PERSONS OR THINGS WHEN DONE WITH A VIEW TO SLOWING DOWN OR STOPPING THE TRAFFIC, AND/OR CLIMBING ONTO VEHICLES;**~~

- ~~CAUSING ANYTHING TO BE DONE ON OR OVER A ROAD, OR THAT WHICH INTERFERES WITH A MOTOR VEHICLE, TRAILER OR CYCLE, OR INTERFERES (DIRECTLY OR INDIRECTLY) WITH TRAFFIC EQUIPMENT, IN SUCH CIRCUMSTANCES THAT IT WOULD BE OBVIOUS TO A REASONABLE PERSON THAT TO DO SO WOULD BE DANGEROUS~~

~~IN EACH CASE WITH THE INTENTION OF DAMAGING THE CLAIMANTS BY OBSTRUCTING, IMPEDING OR INTERFERING WITH THE LAWFUL ACTIVITIES UNDERTAKEN BY THE CLAIMANT(S) (WHETHER CARRIED OUT BY THEMSELVES OR BY THEIR EMPLOYEES OR BY GROUP COMPANIES) OR BY OBSTRUCTING, IMPEDING OR INTERFERING WITH THE LAWFUL ACTIVITIES UNDERTAKEN BY THE CONTRACTORS OR SUB-CONTRACTORS ENGAGED BY THE CLAIMANTS IN CONNECTION WITH THE CLAIMANTS' SEARCHING OR BORING FOR OR GETTING ANY MINERAL OIL OR RELATIVE HYDROCARBON AND NATURAL GAS EXISTING IN ITS NATURAL CONDITION IN STRATA. A LIST OF THE GROUP COMPANIES, CONTRACTORS AND SUB-CONTRACTORS COVERED BY THIS INJUNCTION APPEARS AT SCHEDULE 22. THIS LIST OF GROUP COMPANIES, CONTRACTORS AND SUB-CONTRACTORS MAY BE UPDATED BY WAY OF PUBLICATION AT <https://www.ineos.com/businesses/ineos-shale/injunction/> WITH THE INJUNCTION APPLYING TO SAID GROUP COMPANIES, CONTRACTORS AND SUB-CONTRACTORS FROM THE DATE OF PUBLICATION.~~

Court communications: all communications about the Order should be sent to the Court Manager, High Court of Justice (Ref: HC-2017-002125) (details found at <https://courtribunalfinder.service.gov.uk/courts/rolls-building>)

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; Email address: IneosTeam@fieldfisher.com). Subject to the Defendant(s) providing their name(s), address(es) and proof of identity when making a written request to the Claimants' solicitor (quoting reference OTD/INEOS), the Claimant will promptly make available to the Defendant(s) the Court documents, witness evidence and exhibits via an online file hosting service.

Weblink to: Order dated 12 December 2017, Application Notice dated 31 July 2017 and Amended Claim Form can be found at <https://www.ineos.com/businesses/ineos-shale/injunction/>

SCHEDULE 21

Key Organisations

Frack Off - <http://frack-off.org.uk/>

Friends of the Earth - <https://www.foe.co.uk/>

Greenpeace - <http://www.greenpeace.org.uk>

Reclaim the Power <https://reclaimthepower.org.uk/>

Local Action Groups

Amber Valley Against Fracking – <https://www.facebook.com/groups/862574837111750>

Blackpool and Fylde Community Protection Camps -
<https://www.facebook.com/groups/241716712947463/>

Derby Climate Coalition - <http://derbyclimate.org.uk/>

Eckington Against Fracking -
<https://www.facebook.com/groups/EckingtonAgainstFracking/permalink/400654887000463/>

Harthill Against Fracking – <https://www.facebook.com/groups/620730824777723/>

Kirby Misperton Protection Camp - <https://www.facebook.com/groups/573619286143264/>

Marriotts of Fire Protection Camp - <https://www.facebook.com/groups/1726094950738820/>

Preston New Road Action Group - <http://pnrgroup.org.uk/> -

Residents Action on Fylde Fracking - <http://stopfyldefracking.org.uk/> -

Roseacre Awareness Group - <http://www.ragfrack.co.uk/> -

Frack Free Organisations

Frack Free Cheshire - <https://www.facebook.com/groups/frackfreecheshire/>

Frack Free Derbyshire - <https://www.facebook.com/FrackFreeDerbyshire/>

Frack Free Lancashire - <http://frackfreelancashire.org.uk/cms/>

Frack Free Nottinghamshire - <http://frackfreenotts.org.uk/>

Frack Free Ryedale - <http://frackfreeryedale.org/ebberston-moor-south-planning-application-briefing/>

Frack Free Somerset - <http://www.frackfreesomerset.org/>

Frack Free Tinker Lane - <http://frackfreetinkerlane.uk/>

Frack Free Ashfield - <http://www.frackfreeashfield.co.uk/>

Frack Free Blackpool - <https://www.facebook.com/FrackFreeBlackpool>

Frack Free Burscough - <https://www.facebook.com/FrackFreeBurscough/>

Frack Free Bolsover - <http://www.frackfreebolsover.org.uk/>

Frack Free Clare - <https://frackingfreeclare.org/>

Frack Free Cleveland - <http://frackfreecleveland.co.uk/>

Frack Free Chorlton - <https://www.facebook.com/groups/724082630938120/>

Frack Free Cotswold - <http://frackfreecotswolds.co.uk/>

Frack Free Dee - <http://www.frackfreedee.co.uk/>

Frack Free Deeside - <https://www.facebook.com/Frack-Free-Deeside-434882689978867/>

Frack Free Devizes - <https://www.facebook.com/groups/1617632415151915/>

Frack Free Dudleston - <http://frackfreedudleston.org.uk/>

Frack Free East Cheshire - <https://www.facebook.com/FrackFreeECheshire>

Frack Free EQS (Exmoor, Quantocks & Sedgemoor) - <https://www.facebook.com/FrackFreeEQS>

Frack Free Farndon - <https://www.facebook.com/groups/FrackFreeFarndon/>

Frack Free Five Valleys - <https://frackfreefivevalleys.wordpress.com/>

Frack Free Formby - <https://www.facebook.com/frackfreeformby/>

Frack Free Freckleton - <http://www.frackfreefreck.co.uk/>

Frack Free Frodsham and Helsby - <https://www.facebook.com/FrackFreeFrodshamHelsby/>

Frack Free Gainsborough - <https://www.facebook.com/groups/939006586142924/>

Frack Free Guilden Sutton - <https://www.facebook.com/no2frack>

Frack Free Greater Manchester - <http://www.frackfreegtrmanchester.org.uk/>

Frack Free Handbridge - <https://www.facebook.com/Frack-Free-Handbridge-752754358109744/>

Frack Free Hartpool - <https://www.facebook.com/FrackFreeECheshire>

Frack Free Hull and Holderness - <https://www.facebook.com/groups/589204771172454/>

Frack Free Kirkham & Wesham - <https://www.facebook.com/groups/568475489902386/>

Frack Free Kirton in Lindsey - <https://www.facebook.com/groups/681918388577050/>

Frack Free Levenshulme - <https://www.facebook.com/groups/218243071696995>

Frack Free Little Stanney - <https://www.facebook.com/groups/1672062729679727>

Frack Free Lyme Regis - <https://www.facebook.com/groups/FrackFreeLymeRegis/>

Frack free Malpas - <https://www.facebook.com/FrackFreeMalpas>

Frack Free Mickle Trafford - <https://www.facebook.com/groups/44352145679616/>

Frack Free New Forest - <https://www.facebook.com/groups/25774577491464>

Frack Free North Somerset - <http://frackfreenorthsomerset.org.uk/>

Frack Free North Yorkshire - <http://frackfreenorthyorkshire.com/>

Frack Free Northwich - <https://www.facebook.com/FrackFreeNorthwich>

Frack Free Pendle - <https://www.facebook.com/nofrackingchance>

Frack Free Ryedale - <http://frackfreeryedale.org/>

Frack Free Salford - <https://www.facebook.com/groups/fractivismsalford>

Frack Free Scarborough - <https://www.facebook.com/groups/200759997/>

Frack Free Scunthorpe - <https://frackfreescunthorpe.wordpress.com/>

Frack Free Sherwood (Protecting Sherwood Forest, Edwinstowe, Ollerton, Boughton, Mansfield, Sutton, Dukeries) - <https://inedwinstowe.co.uk/local-groups-in-edwinstowe/frack-free-sherwood-and-edwinstowe/>

Frack Free Stockport - <https://www.facebook.com/frackfreestockport/timeline>

Frack Free Southport - <https://www.facebook.com/groups/278365402538504/>

Frack Free South Yorkshire - <http://www.frackfreesouthyorkshire.co.uk/>

Frack Free Tameside - <https://frackfreetameside.wordpress.com/>

Frack Free Tarvin - <https://www.facebook.com/groups/91633720904659/>

Frack Free Totnes - <https://www.facebook.com/Frack-Free-Totnes-179663495842585/>

Frack Free Tyne and Wear - <https://frackfreetyneandwear.wordpress.com/>

Frack Free Upton - <https://www.facebook.com/groups/724082630938120/>

Frack Free Walkden - www.frackfreewalkden.co.uk/

Frack Free Westbury - <http://www.frackfreewestbury.org/>

Frack Free Wigan, Leigh and Makerfield - <https://www.facebook.com/groups/563230510418861>

Frack Free York - <http://www.frackfreeyork.org.uk/>

Other

Talk Fracking - <http://www.talkfracking.org/>

SCHEDULE 22

~~CONTRACTORS, SUB-CONTRACTORS AND GROUP COMPANIES~~

~~2Works TM Ltd~~

~~Addplant Limited~~

~~Aggreko UK Limited~~

~~Arturius International Ltd~~

~~Athena Racing Limited~~

~~AXIS P.E.D. Ltd~~

~~Certas Energy UK Limited~~

~~CRH Fencing & Security Group (UK) Ltd (t/a Darfen-~~

~~Durafencing)~~

~~Gross Plant Hire Limited~~

~~Eclipse Strategic Security Ltd~~

~~FCC Recycling (UK) Limited trading as FCC Environment~~

~~Fisher German Priestner Limited~~

~~Fox Plant (Owmby) Limited~~

~~Heaton Planning Limited~~

~~Hewitt Plant Hire Limited~~

~~IMC Geophysical Services Ltd~~

~~INEOS Industries Holdings Limited~~

~~INEOS Racing Limited~~

~~INEOS Upstream Services Limited~~

~~Lindum Fire Services Limited~~

~~Mr Peter Williams~~

~~PR Marriott Drilling Ltd~~

~~R Elliott Associates Limited~~

~~SLR Consulting Limited~~

~~S. Lyon & Son (Haulage) Limited~~

~~Special Branch Tree Surgeons Ltd~~

Claim No. HC-2017-002125

IN THE HIGH COURT OF JUSTICE

CHANCERY DIVISION

B E T W E E N

(1) INEOS UPSTREAM LIMITED

First Claimant/Applicant

(2) INEOS 120 EXPLORATION LIMITED

Second Claimant/Applicant

(3) INEOS PROPERTIES LIMITED

Third Claimant/Applicant

(4) INEOS INDUSTRIES LIMITED

Fourth Claimant/Applicant

(5) JOHN BARRIE PALFREYMAN

Fifth Claimant/Applicant

(6) ALAN JOHN SKEPPER

Sixth Claimant/Applicant

(7) JANETTE MARY SKEPPER

Seventh Claimant/Applicant

(8) STEVEN JOHN SKEPPER

Eighth Claimant/Applicant

(9) JOHN AMBROSE HOLLINGWORTH

Ninth Claimant/Applicant

(10) LINDA KATHARINA HOLLINGWORTH

Tenth Claimant/Applicant

-and-

**(1) PERSONS UNKNOWN ENTERING OR
REMAINING WITHOUT THE CONSENT OF
THE CLAIMANT(S) ON LAND AND**

**BUILDINGS SHOWN SHADED RED ON THE
PLANS ANNEXED TO THE CLAIM FORM**

First Defendant/Respondent

**(2) PERSONS UNKNOWN INTERFERING
WITH THE FIRST AND SECOND CLAIMANTS'
RIGHTS TO PASS AND REPASS WITH OR
WITHOUT VEHICLES, MATERIALS AND
EQUIPMENT OVER PRIVATE ACCESS
ROADS ON LAND SHOWN SHADED ORANGE
ON THE PLANS ANNEXED TO THE AMENDED
Claim Form WITHOUT THE CONSENT OF THE
CLAIMANT(S)**

Second Defendant/Respondent

~~**(3) PERSONS UNKNOWN INTERFERING
WITH THE RIGHT OF WAY ENJOYED BY THE
CLAIMANT(S) AND EACH OF ITS AND THEIR
AGENTS, SERVANTS, CONTRACTORS, SUB-
CONTRACTORS, GROUP COMPANIES,
LICENSEES, EMPLOYEES, PARTNERS,
CONSULTANTS, FAMILY MEMBERS AND
FRIENDS OVER LAND SHOWN SHADED
PURPLE ON THE PLANS ANNEXED TO THE
AMENDED CLAIM FORM**~~

Third Defendant/Respondent

~~**(4) PERSONS UNKNOWN PURSUING ANY
COURSE OF CONDUCT SUCH AS AMOUNTS
TO HARASSMENT OF THE CLAIMANTS AND /
OR ANY THIRD PARTY CONTRARY TO THE
PROTECTION FROM HARASSMENT ACT 1997
WITH THE INTENTION SET OUT IN
PARAGRAPH 10 OF THE ORDER**~~

Fourth Defendant/Respondent

~~**(5) PERSONS UNKNOWN COMBINING
TOGETHER TO COMMIT THE UNLAWFUL
ACTS AS SPECIFIED IN PARAGRAPH 10 OF
THE ORDER WITH THE INTENTION SET OUT
IN PARAGRAPH 10 OF THE ORDER**~~

Fifth Defendant/Respondent

(6) JOSEPH BOYD

Sixth Defendant/Respondent

(7) JOSEPH CORRÉ

ORDER

**Fieldfisher LLP
Solicitors for the Claimants**

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2 Swan Lane
London EC4R 3TT
Tel: 020 7861 4000
Fax: 020 7488 0084
Ref: OTD/64340.2**