

Party Name	Claimant
No. of statement Exhibits	G J Robertson
Date	Second "GJR2"
	16 July 2025

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim no. KB-2024-002336

B E T W E E N :

GATWICK AIRPORT LIMITED

Claimant

-and-

PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LONDON GATWICK AIRPORT SHOWN OUTLINED IN YELLOW AND SHADED YELLOW ON PLAN 1 ATTACHED TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

SECOND WITNESS STATEMENT OF GRAEME JAMES ROBERTSON

I, **GRAEME JAMES ROBERTSON**, of Herbert Smith Freehills Kramer LLP, Exchange House, Primrose Street, London EC2A 2EG **WILL SAY** as follows:

1. I am the same Graeme Robertson who gave a first witness statement dated 4 July 2025 in these proceedings.
2. I make this witness statement in support of the Claimant's application (the "**Application**") for the review of the injunction order of Ritchie J dated 19 July 2024 (the "**Injunction Order**"). I am duly authorised to make this statement on the Claimant's behalf.
3. Save where I indicate to the contrary, the facts and matters within this statement are within my own knowledge and are true. Where they are not within my knowledge, I have identified the source of the information and believe such facts and matters to be true.

4. There is now shown to me a bundle of documents, which I exhibit as "**GJR2**". I confirm that the documents in those exhibits are true copies of the documents. References in this witness statement to the page numbers in GJR2 are in the format **GJR2/x**.

Procedural steps taken to notify the potential Defendants: website and email

5. The Claimant has taken the steps specified in paragraph 4 of the Injunction Order as set out below to notify potential Defendants of the Application and the hearing on 18 July 2025.
6. On Tuesday 8 July 2025, I was informed by email by the Claimant's senior corporate communications manager that the documents specified below had been uploaded to the following website: <http://www.gatwickairport.com/injunction.html> (the "**Website**") and would be live on the Website overnight:
 - a. Sealed Application Notice and draft order dated 4 July 2025;
 - b. Witness statement of Graeme James Robertson dated 4 July 2025; and
 - c. Exhibit GJR1.
7. I viewed the above documents on the Website on 9 July 2025. A screenshot of the Website as at 11 July 2025 is exhibited at **GJR2/3**.
8. On Wednesday 9 July 2025 I sent an email to each of the email addresses below stating that a renewal application had been made, that the documents could be found on the Website, that a hearing had been listed for Friday 18 July 2025 and attaching a copy of a warning notice containing the same information:
 - a. juststopoil@protonmail.com
 - b. info@juststopoil.org
 - c. juststopoilpress@protonmail.com
 - d. enquiries@extinctionrebellion.co.uk
 - e. enquiries@extinctionrebellion.uk
9. The above emails are exhibited at **GJR2/4-8** and the warning notice at **GJR2/18**.
10. Also on 9 July 2025, I received an automated response from enquiries@extinctionrebellion.uk which I exhibit at **GJR2/9**. I have not received

responses from any of the other addresses (automated or otherwise) as at the date of signing this witness statement.

11. On 11 July 2025, I searched the internet for contact details for the groups Fossil Free London, Youth Action and Shut the System. Both Fossil Free London and Youth Action had email contact details on their websites (**GJR2/10** and **GJR2/11** respectively). I was not able to find a website or email contact details for Shut the System.
12. Also on 11 July 2025, I sent an email to each of the email addresses below (which I obtained from the websites referred to in paragraph 11 above) stating that a renewal application had been made, that the documents could be found on the Website, that a hearing had been listed for Friday 18 July 2025 and attaching a copy of the same warning notice referenced in paragraphs 8 and 9 above:
 - a. campaigner@fossilfreelondon.org
 - b. youthdemand@proton.me
 - c. youthdemandpress@protonmail.com
13. The above emails are exhibited at **GJR2/12-14** and the warning notice at **GJR2/18**. I have not received any responses to the emails at the date of signing this witness statement.

Procedural steps taken to notify the potential Defendants: affixing of notices

14. On 16 July 2025, I was informed by email by one of the Claimant's in-house solicitors that (a) copies of the warning notice (**GJR2/18**) in A2 size had been affixed to the entrances/exits to the North and South Terminal buildings at Gatwick Airport shown by the blue circles on the plan at **GJR2/19** and to the perimeter fences at the locations shown by red squares on the plan at **GJR2/19**; and (b) the Claimant had issued a Gatwick Airport Directive (reference GAD1002) ("**GAD**") to all companies that operate at the Airport notifying them of the Application and the hearing on 18 July 2025 and where copies of the application documentation may be obtained. The GAD directed recipients to share the GAD with occupiers, undertenants and those sharing possession of property at Gatwick Airport occupied by the recipients. A copy of the GAD is exhibited at **GJR2/15**.

Website as at 16 July 2025

15. On 16 July 2025 an initial hearing bundle for the review application, and the skeleton argument and authorities bundle from the hearing on 19 July 2024 before Ritchie J, were live on the Website.
16. Once the hearing bundle has been updated following the signing of this witness statement, I intend to ask the Claimant to upload it, and the skeleton argument and authorities bundle for the review application, to the Website.
17. I exhibit at **GJR2/17** a screenshot of the Website as at 16 July 2025.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone 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.

SIGNED

Graeme Robertson
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GRAEME JAMES ROBERTSON

DATED

16 July 2025