

Party	Claimant
Name	G J Robertson
No. of statement	Second
Exhibits	"GJR2"
Date	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**

---

**EXHIBIT "GJR2"**

---

This is the exhibit marked "**GJR2**" referred to in the First Witness Statement of **GRAEME JAMES ROBERTSON** dated 16 July 2025.

*Graeme Robertson*  
.....

**GRAEME JAMES ROBERTSON**

## EXHIBIT GJR2 – INDEX

#	Document	Date	Page
1	Screenshot of the Website	11 July 2025	3
2	Emails from HSF Kramer to Just Stop Oil and Extinction Rebellion notifying of the renewal application and hearing	9 July 2025	4
3	Automated response from <a href="mailto:enquiries@extinctionrebellion.uk">enquiries@extinctionrebellion.uk</a>	9 July 2025	9
4	Screenshot of Fossil Free London website	11 July 2025	10
5	Screenshot of Youth Demand website	11 July 2025	11
6	Emails from HSF Kramer to Fossil Free London and Youth Demand notifying of the renewal application and hearing	11 July 2025	12
7	Gatwick Airport Directive (reference GAD1002) notifying of the renewal application and hearing	16 July 2025	15
8	Screenshot of the Website	16 July 2025	17
9	Warning Notice	--	18
10	Plan of locations at Gatwick Airport where warning notice was affixed	--	19

# Injunction

On 19 July 2024, the High Court granted Gatwick Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on the airport in connection with Just Stop Oil (or other environmental campaign groups) without the permission of Gatwick Airport Limited.

Anyone breaching the injunction could be imprisoned for up to two years, fined and/or have their assets seized for contempt of court.

## Key documents

[Hearing Bundle for 18 July 2025](#)

[Exhibit GJR1](#)

[Sealed Application Notice and draft order dated 4 July 2025](#)

[Witness statement of Graeme James Robertson dated 4 July 2025](#)

[Injunction order](#)

[Sealed directions order](#)

[Witness statement of Neil Harvey \(Signed\)](#)

[Neil Harvey Witness Exhibit Bundle \(Part 1\)](#)

[Neil Harvey Witness Exhibit Bundle \(Part 2\)](#)

[First witness statement of Julian Pollock](#)

[Second witness statement of Julian Pollock](#)

[Third witness statement of Julian Pollock](#)

[Julian Pollock witness exhibit bundle](#)

[Julian Pollock third witness exhibit bundle](#)

[GAL v Persons Unknown application notice](#)

[GAL v Persons Unknown amended Particulars of Claim](#)

[GAL v Persons Unknown Amended Claim Form \(19 July 2024\)](#)

[GAL v Persons Unknown Hearing Note](#)

[Hearing bundle \(complete\)](#)

[Sealed Claim Form](#)

Find out more information about our High Court injunction.

### USEFUL LINKS

[FAQS](#)  
[FEEDBACK AND COMPLAINTS](#)  
[CONTACT LONDON GATWICK](#)  
[DROP-OFF CHARGES](#)  
[ROLL-UP CAR PARK PRICES](#)

### YOUR ACCOUNT

[LOGIN](#)  
[CREATE ACCOUNT](#)  
[MANAGE ORDERS](#)

### LEGAL

[TERMS & CONDITIONS](#)  
[PRIVACY POLICY](#)  
[COOKIE POLICY](#)  
[MODERN SLAVERY](#)  
[BIOMETRIC ID](#)  
[INJUNCTION](#)

---

**From:** Robertson, Graeme  
**Sent:** 09 July 2025 12:03  
**To:** juststopoil@protonmail.com  
**Subject:** London Gatwick Airport - Notice of Injunction Renewal Application [HSF-GBR01.FID4724615]  
**Attachments:** GAL Renewal Application - Warning Notice.pdf

Dear Just Stop Oil,

We act for Gatwick Airport Limited ("**GAL**"). On 4 July 2025, GAL issued an interim application (the "**Application**") for the renewal of the injunction against "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)", which was granted pursuant to the Order of the Court dated 19 July 2024.

The documents relating to the Application referred to above can be accessed and viewed at <http://www.gatwickairport.com/injunction.html>.

Further information about the Application is set out in the attached warning notice. The Application has been listed for hearing on 18 July 2025 at the Royal Courts of Justice, Strand, London WC2A 2LL. Further details will be available on the [King's Bench Division Daily Cause List](#) on 17 July 2025.

Yours faithfully,

Herbert Smith Freehills Kramer LLP

---

**From:** Robertson, Graeme  
**Sent:** 09 July 2025 12:05  
**To:** info@juststopoil.org  
**Subject:** London Gatwick Airport - Notice of Injunction Renewal Application [HSF-GBR01.FID4724615]  
**Attachments:** GAL Renewal Application - Warning Notice.pdf

Dear Just Stop Oil,

We act for Gatwick Airport Limited ("**GAL**"). On 4 July 2025, GAL issued an interim application (the "**Application**") for the renewal of the injunction against "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)", which was granted pursuant to the Order of the Court dated 19 July 2024.

The documents relating to the Application referred to above can be accessed and viewed at <http://www.gatwickairport.com/injunction.html>.

Further information about the Application is set out in the attached warning notice. The Application has been listed for hearing on 18 July 2025 at the Royal Courts of Justice, Strand, London WC2A 2LL. Further details will be available on the [King's Bench Division Daily Cause List](#) on 17 July 2025.

Yours faithfully,

Herbert Smith Freehills Kramer LLP

---

**From:** Robertson, Graeme  
**Sent:** 09 July 2025 12:05  
**To:** juststopoilpress@protonmail.com  
**Subject:** London Gatwick Airport - Notice of Injunction Renewal Application [HSF-GBR01.FID4724615]  
**Attachments:** GAL Renewal Application - Warning Notice.pdf

Dear Just Stop Oil,

We act for Gatwick Airport Limited ("**GAL**"). On 4 July 2025, GAL issued an interim application (the "**Application**") for the renewal of the injunction against "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)", which was granted pursuant to the Order of the Court dated 19 July 2024.

The documents relating to the Application referred to above can be accessed and viewed at <http://www.gatwickairport.com/injunction.html>.

Further information about the Application is set out in the attached warning notice. The Application has been listed for hearing on 18 July 2025 at the Royal Courts of Justice, Strand, London WC2A 2LL. Further details will be available on the [King's Bench Division Daily Cause List](#) on 17 July 2025.

Yours faithfully,

Herbert Smith Freehills Kramer LLP

---

**From:** Robertson, Graeme  
**Sent:** 09 July 2025 12:04  
**To:** enquiries@extinctionrebellion.co.uk  
**Subject:** London Gatwick Airport - Notice of Injunction Renewal Application [HSF-GBR01.FID4724615]  
**Attachments:** GAL Renewal Application - Warning Notice.pdf

Dear Extinction Rebellion,

We act for Gatwick Airport Limited ("**GAL**"). On 4 July 2025, GAL issued an interim application (the "**Application**") for the renewal of the injunction against "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)", which was granted pursuant to the Order of the Court dated 19 July 2024.

The documents relating to the Application referred to above can be accessed and viewed at <http://www.gatwickairport.com/injunction.html>.

Further information about the Application is set out in the attached warning notice. The Application has been listed for hearing on 18 July 2025 at the Royal Courts of Justice, Strand, London WC2A 2LL. Further details will be available on the [King's Bench Division Daily Cause List](#) on 17 July 2025.

Yours faithfully,

Herbert Smith Freehills Kramer LLP

---

**From:** Robertson, Graeme  
**Sent:** 09 July 2025 12:04  
**To:** enquiries@extinctionrebellion.uk  
**Subject:** London Gatwick Airport - Notice of Injunction Renewal Application [HSF-GBR01.FID4724615]  
**Attachments:** GAL Renewal Application - Warning Notice.pdf

Dear Extinction Rebellion,

We act for Gatwick Airport Limited ("**GAL**"). On 4 July 2025, GAL issued an interim application (the "**Application**") for the renewal of the injunction against "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)", which was granted pursuant to the Order of the Court dated 19 July 2024.

The documents relating to the Application referred to above can be accessed and viewed at <http://www.gatwickairport.com/injunction.html>.

Further information about the Application is set out in the attached warning notice. The Application has been listed for hearing on 18 July 2025 at the Royal Courts of Justice, Strand, London WC2A 2LL. Further details will be available on the [King's Bench Division Daily Cause List](#) on 17 July 2025.

Yours faithfully,

Herbert Smith Freehills Kramer LLP



---

**From:** Extinction Rebellion <enquiries@extinctionrebellion.uk>  
**Sent:** 09 July 2025 12:05  
**To:** Robertson, Graeme  
**Subject:** Message Received - London Gatwick Airport - Notice of Injunction Renewal Application [HSF-GBR01.FID4724615]

Hello Robertson, Graeme,

This is an automated reply to let you know we received your message.

It'll be read - usually within 24 hours - and we'll send you a personal reply, or forward it to an appropriate person within Extinction Rebellion.

To view the status of the ticket or to add comments, you can visit  
<https://risingup.freshdesk.com/helpdesk/tickets/48199>

Thank you for contacting us,  
With Love & Kindness from

The XR Public Engagement Working Group

[Extinction Rebellion UK - General Enquiries powered by Freshworks](#)

## Media



## Media

Fossil Free London is a grassroots climate action group that aims to kick fossil fuel companies and their financiers out of the UK's capital.

Our actions and comments have been featured in [Reuters](#), [Daily Mail](#), [Guardian](#), [Financial Times](#), [Times](#), [Independent](#), [Bloomberg](#), [Big Issue](#), [ITV News](#), [France24](#) and [Express](#). We have also been covered by local outlets including the [Evening Standard](#), [CityAM](#), [My London](#), [National](#), [Southwark News](#), [Press & Journal](#) and [Hackney Gazette](#) as well as specialist publications like [Energy Voice](#), [Energy Live News](#), and [DeSmog](#).

For media inquiries or to be added to our press list, please email [campaigner\[at\]fossilfreelondon.org](mailto:campaigner[at]fossilfreelondon.org).

For urgent media enquiries please ring 020 3886 2590

[Tweets by fossilfreeLDN](#)

## YOUNG PEOPLE ARE RESISTING

### HELP US GROW THE RESISTANCE

[DONATE TO FUND RESISTANCE](#)
[TRAINING WEEKENDER JUNE 14/15TH](#)


The government is engaging in absolute evil. They are enabling genocide in Palestine by sending money and arms to Israel. They are contributing to the murder of billions to keep the fossil fuel profits flowing.

Young people are stepping up to resist this nightmare. We are demanding that the government must:

1. Stop all trade with Israel: impose a total trade embargo on Israel.
2. Make the rich pay: raise £1Tr by 2030 from the fossil fuel elite to pay damages to countries harmed by fossil fuel burning.

Until these demands are met, we will be in nonviolent resistance against this rigged political system and the people with blood on their hands.

### CURIOUS ABOUT RESISTANCE? COME TO AN EVENT

12 Jul 11:00 - 17:00	Volunteer Training	London, SE1 7AA	<a href="#">Register</a>
24 Jul 18:30 - 21:30	Social	Manchester, M20 4AN	<a href="#">Register</a>
14 Aug 10:00 - 17 Aug 15:00	Social	Worcester, WR6 5JB	<a href="#">Register</a>

### JOIN US TO STAY IN THE LOOP

☐ I agree to the privacy policy and terms of use \*
 ☐ I would like to receive essential emails updates from Youth Demand (you can unsubscribe at any time)

\* required fields, ^ one of these fields is required

[Register](#)



#### CONTACT US

GENERAL INQUIRIES?  
[youthdemand@proton.me](mailto:youthdemand@proton.me)

PRESS INQUIRIES  
[youthdemand@protonmail.com](mailto:youthdemand@protonmail.com)



**From:** [Robertson, Graeme](#)  
**To:** [campaigner@fossilfreelondon.org](mailto:campaigner@fossilfreelondon.org)  
**Subject:** London Gatwick Airport - Notice of Injunction Renewal Application [HSF-GBR01.FID4724615]  
**Date:** 11 July 2025 10:53:28  
**Attachments:** [GAL Renewal Application - Warning Notice.pdf](#)

---

Dear Fossil Free London,

We act for Gatwick Airport Limited ("**GAL**"). On 4 July 2025, GAL issued an interim application (the "**Application**") for the renewal of the injunction against "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)", which was granted pursuant to the Order of the Court dated 19 July 2024.

The documents relating to the Application referred to above can be accessed and viewed at <http://www.gatwickairport.com/injunction.html>.

Further information about the Application is set out in the attached warning notice. The Application has been listed for hearing on 18 July 2025 at the Royal Courts of Justice, Strand, London WC2A 2LL. Further details will be available on the [King's Bench Division Daily Cause List](#) on 17 July 2025.

Yours faithfully,

Herbert Smith Freehills Kramer LLP

**From:** [Robertson, Graeme](#)  
**To:** [youthdemand@proton.me](mailto:youthdemand@proton.me)  
**Subject:** London Gatwick Airport - Notice of Injunction Renewal Application [HSF-GBR01.FID4724615]  
**Date:** 11 July 2025 10:54:01  
**Attachments:** [GAL Renewal Application - Warning Notice.pdf](#)

---

Dear Youth Demand,

We act for Gatwick Airport Limited ("**GAL**"). On 4 July 2025, GAL issued an interim application (the "**Application**") for the renewal of the injunction against "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)", which was granted pursuant to the Order of the Court dated 19 July 2024.

The documents relating to the Application referred to above can be accessed and viewed at <http://www.gatwickairport.com/injunction.html>.

Further information about the Application is set out in the attached warning notice. The Application has been listed for hearing on 18 July 2025 at the Royal Courts of Justice, Strand, London WC2A 2LL. Further details will be available on the [King's Bench Division Daily Cause List](#) on 17 July 2025.

Yours faithfully,

Herbert Smith Freehills Kramer LLP

**From:** [Robertson, Graeme](#)  
**To:** [youthdemandpress@protonmail.com](mailto:youthdemandpress@protonmail.com)  
**Subject:** London Gatwick Airport - Notice of Injunction Renewal Application [HSF-GBR01.FID4724615]  
**Date:** 11 July 2025 10:54:21  
**Attachments:** [GAL Renewal Application - Warning Notice.pdf](#)

---

Dear Youth Demand,

We act for Gatwick Airport Limited ("**GAL**"). On 4 July 2025, GAL issued an interim application (the "**Application**") for the renewal of the injunction against "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)", which was granted pursuant to the Order of the Court dated 19 July 2024.

The documents relating to the Application referred to above can be accessed and viewed at <http://www.gatwickairport.com/injunction.html>.

Further information about the Application is set out in the attached warning notice. The Application has been listed for hearing on 18 July 2025 at the Royal Courts of Justice, Strand, London WC2A 2LL. Further details will be available on the [King's Bench Division Daily Cause List](#) on 17 July 2025.

Yours faithfully,

Herbert Smith Freehills Kramer LLP

## Gatwick Airport Directive

<b>Title : Application for Review of Gatwick Airport High Court Injunction</b>		GAD1002
Issue Date: 2025-07-16	Effective Date: 2025-07-16	Expiry Date: 2025-07-19
<b>It is the responsibility of all employers to ensure the relevant Airport Notice is brought to the attention of their staff. However individuals remain responsible for their own actions and those who are in any doubt should consult their supervisor or manager.</b>		
<b>Introduction:</b>		
<p>On 19 July 2024, the High Court granted Gatwick Airport Limited ("GAL") an injunction to prohibit anyone from entering, occupying or remaining on the airport for the purpose of protesting about fossil fuels or the environment whether or not in connection with Just Stop Oil (or other campaign group) without the permission of GAL. The injunction has to be reviewed by the High Court annually to remain in force.</p> <p>On 4 July 2025, GAL applied to the High Court for the injunction to be reviewed and continued for a further year. A hearing has been listed for 18 July 2025 at the Royal Courts of Justice, Strand, London WC2A 2LL.</p> <p>This notice supersedes: GAD517 This notice supersedes: GAD517</p>		
<b>Programme:</b>		
<p>Pending the hearing on 18 July 2025, the existing injunction remains in force. Anyone breaching the injunction could be imprisoned for up to two years, fined and/or have their assets seized for contempt of court.</p> <p>The documents relating to GAL's claim and application in July 2024, the injunction order of Mr Justice Ritchie dated 19 July 2024, a note of the hearing on 19 July 2024 and the documents relating to GAL's application dated 4 July 2025 to continue the injunction for a further year may be viewed at 5th Floor, Destinations Place, Gatwick Airport, Gatwick, West Sussex, RH6 0NP or online at <a href="http://www.gatwickairport.com/injunction">http://www.gatwickairport.com/injunction</a></p> <p>Notice of GAL's application and the hearing on 18 July 2025 has been posted at appropriate locations around Gatwick Airport.</p>		
<b>Operational Impacts:</b>		
<p>Recipients of this GAD must ensure that it is shared in writing with occupiers, undertenants and those sharing possession of property at Gatwick Airport that the recipients themselves occupy.</p> <p>Safety and security are crucial at the airport, so it is essential that you know how to report suspicious behaviour or protestor activity if you see it.</p> <ul style="list-style-type: none"> <li>• Report any suspected or active protestor activity to the airport emergency number - 01293 501222. They will arrange for Security and Gatwick Police to intervene.</li> <li>• Do not attempt to engage with protestors yourself.</li> <li>• Please refrain from filming / recording any protests on the airport and/or sharing them on social media.</li> </ul>		

A further GAD will be issued after the hearing on 18 July 2025.
<b>Further Information:</b>
For further information, please contact <a href="mailto:legal@gatwickairport.com">legal@gatwickairport.com</a>
<b>Signatory:</b> Neil Harvey
<b><u>For and on behalf of the Chief Executive Officer of Gatwick Airport Limited</u></b>
<b>Distribution:</b> FULL



# Injunction

On 19 July 2024, the High Court granted Gatwick Airport Limited an injunction to prohibit anyone from entering, occupying or remaining on the airport in connection with Just Stop Oil (or other environmental campaign groups) without the permission of Gatwick Airport Limited.

Anyone breaching the injunction could be imprisoned for up to two years, fined and/or have their assets seized for contempt of court.

## Key documents

### July 2025 hearing

[Sealed Application Notice and draft order dated 4 July 2025](#)

[First witness statement of Graeme James Robertson dated 4 July 2025](#)

[Exhibit GJR1](#)

[Hearing Bundle for 18 July 2025](#)

### July 2024 hearing

[Sealed Claim Form](#)

[Sealed Amended Claim Form](#)

[Amended Particulars of Claim](#)

[Sealed Application Notice \(July 2024\)](#)

[Hearing Bundle \(July 2024\)](#)

[Witness statement of Neil Harvey](#)

[Exhibit NH1 \(Part 1 of 2\)](#)

[Exhibit NH1 \(Part 2 of 2\)](#)

[First Witness Statement of Julian Pollock](#)

[Exhibit JP1](#)

[Second Witness Statement of Julian Pollock \(including Exhibit JP2\)](#)

[Third Witness Statement of Julian Pollock](#)

[Exhibit JP3](#)

[Skeleton Argument for hearing on 19 July 2024](#)

[Authorities Bundle for hearing on 19 July 2024](#)

[Note of hearing on 19 July 2024](#)

[Sealed Directions Order of Ritchie J dated 19 July 2024](#)

[Sealed Injunction Order of Ritchie J dated 19 July 2024](#)

Find out more information about our High Court injunction.



#### USEFUL LINKS

[FAQS](#)  
[FEEDBACK AND COMPLAINTS](#)  
[CONTACT LONDON GATWICK](#)  
[DROP-OFF CHARGES](#)  
[ROLL-UP CAR PARK PRICES](#)

#### YOUR ACCOUNT

[LOGIN](#)  
[CREATE ACCOUNT](#)  
[MANAGE ORDERS](#)

#### LEGAL

[TERMS & CONDITIONS](#)  
[PRIVACY POLICY](#)  
[COOKIE POLICY](#)  
[MODERN SLAVERY](#)  
[BIOMETRIC ID](#)  
[INJUNCTION](#)



HIGH COURT CLAIM NO: KB-2024-002336

# High Court Injunction: Renewal Application

## NOTICE OF LODGING OF A RENEWAL APPLICATION AND HEARING ON 18 JULY 2025

**TO:** 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) (the "**Defendants**")

**FROM:** Gatwick Airport Limited ("the **Claimant**")

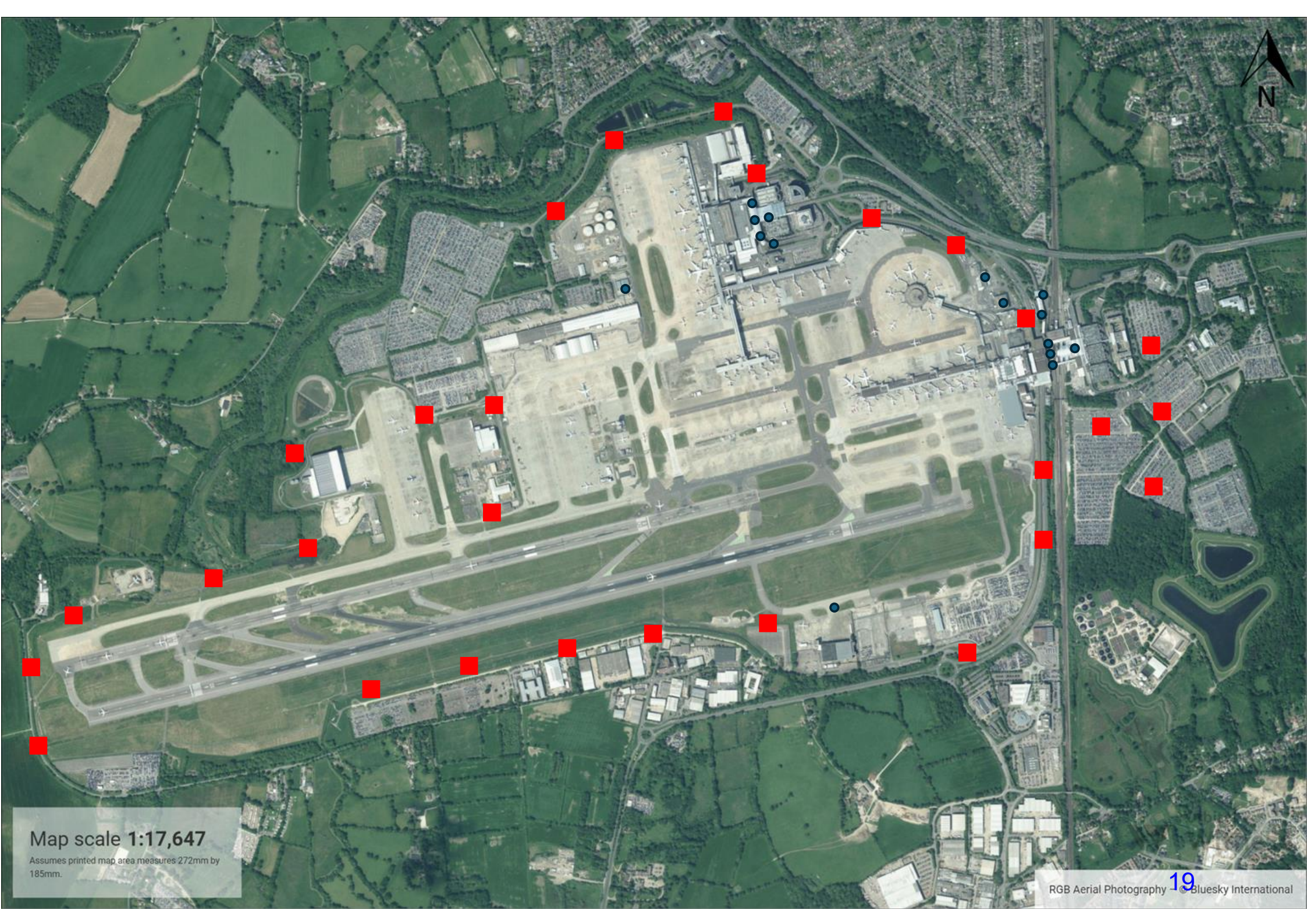
This notice relates to the injunction granted by the High Court on 19 July 2024 (the "**Injunction**") relating land known as London Gatwick Airport, Gatwick RH6 0NP

The Claimant has lodged an application dated 4 July 2025 to renew the Injunction and a hearing has been listed for 18 July 2025 at the Royal Courts of Justice, Strand, London WC2A 2LL.

The application documents and may be viewed at: 5th Floor, Destinations Place, Gatwick Airport, Gatwick, West Sussex, RH6 0NP or online at <http://www.gatwickairport.com/injunction.html>.

Copies may also be obtained from the Information Desk or by contacting Graeme Robertson of Herbert Smith Freehills Kramer LLP at Exchange House, Primrose Street, London EC2A 2EG, on 020 7374 8000 or by email at [injunctions@hsfkramer.com](mailto:injunctions@hsfkramer.com).





Map scale 1:17,647

Assumes printed map area measures 272mm by 185mm.