

Party: Claimants
Name: Alexander James Wright
Number: Second
Date: 17.07.2024

CLAIM NO: KB-2024-002317

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

B E T W E E N

- (1) LEEDS BRADFORD AIRPORT LIMITED**
- (2) LONDON LUTON AIRPORT OPERATIONS LIMITED**
- (3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED**
- (4) NIAL SERVICES LIMITED**

Claimants

- v -

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

Defendants

SECOND WITNESS STATEMENT OF

ALEXANDER JAMES WRIGHT

I ALEXANDER JAMES WRIGHT of Eversheds Sutherland (International) LLP One Wood Street, London EC2V 7WS WILL SAY as follows:-

1. I am a Principal Associate in the firm of Eversheds Sutherland (International) LLP and assisting Stuart Wortley (Partner) who has conduct of these proceedings on behalf of the Claimants.
2. I make this witness statement in support of the Claimants' application for an injunction. I make it further to my first witness statement of 16 July 2024.
3. This witness statement has been produced by me with the assistance of my colleagues Nawaaz Allybokus and Emma Payne.
4. The statements in this witness statement are from my own knowledge, save where I state otherwise. Where statements are matters of information or belief, I provide the source of that information or belief.

OTHER AIRPORT PROTESTS

5. At paragraphs 67-76 of my first witness statement, I referred to protests which had occurred at other airports.
6. I noted the evidence filed in support of the injunctions granted in favour of Manchester Airport, Stansted Airport and East Midlands Airport in the claim under number KB-2024-0002132, which included a protest having occurred at Stansted airport on 20 June 2024.
7. I did not mention in that statement a further incident which was mentioned in the evidence in support of that application, which was an attempted protest at Gatwick airport. The evidence from Mr David McBride, head of legal at Manchester Airports Group stated at paragraph 47:

"25 JUNE 2024 – DIRECT ACTION AT GATWICK AIRPORT

47. On 26 June 2024, our security team received a briefing from the National Police Coordination Centre concerning the arrest of four JSO protestors at London Gatwick Airport. These individuals were not intending to travel but were in possession of bags containing several hundred bandages. The police suspect that they intended to distribute the bandages across a runway – forcing the closure of the airport until all of the bandages could be removed (owing to the risk of damage which might occur if any of the bandages was drawn into to an aircraft jet engine)."

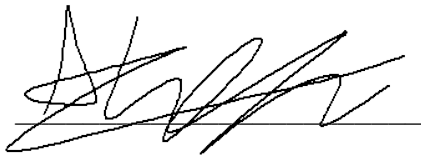
A copy of Mr McBride's witness statement is available online at <https://assets.live.dxp.maginfrastucture.com/f/73114/x/270ba6fa6d/injunction-mag-hearing-bundle.pdf>.

Statement of truth

I believe that the facts stated in this Witness Statement and Exhibits 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.

I am duly authorised to make this statement on the Claimants' behalf.

A handwritten signature in black ink, appearing to be 'AJ Wright', written over a horizontal line.

Alexander James Wright

17 July 2024