

Party: Claimants
Name: Alexander James Wright
Number: Fourth
Date: 18.07.2024
Exhibit: AW1

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

FOURTH 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 ("**My First Witness Statement**") and my second and third witness statements of 17 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.
5. I refer to an exhibit marked "**AW1**" in this statement. They have been produced to me and I verify that the documents in those exhibits are true copies of the documents.

Newcastle International Airport – Plan 3A

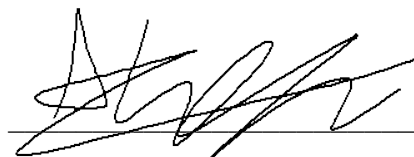
1. My First Witness Statement refers to a plan titled 'Plan 3A' (which is exhibited to my First Witness Statement at Exhibit AW9).
2. Following the production of that plan, the Third Claimant identified that part of the land which is shown on it as a 'Wholly Third Party Area' to the East / South-East of the airport site was recently returned into the immediate ownership and control of the Third Claimant following a surrender of the relevant area of land from a third party tenant farmer (to whom the land was previously let).
3. 'Plan 3A' exhibited to my First Witness Statement does not show this. An updated version of Plan 3A which reflects the above is exhibited to this witness statement at **Exhibit AW1**.

Statement of truth

I believe that the facts stated in this Witness Statement and Exhibit 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

18 July 2024

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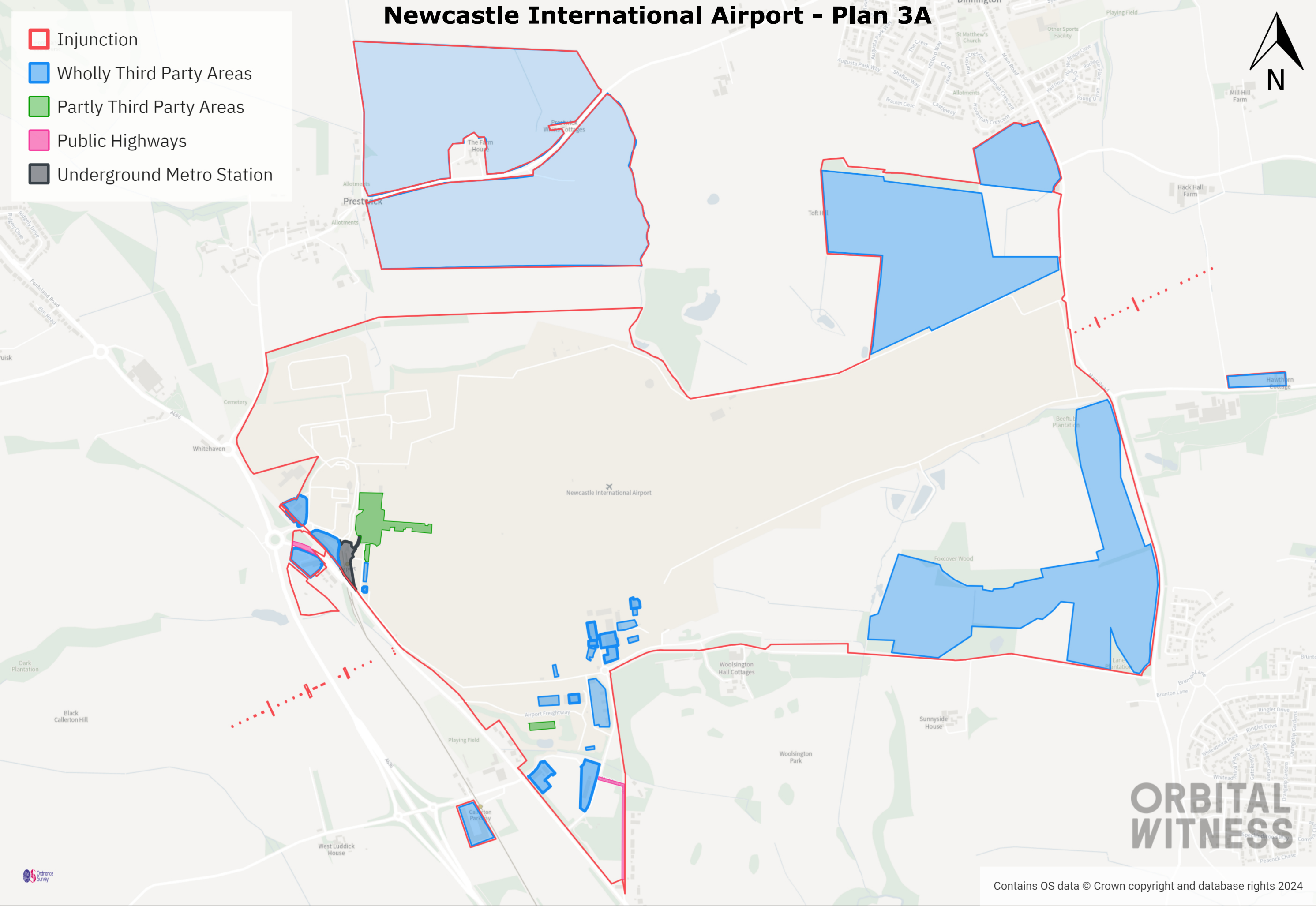
Defendants

AW1

This is the Exhibit marked "AW1" in the Fourth Witness Statement of Alexander James Wright

Newcastle International Airport - Plan 3A

- Injunction
- Wholly Third Party Areas
- Partly Third Party Areas
- Public Highways
- Underground Metro Station



ORBITAL
WITNESS