Amended 24.1.25 **CLAIM NO: KB-2025-000136**

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: THE HONOURABLE MR JUSTICE FORDHAM

DATED: 21 JANUARY 2025

BETWEEN:-

(1) WM MORRISON SUPERMARKETS LIMITED
(2) SAFEWAY STORES LIMITED
(3) WM MORRISON PRODUCE LIMITED

Claimants

- v -

(1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS

(2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN

CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the Claimants' claim by the Claim Form dated 15 January 2025

AND UPON the Claimants' application for an injunction dated 15 January 2025 (the "**Application**")

AND UPON the making of injunctions by Order dated 16 January 2025 by Mrs Justice Collins Rice (the "**Collins Rice J Order**") which was continued by Order dated 20 January 2025 by Mr Justice Fordham (the "**First Fordham J Order**"), both of which are available at www.morrisons-corporate.com/injunction

AND UPON reading the Application and the witness statements filed in support of it (the "**Witness Statements**") and hearing Leading and Junior Counsel for the Claimants at the return date of 20 January 2025, there being no other attendance

AND UPON reading an email from info@farmerstoaction.org dated 20 January 2025 at 9:00am

AND UPON Fordham J having given brief reasons orally incorporated within a written judgment [2025] EWHC 83 (KB) to be available at www.morrisons-corporate.com/injunction

AND UPON the Court being satisfied, on the evidence and submissions before it as to circumstances and investigations made by or available to the Claimants, that the Claimants have thereby taken all practicable steps to notify the Defendants of the Application prior to the initial return date of 20 January 2025 pursuant to section 12(1) and (2) of the Human Rights Act 1998

AND UPON the Court having carefully considered the grounds for the Application, the evidence and any arguable defences that might be raised by the Defendants and being satisfied

that the Claimants have established, on the evidence filed by the Claimants, that: (1) the Claimants have a good cause of action in relation to each of the Distribution Centres and the Access Roads, in respect of which they are likely to succeed at trial pursuant to section 12(3) of the Human Rights Act 1998; (2) the Claimants have complied with the duty of full and frank disclosure; (3) there is sufficient evidence of a real and imminent risk of tortious activity and real harm; (4) there is no realistic defence to the claim; (5) there is a compelling justification for the injunctions sought; and (6) damages would not be an adequate remedy

AND UPON the Court being satisfied that the relevant procedural requirements for the grant of injunctions against "Persons Unknown" have been established by the Claimants on the evidence and that the terms of the Order are clear and appropriate and, in the circumstances, that it is just and convenient to grant the injunctions sought

AND UPON the Claimants confirming that this order is not intended to prohibit any lawful protest outside the Distribution Centres in so far as any such protest does not obstruct any of the pedestrian and vehicular entrances or exits to the Distribution Centres

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 3 to this order

AND in replacement of the injunctions granted by the Collins Rice J Order and continued by the First Fordham J Order, but with the intention that the provisions for alternative service set out in paragraphs 8-12 and 14 of the Collins Rice J Order shall remain unaffected and in force

IT IS ORDERED THAT:

DEFINITIONS

1. "**The Distribution Centres**" means the land defined in Schedule 1 to this order, the extent of which is shown for identification purposes coloured blue on each of the relevant plans appended to this order in Schedule 2 ("**the Plans**").

2. "**The Access Roads**" means the roads which provide direct access to each of the relevant Distribution Centres, the extent of which is shown for identification purposes in pink and/or orange on the Plans.

3. "**Warning Notices**" means notices in the form as set out in Schedule 5 to this order (and warning of the existence and general nature of this order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the order may be requested and identifying the website address www.morrisons-corporate.com/injunction at which copies of this order may be viewed and downloaded).

PERMISSION TO AMEND

4. The Claimants have permission to re-amend the claim form in order to re-amend the description of the Defendants by substituting the reference to "Sites" for "Distribution Centres" and correcting the reference to "regional distribution centres" in paragraph 3 of the details of claim.

INJUNCTION

5. Subject to paragraph 8 below, this order shall operate with immediate effect until varied, discharged or extended by further order.

6. The Defendants and each of them must not do any of the acts listed in paragraph 7 of this order.

7. The acts referred to in paragraph 6 of this order are:

    a. entering, occupying or remaining upon any part of the Distribution Centres without the consent of the Claimants in connection with agricultural protests;

    b. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants, its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the Access Roads in connection with agricultural protests.

8. There is to be a further return date of the Application, listed for 29 January 2025 at 12pm, with a time estimate of three and a half hours at which the Court will consider whether the injunctions granted by this order shall continue for a further period and, if appropriate, give case management directions for the progression of the claim

FURTHER DIRECTIONS

9. The Defendants and any persons affected by this order who wish to attend the return date hearing and make representations to the Court shall provide their written representations and any evidence which is to be relied upon by them at the hearing of the return date to the Claimants' solicitors by no later than 4pm on 24 January 2025.

10. No acknowledgment of service, admission or defence is required by any party until further so ordered.

11. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

12. The Claimants' solicitors and their contact details are:

(1) Andrew Todd
Eversheds Sutherland (International) LLP
andrewtodd@eversheds-sutherland.com

(2) Alex Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com

SCHEDULE 1 - THE DISTRIBUTION CENTRES

THE DISTRIBUTION CENTRES BEING:

(1) THE FIRST CLAIMANT'S NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE AT (A) COB DRIVE, SWAN VALLEY, NORTHAMPTON NN4 9BB; (B) DC2, SWAN VALLEY, NORTHAMPTON NN4 9BD; AND (C) (SV3), UPTON, NORTHAMPTON, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 1.1., 1.2, AND 1.3, APPENDED TO THIS ORDER IN SCHEDULE 2

(2) THE SECOND CLAIMANT'S STOCKTON DICKENS RETAIL DISTRIBUTION CENTRE MALLEABLE WAY, STOCKTON-ON-TEES, TS18 2QZ, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 2 APPENDED TO THIS ORDER IN SCHEDULE 2

(3) THE FIRST CLAIMANT'S SITTINGBOURNE RETAIL DISTRIBUTION CENTRE AT G PARK, SITTINGBOURNE ME10 2FD, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 3 APPENDED TO THIS ORDER IN SCHEDULE 2

(4) THE FIRST AND THIRD CLAIMANTS' GADBROOK RETAIL DISTRIBUTION CENTRE AT KING ST, RUDHEATH, NORTHWICH CW9 7WA, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 4 APPENDED TO THIS ORDER IN SCHEDULE 2

(5) THE FIRST CLAIMANT'S LATIMER PARK KETTERING RETAIL DISTRIBUTION CENTRE AT ALTENDIEZ WAY, BURTON LATIMER, KETTERING NN15 5YT, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 5 APPENDED TO THIS ORDER IN SCHEDULE 2

(6) THE FIRST CLAIMANT'S LATIMER PARK CORBY RETAIL DISTRIBUTION CENTRE AT HALLEY ROAD, CORBY NN17 5AN, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 6 APPENDED TO THIS ORDER IN SCHEDULE 2

(7) THE FIRST CLAIMANT'S WILLOW GREEN RETAIL DISTRIBUTION CENTRE AT (A) KINGS DR, BRIDGWATER TA6 4FG; AND (B) BRISTOL ROAD, BRIDGWATER TA6 4BU, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLANS 7.1 AND 7.2 APPENDED TO THIS ORDER IN SCHEDULE 2

(8) THE FIRST CLAIMANT'S WAKEFIELD RETAIL DISTRIBUTION CENTRE AT KENMORE RD, WAKEFIELD INDUSTRIAL ESTATE, WAKEFIELD WF2 0XF, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 8 APPENDED TO THIS ORDER IN SCHEDULE 2

SCHEDULE 2 – PLANS TO THE DISTRIBUTION CENTRES

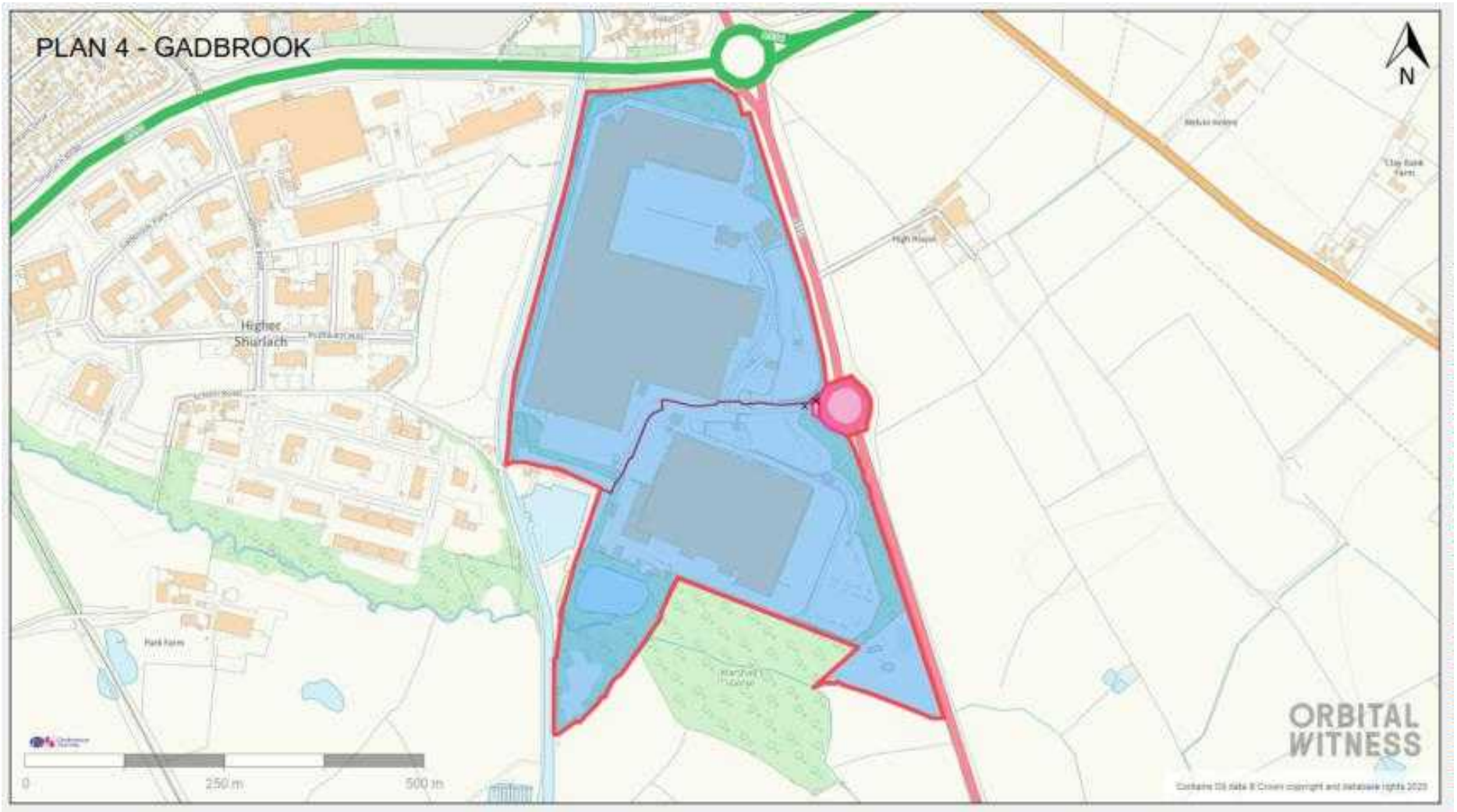
PLAN 1.1 - SV1
N
ORBITAL WITNESS

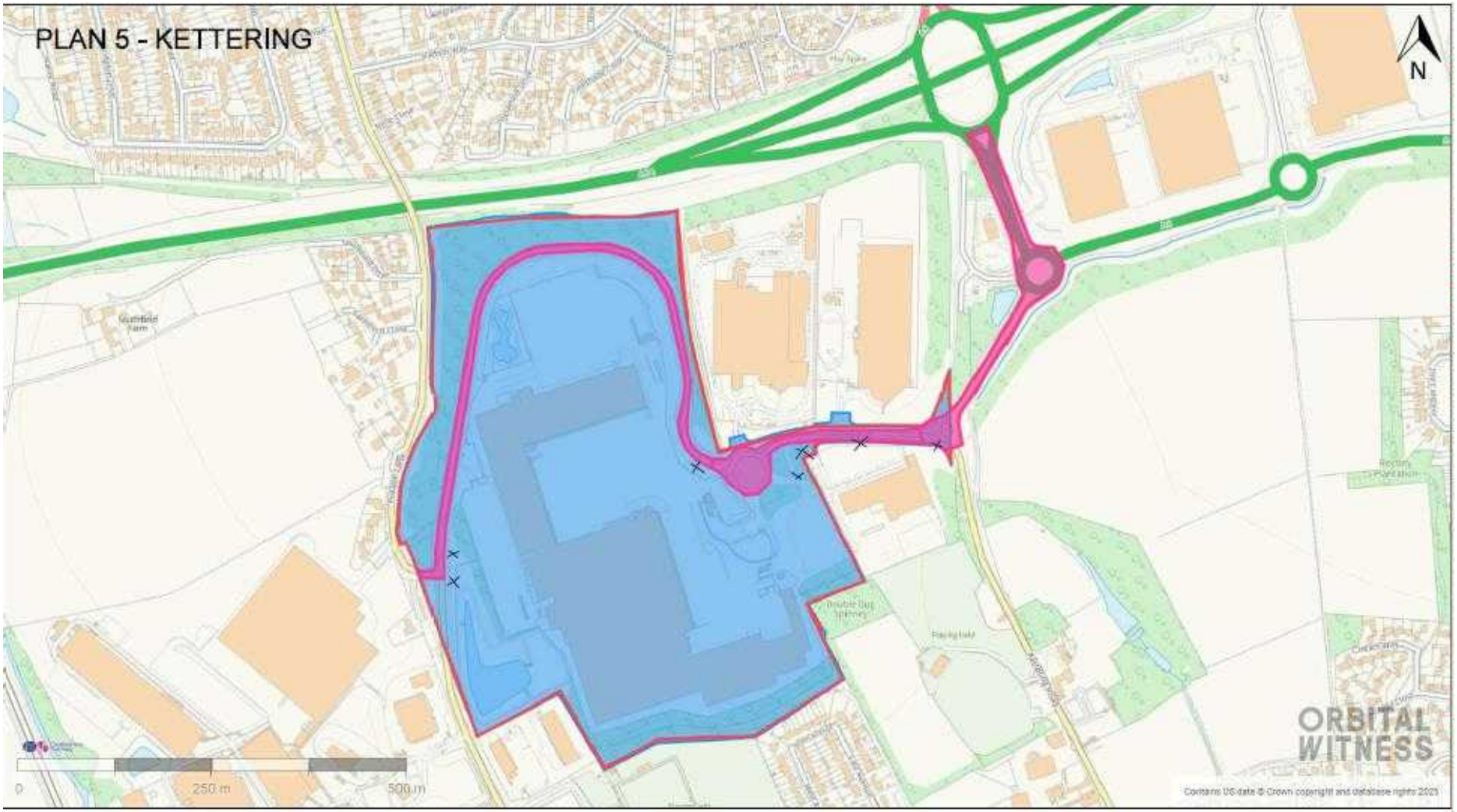
PLAN 1.2 - SV2
N
0
100 m
200 m
ORBITAL WITNESS

PLAN 1.3 - SV3
N
0
250 m
500 m
ORBITAL WITNESS

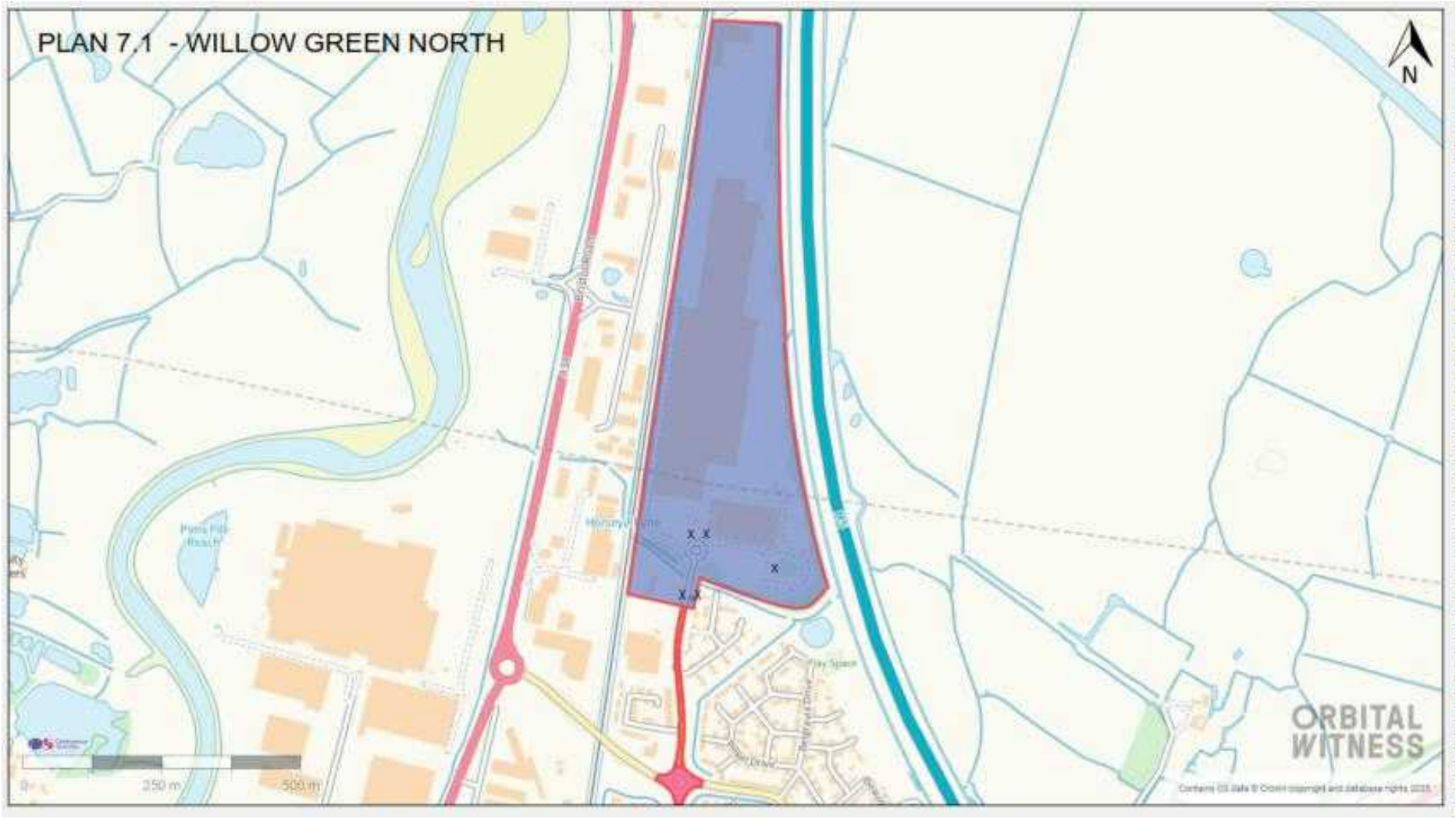
PLAN 2 - STOCKTON
N
ORBITAL WITNESS

PLAN 3 - SITTINGBOURNE
N
ORBITAL WITNESS
250 m
500 m

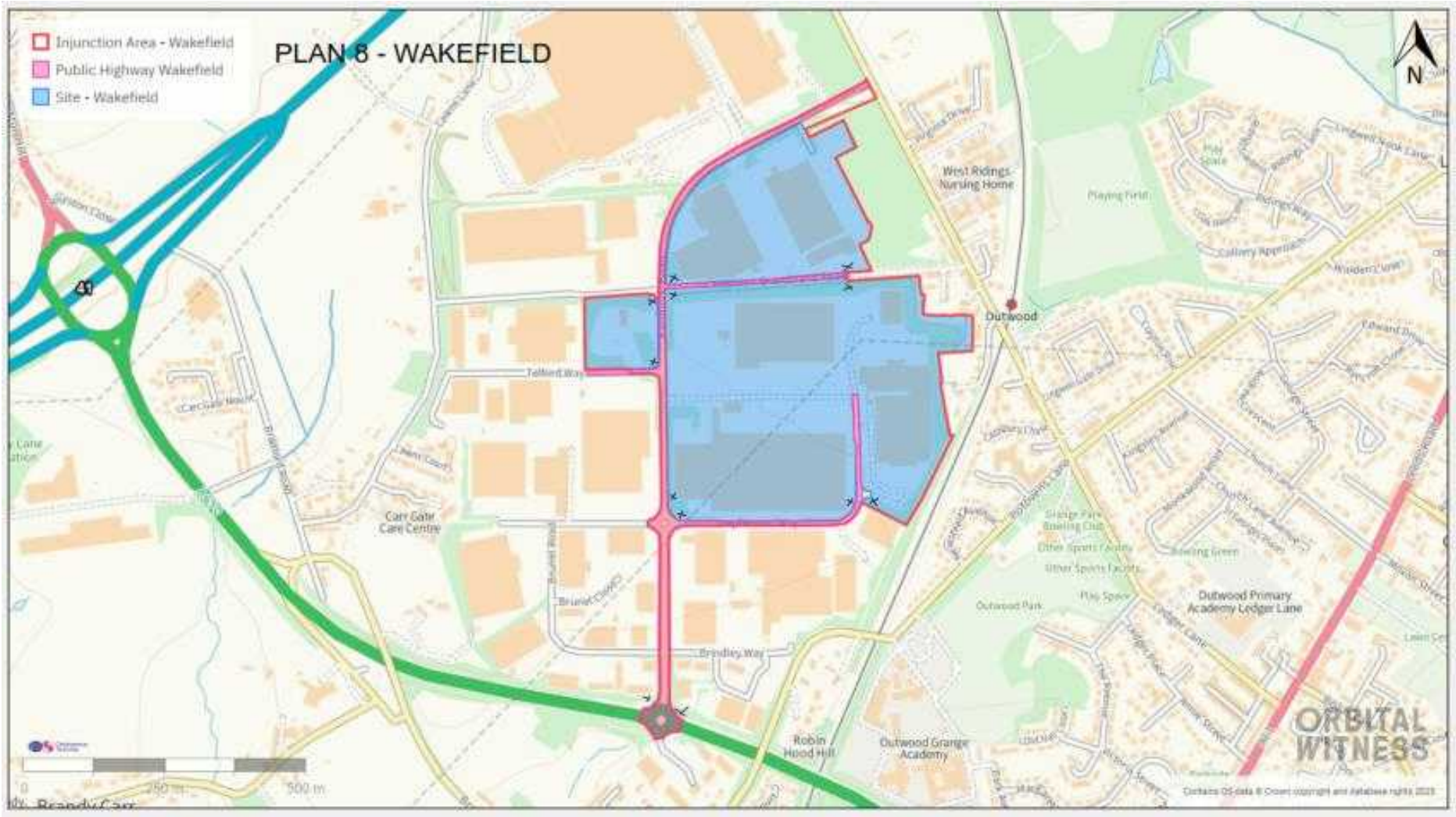

PLAN 4 - GADBROOK
N
Higher Shurlach
Park Farm
High House
Clay Bank Farm
0
250 m
500 m
ORBITAL WITNESS


PLAN 5 - KETTERING
N
0
250 m
500 m
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2023

PLAN 6 - CORBY
N
Gas Gov
Shelter
Cycle Path
Tank
ESS
Gas Gov
Gas Gov
WB
ESS
0
100 m
200 m
ORBITAL WITNESS


PLAN 7.1 - WILLOW GREEN NORTH
N
ORBITAL WITNESS
250 m
500 m

PLAN 7.2 - WILLOW GREEN SOUTH
N
100 m
200 m
ORBITAL WITNESS


Injunction Area - Wakefield
Public Highway Wakefield
Site - Wakefield
PLAN 8 - WAKEFIELD
N
West Ridings Nursing Home
Outwood
Carr Gate Care Centre
Outwood Primary Academy Ledger Lane
Robin Hood Hill
Outwood Grange Academy
Bradley Way
Talbot Way
Brunel Court
ORBITAL WITNESS
0
250 m
500 m

SCHEDULE 3 - UNDERTAKINGS GIVEN BY THE CLAIMANTS

(1) The Claimants will, as soon as practicable take steps (a) to serve the Defendants with a note of the hearing dated 20 January 2025 and (b) to obtain transcript of the hearings on 16 and 20 January 2025 to supply to the clerks to Collins Rice J and Fordham J, for publication on the Courts and Tribunals Judiciary website.

(2) The Claimants will upload any documents in the proceedings to www.morrisons-corporate.com/injunction.

(3) The Claimants will use best endeavours on an ongoing basis to identify any persons falling within the category of the Defendants and consider whether it is appropriate to join them as parties.

(4) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 6 of this order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 4 – EMAIL ADDRESSES

info@farmerstoaction.org

SCHEDULE 5 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

1. **PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS**

2. **PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS**

("**the Defendants**")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

1. **PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS**

2. **PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS**

("**the Defendants**")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.

PLAN 1.2 - SV2
N
0
100 m
200 m
ORBITAL WITNESS

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

1. **PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS**

2. **PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS**

("**the Defendants**")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.

PLAN 1.3 - SV3
N
0
250 m
500 m
ORBITAL WITNESS

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

1. **PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS**

2. **PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS**

("**the Defendants**")

FROM: SAFEWAY STORES LIMITED

("the Second Claimant")

This notice relates to the land known as **STOCKTON DICKENS RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the Second Claimant; and
2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.

PLAN 2 - STOCKTON
N
ORBITAL WITNESS

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

1. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS**

2. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS**

("**the Defendants**")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **SITTINGBOURNE RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.

PLAN 3 - SITTINGBOURNE
N
ORBITAL WITNESS

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

1. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS**

2. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS**

FROM: WM MORRISON SUPERMARKETS LIMITED AND WM MORRISON PRODUCE LIMITED

("the First and Third Claimants")

This notice relates to the land known as **GADBROOK RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

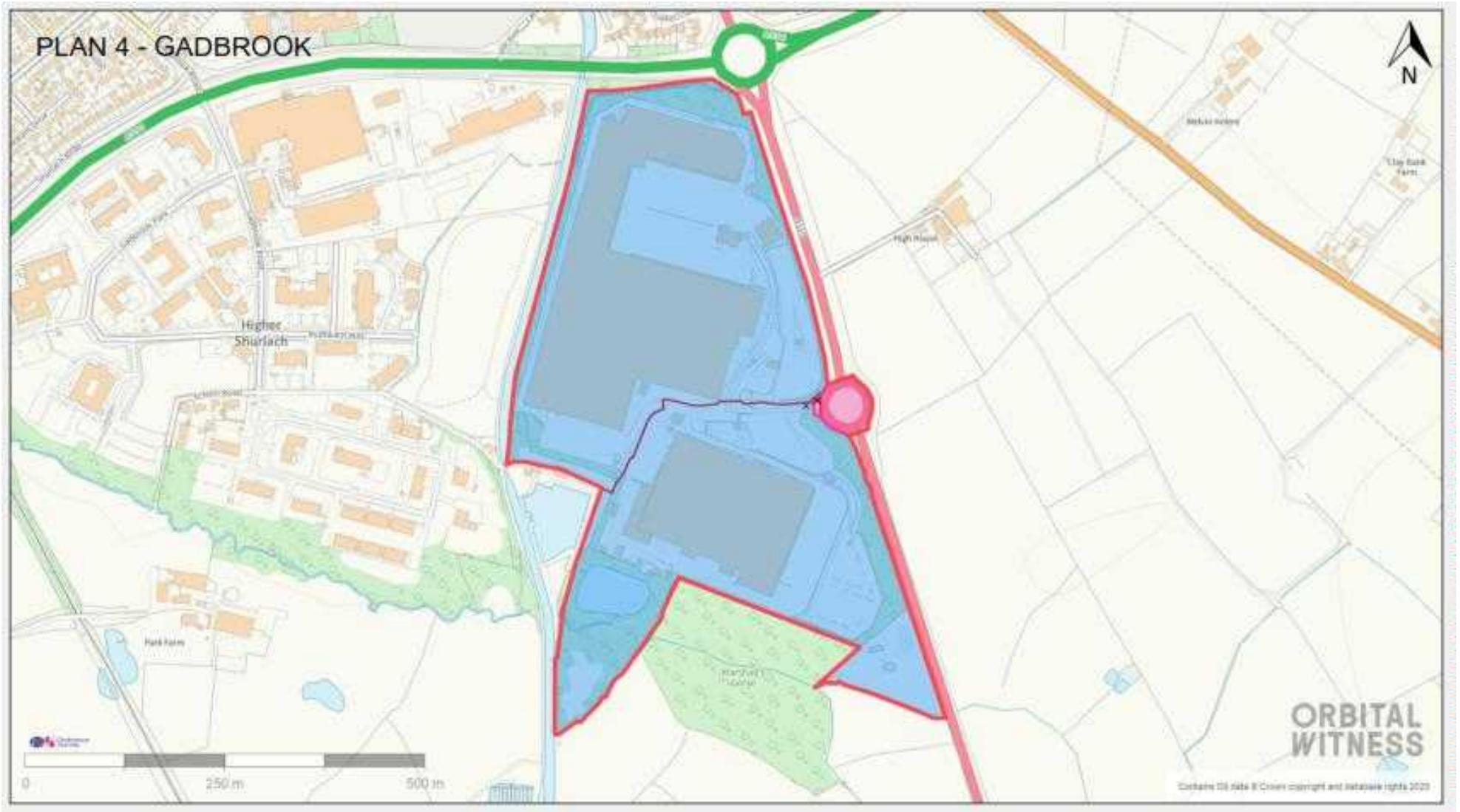
1. entering or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First and Third Claimants; and
2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.


PLAN 4 - GADBROOK
N
Higher Shurlach
Park Farm
0
250 m
500 m
ORBITAL WITNESS

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

1. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS**

2. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS**

("**the Defendants**")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **LATIMER PARK KETTERING RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.

PLAN 5 - KETTERING
N
ORBITAL WITNESS
0
250 m
500 m

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

1. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS**

2. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS**

("**the Defendants**")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **LATIMER PARK CORBY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.

PLAN 6 - CORBY
N
Workings (dry)
Ponds
Gas Gov
Shelter
Cycle Path
Tank
ESS
Gas Gov
Gas Gov
WB
0
100 m
200 m
ESS
ORBITAL WITNESS

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

1. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS**

2. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS**

("**the Defendants**")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **WILLOW GREEN RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

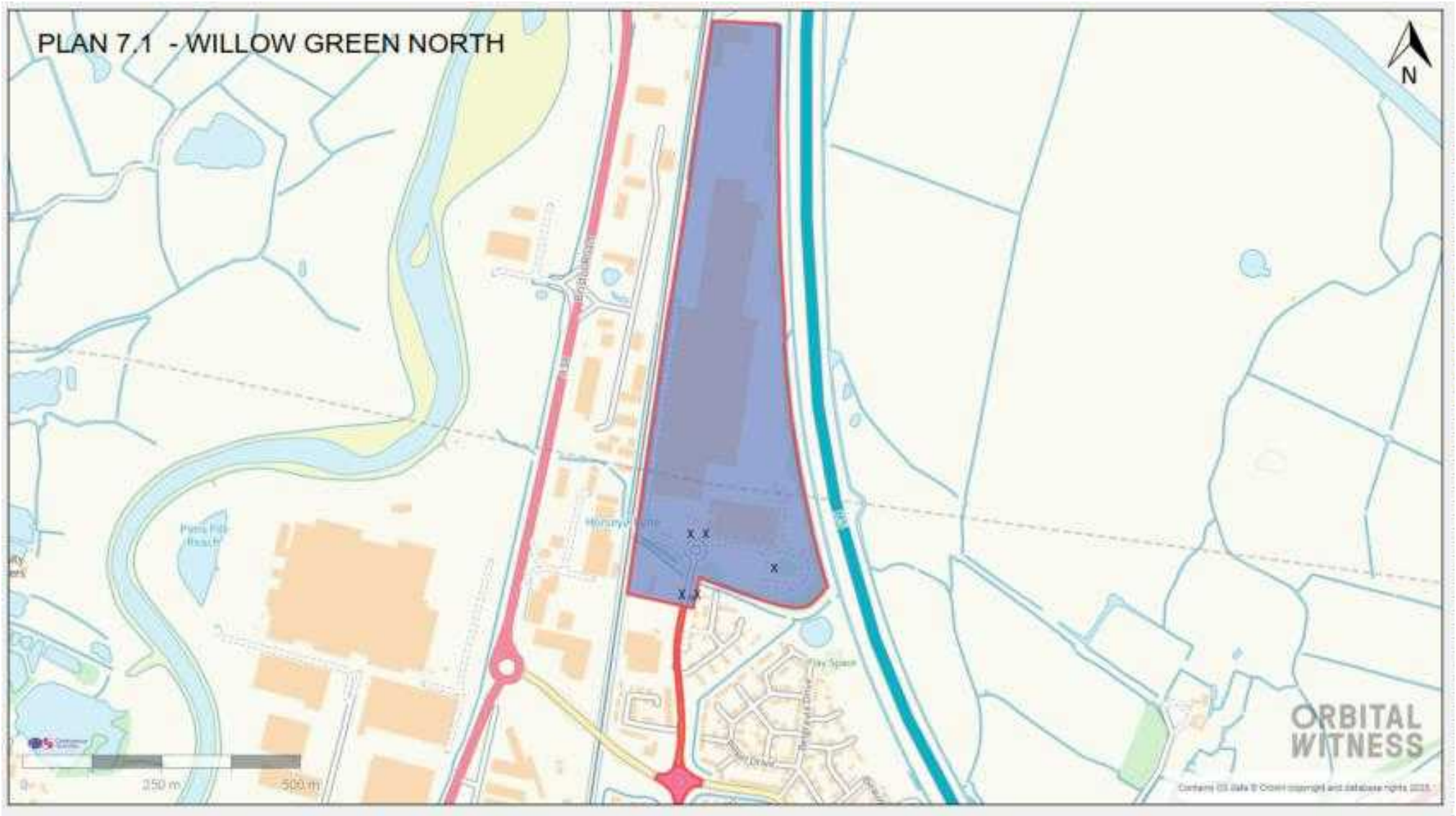
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.


PLAN 7.1 - WILLOW GREEN NORTH
N
250 m
500 m
ORBITAL WITNESS

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

1. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS**

2. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS**

("**the Defendants**")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **WILLOW GREEN RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.

PLAN 7.2 - WILLOW GREEN SOUTH
N
100 m
200 m
ORBITAL WITNESS

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

1. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS**

2. **PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS**

("**the Defendants**")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **WAKEFIELD RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

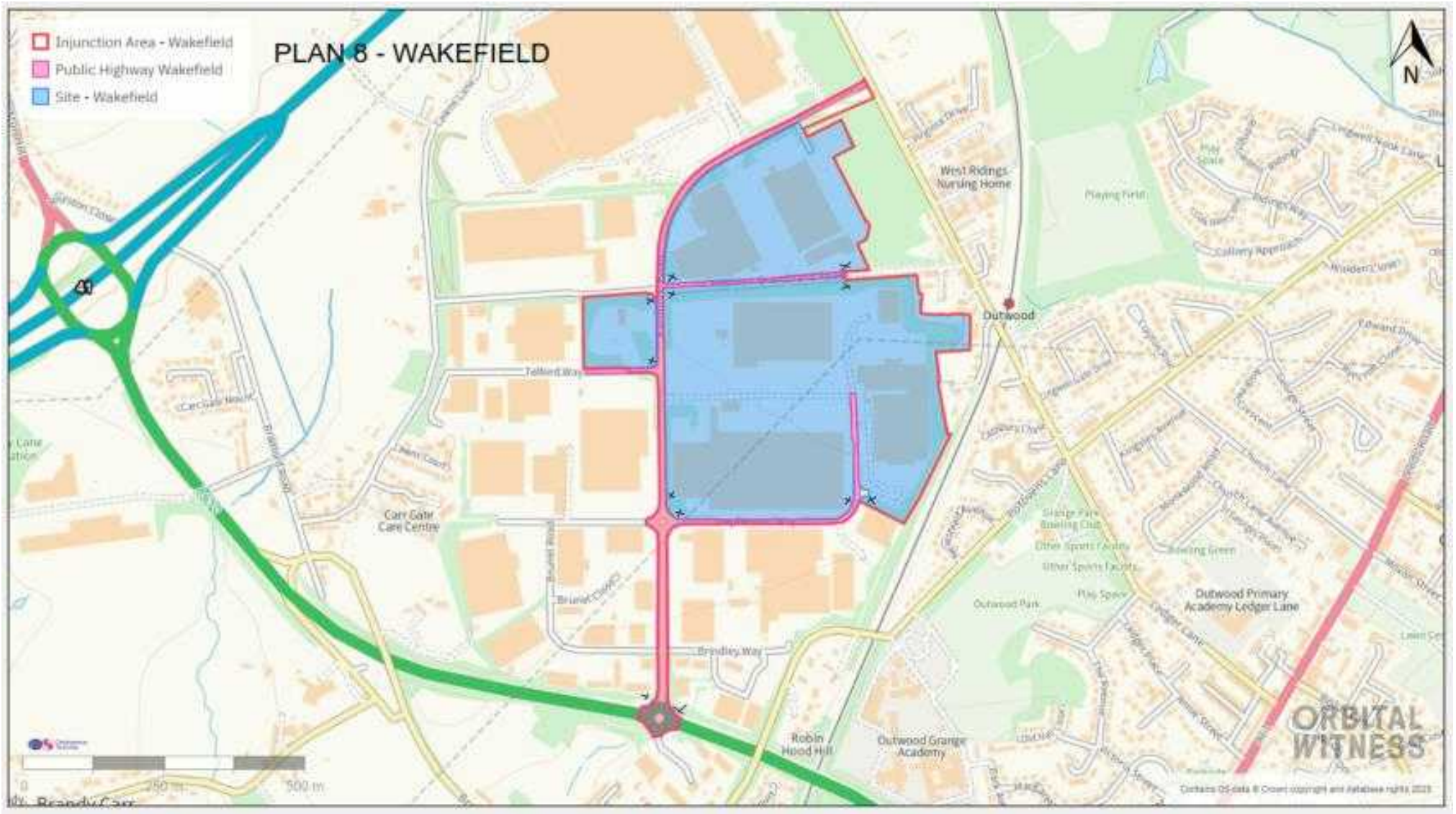
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.


Injunction Area - Wakefield
Public Highway Wakefield
Site - Wakefield
PLAN 8 - WAKEFIELD
N
West Ridings Nursing Home
Outwood
Carr Gate Care Centre
Outwood Primary Academy Ledger Lane
Outwood Grange Academy
Robin Hood Hill
Bradley Way
Telford Way
Outwood Park
ORBITAL WITNESS
250 m
500 m