

Made on behalf of the Claimants
Witness: Philip Keith Spencer
Number of Statement: Fourth
Exhibit: N/A
Dated: 1 July 2026

IN THE HIGH COURT OF JUSTICE

Claim Number: KB-2024-002596

KING'S BENCH DIVISION

BETWEEN:

- (1) LONDON SOUTHEND AIRPORT COMPANY LIMITED**
- (2) LONDON SOUTHEND SOLAR LIMITED**
- (3) THAMES GATEWAY AIRPORT LIMITED**

Claimants

- and -

PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON 'LONDON SOUTHEND AIRPORT' AS IS SHOWN EDGED RED ON THE ATTACHED PLAN A TO THE AMENDED PARTICULARS OF CLAIM

Defendants

FOURTH WITNESS STATEMENT OF PHILIP KEITH SPENCER

I, **PHILIP KEITH SPENCER**, of Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR, **will say as follows:**

1. I am a senior associate in the firm of Bryan Cave Leighton Paisner LLP ("**BCLP**"). BCLP act for the Claimants ("**Southend**") in this matter. I am duly authorised to make this witness statement on behalf of Southend. This is my fourth witness statement in these proceedings.

2. Except where I state to the contrary (in which case I give the source of information upon which I rely) I am able to state the matters in this witness statement from my own knowledge.
3. Where facts and matters referred to in this statement are not within my own knowledge they are based on instructions, documents and information supplied to me in my capacity as solicitor for the Claimants and are true to the best of my knowledge and belief.

Purpose of this Statement

4. I make this statement to certify the actions taken by the Claimants and/or BCLP acting on behalf of the Claimants, to further comply with the notification requirements as set out within the Order of The Honourable Mrs Justice Farbey dated 14 August 2024 (the “**Order**”). In particular, this statement covers the actions taken by the Claimants to notify the Defendants of documents in relation to the second annual review hearing listed to be heard on 2 July 2026 (the “**Second Review Hearing**”). It is intended to amount to the “Certificate of Service” required by paragraph 11.2 of the Injunction. I am providing it in the form of a witness statement in order to provide greater detail of the steps that have been taken than could conveniently be included in a certificate.

Previous Service

5. Details of notification of the original Order, notice of the first review hearing and application notice relating to the first review hearing on 22 October 2025 (the “**First Review Hearing**”) are set out in my First and Second Witness Statements. See in particular:
 - 5.1. Paragraph 9 of my First Witness Statement for details of notification of the original Order;
 - 5.2. Paragraphs 46 – 47.4 of my First Witness Statement for details of notification of the First Review Hearing and Application made by the Claimants in relation to the First Review Hearing; and

- 5.3. Paragraphs 8 – 9 of my Second Witness Statement for details of notification of the bundle of documents for the First Review Hearing.
6. Details of notification of the order made at the First Review Hearing are set out in my Third Witness Statement at paragraph 35. I wish to add that copies of the order made at the First Review Hearing were also affixed at the locations marked with a green or purple dot on Plan B to the Order and a copy of the order was also made available at the Train Station. We are informed by the Claimants that these steps were taken by 13:23 on 31 October 2025.
7. Details of publication of the Second Review Hearing listing on Southend’s website at <https://londonsouthendairport.com/corporate/injunction/> (the “**Website**”) are set out at paragraph 37 of my Third Witness Statement.

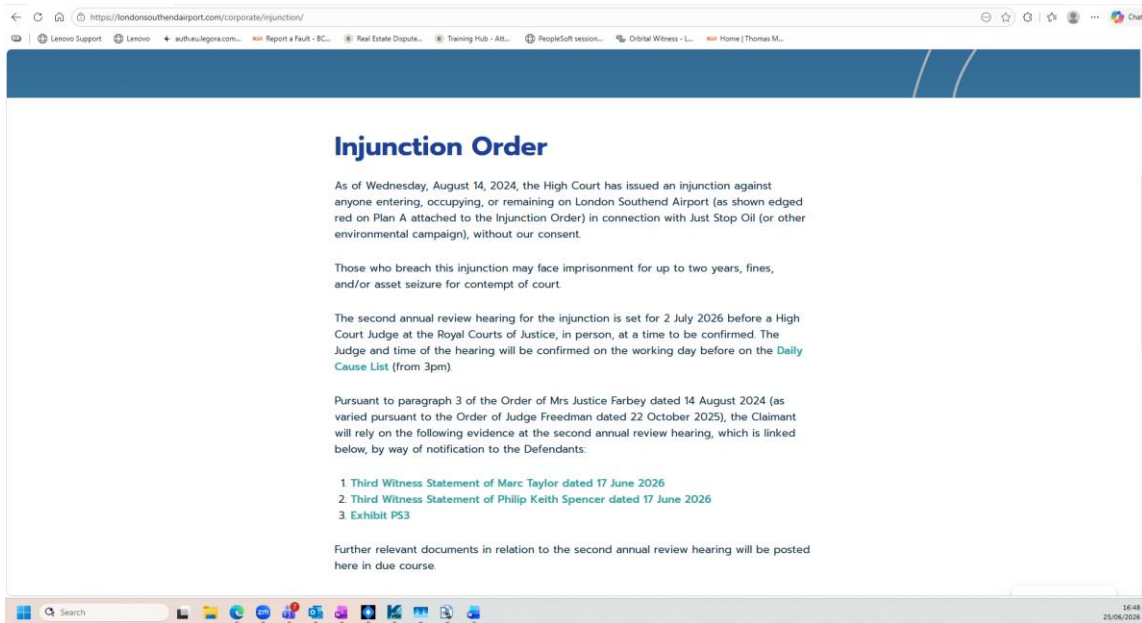
Further Service

8. The Claimants and/or BCLP acting on behalf of the Claimants have undertaken the following further steps since my Third Witness Statement in relation to the Second Review Hearing.

Notification of the Second Review Hearing

9. BCLP notified the Defendants of listing of the Second Review Hearing by email to the email addresses listed in Schedule 3 of the Order at 22:04 on 17 June 2026.

10. As above at paragraph 7 and set out in paragraph 37 of my Third Witness Statement, the Claimants added details of the Second Review Hearing to the Website on 9 June 2026. A screenshot of the text displayed on the Website is below. The Notice of Hearing in relation to the Second Review Hearing which was emailed to BCLP was also uploaded to the website as part of Exhibit PS3 to my Third Witness Statement.



Notification of evidence to be relied upon by the Claimants at the Second Review Hearing

11. The Defendants were notified of the further evidence to be relied upon by the Claimants at the Second Review Hearing¹ (the “**Second Review Hearing Evidence**”) as follows:
- 11.1. The Claimants uploaded copies of the Second Review Hearing Evidence to the Website on 17 June 2026. I am informed by the Claimants that this took place approximately around 20:38 – 21:00; and
- 11.2. BCLP confirmed the availability of the Second Review Hearing Evidence on the Website by email to the email addresses listed in Schedule 3 of the Order at 22:04 on 17 June 2026.

¹ The Third Witness Statement of Marc Taylor dated 17 June 2026; the Third Witness Statement of Philip Keith Spencer dated 17 June 2026 and Exhibit PS3.

12. The Defendants were notified of the bundle to be used for the Second Review Hearing (the “**Second Review Hearing Bundle**”) as follows:
 - 12.1. The Claimants made the Second Review Hearing Bundle available for electronic download on the Website on 25 June 2026. I am informed by the Claimants that this took place approximately at 08:43;
 - 12.2. BCLP confirmed the availability of the Second Review Hearing Bundle for electronic download on the Website by email to the email addresses listed in Schedule 3 of the Order on 25 June 2026 at 08:56; and
 - 12.3. The Claimants have confirmed to me that a hard copy of the Second Review Hearing Bundle has been made available at the Train Station (consistent with the contents of the Warning Notice at Schedule 5 of the Order) and was first made available on 27 June 2026.

The Claimants’ application dated 26 June 2026

13. On Friday 26 June 2026, the Claimants filed with the Court an application to amend the Claim so as to extend the definition of the Defendants to include persons unknown who act in connection with “*the Take Back Power campaign or other wealth inequality campaign*” (the “**Application**”). The following steps have been taken to notify the Defendants of the Application:
 - 13.1. The Claimants filed the Application at 18:38 on Friday 26 June. As at the time of giving this statement, no sealed Application has yet been received back from the Court.
 - 13.2. BCLP emailed the Application documents in draft to the email addresses listed in Schedule 3 of the Order at 19:11 on Friday 26 June.
 - 13.3. The Claimants affixed notices at the locations marked with a green or purple dot on Plan B to the Order stating that the Application has been made and where it can be accessed in hard copy and online on Saturday 27 June. An image of the form of notice is set out below:

IN THE HIGH COURT OF JUSTICE

CLAIM NO: KB-2024-002596

NOTICE OF APPLICATION DATED 26 JUNE 2026

TO: Persons Unknown who, in connection with the Just Stop Oil or other environmental campaign, enter, occupy or remain (without the Claimants' consent) upon that area of land known as London Southend Airport (as shown for identification edged red on the plan A attached to the Amended Particulars of Claim) (the "**Defendants**")

Notice is hereby given that an application, dated 26 June 2026, has been made to amend the description of the Defendant and to amend the Claim Form and Particulars of Claim to record that change in these proceedings.

A copy of the relevant application and accompanying documents in draft, together with copies of all relevant documents concerning these proceedings may:

1. be viewed at: <https://londonsouthendairport.com/corporate/injunction>; and
2. also be obtained from the Ticket Office, Southend Airport Train Station, Southend-on-Sea, Essex SS2 6YF (open between 9am–5pm Monday–Friday); or
3. by contacting Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR; or
4. by contacting Phil Spencer of Bryan Cave Leighton Paisner LLP by email: Phil.Spencer@bcplaw.com

The final sealed application documents will also be made available as above upon receipt of the sealed application from the Court.

London Southend Airport Company Limited

London Southend Solar Limited

Thames Gateway Airport Limited

13.4. The Claimants uploaded the Application documents in draft to the Website on Sunday 28 June. BCLP accordingly sent a further email to the email addresses listed in Schedule 3 of the Order at 15:51 on Sunday 28 June by way of notification that the Application documents are now accessible on the Website.

14. BCLP also:

14.1. Emailed info@takebackpower.net and press@takebackpower.net at 19:17 on Friday 26 June to inform the Take Back Power organisation of the Second Review Hearing and the Application. Again, the Application documents were attached in draft.

14.2. Emailed info@takebackpower.net and press@takebackpower.net at 15:51 on Sunday 28 June to inform the Take Back Power organisation that the Application documents in draft had been uploaded to the Website. These are the “general” and “press” email addresses recorded on the TBP website (and, aside from a fundraising (“giving”) email address, are the only means of contact known to the Claimants).

15. Upon receipt of the sealed Application from the Court, the Claimants/BCLP shall:
 - 15.1. upload the sealed Application documents to the Website;
 - 15.2. email the sealed Application documents to the email addresses listed in Schedule 3 of the Order;
 - 15.3. email the sealed Application documents to info@takebackpower.net and press@takebackpower.net; and
 - 15.4. make the sealed Application documents available at the Train Station.
16. As stated above in paragraph 13.1, the Claimants still await a sealed application notice. Accordingly, the Claimants consider they have taken as many prudent steps as possible at this stage in order to notify the Defendants of the intended Application.

Notification of skeleton argument and authorities bundle

17. On Monday 29 June before 16:00, the Claimants filed their skeleton argument for the Second Review Hearing and an accompanying authorities bundle. The Claimants/ BCLP have taken the following steps to notify the Defendants of those documents:
 - 17.1. The Claimants' skeleton argument and authorities bundle were uploaded to the Website at approximately 18:01 on 29 June 2026;
 - 17.2. BCLP confirmed the availability of the skeleton argument and authorities bundle for electronic download on the Website by email to the email addresses listed in Schedule 3 of the Order on 29 June 2026 at 20:14.
 - 17.3. The Claimants also made hard copies of the skeleton argument and authorities bundle available at the Train Station at approximately 18:04 on 29 June 2026.
 - 17.4. BCLP also confirmed the availability of the skeleton argument and authorities bundle for electronic download on the Website by email to

info@takebackpower.net and press@takebackpower.net on 29 June 2026 at 20:16.

18. The Claimants intend to prepare a supplementary bundle for the Second Review Hearing with documents which post-date the existing filed bundle. Such supplementary bundle will be filed and hard copies will be brought to the Second Review Hearing for any interested parties, and to hand up to the Judge as necessary.

19. As at the time of this statement, neither BCLP nor the Claimants have received any further correspondence or requests in relation to the previously notified documents, the Second Review Hearing Evidence, the Second Review Hearing Bundle nor the Application.

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.

DocuSigned by:
Philip Spencer
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Philip Keith Spencer

1 July 2026