

IN THE COURT OF APPEAL (CIVIL DIVISION)
ON APPEAL FROM THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE:

Court of Appeal Ref: CA-2022-001066
and linked case reference: CA-2022-001105

BETWEEN:

NATIONAL HIGHWAYS LIMITED

Appellant

- and -

**(1) PERSONS UNKNOWN CAUSING THE BLOCKING OF,
ENDANGERING, OR PREVENTING THE FREE FLOW OF TRAFFIC ON
THE M25 MOTORWAY, A2, A20 AND A2070 TRUNK ROADS AND M2
AND M20 MOTORWAY, A1(M), A3, A12, A13, A21, A23, A30, A414 AND
A3113 TRUNK ROADS AND THE M1, M3, M4, M4 SPUR, M11, M26, M23
AND M40 MOTORWAYS FOR THE PURPOSE OF PROTESTING**

(2) ALEXANDER RODGER AND 132 OTHERS

Respondents

DRAFT ORDER

UPON the Appellant's Application dated 14 December 2022 (the "**Application**")

AND UPON reading the Witness Statement of Laura Natasha Higson dated 14 December 2022 in support of the Application

IT IS ORDERED THAT:

1. Permission is granted pursuant to paragraph 27(11) of Practice Direction 52C for the Appellant to file a supplementary bundle in excess of 350 pages.
2. The supplementary appeal bundle to be filed with the Court will contain only the documents listed on the proposed supplementary bundle index as set out at Appendix 1 of this Order.

3. Permission is granted pursuant to paragraph 27(12) of Practice Direction 52C for the Appellant to rely on an unagreed core appeal bundle and an unagreed supplementary appeal bundle.

Costs

4. No order for costs.

Communications with the Appellant

5. The Appellant's solicitors and their contact details are:

FAO: NH Injunctions Team

NH-Injunctions@dlapiper.com

BY THE COURT

Dated [--] 2022

APPENDIX 1

SUPPLEMENTARY BUNDLE INDEX

TAB	DOCUMENT	PAGES
Interim Injunctions		
1.	Order of Mr. Justice Lavender dated 21 September 2021	
2.	Order of Mr. Justice Cavanagh dated 24 September 2021	
3.	Order of Mr. Justice Holgate dated 2 October 2021	
Supporting Witness Statement for M25 Injunction		
4.	Witness Statement of Anthony Nwanodi (without Exhibits) dated 30 September 2021	
Claim Forms and Particulars of Claim		
5.	Claim Form dated 21 September 2021	
6.	Claim Form dated 24 September 2021	
7.	Claim Form dated 2 October 2021	
8.	Consolidated Particulars of Claim dated 22 October 2021	
Application for Summary Judgment		
9.	Sealed Application Notice	
10.	Draft Order	
11.	Witness Statement of Nicola Bell (without Exhibit) dated 22 March 2022	
12.	First Witness Statement of Laura Higson (without Exhibit) dated 24 March 2022	
13.	Second Witness Statement of Laura Higson (without Exhibit) dated 25 April 2022	
14.	Claimant's Skeleton Argument	
15.	Skeleton Argument of Jessica Branch and Caspar Hughes	
Application for Permission to Appeal		
16.	Appellant's Notice	
17.	Form N460	
18.	Skeleton argument for application for permission to appeal	
Application for Permission to Serve Documents by Alternative Means		
19.	Sealed Application Notice	
20.	Witness Statement of Laura Higson (without Exhibit) dated 3 November 2022	
Correspondence		
21.	Listing Window Notification Letter dated 31 October 2022	

22	Letter to Civil Appeals Office requesting the expedition of the Appeal Hearing date	
Schedule of Named Defendants		
23	Schedule of Named Defendants	