### N244

# Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

Notice of hearing

Application will be heard at 7 Rolls Buildings,

London, EC4A 1NL Date: 02/10/2018

Fieldfisher LLP

Claimant

Other (please specify)

2. Are you a

Time: not before 10:30am

Court: 10

# Name of court Claim no. BL-2018 0019 3 Sep 2018 High Court of Justice **Business and Property** Courts of England and # PROPERTY COURTS OF Wales Chancery Division Property Trusts and Probate List BL-2018-001978 Help with Fees - Ref. no. Fee account no. (if applicable) (if applicable) H W F Warrant no. (if applicable) Claimant's name (including ref.) (1) ISLAND GAS LIMITED (2) DART ENERGY (EAST ENGLAND) LIMITED (3) ANDREW DAVID MORRELL REF:OTD/2004719.1 Defendant's name (including ref.) (1) Persons Unknown entering or remaining without the consent of the Claimant(s) on land and buildings shown shaded red on the plans annexed to the claim form (2) Persons Unknown without the consent of the Claimant(s) interfering with the First and Second Claimant's rights to pass and repass with or without vehicles, materials and equipment over private access roads on land shown shaded blue on the plans annexed to the claim form (3) Persons Unknown interfering with the right of way enjoyed by the Claimant(s) and each of its and their agents, servants, contractors, sub-contractors, group companies, licensees, employees, partners, consultants and other visitors over land shown shaded pink on the plans annexed to the claim form (4) Ian Rowland Crane Date 26 September 2018 1. What is your name or, if you are a legal representative, the name of your firm? Defendant Legal Representative

If you are a legal representative whom do you represent?

The Claimants

3. What order are you asking the court to make and why?

The Claimants are seeking an Order that, until trial or further order:

### SITE 1

- 1. The First Defendant and each of them are forbidden from entering or remaining upon the land and/or buildings described in and defined as "Site 1" in Schedule 2 to the Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 4 ("Site 1"), and/or from causing damage to, or removing equipment from, Site 1, without the consent of the First Claimant.
- The Second Defendant and each of them are forbidden from substantially interfering with the First Claimant's rights to use (with or without vehicles and at any time), carry out work on and/or construct, make up and maintain, the private access road on the land adjoining Site 1 (the "Site 1 Access Route"), which is shown shaded blue on the plan annexed to Schedule 4 of the Order, including any passing bays and splays for access and egress between Site 1 and the public highway.

### SITE 2

3. The First Defendant and each of them are forbidden from entering or remaining upon the land and/or buildings described in and defined as "Site 2" in Schedule 2 to the Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 5 ("Site 2"), and/or from causing damage to, or removing equipment from, Site 2 without the consent of the Second Claimant or the Third Claimant.

# SITE 3

- 4. The First Defendant and each of them are forbidden from entering or remaining upon the land and buildings described in and defined as "Site 3" in Schedule 2 to the Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 6 ("Site 3"), and/or from causing damage to, or removing equipment from, Site 3 without the consent of the First Claimant.
- The Second Defendant and each of them are forbidden from substantially interfering with the rights of the First Claimant, and all others authorised by the First Claimant, to pass and re-pass (with or without vehicles and at any time) over the private access road on the land adjoining Site 3 (the "Site 3 Access Route"), which is shown shaded blue on the plan annexed to Schedule 6 of the Order, including any passing bays and splays for access and egress between Site 3 and the public highway

### THE EXCLUSION ZONES

- 6. In relation to exclusion zones shown shaded pink on the plans annexed to Schedules 7 and 8 of the Order (such zones comprising the primary access ways to Sites 1 and 2) (the "Exclusion Zones"), the Third Defendant and each of them are forbidden from carrying out any of the following acts within any of the Exclusion Zones except that this paragraph of this Order shall not apply to any public footpath and/or pavement within either Exclusion Zone:
  - (a) blocking the highway with persons or things with a view to slowing down or stopping traffic, and with the intention of causing inconvenience and delay to the Claimants and/or their visitors;
  - (b) slow walking in front of vehicles with the object of slowing them down, and with the intention of causing inconvenience and delay to the Claimants and/or their visitors;
  - (c) climbing onto vehicles;
  - (d) otherwise, unreasonably and/or without lawful authority or excuse, preventing the Claimants and/or their visitors from access to, and/or egress from, any of the Sites;
  - (e) otherwise, unreasonably and/or without lawful authority or excuse, obstructing the highway, with the intention of causing inconvenience and delay to the Claimants and/or their visitors.

	7.	7. An Order permitting service of Court documents and evidence by an alternative method.			
	8.	Costs			
	The Clai	The Claimants rely on the Claimants' witness evidence referred to in Schedule 1 of the draft Order.			
				in concount of the	Tarant Order.
4.	Have you	u attached a draft of the order you are apply	ving for?	X Yes	No
<ol> <li>6.</li> </ol>		ou want to have this application dealt with	2	without a heari at a telephone Hours	hearing Minutes
	Is this tim	ne estimate agreed by all parties?	N.B ple	ease see response	e to 7. below
7.	Give deta	ails of any fixed trial date or period		dated 3 September hearing was set for Claimants made at September 2018 for listed with a time of Court has advised accommodate a 2 2018. The Claimat Court in correspond Office that the hear on 2 October 2018 directions hearing	ted by Mr Justice Morgan er 2018, a return date or 2 October 2018. The an application on 21 for the return date to be so estimate of one day. The I that they can only hour hearing on 2 October onts have proposed to the indence with the Listing aring ordered to take place a now takes the form of a with a substantive one day if at that directions hearing
8.	What leve	el of Judge does your hearing need?		High Court Judge	
9.	Who shou	uld be served with this application?		The Fourth Defend	dant

9a.	Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.	Ian Rowland Crane, Misson Springs Protection Camp, Springs Lane, Misson DN10 6ES				
10.	What information will you be relying on, in support of your appli	cation?				
	the attached witness statements					
	X the statement of case					
	the evidence set out in the box below					
	If necessary, please continue on a separate sheet.					
	Please see paragraph 3 above					
	Statement of Truth	C. C. C. L. L. N. L. L.				
	The applicant believes that the facts stated in this section (and any Signed					
	Applicant's legal representative	Dated <u>26 September 2018</u>				
Full name DANIEL OWEN CHRISTOPHER TALFAN DAVIES						
	Name of applicant's legal representative's firm FIELDFISHER LLP  Position or office held PARTNER (if signing on behalf of firm or company)					

Ian Rowland Crane, Misson Springs Protection Camp, Springs Lane, Misson

11. Signature and address details						
Signed	Dated <u>26 September 2018</u>					
Position or office held PARTNER  (if signing on behalf of firm or company)  pplicant's address to which documents about this application should be sent						
FIELDFISHER LLP	If applicable					
RIVERBANK HOUSE 2 SWAN LANE	Phone no. 020 7861 4000					
LONDON	Fax no. 020 7488 0084					
	DX no.					
Postcode E C 4 R 3 T T	Ref no. OTD/2004719.1					
E-mail address						

Claim No. BL-2018-001973

# IN THE HIGH COURT OF JUSTICE

# **BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES**

**CHANCERY DIVISION** 

# PROPERTY TRUSTS AND PROBATE LIST

BETWEEN

- (1) ISLAND GAS LIMITED
- (2) DART ENERGY (EAST ENGLAND) LIMITED
  - (3) ANDREW DAVID MORRELL

Claimants/Applicants

### and

- (1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANT(S) ON LAND AND BUILDINGS SHOWN SHADED RED ON THE PLANS ANNEXED TO THE CLAIM FORM
- (2) PERSONS UNKNOWN WITHOUT THE CONSENT OF THE CLAIMANT(S) INTERFERING WITH THE FIRST AND SECOND CLAIMANTS' RIGHTS TO PASS AND REPASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER PRIVATE ACCESS ROADS ON LAND SHOWN SHADED BLUE ON THE PLANS ANNEXED TO THE CLAIM FORM
- (3) PERSONS UNKNOWN INTERFERING WITH THE RIGHT OF WAY ENJOYED BY THE CLAIMANT(S) AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER VISTORS OVER LAND SHOWN SHADED PINK ON THE PLANS ANNEXED TO THE CLAIM FORM

### (4) IAN ROWLAND CRANE

	Defendants/Respondents
DRAFT ORDER	

If you the within-named Defendants, or any of you, disobey this order you may be held to be in contempt of Court and may be imprisoned, fined or have your assets seized.

### **IMPORTANT**

You should read the terms of the Order very carefully. You are advised to consult a Solicitor as soon as possible.

This Order was made at a hearing with notice to the Defendants who have the right to apply to the Court to vary or discharge the Order as set out below.

UPON hearing Leading Counsel for the Claimants [and the Fourth Defendant acting as a litigant in person]

AND UPON the grant of various interim injunctions by Order of Mr Justice Morgan dated 3 September 2018 following a hearing without notice on 31 August 2018 ("the Interim Order")

AND UPON Leading Counsel for the Claimants identifying Sites 1, 2 and 3 by reference to the plans annexed to Schedules 4 to 6 and the associated Exclusion Zones by reference to the plans annexed to Schedules 7 to 8

AND UPON READING the Claimants' application and the written evidence listed in Schedule 1 and accepting the undertakings listed in Schedule 3

AND UPON IGas Energy Plc ("IGas") undertaking to the Court that if the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Claimants and/or IGas will comply with any order the Court may make

**AND UPON** the Orders at paragraphs 1 to 6 inclusive being made, respectively, against the First, Second and Third Defendants alone, but on the basis that the Orders at paragraphs 1 to 6 inclusive may extend to the Fourth Defendant if his actions bring him within the descriptions of the First, Second and Third Defendants

## IT IS ORDERED THAT, until trial or further order:

### SITE 1

- 1. The First Defendant and each of them are forbidden from entering or remaining upon the land and/or buildings described in and defined as "Site 1" in Schedule 2 to this Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 4 ("Site 1"), and/or from causing damage to, or removing/equipment from, Site 1, without the consent of the First Claimant.
- The Second Defendant and each of them are forbidden from substantially interfering with the First Claimant's rights to use (with or without vehicles and at any time), carry out work on and/or construct, make up and maintain, the private access road on the land adjoining Site 1 (the "Site 1 Access Route"), which is shown shaded blue on the plan annexed to Schedule 4 of the Order, including any passing bays and splays for access and egress between Site 1 and the public highway.

### SITE 2

3. The First Defendant and each of them are forbidden from entering or remaining upon the land and/or buildings described in and defined as "Site 2" in Schedule 2 to this Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 5 ("Site 2"), and/or from causing damage to, or removing equipment from, Site 2 without the consent of the Second Claimant or the Third Claimant.

### SITE 3

- 4. The First Defendant and each of them are forbidden from entering or remaining upon the land and buildings described in and defined as "Site 3" in Schedule 2 to this Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 6 ("Site 3"), and/or from causing damage to, or removing equipment from, Site 3 without the consent of the First Claimant.
- 5. The Second Defendant and each of them are forbidden from substantially interfering with the rights of the First Claimant, and all others authorised by the First Claimant, to pass and re-pass (with or without vehicles and at any time) over the private access road on the land adjoining Site 3 (the "Site 3 Access Route"), which is shown shaded blue on the plan annexed to Schedule 6 of the Order, including any passing bays and splays for access and egress between Site 3 and the public highway

### THE EXCLUSION ZONES

- 6. In relation to exclusion zones shown shaded pink on the plans annexed to Schedules 7 and 8 of the Order (such zones comprising the primary access ways to Sites 1 and 2) (the "Exclusion Zones"), the Third Defendant and each of them are forbidden from carrying out any of the following acts within any of the Exclusion Zones except that this paragraph of this Order shall not apply to any public footpath and/or pavement within either Exclusion Zone:
  - blocking the highway with persons or things with a view to slowing down or stopping traffic, and with the intention of causing inconvenience and delay to the Claimants and/or their visitors;
  - (b) slow walking in front of vehicles with the object of slowing them down, and with the intention of causing inconvenience and delay to the Claimants and/or their visitors;
  - (c) climbing onto vehicles;
  - otherwise, unreasonably and/or without lawful authority or excuse, preventing the Claimants and/or their visitors from access to, and/or egress from, any of the Sites;
  - (e) otherwise, unreasonably and/or without lawful authority or excuse, obstructing the highway, with the intention of causing inconvenience and delay to the Claimants and/or their visitors.

## IT IS FURTHER ORDERED THAT

- Pursuant to CPR 6.27 notice and service of this Order, the Application Notice dated 21 September 2018 and the witness statements containing exhibits relied upon by the Claimants shall be given to the First, Second and Third Defendants, as follows:
  - (a) In respect of Site 1 by:

- (i) affixing the form of site injunction notice set out in Schedule 9 (in no smaller than A3 format in size) and the form of exclusion zone notice set out in schedule 12 (in no smaller than A4 size) (together the "Site 1 Notices") in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Site 1 and, to the extent that the Claimants have consent to do so, along and at the gate to the Site 1 Access Route. Such service is to be good and sufficient service;
- (ii) the Claimants using all reasonable endeavours to leave copies of the Site 1 Notices at the entranceways to the protester camp known as the 'Misson Springs Protection Camp', which is located in the vicinity of Site 1 and the approximate location of which is shown for identification purposes only shaded purple on the plan attached at schedule 14, to the extent that such camp is still occupied at the time of attempted service; and
- (iii) the Claimants using all reasonable endeavours to bring the Site 1 Notices to the attention of the organisations and groups as identified and specified in paragraph 1 of Schedule 16 (by e-mail or, where e-mail is not available, by private message or equivalent electronic facility (including, for the avoidance of doubt, by sending the aforementioned Notices by attachment or by reference to a weblink, to a contact form on the organisation or group's website, by Tweet to the organisation or group's Twitter page, by direct Facebook message to the administrators / moderators of the organisation or group's Facebook page and / or by a post on the organisation or group's Facebook page)).

### (b) In respect of Site 2 by:

- (i) affixing the form of site injunction notice set out in Schedule 10 (in no smaller than A3 format in size) and the form of exclusion zone notice set out in schedule 13 (in no smaller than A4 size) (together the "Site 2 Notices") in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Site 2. Such service is to be good and sufficient service;
- (ii) the Claimants using all reasonable endeavours to leave copies of the Site 2 Notices at the entranceways to the protestor camp known as the 'Tinker Lane Protectors Camp Group', which is located in the vicinity of Site 2 and the approximate location of which is shown for identification purposes only shaded purple on the plan attached at schedule 15, to the extent that such camp is still occupied at the time of attempted service; and
- the Claimants using all reasonable endeavours to bring the Site 2 Notices to the attention of the organisations and groups as identified and specified in paragraph 2 of Schedule 16 (by e-mail or, where e-mail is not available, by private message or equivalent electronic facility (including, for the avoidance of doubt, by sending the aforementioned Notices by attachment or by reference to a weblink, to a contact form on the organisation or group's website, by Tweet to the organisation or group's Twitter page, by direct Facebook message to the administrators / moderators of the organisation or group's Facebook page and / or by a post on the organisation or group's Facebook page)).

### (c) In respect of Site 3 by:

- (i) affixing the form of site injunction notice set out in Schedule 11 (in no smaller than A3 format in size) (the "Site 3 Notice") in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Site 3 and, to the extent that the Claimants have consent to do so, along the Site 3 Access Route. Such service is to be good and sufficient service; and
- the Claimants using all reasonable endeavours to bring the Site 3 Notice to the attention of the organisations and groups as identified and specified in paragraph 3 of Schedule 16 (by e-mail or, where e-mail is not available, by private message or equivalent electronic facility (including, for the avoidance of doubt, by sending the aforementioned Notice by attachment or by reference to a weblink, to a contact form on the organisation or group's website, by Tweet to the organisation or group's Twitter page, by direct Facebook message to the administrators / moderators of the organisation or group's Facebook page and / or by a post on the organisation or group's Facebook page)).

the said documents will be deemed to be served on the date of such affixation to the said locations, such date to be verified by a certificate of service, such service to be effected within 7 days of this Order.

- 8. Pursuant to CPR 6.27 notice and service of this Order, the Application Notice dated 21 September 2018 and the witness statements containing exhibits relied upon by the Claimants shall be given to the Defendants by providing notices in the form set out in Schedules 9 to 13 (together the "Notices") to the potentially interested parties listed at Schedule 16 of the Order. The giving of such Notices will be effected by:
  - (i) the Claimants using all reasonable endeavours to bring the Notices to the attention of the individuals, organisations and groups identified in paragraphs 4 and 5 of Schedule 16 (by e-mail or, where e-mail is not available, by private message or equivalent electronic facility (including, for the avoidance of doubt, by sending the aforementioned Notices by attachment or by reference to a weblink, to a contact form on the organisation or group's website, by Tweet to the organisation or group's Twitter page, by direct Facebook message to the administrators / moderators of the organisation or group's Facebook page and / or by a post on the organisation or group's Facebook page);
  - (ii) posting this Order, and the Application Notice dated [insert] September 2018 on IGas Energy Plc's website (being <a href="http://IGasplc.com/">http://IGasplc.com/</a>) and by posting a weblink to those documents on IGas Energy Plc's corporate social media account (<a href="https://twitter.com/IGasEnergy?ref">https://twitter.com/IGasEnergy?ref</a> src=twsrc%5Egoogle%7Ctwcamp%5Eser p%7Ctwgr%5Eauthor);
  - (iii) Posting a 'tweet' from the Twitter accounts for IGas (with the username "@IGasEnergy") reporting the existence of this Order; and

within 7 days of this Order. The said documents will be deemed to be served on the date such electronic communication is made and/or effected, such date to be verified by a certificate of service, and such service shall constitute good and sufficient service.

9. Until service of this Order has been completed in accordance with paragraphs 7 to 8 above, the Interim Order shall remain in full force and effect save that reference to the Return Date in the Interim Order shall be construed as the date of service of this Order.

### **DIRECTIONS**

10. Anyone served or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 3 working days' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 24 hours in advance of any hearing.

### COSTS

11. [

### COMMUNICATIONS WITH THE COURT

12. All communications about this Order should be sent to:

Court Manager
High Court of Justice
Chancery Division
Rolls Building
7 Rolls Building
Fetter Lane
London
EC4A 1NL

The telephone number is 020 7947 7501. The offices are open weekdays 10.00 a.m. to 4.30 p.m.

Out of hours telephone number is 020 7947 6260

Name and address of Claimants' legal representatives

Fieldfisher LLP Riverbank House 2 Swan Lane London EC4R 3TT

Telephone:

020 7861 4000

Fax:

020 7488 0084

Out of hours telephone number: 07711 088057

Reference:

OTD/2004719.1

### SERVICE OF THE ORDER

The Court has provided a sealed copy of this Order to the Claimants at:

Fieldfisher LLP Riverbank House, 2 Swan Lane, London EC4R 3TT

Reference:

OTD/2004719.1

### **GUIDANCE NOTES**

### Effect of this Order

- (1) A Respondent who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instructions or with his encouragement.
- (2) A Respondent which is a corporation and which is ordered not to do something must not do it itself or by its directors, officers, employees or agents or in any other way.

### Interpretation of this Order

- (1) In this Order, where there is more than one Respondent, (unless otherwise stated) references to "the Respondent" means both or all of them.
- (2) A requirement to serve on "the Respondent" means on each of them. However, the Order is effective against any Respondent on whom it is served.
- (3) An Order requiring "the Respondent" to do or not to do anything applies to all Respondents.

- 1. First witness statement of Daniel Owen Christopher Talfan Davies dated 29 August 2018;
- 2. Second witness statement of Daniel Owen Christopher Talfan Davies dated 29 August 2018
- 3. Third witness statement of Daniel Owen Christopher Talfan Davies dated 29 August 2018;
- 4. First witness statement of Ross David Hamilton Glover dated 29 August 2018;
- 5. Witness statement of Andrew David Nowell dated 20 September 2018;
- 6. Witness statement of Eric Ekanem dated 21 September 2018;
- 7. Second witness statement of Ross Hamilton Glover dated 21 September 2018;
- 8. Fourth witness statement of Daniel Owen Christopher Talfan Davies dated 21 September 2018;
- 9. Witness Statement of Ian Rowland Crane dated 14 September 2018; and
- 10. Witness statement of David Timms dated 17 September 2018.

### THE SITES

Misson Springs ("Site 1")

The leasehold land at:

- the Rocket Site, Springs Road, Misson Springs, Nottinghamshire DN10 6ET as more particularly described by a lease dated 22 May 2015 made between (1) L. Jackson & Co Limited; (2) Island Gas Limited; and (3) IGas Energy Plc registered at the Land Registry under title number NT520551 and marked 1 on the plan annexed to Schedule 4 of this Order; and
- Misson Springs Cottage, Misson Springs, Doncaster DN10 6ES, Chester as more particularly 2. described by a lease dated 22 May 2015 made between (1) Andrew David Jackson and (2) Island Gas Limited and registered at the Land Registry under title number NT515056 and marked 2 on the plan annexed to Schedule 4 of this Order; and
- Two borehole sites on the land adjoining title number NT520551, as more particularly described 3. by a lease dated 18 July 2016 and made between (1) L. Jackson and Co Limited; (2) Island Gas Limited; and (3) IGas Energy PLC and marked 3 on the plan annexed to Schedule 4 of this

Retford Road / Tinker Lane ("Site 2")

Such land to the South West side of Retford Road, Worksop as forms the subject of an option agreement dated 1 July 2015 made between (1) Andrew David Morrell and (2) Dart Energy (Europe) Limited.

Ellesmere Port ("Site 3")

The leasehold land at Ellesmere Port as more particularly described by an exploration deed dated 28 April 2017 made between (1) Peel Land and Property (Ports) Ltd and (2) Island Gas Limited.

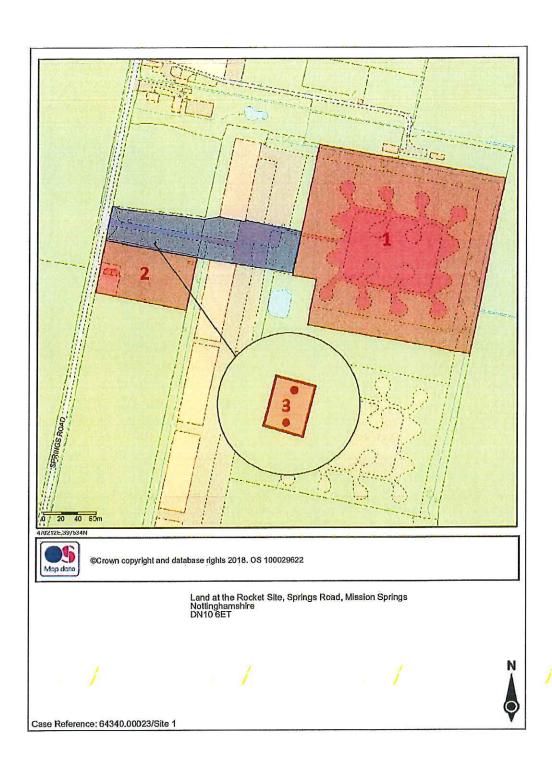
(together, the "Sites")

-13-

- 1. On the making of this Order, the Claimants undertake as follows:
  - a) once in every three months to inspect the perimeter of the Sites, the Site 1 Access Route and the Site 3 Access Route, to ensure that any notices affixed to the perimeter of the Sites pursuant to paragraph 7 of this Order remain so affixed and, if not, to replace the notice and affix a duplicate notice in its place as soon as practicable; and
  - b) to make available to any person (who has provided their name(s) and address(es) and proof of identity to the Claimants' solicitors, Fieldfisher LLP) upon written application to the Claimant's solicitors (either in writing at their said offices or by email to IGasTeam@fieldfisher.com and in either case quoting reference OTD/IGas), using an encrypted online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafter and in either case within two clear working days from the first working day on which such written application is received.

Plan of Misson Springs ("Site 1")

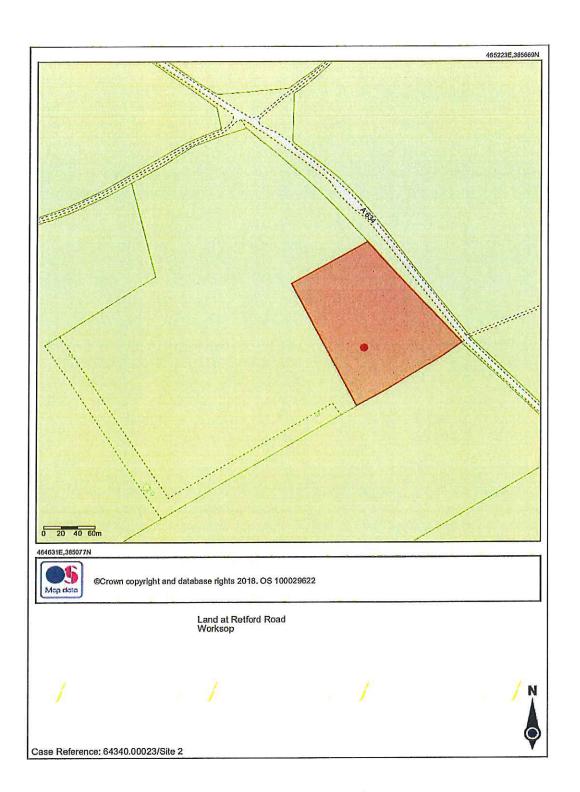
-15-



-16-

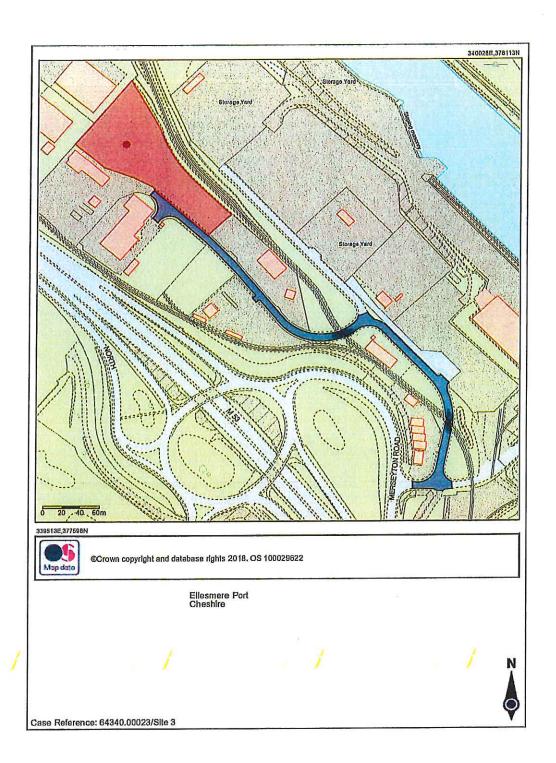
Plan of Retford Road / Tinker Lane ("Site 2")

-17-



-18-

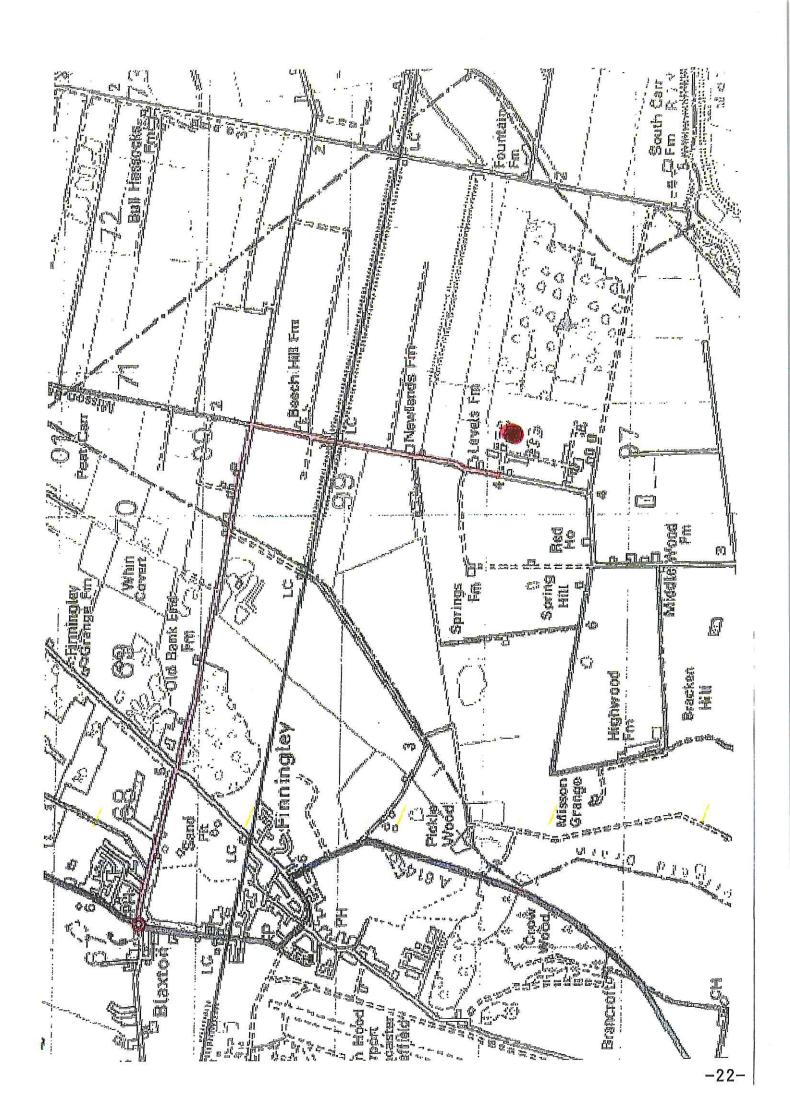
Plan of Ellesmere Port ("Site 3")



-20-

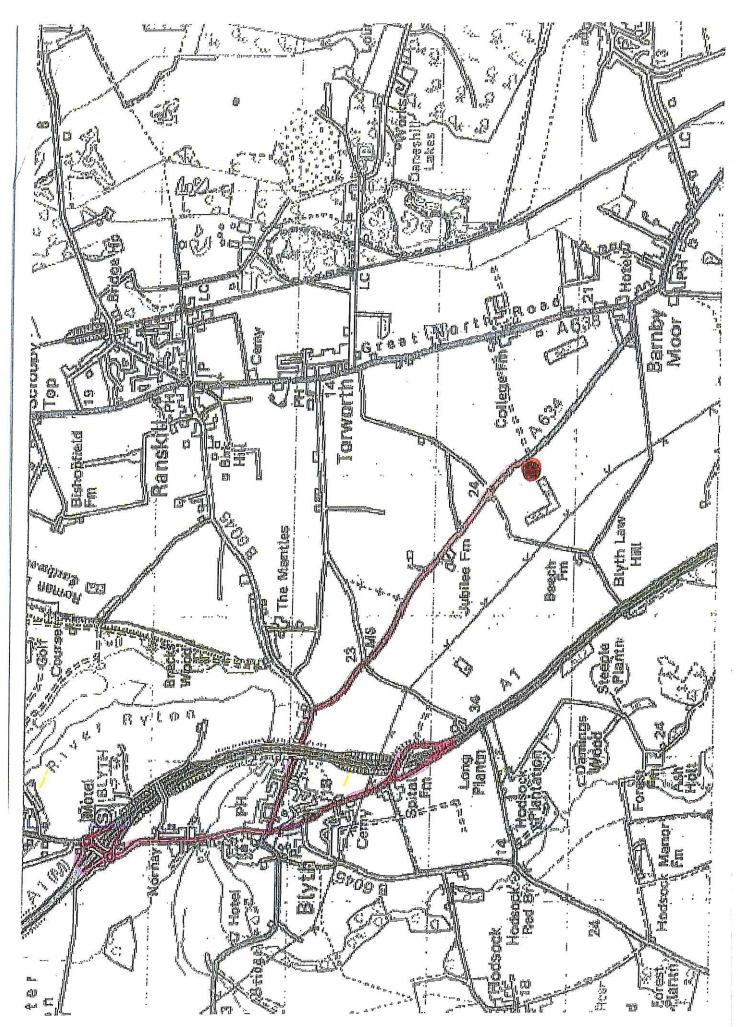
Plan showing Exclusion Zones at Site 1

(Misson Springs)



Plan showing Exclusion Zones at Site 2

(Retford Road / Tinker Lane)



SEE ATTACHED NOTICE AND SERVICE OF ORDER OF THE SITE 1 INJUNCTION IN NO SMALLER THAN A3 FORMAT

HIGH COURT CLAIM NO: BL-2018-001973

# HIGH COURT INJUNCTION IN FORCE NOTICE OF HIGH COURT ORDER DATED

# A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW

PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST AND SECOND DEFENDANT IN THE ORDER (THE "DEFENDANTS")

(1) ISLAND GAS LIMITED AND OTHERS (THE "CLAIMANTS")

FROM:

IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

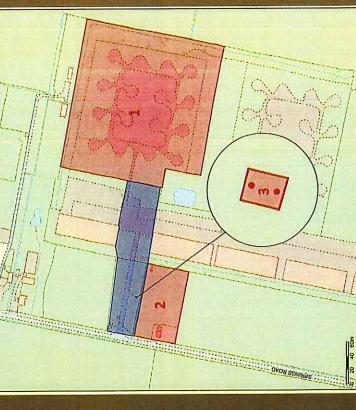
IT IS ORDERED THAT, UNTIL TRIAL OR FURTHER ORDER, THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM:

- ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") AND / OR FROM CAUSING
  DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN, WITHOUT THE CONSENT OF THE CLAIMANTS; AND
- SUBSTANTIALLY INTERFERING WITH THE CLAIMANTS' RIGHTS TO USE (WITH OR WITHOUT VEHICLES AND AT ANY TIME), CARRY OUT WORK ON AND/OR CONSTRUCT, MAKE UP AND MAINTAIN, THE PRIVATE ACCESS ROAD ON THE LAND SHADED BLUE ON THE PLAN, INCLUDING ANY PASSING BAYS AND SPLAYS FOR ACCESS AND EGRESS BETWEEN THE LAND SHADED RED ON THE PLAN AND THE PUBLIC HIGHWAY

REFERENCES TO THE 'CLAIMANT' OR 'CLAIMANTS' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER VISITORS.

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justi (Ref. BL-2018-001973) (details found at <u>https://courtribunalfinder.senvice.gov.uk/courts/rolls-building</u>). Claimants' solicitors: Fleidfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 851, 4000; email address: ICastaam@fieldfisher.com). The Claimants will make available to any person (who has provided their name(s), address(es) and proof of identity to the Claimants' solicitors (either in writing at their said offices or by email to ICasteam@fieldfisher.com and in either case quoting reference OTD/IGas), using an encrypted online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafter and in either case within two clear working days from the first working day on which such written application is received.

Weblink to: Order dated [ ] and Application Notice dated 21. September 2018 can be found at https://www.lgasplo.com/



The leasehold land at:

- the Rocket Site, Springs Road, Misson Springs, Nottinghamshire DN10 6ET as more particularly described by a lease dated 22 May 2015 made between (1) L. Jackson & Co Limited; (2) Island Gas Limited; and (3) IGas Energy Plc registered at the Land Registry under title number NT520551 and marked 1 on the plan above;
- Misson Springs Cottage, Misson Springs, Doncaster DN10 6ES, Chester as more particularly described by a lease dated 22 May 2015 made between (1) Andrew David Jackson and (2) Island Gas Limited and registered at the Land Registry under title number NTS15056 and marked 2 on the plan above; and
- Two borehole sites on the land adjoining title number NT520551, as more particularly described by a lease dated 18 July 2016 and made between (1) L Jackson and Co Limited; (2) Island Gas Limited; and (3) IGas Energy PLC and marked 3 on the plan above.

SEE ATTACHED NOTICE AND SERVICE OF ORDER OF THE SITE 2 INJUNCTION

IN NO SMALLER THAN A3 FORMAT

HIGH COURT CLAIM NO: BL-2018-001973

# HIGH COURT INJUNCTION IN FORCE

A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW NOTICE OF HIGH COURT ORDER DATED [

PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT IN THE ORDER (THE

"DEFENDANTS")

FROM:

(2) DART ENERGY (EAST ENGLAND) LIMTED AND (3) ANDREW DAVID MORRELL AND ANOTHER (THE "CLAIMANTS")

IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

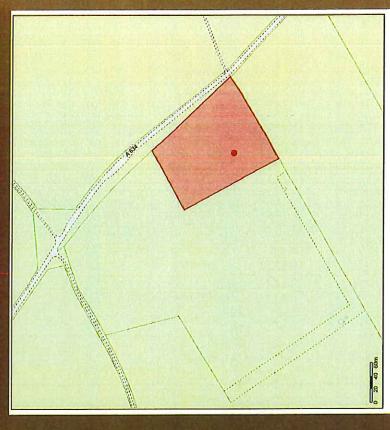
IT IS ORDERED THAT, UNTIL TRIAL OR FURTHER ORDER, THIS INJUNCTION PROHIBITS THE DEFENDANTS:

- FROM ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN"); AND/OR
- FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM, THE LAND SHADED RED ON THE PLAN WITHOUT THE CONSENT OF THE CLAIMANTS.

REFERENCES TO THE 'CLAIMANT' OR 'CLAIMANTS' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER VISITORS.

**Court communications**: all communications about this Order should be sent to the Court Manager, High Court of Justice (Ref: Bu-2018-001973) (details found at <u>https://courttribunalfinder.service.gov.uk/courts/rolls-building),</u> Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number, 0207 861, 4000; email address: <a href="IGasTeam@fieldfisher.com">IGasTeam@fieldfisher.com</a>. The Claimants will make available to any person (who has provided their name(s), address(es) and proof of identity to the Claimants' solicitors) upon written application to the Claimants' solicitors (either in writing at their said offices or by email to <a href="IGasTeam@fieldfisher.com">IGasTeam@fieldfisher.com</a> and in either case quoting reference OTD/IGas), using an encrypted online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafter and in either case within two clear working days from the first working day on which such written application is received.

Weblink to: Order dated [ ] and Application Notice dated 21 September 2018 can be found at https://www.igasplc.com/



Such land to the South West side of Retford Road, Worksop as forms the subject of an option agreement dated 1. July 2015 made between (1) Andrew David Morrell and (2) Dart Energy (Europe) Limited.

SEE ATTACHED NOTICE AND SERVICE OF ORDER OF THE SITE 3 INJUNCTION

IN NO SMALLER THAN A3 FORMAT

HIGH COURT CLAIM NO: BL-2018-00197

# HIGH COURT INJUNCTION IN FORCE NOTICE OF HIGH COURT ORDER DATED

# A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW

PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST AND SECOND DEFENDANT IN THE ORDER ITHE PREENDANTS...

(1) ISLAND GAS LIMITED AND OTHERS (THE "CLAIMANTS")

IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

IT IS ORDERED THAT, UNTIL TRIAL OR FURTHER ORDER, THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM

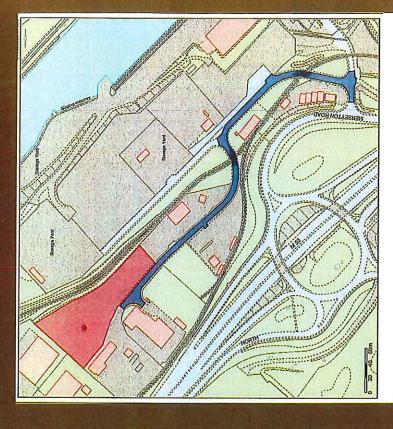
- ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") AND / OR FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN, WITHOUT THE CONSENT OF THE CLAIMANTS; AND
  - SUBSTANTIALLY INTERFERING WITH THE RIGHTS OF THE CLAIMANTS, AND ALL OTHERS AUTHORISED BY THE CLAIMANTS, TO PASS AND RE-PASS (WITH OR WITHOUT VEHICLES AND AT ANY TIME) OVER THE PRIVATE ACCESS ROAD ON THE LAND SHADED BLUE ON THE PLAN, HIGHMAN

REFERENCES TO THE 'CLAIMANT' OR 'CLAIMANTS' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER VISITORS.

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Jus (Ref: BL-2018-001973) (details found at https://courtribunalfinder.service.gov.uk/courts/rolls-building).

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 40000; email address: IGasTeam@fieldfisher.com). The Claimants will make available to any person (who has provided their name(s), address(es) and proof of identity to the Claimants' solicitors) upon written application to the Claimants' solicitors (either in writing at their said offices or by email to IGasTeam@fieldfisher.com and in either case quoting reference OTD/IGas), using an encrypted online file hosting service, the Court documents, with ness evidence and exhibits, as soon as possible thereafter and in either case within two clear working days from the first working day on which such written application is received.

Weblink to: Order dated [ ] and Application Notice dated 21 September 2018 can be found at <a href="https://www.jeasple.com/">https://www.jeasple.com/</a>



The leasehold land at Ellesmere Port as more particularly described by an exploration deed dated 28 April 2017 made between (1) Peel Land and Property (Ports) Ltd and (2) Island Gas Limited.

SEE ATTACHED NOTICE AND SERVICE OF ORDER OF THE SITE 1 EXCLUSION ZONE INJUNCTION IN NO SMALLER THAN A4 FORMAT

HIGH COURT CLAIM NO: BL-2018-001973

# HIGH COURT INJUNCTION IN FORCE NOTICE OF HIGH COURT ORDER DATED [

# A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW

(1) ISLAND GAS LIMITED AND OTHERS (THE "CLAIMANTS")

MPRISONED, FINED OR HAVE YOUR ASSETS SEIZED

IT IS ORDERED THAT, UNTIL TRIAL OR FURTHER ORDER, THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM CARRYING OUT ANY OF THE FOLLOWING ACTS WITHIN THE EXCLUSION ZONE (AS MORE PARTICULARLY DEFINED AND DESCRIBED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN")), EXCEPT THAT THIS ORDER SHALL NOT APPLY TO ANY PUBLIC FOOTPATH AND/OR PAVEMENT WITHIN THE EXCLUSION ZONE:

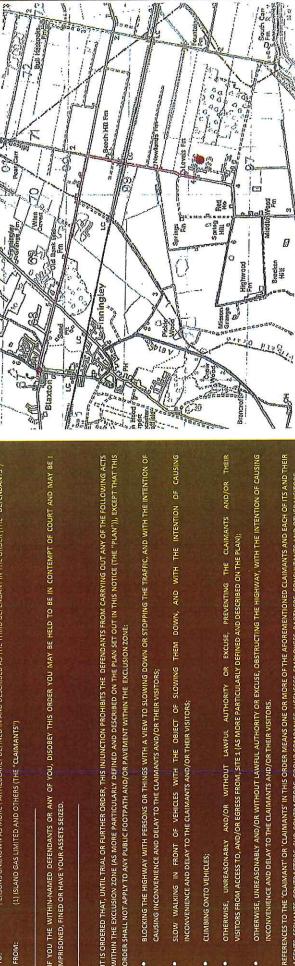
- BLOCKING THE HIGHWAY WITH PERSONS OR THINGS WITH A VIEW TO SLOWING DOWN OR STOPPING THE TRAFFIC, AND WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS AND/OR THEIR VISITORS;
- SLOW WALKING IN FRONT OF VEHICLES WITH THE OBJECT OF SLOWING THEM DOWN, AND WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS AND/OR THEIR VISITORS,
- CLIMBING ONTO VEHICLES;
- EXCUSE, PREVENTING THE CLAIMANTS AND/OR THEIR VISITORS FROM ACCESS TD, AND/OR EGRESS FROM, SITE 1 (AS MORE PARTICULARLY DEFINED AND DESCRIBED ON THE PLAN); OTHERWISE, UNREASONABLY AND/OR WITHOUT LAWFUL AUTHORITY OR
- OTHERWISE, UNREASONABLY AND/OR WITHOUT LAWFUL AUTHORITY OR EXCUSE, OBSTRUCTING THE HIGHWAY, WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS AND/OR THEIR VISITORS.

REFERENCES TO THE 'CLAIMANT' OR 'CLAIMANTS' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER VISITORS.

Court communications: all communications about this Order should be sent to [Ref: 8t-2018-001973] (details found at https://courtri/buna/finder.service.gov.uk/courts/rolls-building)

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London ECAR 3TT (Telephone number: 0207 861 4000; email address: <u>IGasTeam@fieldfisher.com</u>). The Claimants will make avallable to any person (who has provided their name(s), address(es) and proof of Identity to the Claimants' written application to the Claimants' solicitors (either in writing at their said offices or by email to I<u>GasTeam@fieldfisher.com</u> and in either case quoting reference OTD/IGas), using an encrypted online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafte and in either case within two clear working days from the first working day on which such written application is received

] and Application Notice dated 21 September 2018 can be found at https://www.lgasplc.com/ Weblink to: Order dated [



The leasehold land at:

- the Rocket Site, Springs Road, Misson Springs, Nottinghamshire DN10 6ET as more particularly described by a lease dated 22 May 2015 made between (1) L. Jackson & Co Limited; (2) Island Gas Limited; and (3) IGas Energy Pic registered at the Land Registry under title number NTS20551; and
- Misson Springs Cottage, Misson Springs, Doncaster DN10 6ES, Chester as more particularly described by a lease dated 22 May 2015 made between (1) Andrew David Jackson and (2) Island Gas Limited and registered at the Land Registry under
- two borehole sites on the land adjoining title number NT520551, as more particularly described by a lease dated 18 July 2016 and made between (1) L. Jackson and Co Limited; (2) Island Gas Limited; and (3) IGas Energy PLC

shown for illustration purposes shaded red ("Site 1")

The part of Springs Road that runs Northbound from Site 1 and the stretch of the B1396 (Bank End Road) that runs from Springs Road up to, and including, the roundabout at Blaxton, shown for illustration purposes shaded pink (the "Exclusion Zone").

SEE ATTACHED NOTICE AND SERVICE OF ORDER OF THE SITE 2 EXCLUSION ZONE INJUNCTION IN NO SMALLER THAN A4 FORMAT

HIGH COURT CLAIM NO: BL-2018-001973

# HIGH COURT INJUNCTION IN FORCE NOTICE OF HIGH COURT ORDER DATED [

# A FULL COPY OF THE ORDER CAN BE FOUND VIA WEBLINK LISTED BELOW

PERSONS UNKNOWN AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE THIRD DEFENDANT IN THE ORDER (THE

"DEFENDANTS")

FROM:

(2) DART ENERGY (EAST ENGLAND) LIMITED AND (3) ANDREW DAVID MORRELL AND ANOTHER (THE "CLAIMANTS")

IF YOU THE WITHIN-NAMED DEFENDANTS OR ANY OF YOU, DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

IT IS ORDERED THAT, UNTIL TRIAL OR FURTHER ORDER, THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM CARRYING OUT ANY OF THE FOLLOWING. ACTS WITHIN THE EXCLUSION ZONE (AS MORE PARTICULARLY DEFINED AND DESCRIBED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN")), EXCEPT THAT THIS ORDER SHALL NOT APPLY TO ANY PUBLIC FOOTPATH AND/OR PAVEMENT WITHIN THE EXCLUSION ZONE.

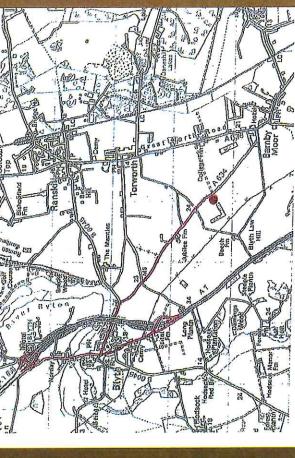
- BLOCKING THE HIGHWAY WITH PERSONS OR THINGS WITH A VIEW TO SLOWING DOWN OR STOPPING THE TRAFFIC, AND WITH THE INTENTION.
   OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS AND/OR THEIR VISITORS;
- SLOW WALKING IN FRONT OF VEHICLES WITH THE OBJECT OF SLOWING THEM DOWN, AND WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS AND/OR THER VISITORS;
- CLIMBING ONTO VEHICLES;
- OTHERWISE, UNREASONABLY AND/OR WITHOUT LAWFUL AUTHORITY OR EXCUSE, PREVENTING THE CLAIMANTS AND/OR THEIR VISITORS FROM ACCESS TO, AND/OR EGRESS FROM, SITE 2 (AS MORE PARTICULARLY DEFINED AND DESCRIBED ON THE PLAN);
- OTHERWISE, UNREASONABLY AND/OR WITHOUT LAWFUL AUTHORITY OR EXCUSE, OBSTRUCTING THE HIGHWAY, WITH THE INTENTION OF CAUSING INCONVENIENCE AND DELAY TO THE CLAIMANTS AND/OR THEIR VISITORS.

REFERENCES TO THE 'CLAIMANT' OR 'CLAIMANTS' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THER THE AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER THE AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER THE AGENTS.

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Ju (Ref: 8L-2018-001973) (details found at <a href="https://courtribunalfinder.service.gov.uk/courts/rolls-building">https://courtribunalfinder.service.gov.uk/courts/rolls-building</a>).

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London ECAR 3TT (Telephone number: 0207 861 4000; email address: ISAREam@Reidfisher.com). The Claimants will make available to any person (who has provided their name(s), address(es) and proof of identity to the Claimants' solicitors) upon written application to the Claimants' solicitors (either in writing at their sald offices or by email to IGasTeam@Reidfisher.com and in either case quoting reference OTD/IGas), using an encrypted online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafter and in either case within two clear working days from the first working day on which such written application is received.

Weblink to: Order dated [ ] and Application Notice dated 21 September 2018 can be found at https://www.lgasplc.com/



Such land to the South West side of Retford Road, Worksop as forms the subject of an option agreement dated 1 July 2015 made between (1) Andrew David Morrell and (2) Dart Energy (Europe) Umited, shown for illustration purposes shaded red ("Site 2").

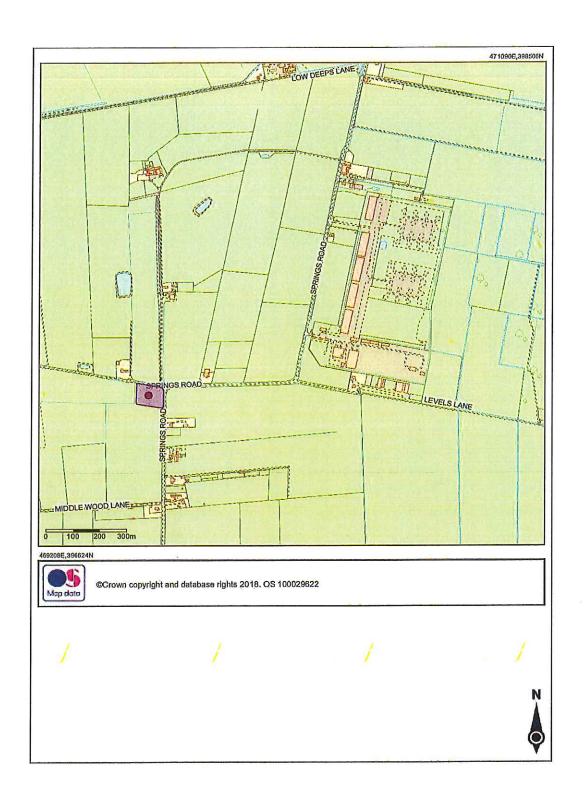
The exclusion zone includes:

- that part of the AG34 (Retford Road) that runs northbound from Site 2 up to the roundabout where the AG34 (also known as Retford Road) meets the High Street at Blyth; and
- both directions along the High Street:
- turning left at the roundabout, the High Street runs Southward until it Joins the A1 (Blythe Road) via Spital Road; and
- turning right, the High Street runs North until it joins the A1(M) at the Blyth Roundabout via Bawtry Road (the B6045).

shown for illustration purposes shaded pink (the "Exclusion Zone")

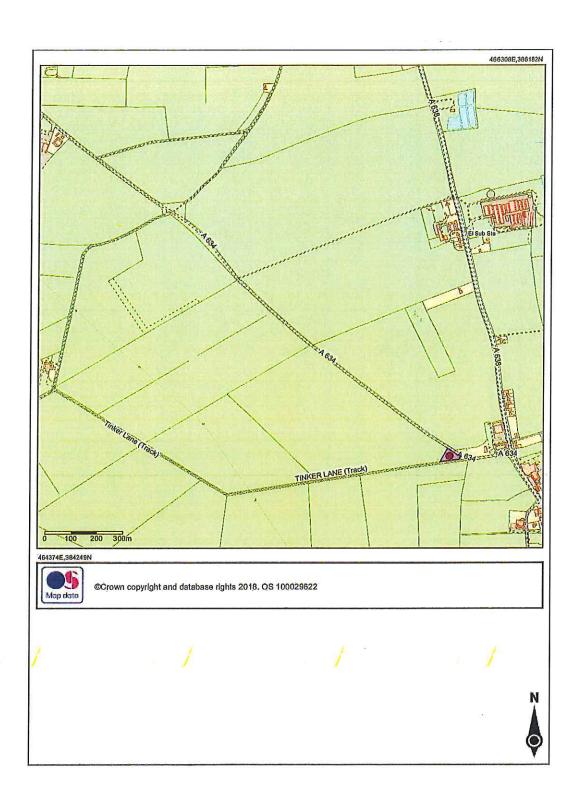
Plan showing approximate location of the 'Misson Springs Protection Camp', which is located in the vicinity of Site 1

(Springs Lane)



Plan showing approximate location of the 'Tinker Lane Protectors Camp Group', which is located in the vicinity of Site 2

(Tinker Lane)



1.	Site 1

Frack Free Misson

www.frackfreemisson.co.uk

https://www.facebook.com/groups/FrackFreeMisson/

https://twitter.com/FrackFreeMisson

Misson Springs Protection Camp (MSPC)

https://www.facebook.com/groups/593190917685843/about/

Misson Springs Hauliers of Shame

https://www.facebook.com/groups/1642940302451649/

- 2. Site 2
- Frack Free Tinker Lane

www.frackfreetinkerlane.co.uk

https://www.facebook.com/groups/1981005762123927/

Tinker Town in an Anti-Fracking World

https://www.facebook.com/permalink.php?story\_fbid=852096661664023&id=851699271703762

Tinker Lane Protectors Camp Group

https://www.facebook.com/groups/1799789486780514/

- 3. Site 3
- Frack Free Dee

http://www.frackfreedee.co.uk/

Ellesmere Port Frack Free

https://www.facebook.com/groups/EllesmerePortFrackFree/about/

https://twitter.com/FrackFreeElles

https://www.facebook.com/pg/EPFrackFree/posts/?ref=page\_internal

Frack Free Dee Coalition

https://www.facebook.com/frackfreedee/

- 4. Others
- Reclaim the Power

https://www.facebook.com/ReclaimThePower

https://reclaimthepower.org.uk/

Greenpeace UK

https://www.greenpeace.org.uk

Friends of the Earth

https://www.foe.co.uk/

https://friendsoftheearth.uk/climate-change/fracking?origin=d-7

Frack Off

http://frack-off.org.uk/

Frack Off London

https://www.facebook.com/FrackOffLondon/?ref=py\_c

Frack Free UK – Web site

www.frackfreeuk.co.uk

Fracking Disclosure – Facebook

https://www.facebook.com/groups/1932458957072378/about/

The new Frack Free South Yorkshire

https://www.facebook.com/groups/406431869518525/?multi\_permalinks=729135470581495%2 C728783857283323%2C728776753950700%2C728412637320445%2C728411717320537&ref =notif&notif\_t=group\_activity&notif\_id=1495647837773493

Frack Free Nottingham

http://frackfreenotts.org.uk/

Frack Free Nottinghamshire

https://www.facebook.com/frackfreenottinghamshire

Bassetlaw Against Fracking – Facebook

https://www.facebook.com/BassetlawAgainstFracking

Marriotts of Fire Protection Camp- Facebook

https://www.facebook.com/groups/1726094950738820/about/

Talk Fracking

http://www.talkfracking.org/

### 5. Individuals

Ross Monaghan

https://www.facebook.com/ross.monaghan.35?fref=search

Zoe Gummerson

https://www.facebook.com/zoen.gummerson?fref=search

Louise Hammond

https://www.facebook.com/nannylou63?fref=mentions

Ian R Crane

https://www.facebook.com/lan-R-Crane-200294730037361/

Harriet Kenzie

https://www.facebook.com/happyharrie?fref=mentions

Simone Lister

https://www.facebook.com/simone.h.lister

Katrina Lawrie

https://www.facebook.com/ruth.besant

Nick Potts

https://www.facebook.com/profile.php?id=100009121247668

Lance McConnell

https://www.facebook.com/lance.mcconnell.79

Ben Deevoy /

https://www.facebook.com/L1VE.N.LET.DIE