

IN THE HIGH COURT OF JUSTICE IN NORTHERN IRELAND
QUEEN'S BENCH DIVISION

Between:

TAMBORAN RESOURCES LIMITED (1)
TAMBORAN RESOURCES UK LIMITED (2)

Intended Plaintiffs

-and-

PERSONS UNKOWN (1), PERSONS SEEKING, WITHOUT THE PERMISSION OR CONSENT OF THE OWNER, TO GAIN ACCESS TO LANDS SITUATE AND KNOWN AS GANDRUM ROAD, COUNTY FERMANAGH, CONTAINED IN FOLIOS FE 2732, FE 1950 AND FE 1675 CO. FERMANAGH (2), THE MEMBERS OF FERMANAGH FRACKING AWARENESS NETWORK (3) -and- THE MEMBERS OF BELCOO COMMUNITY FIGHTBACK (4)

Intended Defendants

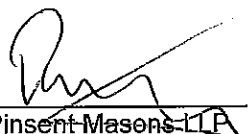
NOTICE OF MOTION

TAKE NOTICE that application shall be made to the Judge sitting in chambers at the Royal Courts of Justice, Chichester Street, Belfast on day the day of 2014 at am/pm or as soon thereafter as Counsel on behalf of the above named Plaintiff may be heard for:-

1. An Order abridging the time for the hearing and/or service of this application pursuant to Order 5 Rule 3 of the Rules of the Court of Judicature (NI) 1980 upon such terms as this Honourable Court shall deem fit and just;
2. An injunction until judgment or further order restraining the Defendants and each of them, whether by themselves their servants or agents or otherwise howsoever from:
 - i. Entering onto or being on the plaintiff's lands situate at and known as Gandrum Road, County Fermanagh, contained in Folios FE 2732, FE 1950 and FE 1675 Co. Fermanagh and more particularly delineated in red in the map annexed hereto ('the Lands');
 - ii. Interfering with and/or preventing the plaintiff, its servants or agents, from carrying on exploratory mining operations at or about the Lands under Petroleum Licence granted by The Department of Enterprise Trade and Investment to Tamboran on
3. Such further or other Orders or Directions as to the hearing of this matter as to the Court shall seem fit and just;
4. An Order providing for the costs of and incidental to this application.

DATED this 23rd day of July 2014.

Signed


Pinsent Masons LLP
Soloist Building
1 Lanyon Place
Belfast
BT1 3LP
Solicitors for the intended Plaintiffs

IF YOU DO NOT ATTEND EITHER IN PERSON OR BY YOUR SOLICITOR OR COUNSEL THE COURT MAY MAKE SUCH ORDER IN YOUR ABSENCE AS IT DEEMS FIT.