

Application notice

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

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In the High Court of Justice Queen's Bench Division	
Claim no.	
Fee Account no.	PBA0087028
Warrant no. (if applicable)	
Claimant (including ref.)	(1) Thurrock Council (2) Essex County Council
Defendants (including ref.)	(1) Madeline Adams (2)-(222) Other Named Defendants (223)-(229) Persons Unknown
Date	24 April 2022

1. What is your name or, if you are a legal representative, the name of your firm?

Sharpe Pritchard LLP

2. Are you a Claimant Defendant Legal Representative

Other (please specify)

If you are a solicitor whom do you represent

Claimants

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

4. Have you attached a draft of the order you are applying for Yes No

5. How do you want to have this application dealt with? at a hearing without a hearing

at a telephone hearing

6. How long do you think the hearing will last?

Hours Minutes

Is this time estimate agreed by all parties?

Yes No

7. Give details of any fixed trial date or period

-

8. What level of Judge does your hearing need?

High Court

9. Who should be served with this application?

-

- 9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

the attached witness statement

the statement of case

the evidence set out in the box below

If necessary, please continue on a separate sheet

1. Witness Statement of Adewale Adesina dated 23 April 2022 and its exhibits.
2. Witness Statement of Adam Rulewski dated 24 April 2022 and its exhibits.
3. Witness Statement of Morgan Cronin dated 23 April 2022 and its exhibits.
4. Witness Statement of Paul Crick dated 23 April 2022 and its exhibits.

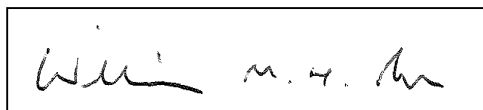
The Claimants seek interim injunctive relief, pursuant to the Local Government Act 1972, s222, the Highways Act 1980, s130(5), the Senior Courts Act 1981, s37(1) and CPR 25.1(1)(a), to restrain acts of public nuisance and trespass that have occurred in the administrative area of Thurrock, and which are apprehended to recommence and escalate on 25 April 2022, and to restrain acts of public nuisance and trespass in the administrative area of Essex County Council, which are apprehend to commence on 25 April 2022. The Claimants seek to attach a power of arrest to the injunction order pursuant to the Police and Justice Act 2006, s27. Pursuant to CPR 6.15 and 6.27, the Claimants seek alternative service orders in relation to the Claim Form, Application, supporting documents, injunction order and power of arrest. This Application is made without notice to the Defendants.

Statement of Truth

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.

- I believe that the facts stated in section 10 (and any continuation sheets) are true.
- The Applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature



- Applicant
- Litigation friend (where applicant is a child or a Protected Party)
- Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

Month

Year

24

April

2022

Full name

William Maxwell Hunt Rose

Name of applicant's legal representative's firm

Sharpe Pritchard LLP

If signing on behalf of firm or company give position or office held

Partner

Applicant's address to which documents should be sent.

Building and street

Elm Yard, 10-16 Elm Street

Second line of address

Town or city

London

County (optional)

Postcode

WC1X 0BJ

If applicable

Phone number

020 7405 4600 / 07799 900961

Fax number

020 7204 2244

DX number

353 London/Chancery Lane

Your Ref.

WMHR/ 1329.48

Email

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