

B E T W E E N:

1. WOLVERHAMPTON CITY COUNCIL
2. DUDLEY METROPOLITAN BOROUGH COUNCIL
3. SANDWELL METROPOLITAN BOROUGH COUNCIL
4. WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING
2. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING
3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)
4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

5. Mr ANTHONY PAUL GALE
6. Miss WIKTORIA SZCZUBLINSKA
7. Mr ISA IQBAL
8. Mr MASON PHELPS
9. Miss REBECCA RICHOLD
10. Mr OLIVER CLARKE
11. Mr SIKANDER HUSSAIN

Defendants

FINAL INJUNCTION, FINAL POWER OF ARREST AND SERVICE DIRECTIONS

Wolverhampton City Council, Legal Services, Civic Centre,
St Peter's Square, Wolverhampton, WV1 1RG
DX 744350 Wolverhampton 27
Tel: 01902 556556; e-mail: litigation@wolverhampton.gov.uk
Claimants' Ref: LIT/AS/LIJ017753P

Injunction, Power of Arrest and Service Directions

1. (SEALED) Amended Final Injunction Final Inj Version 2 29 May 2024 p 1 - p 10
2. (SEALED) Documents comprising Schedule to Injunction p 11 - p 33
3. (SEALED) Plan A to Accompany Final Injunction and Power of Arrest p 34
4. (SEALED) Amended final POA p 35 - p 37
5. (SEALED) Plan A to Accompany Final Injunction and Power of Arrest p 38
6. Directions Accompanying Final Order (Black Country) (Sealed) 27 February 2024 p 39 - p 48

Injunction, Power of Arrest and Service Directions

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

Claim No. KB-2022-BHM-000188



Julian Knowles J: 27 February 2024
HHJ Emma Kelly: 21 and 23 May 2024

KB-2022-BHM-000188

In the matter of an application for an injunction under s.222 Local Government Act 1972 and s.130 of the Highways Act 1980

B E T W E E N:-

1. WOLVERHAMPTON CITY COUNCIL
2. DUDLEY METROPOLITAN BOROUGH COUNCIL
3. SANDWELL METROPOLITAN BOROUGH COUNCIL
4. WALSALL METROPOLITAN
BOROUGH COUNCIL

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING
- 2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING
3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)
4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR

RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR
OBSTRUCTIVE DRIVING

5. Mr ANTHONY PAUL GALE

6. Miss WIKTORIA SCZCUBLINSKA

7. Mr ISA IQBAL

8. Mr MASON PHELPS

9. Ms REBECCA RICHOLD

10. Mr OLIVER DAVID CLARKE

11. Mr SIKANDER HUSSAIN

Defendants

FINAL INJUNCTION (VERSION 2)

Fourth Defendants added as parties pursuant to the Order of the Honourable Mr Justice Ritchie, made on 19 May 2023

Fifth and Sixth Defendants added as parties pursuant to the Order of HHJ Kelly made on 4 October 2023

Seventh Defendant added as a party pursuant to the Order of HHJ Kelly made on 1 November 2023

Eighth Defendant added as a party pursuant to the Order of HHJ Kelly made on 29 January 2024

Ninth Defendant added as a party pursuant to the Order of the Honourable Mr Justice Julian Knowles made on 27 February 2024

Tenth Defendant added as a party pursuant to the Order of HHJ Kelly made on 21 May 2024

Eleventh Defendant added as a party pursuant to the Order of HHJ Kelly made on 23 May 2024

To:

1. the First, Second and Third Defendants being Persons Unknown:
 - a. who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country area shown

- on plan A (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving (First Defendants);
- b. who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country area shown on plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving (Second Defendants); and
 - c. promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00pm and 7:00am of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area shown on plan A (attached) (Third Defendants)
2. the Fourth Defendants being Persons Unknown being drivers, riders or passengers in or on motor vehicle(s) who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which such Defendants engage in motor racing or motor stunts or other dangerous or obstructive driving

And to: the Fifth, Sixth, Seventh Eighth, ~~and Ninth, Defendants Tenth and Eleventh Defendants~~ (“the Named Defendants”) being persons who have been found to be in breach of the Interim and Final Injunctions and who became parties to the claim by subsequent orders of the court

PENAL NOTICE

IF YOU THE WITHIN NAMED PERSONS UNKNOWN AND THE NAMED DEFENDANTS , DO NOT COMPLY WITH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND IMPRISONED OR FINED, OR YOUR ASSETS MAY BE SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS ANY OF THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order but you must obey the order unless it is varied or discharged by the Court.

A Defendant who is an individual who is ordered not to do something must not do it himself/herself or in any other way. He/she must not do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

This Order was made when the Defendants were not present at court but notice of the Claimants application had been given

Before the Honourable Mr Justice Julian Knowles sitting at the High Court of Justice, Birmingham District Registry, Priory Courts, 33 Bull Street, Birmingham, B4 6DS on 27 February 2024

Upon hearing Mr Singleton of counsel for the Claimants and there being no appearance by any other person and neither the Court nor the Claimants having received any notification that any other person wished to be joined as a party or heard

And Upon the Claimants' application, by an Application Notice dated 7 October 2022 for an injunction pursuant to section 222 Local Government Act 1972 and section 130 Highways Act 1980

And Upon the Court having granted an Interim Injunction and Power of Arrest, by Order of the Honourable Mrs Justice Hill sealed on 22 December 2022

And Upon the court exercising its discretion to grant injunctive relief pursuant to section 37(1) Senior Courts Act 1981;

And Upon the Court being satisfied for the purposes of s.27(3), Police and Justice Act 2006, that there is a significant risk of harm to a person or persons from the conduct prohibited by the Injunction Order and that a Power of Arrest should therefore be granted.

And Upon the Court noting the order of the Her Honour Judge Kelly sealed on 21 December 2023 giving directions and approving service by alternative means pursuant to CPR r.6.27 and CPR r.81.4 of: that order; and further evidence.

And Upon it appearing to the court that there is good reason to authorise service by a method or place not otherwise permitted by CPR Parts 6 & 81

And Upon the Claimants reconfirming that this Order is not intended to prohibit lawful motorsport taking place on private land where planning permission has been granted (or is not required) and such activities take place under an approved code or licence from a recognised regulatory body.

And further upon the Claimant undertaking, and being given permission, to file a further Amended Claim Form and further Amended Particulars of Claim to reflect the addition to the proceedings of the Ninth Defendant referred to above. Such amendments to be filed by 4.00pm, 12 March 2024 and served by the same date by adopting like measures to those set out at paragraph 9 of the Directions Order

IT IS ORDERED THAT:

Injunction in force

- 1 **IT IS FORBIDDEN** for any of the First Defendants or any of the Named Defendants to participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country area shown on plan A (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.
- 2 **IT IS ALSO FORBIDDEN** for any of the Second Defendants or any of the Named Defendants to participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country area shown on plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving.
- 3 **IT IS ALSO FORBIDDEN** for any of the Third Defendants or any of the Named Defendants to promote organise publicise (by any means whatsoever) any gathering between the hours of 3:00pm and 7:00am of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area shown on plan A (attached)
- 4 **IT IS ALSO FORBIDDEN** for any of the Fourth Defendants or any of the Named Defendants being a driver, rider or passenger in or on a motor

vehicle to participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which such Defendants engage in motor racing or motor stunts or other dangerous or obstructive driving.

Stunts are driving manoeuvres often undertaken at such gatherings including but not limited to:

- (1) “Burnouts” Causing a vehicle to damage or destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed.
- (2) “Donuts/Donutting” Causing a vehicle to rotate around a fixed point (normally the front axle) while not moving off causing noise, smoke and tyre marks to be created.
- (3) “Drifting” Turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input.
- (4) “Undertaking” passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code

5 A Power of Arrest, pursuant to 27(3), Police and Justice Act 2006, is attached, to paragraph 4 of this Order and shall remain in force until 23.59 on 1 March 2027 unless extended, varied or discharged by further Order of the Court

Definitions

6 In this Order the following definitions have been applied:

- (1) “the Final Injunction” this Order

- (2) “the Final Power of Arrest” means the Power of Arrest, made on 28 February 2024
- (3) the “Interim Injunction” means the Order of the Honourable Mrs Justice Hill J sealed on 23 December 2022 as amended by Order of the Honourable Mr Justice Ritchie made on 19 May 2023
- (4) “the Interim Power of Arrest” means the Power of Arrest, sealed on 23 December 2022
- (5) “the Interim Relief Application” - the Application Notice of 13 December 2022, including the draft Injunction Order referred to therein.
- (6) “the Alternative Service Application” – the Application Notice of 7 October 2022, seeking permission for alternative service of Claim Form.
- (7) “the Applications” – the Interim Relief Application, the Alternative Service Application and the application for a final injunction issued on 13 October 2022.
- (8) “the Documents”
 - (a) Notice of Hearing and a sealed copy of this Order
 - (b) Part 8 Claim Form;
 - (c) Particulars of Claim
 - (d) N16A application for an Injunction;
 - (e) Draft Injunction Order
 - (f) Draft Power of Arrest
 - (g) The Interim Relief Application;
 - (h) The Alternative Service Application.
- (9) “the Evidence” materials set out at Schedule A below
- (10) “the Directions Order” the Directions order made on 28 February 2024 in this claim.

1 Commencement, Term and Duration

7 This Final Injunction Order shall come into force immediately and be deemed served on the Defendants at 11.59 on the date upon which the final step in paragraphs 5 and 6 of the Directions Order have been complied with.

8 The Interim Injunction and Interim Power of Arrest dated 22 December 2022 made by the Honourable Mrs Justice Hill as amended by the Honourable Mr Justice Ritchie on 16 May 2023 shall stand discharged once paragraph 7 has been complied with

9 This Order & Power of Arrest shall, expire at 11.59 pm on 1 March 2027 unless it is extended, varied or discharged by further order of the court.

2 Further Case Management

10 A review hearing will take place in open court (elh 30 minutes) before a Judge of the High Court (section 9 if practicable) after this order has been in force for 12 months and for no longer than 14 months. The Claimants shall file with the court a succinct report to inform the court of their experience with the publication, operation and enforcement of the extended order, including for example, breaches, warnings or problems, if any arising out the extended order (including the Power of Arrest).

Further Matters

11 Without prejudice to the foregoing, any person affected by this Final Injunction or Power of Arrest may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants'

solicitors immediately (and in any event not less than 48 hours before the hearing of any such application).

12 Further information on how to make such application and useful sources of information are set out in the Directions Order.

13 There be no order as to costs.

SCHEDULE A

Please see:

- (1) Material contained in the six Bundles of Evidence in support of this Application for an Injunction (the Indices of which are appended hereto)



BETWEEN:

1. WOLVERHAMPTON CITY COUNCIL
2. DUDLEY METROPOLITAN BOROUGH COUNCIL
3. SANDWELL METROPOLITAN BOROUGH COUNCIL
4. WALSALL METROPOLITAN BOROUGH COUNCIL

KB-2022-BHM-000188

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

5. Mr ANTHONY PAUL GALE

6. Miss WIKTORIA SZCUBLINSKA

7. Mr ISA IQBAL

8. Mr MASON PHELPS

Defendants

**CLAIMANTS' APPLICATION FOR INJUNCTIVE RELIEF
BUNDLE OF DOCUMENTS FOR USE AT A HEARING LISTED 27 FEBRUARY AND
28 FEBRUARY 2024**

VOLUME ONE

A. SECTION A - Statements of Case

1.	N208 Claim Form (Amended) 29 Jan 2024 SEALED	A 1 - A 3
2.	Amended Particulars of Claim v5 30 01 24.pdf	A 4 - A 20
3.	Amended Injunction Version 5 (29 Jan 2024) Latest Version of Interim Injunction naming 5th-8th Defendants as Parties	A 21 - A 29
4.	Schedule A to Injunction Index to Injunction Order 19 May 2023.pdf	A 30 - A 39
5.	Plan A.pdf	A 40
6.	Power of Arrest 29 01 2024 v6 Latest Version of Interim Power of Arrest naming 5th-8th Defendants as Parties	A 41 - A 44
7.	Plan A.pdf	A 45

B. SECTION B - Overarching Evidence Filed on Behalf of The Claimant Councils For the Final Hearing

1.	Statement of Pardip Nagra 12 February 2024	B 1 - B 12
2.	Exhibit Cover - Exhibit PN1 Statement of Pardip Nagra February 2024	B 13
3.	Exhibit PN1 email from Mrs J Bateman 2 Feb 2024	B 14 - B 15
4.	Exhibit Cover - Exhibit PN2 Statement of Pardip Nagra February 2024	B 16
5.	Exhibit PN2 (part1) Statement of Pardip Sandhu Sandwell MBC 30 January 2024 (Exhibit PS3 part 1 of 3 to statement of Pardip Sandhu 30 01 2024)	B 17 - B 25
6.	Exhibit PN2 (part 2) (Exhibit PS3 part 2 of 3 to statement of Pardip Sandhu 30 01 2024)	B 26 - B 35
7.	Exhibit PN2 (Part 3) (Exhibit PS3 part 3 of 3 to statement of Pardip Sandhu 30 01 2024)	B 36 - B 39
8.	Exhibit Cover - Exhibit PN3 Statement of Pardip Nagra February 2024	B 40
9.	Exhibit PN3(1) Witness Statement of Andrew Clarke Sandwell MBC (Signage) 25 January 2024	B 41 - B 45
10.	Exhibit PN3(2) - Exhibit AC3 to Statement of Andrew Clarke (Sandwell MBC) 25 Jan 2024	B 46 - B 65
11.	Exhibit PN3(3) 3.1 Exhibit AC5 to Statement of Andrew Clarke (Sandwell MBC) 25 Jan 2024 Location List - Car Cruising Signage	B 66 - B 68
12.	Exhibit PN3(3) 3.2 Exhibit AC5 to Statement of Andrew Clarke (Sandwell MBC) 25 Jan 2024 Axletree Way, Wednesbury - Locations 1-4	B 69
13.	Exhibit PN3(3) 3.3 Exhibit AC5 to Statement of Andrew Clarke (Sandwell MBC) 25 Jan 2024 Hallens Drive, Wednesbury - Locations 5-8	B 70
14.	Exhibit PN3(3) 3.4 Exhibit AC5 to Statement of Andrew Clarke (Sandwell MBC) 25 Jan 2024 Navigation Roundabout, Great Bridge - Locations 9-12	B 71
15.	Exhibit PN3(3) 3.5 Exhibit AC5 to Statement of Andrew Clarke (Sandwell MBC) 25 Jan 2024 Dudley Port, Tipton - Location 13	B 72
16.	Exhibit PN3(3) 3.6 Exhibit AC5 to Statement of Andrew Clarke (Sandwell MBC) 25 Jan 2024 Kenrick Way, West Bromwich - Locations 14-16	B 73
17.	Exhibit PN3(3) 3.7 Exhibit AC5 to Statement of Andrew Clarke (Sandwell MBC) 25 Jan 2024 Black Lake, West Bromwich - Location 17	B 74
18.	Exhibit PN3(3) 3.8 Exhibit AC5 to Statement of Andrew Clarke (Sandwell MBC) 25 Jan 2024 Birchley Island, Oldbury - Locations 18-21	B 75
19.	Exhibit PN3(4) Exhibit AC5 to Statement of Andrew Clarke (Sandwell MBC) 25 Jan 2024	B 76

20.	Exhibit Cover - Exhibit PN4 Statement of Pardip Nagra February 2024	B 77
21.	Exhibit PN4 Statement of Mark Wilson Dudley MBC 1 February 2024	B 78 - B 81
22.	Exhibit Cover - Exhibit PN5 Statement of Pardip Nagra February 2024	B 82
23.	Exhibit PN5(1) Witness Statement of Steve Gittins (Walsall MBC) 5 February 2024	B 83 - B 89
24.	Exhibit PN5(2) Exhibit SJG1 to statement of Steve Gitins 5 Feb 2024 - Plan Depicting Locations of Car Cruising Injunction Signage (Walsall MBC)	B 90
25.	Exhibit Cover - Exhibit PN6 Statement of Pardip Nagra February 2024	B 91
26.	Exhibit PN6 - Schedule of Committals 1 February 2024	B 92 - B 93
27.	Exhibit Cover - Exhibit PN7 Statement of Pardip Nagra February 2024	B 94
28.	Exhibit PN7(1) - Witness Statement Cover Tim Philpot Febraury 2024	B 95
29.	Exhibit PN7(2) - Witness Statement of Tim Philpot 9 Feb 2024	B 96 - B 104
30.	Exhibit Cover - Exhibit PN8 Statement of Pardip Nagra February 2024	B 105
31.	Exhibit PN8 - Briefing Note 19 January 2024 - Alternative Remedies to Injunction	B 106 - B 116

C. SECTION C - Overarching Evidence Filed on Behalf of West Midlands Police For the Final Hearing

1.	Statement of PC Mark Campbell 9 February 2024	C 1 - C 24
2.	PC Mark Campbell 9 2 24 - Exhibit Cover MRC3	C 25
3.	PC Mark Campbell 9 2 24 - Exhibit Cover MRC4	C 26

D. SECTION D - Claimants' Evidence Demonstrating purported compliance with publicity requirements in order of 20 December 2023 and impact of Claimants' publicity generally

1.	18th Statement of Paul Brown 25 01 24	D 1 - D 7
2.	EXHIBIT PB18A	D 8 - D 28

E. SECTION E - Court Order 20 December 2023

1.	Black Country Car Cruising Injunction - Order from hearing 20 December 2023	E 1 - E 18
2.	Amended Black Country Injunction (20 December 2023) V4	E 19 - E 27
3.	Schedule A to Injunction Index to injunction order 19 May 2023 (annex to order 20 December 2023)	E 28 - E 37
4.	Sealed Plan A (20 December 2023)	E 38
5.	Black Country Car Cruising Injunction - Sealed Power of Arrest - Version 5 (20 December 2023)	E 39 - E 42
6.	Sealed Plan A (20 December 2023)	E 43

F. SECTION F - Contempt orders and Service of Documents on Named Defendants Since 2023 and applications to join certain named persons as Defendants to the Injunction

1.	Certificate of Service 22 12 23 Solicitors for A Gale	F 1 - F 2
2.	Email Serving Solicitors for Mr A Gale with documents from hearing 20 December 2023 sent 22 12 2023 at 1100 hours	F 3 - F 4
3.	Certificate of Service Solicitors for Miss W Szczublińska service 22 12 2023	F 5 - F 6

4.	Email Serving Solicitors for Miss W Szczublińska with documents from hearing 20 December 2023 sent 22 12 2023 at 1134 hours	F 7 - F 8
5.	Certificate of Service Solicitors for Mr I Iqbal service 22 12 2023	F 9 - F 10
6.	Email Serving Solicitors for Mr I Iqbal with documents from hearing 20 December 2023 sent 22 12 2023 at 1136 hours	F 11 - F 12
7.	Certificate of Service (02.02.2024) re Mr Antony Gale.pdf	F 13 - F 14
8.	E-mail WCC to Solicitors for Mr Anthony Gale 02 Feb 2024 1153 hrs.pdf	F 15
9.	Certificate of Service (02.02.2024) re Miss Wiktoria Szczublińska.pdf	F 16 - F 17
10.	E-mail WCC to Solicitors for Miss Szczublińska 02 Feb 2024 1151 hrs.pdf	F 18 - F 19
11.	Certificate of Service (02.02.2024) re: Mr Isa Iqbal.pdf	F 20 - F 21
12.	E-mail WCC to Solicitors for Mr Isa Iqbal 02 Feb 2024 1055 hrs.pdf	F 22
13.	Certificate of Service (02.02.2024) re Mr Mason Phelps.pdf	F 23 - F 24
14.	E-mail WCC to Mr Mason Phelps 02 Feb 2024 1042 hrs.pdf	F 25 - F 26
15.	N603 Sandwell MBC v Richold contempt order 9 January 2024	F 27 - F 30
16.	Certificate of service (serving Contempt Order (9 January 2024)	F 31 - F 32
17.	N603 - Sandwell MBC v Phelps 29 01 2024	F 33 - F 36
18.	Order - Sandwell MBC v Mason PHELPS 29 Jan 2024	F 37 - F 39
19.	2024 EWHC 139 (KB) KB-2022-BHM-000188 WCC (Sandwell MBC) v MASON PHELPS- Approved Judgment	F 40 - F 63

G. SECTION G - Application to join a further named Defendant as a party to the Injunction

1.	WCC v Richold - N244 - Application to join Ms Rebecca Richold as a party to the injunction (SEALED)	G 1 - G 5
2.	WCC v Richold - Draft Order joining a contemnor as a party to the injunction	G 6
3.	Further Copy of Order from Hearing on 20 December 2023 sealed 21 December 2023	G 7 - G 24
4.	Letter WCC to Rebecca Richold Serving Application 2 2 24 redacted.pdf	G 25 - G 26
5.	Certificate of Service - RICHOLD 6 February 2024 REDACTED.pdf	G 27 - G 28
6.	E-mail from Solicitors for Miss Richold 2 February 2024 confirming service not accepted	G 29 - G 31
7.	N603 Sandwell MBC v Richold contempt order 9 January 2024	G 32 - G 35
8.	Certificate of service (serving Contempt Order (9 January 2024)	G 36 - G 37

B E T W E E N:

- 1. WOLVERHAMPTON CITY COUNCIL**
- 2. DUDLEY METROPOLITAN BOROUGH COUNCIL**
- 3. SANDWELL METROPOLITAN BOROUGH COUNCIL**
- 4. WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

5. Mr ANTHONY PAUL GALE

6. Miss WIKTORIA SZCUBLINSKA

7. Mr ISA IQBAL

8. Mr MASON PHELPS

Defendants

**CLAIMANTS' APPLICATION FOR INJUNCTIVE RELIEF
BUNDLE OF DOCUMENTS FOR USE AT A HEARING LISTED 27 FEBRUARY AND
28 FEBRUARY 2024**

VOLUME TWO

A. SECTION A - STATEMENTS OF CASE

1.	WCC & OTHERS v PERSONS UNKNOWN PART 8 CLAIM FORM	A 1 - A 4
2.	WCC & Others v Persons Unknown PARTICULARS OF CLAIM (CPR Part 8) 7 October 2022	A 5 - A 17
3.	Map of Black Country Area	A 18
4.	WCC & Others v Persons Unknown Application For Injunction FORM N16a	A 19 - A 20
5.	Annex to Form N16A - Index to bundle of evidence (not including statements of case)	A 21 - A 26
6.	Map of Black Country Area	A 27
7.	WCC & Others v Persons Unknown - Draft INJUNCTION order	A 28 - A 40
8.	Map of Black Country Area	A 41
9.	WCC & Others v Persons Unknown - Draft POWER OF ARREST	A 42 - A 44
10.	Map of Black Country Area	A 45
11.	Form N244 Application Notice Alternative Service 7 October 2022	A 46 - A 50
12.	WCC & Others v Persons Unknown - Draft ORDER Permitting ALTERNATIVE SERVICE of injunction application	A 51 - A 58
13.	SCHEDULE A of Draft Order for Alternative Service - Index to bundle of evidence (not including statements of case)	A 59 - A 64
14.	STATEMENT OF PAUL BROWN 7 October 2022	A 65 - A 72

B. SECTION B - Global Overarching Statements

1.	Statement of Adam Sheen 4 October 2022	B 1 - B 3
2.	Overarching Statement of Pardip Nagra (For Wolverhampton) 19 July 2022	B 4 - B 35
3.	EXHIBIT PN1	B 36
4.	Exhibit PN1 - Statement of Lisa Fox (From 2014 Application 01 11 2013_Redacted	B 37 - B 40
5.	EXHIBIT PN2	B 41
6.	Exhibit PN2 - Statement of Peter James (From 2014 Application 09 11 2013_Redacted	B 42 - B 44
7.	EXHIBIT PN3	B 45
8.	Exhibit PN3 - Statement of Carl Yeomans (From 2014 Application 07 11 2013_Redacted	B 46 - B 49
9.	EXHIBIT PN4	B 50
10.	Exhibit PN4 - Statements of David Clark (From 2014 Application) 12 03 2014	B 51 - B 70
11.	Note for Exhibit DPC1 (Exhibit of David Clarke statement from 2014 application)	B 71
12.	EXHIBIT PN5	B 72
13.	Exhibit PN5 - Statement of Lisa Parmar (From 2014 Application 22 05 2014_Redacted	B 73 - B 89
14.	EXHIBIT PN6	B 90
15.	Exhibit PN6 - Statement of Lydia Pulford (From 2014 Application 11 11 2013_Redacted	B 91 - B 93
16.	EXHIBIT PN7	B 94
17.	Exhibit PN7 - Statement of Fanella Bird (From 2014 Application) 23.11.2014	B 95 - B 96

18.	Exhibit PN7 Statement of Fanella Bird (From 2014 Application) 23 11 2014	B 97
19.	EXHIBIT PN8	B 98
20.	Exhibit PN8 - Statement of PC J Hartford (From 2014 Application) 16 11 2013	B 99 - B 100
21.	EXHIBIT PN9	B 101
22.	Exhibit PN9 - Statement of Richard Hardy (From 2014 Application) 06 11 2013_Redacted	B 102 - B 104
23.	EXHIBIT PN10	B 105
24.	Exhibit PN10 - Statement of Police Inspector Julie Mason (From 2014 Application) 23 07 2014	B 106 - B 110
25.	EXHIBIT PN11 - (Video Footage Available Separately)	B 111
26.	EXHIBIT PN12	B 112
27.	Exhibit PN12 - E-mail from Lisa Fox 17 April 2021	B 113
28.	EXHIBIT PN13	B 114
29.	Exhibit PN13 - Express & Star Article 12 04 22 direct print from Website	B 115 - B 127
30.	Exhibit PN13 Print Friendly Version of E & S Article 12 04 2022	B 128 - B 130
31.	EXHIBIT PN14	B 131
32.	Exhibit PN14 - Letter from Councillor Leach to ASB Team 05 22	B 132
33.	EXHIBIT PN15	B 133
34.	Exhibit PN15 - Letter from Pat McFadden MP 31 05 22	B 134
35.	EXHIBIT PN16	B 135
36.	Exhibit PN16 - Letter From Nicola Richards MP 25 04 22	B 136
37.	EXHIBIT PN17	B 137
38.	Exhibit PN17 - Version 1 Print Friendly Version of story published on E & S Website 15 08 2018	B 138 - B 143
39.	Exhibit PN17 Version 2 print from E & S Website 15 08 2018	B 144 - B 161
40.	EXHIBIT PN18	B 162
41.	Exhibit PN18 - Essex Live Article 5 April 2021 (Print Friendly Version)	B 163 - B 165
42.	Exhibit PN18 - Essex Live News 5 April 2021 - Report of Thurrock Car Meet From Essex News Website	B 166 - B 171
43.	EXHIBIT PN19	B 172
44.	Exhibit PN19 - Media release July 2022	B 173 - B 174
45.	Overarching Statement of Chief Superintendent Ian Green (West Midlands Police) 19 07 22	B 175 - B 177
46.	Overarching Statement of PC Mark Campbell (West Midlands Police) 15 07 22	B 178 - B 214
47.	EXHIBIT MRC1 - Video Footage (Available Separately)	B 215
48.	EXHIBIT MRC2 - Video Footage (Available Separately)	B 216
49.	EXHIBIT MRC3	B 217
50.	Exhibit MRC3 - Statement of PC Mark Campbell 13 July 2022	B 218 - B 225
51.	Witness Statement of Paul Brown (Communications Manager) (For Wolverhampton)16 September 2022	B 226 - B 228
52.	STREET RACING COMMUNICATIONS PLAN	B 229 - B 237
53.	Comms Plan Appendix 1	B 238

54.	Comms Plan - APPENDIX 1	B 239 - B 240
55.	Comms Plan Appendix 2	B 241
56.	Comms Plan - APPENDIX 2	B 242 - B 243
57.	Comms Plan Appendix 3	B 244
58.	Comms Plan - APPENDIX 3	B 245 - B 246
59.	Comms Plan Appendix 4	B 247
60.	Comms Plan - APPENDIX 4	B 248 - B 249
61.	Comms Plan Appendix 5	B 250
62.	Comms Plan - APPENDIX 5	B 251 - B 252
63.	Comms Plan Appendix 6	B 253
64.	Comms Plan - APPENDIX 6	B 254
65.	Comms Plan Appendix 7	B 255
66.	Comms Plan - APPENDIX 7	B 256 - B 258
67.	Comms Plan Appendix 8	B 259
68.	Comms Plan - APPENDIX 8	B 260 - B 261
69.	Comms Plan Appendix 9	B 262
70.	Comms Plan - APPENDIX 9	B 263 - B 265
71.	Comms Plan Appendix 10	B 266
72.	Comms Plan - APPENDIX 10	B 267 - B 268
73.	Comms Plan Appendix 11	B 269
74.	Comms Plan - APPENDIX 11	B 270 - B 271
75.	Comms Plan Appendix 12	B 272
76.	Comms Plan - APPENDIX 12	B 273 - B 274
77.	Comms Plan Appendix 13 -	B 275
78.	Comms Plan - APPENDIX 13	B 276 - B 277
79.	Comms Plan Appendix 14	B 278
80.	Comms Plan - APPENDIX 14	B 279 - B 280
81.	Comms Plan Appendix 15	B 281
82.	Comms Plan - APPENDIX 15	B 282 - B 283
83.	Comms Plan Appendix: "Digital Signage"	B 284
84.	Comms Plan - APPENDIX DIGITAL SIGNAGE	B 285 - B 289
85.	Comms Plan Appendix "Signage 1"	B 290
86.	Comms Plan - Appendix signage 1 - Dudley Existing Signs	B 291
87.	Comms Plan Appendix "Signage 2"	B 292
88.	Comms Plan - Appendix signage 2 - Dudley Existing and Proposed Signs	B 293 - B 296
89.	Comms Plan Appendix "Signage 3"	B 297
90.	Comms Plan - Appendix Signage 3	B 298 - B 300
91.	Comms Plan Appendix "Signage 4"	B 301
92.	Appendix signage 4 - Sandwell Existing and Proposed Signs	B 302 - B 305
93.	Comms Plan Appendix "Signage 5"	B 306
94.	Comms Plan - Appendix signage 5 - Walsall Existing Signs	B 307

95.	Comms Plan Appendix "Sigange 6"	B 308
96.	Comms Plan - Appendix signage 6 - Walsall Existing and Proposed Signs	B 309 - B 311
97.	Comms Plan Appendix "Signage 7"	B 312
98.	Comms Plan - Appendix signage 7 - Wolverhampton Existing Signs	B 313 - B 322
99.	Comms Plan Appendix "Signage 8"	B 323
100.	Comms Plan - Appendix signage 8 - Wolverhampton Existing and Proposed Signs	B 324 - B 327

C. SECTION C- Overarching Statements of Professionals for Each Claimant Local Authority

1.	Statement of Kathryn Jones 13 07 22 (For Dudley)	C 1 - C 5
2.	Witness Statement of Pardip Sandhu 27 September 2022	C 6 - C 12
3.	Exhibit Cover - Exhibit PS1 (Pardip Sandhu 27.9.2022)	C 13
4.	Exhibit PS1 o Statement of Pardip Sandhu 2022 car crusing incidents 2021 - 2022 with date of incidents	C 14 - C 36
5.	Exhibit Cover - Exhibit PS2 (Pardip Sandhu 27.9.2022)	C 37
6.	Statement of Steve Gittins 08 09 22 (For Walsall)	C 38 - C 44
7.	Exhibit Cover SJG1	C 45
8.	Exhibit SJG1 [Steve Gittins] (for Walsall)_Redacted	C 46
9.	Exhibit Cover SJG2	C 47
10.	Exhibit SJG2 [Steve Gittins] (for Walsall)_Redacted	C 48
11.	Exhibit Cover SJG3	C 49
12.	Exhibit SJG3 [Steve Gittins] (For Walsall)	C 50 - C 51
13.	Statement of Police Sergeant Lee Plant 15 07 22 (For Wolverhampton)	C 52 - C 53
14.	(MG11 Format) Police Sergeant Lee Plant Street racing - Wolverhampton	C 54 - C 74
15.	Statement of Police Constable Jonathan Edwards 12 05 22 (For Dudley)	C 75 - C 86
16.	Statement of Police Sergeant Richard Phillips 29 06 22 (For Sandwell)	C 87 - C 90
17.	Statement Police Inspector Phil Upton 09 06 22 (For Walsall)	C 91 - C 93
18.	Second Statement of Police Inspector Phil Upton 04 09 22 (For Walsall)	C 94 - C 104

D. SECTION D - Statements of Councillors, MPs, Residents and Business for Wolverhampton

1.	Witness Statement of Dharminder Dhaliwal (Wolverhampton) Tier 3	D 1 - D 2
2.	Witness Statement of Margaret Clemson (Wolverhampton) Tier 3	D 3 - D 4
3.	Witness Statement of Nicki Wellings (Wolverhampton) Tier 3	D 5
4.	Witness Statement of Taylor Harvey-Beardsmore (Wolverhampton) Tier 3	D 6
5.	Witness Statement of Teja Sidhu (Wolverhampton) Tier 3	D 7
6.	Witness Statement of Teresa Welburn (Wolverhampton) Tier 3	D 8
7.	Witness Statement of Jennifer Bateman 26.05.2022 (for Wolverhampton)	D 9 - D 12

E. SECTION E- Statements of Councillors, MPs, Residents and Business for Dudley

1.	Signed statement of James Morris MP (For Dudley)	E 1 - E 6
2.	Statement of Stacy Hewardine - Waterfront Security 10-05-22 (For Dudley)	E 7 - E 12

3.	Exhibit Cover - EXHIBIT SH1 [Stacy Hewedine] (For Dudley) (Clearer Version of Exhibit SH1)	E 13
4.	EXHIBIT SH1 (Waterfront Car Park) [Stacy Hewerdine] (For Dudley) (Clearer Version)	E 14
5.	Signed statement of Richard Hubbard- Harris - Showcase 10-05-22 (For Dudley)	E 15 - E 22
6.	Exhibit Cover RHH1 [Richard Hubbard-Harris] (For Dudley) (Clearer Version of Exhibit RHH1)	E 23
7.	EXHIBIT RHH1 Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 24
8.	EXHIBIT RHH1 Front Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 25
9.	EXHIBIT RHH1 Rear Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 26
10.	Signed 2nd stmt of Richard Hubbard-Harris dated 14-09-22	E 27 - E 33
11.	Exhibit RHH2 - (Video Footage Available Separately)	E 34
12.	Exhibit RRH3 - Cover Sheet	E 35
13.	EXHIBIT RHH3	E 36 - E 40
14.	Exhibit RRH4 - Cover Sheet	E 41
15.	EXHIBIT RHH4	E 42
16.	Exhibit RHH5 - Cover Sheet	E 43
17.	EXHIBIT RHH5	E 44
18.	Exhibit RHH6 - Cover Sheet	E 45
19.	EXHIBIT RHH6	E 46 - E 47
20.	Exhibit RHH7- Cover Sheet	E 48
21.	EXHIBIT RHH7	E 49
22.	Exhibit RHH8 - Cover Sheet	E 50
23.	EXHIBIT RHH8	E 51
24.	Signed statement of John Slater-Kiernan - Shell Garage 11-05-22 (For Dudley)	E 52 - E 56
25.	Exhibit Cover JSK1 [John Slater-Kiernan] (For Dudley)	E 57
26.	Statement of Chris Southall - Tesco 11-05-22 (For Dudley)	E 58 - E 62

F. SECTION F - Statements of Councillors, MPs, Residents and Businesses for Sandwell

1.	Witness Statement of Shiela Powell (Sandwell) 10.06.2022_Redacted	F 1 - F 2
2.	Witness Statement of Ronald Hill (Sandwell) 31 05 22	F 3
3.	Witness Statement of Nicki Wellings (Wolverhampton) 11 06 22	F 4
4.	Witness Statement of John Gallagher (Sandwell) 31.03.2022_Redacted	F 5 - F 6
5.	Witness Statement of Donata Halasa (Sandwell) 10.06.2022_Redacted	F 7 - F 8
6.	Letter from Nicola Richards MP 25 04 22	F 9

G. SECTION G - Statements of Councillors, MPs, Residents and Business for Walsall

1.	Witness Statement of Simon Pearson (Walsall) 28 04 22	G 1 - G 2
----	---	-----------

2.	Witness Statement of Kelly Matthews (Walsall) 28 04 22	G 3 - G 4
3.	Witness Statement of Julia Westwood (Walsall) 13 05 2022	G 5 - G 6
4.	Witness Statement of Lee Roden (Walsall) 21 05 2022	G 7 - G 8
5.	Witness Statement of Robert Norton (Walsall) 22 05 2022	G 9 - G 10
6.	Witness Statement of Ravdeep Khara (Walsall) 24 05 2022	G 11 - G 12

H. SECTION H - Bundle May 2021

1.	May 2021 Bundle.pdf	H 1 - H 420
----	---------------------	-------------

I. SECTION I - Supplemental Evidence Bundle as filed 14 December 2022 and Application for Urgent Relief

1.	Application For Urgent Relief December 2022	I 1 - I 64
2.	David England Statement 3.11.2020	I 65 - I 66
3.	Faye Willetts Statement 12.04.2021_Redacted	I 67 - I 71
4.	Hema Hayer Statement 27.10.2020_Redacted	I 72 - I 74
5.	Jeffrey Differ Statement 27.10.2020_Redacted	I 75 - I 76
6.	Lisa Fox Statement 28.10.2020_Redacted	I 77 - I 78
7.	Rachel Fanthom Statement 13.04.2021	I 79 - I 81
8.	Rajbinder Kaur Statement 3.11.2020_Redacted	I 82 - I 83
9.	Richard Hardy Statement 16.10.2020_Redacted	I 84 - I 85

J. SECTION J - COURT ORDERS

1.	INJUNCTION (Granted 22.12.2022)	J 1 - J 24
2.	POWER OF ARREST (Granted 22.12.2022)	J 25 - J 27
3.	PLAN A Map of the Black Country Councils Areas	J 28
4.	KB 2022 BHM 000221 - Birmingham City Council v Nagmadin Ors; KB 2022 BHM 000188 Wolverhampton City Council & Ors v Persons Unknown (21.12.22) - Approved judgment	J 29 - J 46

K. SECTION K - Claimants' Evidence re: Compliance with Court Orders and Updating Evidence

1.	Witness Statement Pardip Nagra 23 Jan 2023	K 1 - K 3
2.	Witness Statement of PC Mark Campbell 27 January 2023	K 4 - K 7
3.	Statement of Paul Brown re Injunction Service Requirements 27 01 2023	K 8 - K 18
4.	Exhibit Cover Exhibit PB3A	K 19
5.	EXHIBIT PB3A	K 20 - K 31
6.	Exhibit Cover Exhibit PB3B	K 32
7.	EXHIBIT PB3B	K 33 - K 36
8.	Exhibit Cover Exhibit PB3C	K 37
9.	EXHIBIT PB3C	K 38 - K 39
10.	Exhibit Cover Exhibit PB3D	K 40
11.	EXHIBIT PB3D	K 41 - K 44
12.	Exhibit Cover Exhibit PB3E	K 45
13.	EXHIBIT PB3E	K 46
14.	Exhibit Cover Exhibit PB3F	K 47

15.	EXHIBIT PB3F	K 48 - K 52
16.	Exhibit Cover Exhibit PB3G	K 53
17.	EXHIBIT PB3G	K 54 - K 55
18.	Exhibit Cover Exhibit PB3H(i)	K 56
19.	Exhibit PB3H(i) - Part 1 of Statement of Anrdew Clarke (Sandwell MBC)	K 57 - K 60
20.	Exhibit PB3H(i) - Part 2 Exhibit Cover AC1	K 61
21.	Exhibit PB3H(i) - Part 3 Exhibit AC1	K 62 - K 78
22.	Exhibit PB3H(i) - Part 4 Exhibit Cover AC2	K 79
23.	Exhibit PB3H(i) - Part 5 Exhibit AC2	K 80 - K 82
24.	Exhibit Cover Exhibit PB3H(ii)	K 83
25.	Exhibit PB3H(ii) - Statement of Nick Hooper with Exhibits (Dudley MBC)	K 84 - K 102
26.	Exhibit Cover Exhibit PB3H(iii)	K 103
27.	Exhibit PB3H(iii) - Witness Statement of Tim Philpot and Exhibits (Wolverhampton City Council)	K 104 - K 114
28.	Exhibit Cover Exhibit PB3H(iv)	K 115
29.	Exhibit PB3H(iv) - Part 1 Witness Statement of Steven Gittins (Walsall MBC)	K 116 - K 120
30.	Exhibit PB3H(iv) - Part 2 Exhibit Cover SJG4	K 121
31.	Exhibit PB3H(iv) - Part 3 Exhibit SJG4 Car Cruising Replacement signs 24.1.23	K 122 - K 138
32.	Receipt Filing Paul Brown Witness Statement 27 01 23 and Exhibit Bundle (split into two parts due to file size) 27 01 23	K 139
33.	Statement of Adam Sheen 3 2 23.pdf	K 140 - K 149
34.	Statement of Paul Brown 1 Feb 2023.pdf	K 150 - K 157
35.	Exhibit Cover PB4A	K 158
36.	EXHIBIT PB4A	K 159 - K 165
37.	Exhibit Cover PB4B	K 166
38.	EXHIBIT PB4B	K 167 - K 175
39.	Exhibit Cover PB4C	K 176
40.	EXHIBIT PB4C	K 177 - K 181
41.	Exhibit Cover PB4D	K 182
42.	EXHIBIT PB4D	K 183 - K 190
43.	Exhibit Cover PB4E	K 191
44.	EXHIBIT PB4E	K 192 - K 200
45.	Exhibit Cover PB4F	K 201
46.	EXHIBIT PB4F	K 202 - K 204
47.	7th Statement of Paul Brown 27 2 23	K 205 - K 212
48.	EXHIBIT PB7A	K 213 - K 223
49.	EXHIBIT PB7B	K 224 - K 238
50.	EXHIBIT PB7C	K 239 - K 243
51.	EXHIBIT PB7D	K 244 - K 245
52.	EXHIBIT PB7E	K 246 - K 252
53.	EXHIBIT PB7F	K 253 - K 261

54.	Affidavit of Paul Brown 29 June 2023 (re witness statements PB12 and PB13)	K 262 - K 264
55.	12th Statement of Paul Brown 16 6 23	K 265 - K 272
56.	Exhibit Cover PB12A	K 273
57.	EXHIBIT PB12A	K 274 - K 301
58.	Exhibit Cover PB12B	K 302
59.	EXHIBIT PB12B	K 303 - K 304
60.	13th Statement of Paul Brown 16 6 23	K 305 - K 307
61.	Exhibit Cover PB13A	K 308
62.	EXHIBIT PB13A	K 309
63.	Filing Receipt 12th and 13th statements of Paul Brown.pdf	K 310

B E T W E E N:

1. WOLVERHAMPTON CITY COUNCIL
2. DUDLEY METROPOLITAN BOROUGH COUNCIL
3. SANDWELL METROPOLITAN BOROUGH COUNCIL
4. WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

5. Mr ANTHONY PAUL GALE

6. Miss WIKTORIA SZCUBLINSKA

7. Mr ISA IQBAL

8. Mr MASON PHELPS

Defendants

**CLAIMANTS' APPLICATION FOR INJUNCTIVE RELIEF
BUNDLE OF DOCUMENTS FOR USE AT A HEARING LISTED 27 FEBRUARY AND
28 FEBRUARY 2024**

VOLUME THREE

A. SECTION A - Statements of Case

- | | |
|---|-----------|
| 1. Wolverhampton CC & Ors v Persons Unknown - Statement of Case for Hearing 15 May 2023 | A 1 - A 7 |
|---|-----------|

B. SECTION B - Evidence Filed on Behalf of the Claimant

- | | |
|--|-------------|
| 1. Witness Statement Pardip Nagra (Wolverhampton City Council) 02 May 2023 | B 1 - B 3 |
| 2. Statement of Mark Wilson Dudley MBC 25 April 2023 | B 4 - B 6 |
| 3. Statement of Pardip Sandhu 3 May 2023 | B 7 - B 17 |
| 4. 03 05 23 Witness Statement of Steve Gittins | B 18 - B 21 |
| 5. Statement of PC Mark Campbell 02 May 2023 | B 22 - B 25 |
| 6. Notice of Moving - Paul Brown Statement no.7 | B 26 |
| 7. 8th Statement of Paul Brown 28 April 23 | B 27 - B 31 |
| 8. Exhibit PB8A | B 32 |
| 9. Paul Brown Statement no 9 | B 33 - B 36 |
| 10. Exhibit PB9A | B 37 - B 67 |

C. SECTION C - Evidence Filed on Behalf of The Defendant

- | | |
|---|-----|
| 1. Confirmation of No Evidence from Any Defendant | C 1 |
|---|-----|

D. SECTION D - Court Orders

- | | |
|--|--------------|
| 1. SEALED INJUNCTION ORDER (Order of Hill J) 22.12.22 Wolverhampton City Council and others v Unknown KB-2022-BHM-000188 | D 1 - D 24 |
| 2. SEALED POWER OF ARREST (Order of Hill J) 22.12.22 KB-2022-BHM-000188 | D 25 - D 27 |
| 3. KB 2022 BHM 000188 - Wolverhampton City Council v Nagmadin Ors (21.12.22) - Approved judgment of Hill J | D 28 - D 45 |
| 4. Order 16 Februray 2023 (Black Country Car Cruising Injunction) | D 46 - D 59 |
| 5. Schedule A Index (Schedule to Order Sealed 16 February 2023) | D 60 - D 66 |
| 6. Plan A | D 67 |
| 7. TRANSCRIPT OF JUDGMENT 13 February 2023 - Wolverhampton City Council v Persons Unknown (KB-2022-BHM-000188) | D 68 - D 84 |
| 8. Transcript of Hearing 06 February 2023 Wolverhampton City Council & Ors v Persons Unknown - KB.2022.BHM-00188 | D 85 - D 143 |
| 9. Hearing Notice - Hearing: 15 May 2023 at 10.30 a.m. | D 144 |
| 10. Hearing Notice - Hearing: 15 May 2023 at 10.30 a.m. | D 145 |

B E T W E E N:

- 1. WOLVERHAMPTON CITY COUNCIL**
- 2. DUDLEY METROPOLITAN BOROUGH COUNCIL**
- 3. SANDWELL METROPOLITAN BOROUGH COUNCIL**
- 4. WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

5. Mr ANTHONY PAUL GALE

6. Miss WIKTORIA SZCUBLINSKA

7. Mr ISA IQBAL

8. Mr MASON PHELPS

Defendants

**CLAIMANTS' APPLICATION FOR INJUNCTIVE RELIEF
BUNDLE OF DOCUMENTS FOR USE AT A HEARING LISTED 27 FEBRUARY AND
28 FEBRUARY 2024**

VOLUME FOUR

A. SECTION A - Statements of Case

- | | | |
|----|--|-------------|
| 1. | Wolverhampton ats ors v PU Rep for 4OCT23.pdf | A 1 - A 7 |
| 2. | Pt 8 Claim form amended June 2023 Page 1 to 2.pdf | A 8 - A 9 |
| 3. | Car Cruise 2022 Pt 8 Signed Amended Particulars of Claim 6 June 2023 | A 10 - A 25 |
| 4. | Confirmation of Filing Amended Particulars of Claim 7 June 2023.pdf | A 26 |
| 5. | Confirmation of Filing Amended Part 8 Claim Form 7 June 2023.pdf | A 27 |

B. SECTION B - Evidence Filed on Behalf of the Claimant

- | | | |
|-----|---|---------------|
| 1. | Overarching Witness Statement Pardip Nagra (Wolverhampton City Council) 21.09.23 | B 1 - B 5 |
| 2. | Exhibit PN1 Pardip Nagra Statement 21 September 2023 | B 6 - B 7 |
| 3. | Exhibit PN2 (Statement of Pardip Nagra September 2023) (Sandwell MBC Overarching Statement) | B 8 - B 13 |
| 4. | Exhibit PN3A (Statement of Pardip Nagra) Dudley MBC Overarching Statement 22-09-23 | B 14 - B 17 |
| 5. | Exhibit PN3B (Statement of Pardip Nagra) (Exhibit to Dudley MBC Overarching Statement) | B 18 |
| 6. | Statement of PC Karam Soomal-Goode (Wolverhampton Signs) 18 September 2023 | B 19 - B 20 |
| 7. | Witness Statement of Steve Gittins (Walsall MBC) 22-09-23 | B 21 - B 24 |
| 8. | Statement of PC Mark Campbell 21 September 2023 | B 25 - B 29 |
| 9. | 10th Witness Statement of Paul Brown.pdf | B 30 - B 34 |
| 10. | EXHIBIT PB10A.pdf | B 35 - B 57 |
| 11. | 11th Witness Statement of Paul Brown 17 May 23.pdf | B 58 - B 62 |
| 12. | EXHIBIT PB11A .pdf | B 63 - B 82 |
| 13. | Notice of Moving 12th and 13th Witness Statements | B 83 |
| 14. | Witness Statement - 14th Statement of Paul Brown 22 9 23 | B 84 - B 92 |
| 15. | EXHIBIT PB14A (14th Statement of Paul Brown 22 Sept 2023) | B 93 - B 129 |
| 16. | EXHIBIT PB14B (14th Statement of Paul Brown 22 Sept 2023) | B 130 - B 131 |
| 17. | EXHIBIT PB14C (14th Statement of Paul Brown 22 Sept 2023) | B 132 - B 140 |
| 18. | Witness Statement -15th Statement of Paul Brown 22 9 23 | B 141 - B 144 |
| 19. | Exhibit Cover PB15A (15th Statement of Paul Brown Sept 2023) | B 145 |
| 20. | Exhibit PB15A (15th Stat Paul Brown Sept 2023) STREET RACING STATS 19 MAY TO 15 SEPTEMBER | B 146 - B 151 |

C. SECTION C - Evidence Filed on Behalf of The Defendant

- | | | |
|----|--|-----|
| 1. | Confirmation of No Evidence from Any Defendant | C 1 |
|----|--|-----|

D. SECTION D - Court Orders

- | | | |
|----|--|-------------|
| 1. | Notice of Moving of court orders from original review hearing 04 October 2023 bundle | D 1 |
| 2. | Combined Directions Order 19 May 2023 (Sealed 23 May 2023) | D 2 - D 17 |
| 3. | Amended Injunction Order 19 May 2023 (Sealed 23 May 2023) | D 18 - D 35 |
| 4. | Amended Power of Arrest (Amended 19 May 2023; Sealed 23 May 2023) | D 36 - D 38 |

5.	Clearer Copy of Plan A for injunction (WCC & Ors v Persons Unknown KB-2022-BHM-000188)	D 39
6.	Letter WCC to Court 07 06 2023	D 40
7.	Letter WCC to Court 14 6 23	D 41
8.	Letter to Claimants from Court 3 July 2023	D 42
9.	Letter WCC to HHJ E. Kelly 26 July 2023	D 43 - D 44
10.	Confirmation of Filing Letter 26 July 2023	D 45
11.	Order of Her Honour Judge Kelly 26 July 2023	D 46 - D 49
12.	Letter from Claimants to Court 1 August 2023	D 50 - D 51
13.	Confirmation of Filing of Dates of Availability Aug to Sept 2023 1 August 2023 at 1202 hours	D 52
14.	Notice of Hearing 04 October 2023	D 53 - D 54
15.	Notice of Further Case Management Hearing 21 September 2023 (VACATED)	D 55 - D 56
16.	Notice of Further Case Management Hearing 10 November 2023 (VACATED)	D 57 - D 58

B E T W E E N:

- 1. WOLVERHAMPTON CITY COUNCIL**
- 2. DUDLEY METROPOLITAN BOROUGH COUNCIL**
- 3. SANDWELL METROPOLITAN BOROUGH COUNCIL**
- 4. WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

5. Mr ANTHONY PAUL GALE

6. Miss WIKTORIA SCZCUBLINSKA

7. Mr ISA IQBAL

8. Mr MASON PHELPS

Defendants

**CLAIMANTS' APPLICATION FOR INJUNCTIVE RELIEF
BUNDLE OF DOCUMENTS FOR USE AT A HEARING LISTED 27 FEBRUARY AND
28 FEBRUARY 2024**

VOLUME FIVE

A. SECTION A - Statements of Case For Hearing 20 December 2023

1.	Wolverhampton & ors v PU Case Summary for hearing 20 DEC 23	A 1 - A 26
2.	SIGNED N244 Relief from Sanctions Application (Car Cruising) 13 12 23	A 27 - A 31
3.	Car Cruising - Relief from sanctions - witness statement Mushtaq Ahmed-Khan 12 12 23	A 32 - A 34
4.	Draft Order for relief to accompany application for relief from sanctions 13 12 23	A 35 - A 38
5.	SIGNED Claim Form V4 13 12 2023.pdf	A 39 - A 42
6.	Amended Particulars of Claim v4 13 12 23	A 43 - A 59
7.	Black Country Car Cruising Injunction v4 13 December 2023	A 60 - A 68
8.	Schedule A to Injunction Index to injunction order 19 May 2023	A 69 - A 78
9.	Plan A	A 79
10.	Amended Power of Arrest (Version 4)	A 80 - A 83
11.	Plan A	A 84

B. SECTION B - Supreme Court Judgment in the WCC v London Gypsies and Travellers and Others case [2023] UKSC 47

1.	WCC v London Gypsies and Travellers Judgment Summary 29 11 23	B 1 - B 3
2.	WCC v London Gypsies and Travellers Judgment 29 11 23	B 4 - B 80
3.	E-mail WCC to Court 29 November 2023 at 20 36 hours Supreme Court Judgment	B 81
4.	Confirmation of Filing Supreme Court Judgment via CE File 29 November 2023	B 82
5.	Confirmation of Filing Supreme Court Judgment via KB Birmingham Addresss 30 November 2023 at 10 33 hrs	B 83 - B 84

C. SECTION C - Evidence Filed on Behalf of Claimants for Hearing 20 December 2023

1.	Witness Statement of Pardip Nagra 11.12.23	C 1 - C 5
2.	Exhibit PN1 Part 1 of 2 - Witness Statement of Pardip Sandhu 11.12.23	C 6 - C 12
3.	Exhibit PN1 Part 2 of 2 - Express & Star Article 5 December 2023	C 13 - C 18
4.	Exhibit PN2 -Third Witness Statement of Mark Wilson	C 19 - C 24
5.	Schedule of Committals re Black Country Car Cruising Injunction December 2022 to December 2023	C 25
6.	Exhibit PN3 Part One of Three - Witness Statement of Steve Gittins 30-11-23	C 26 - C 29
7.	Exhibit PN3 Part Two of Three -Witness Statement of Steve Gittins 8-12-23	C 30 - C 32
8.	Exhibit PN3 Part Three of Three -Exhibit SJG 5 to Statement of Steve Gittins 8 12 23 Car Cruising Sign Audit December 2023	C 33 - C 51
9.	17th Statement of Paul Brown 30 11 23	C 52 - C 55
10.	10-12-23 Statement of PC Mark Campbell	C 56 - C 59

D. SECTION D - Orders and Sealed Documents from Hearing 4 October 2023 and Claimants' evidence purporting to show compliance with those orders

1.	Order (re Persons Unknown) Hearing of 4 October 2023	D 1 - D 14
----	--	------------

2.	Sealed Amended Part 8 Claim Form 6 10 23	D 15 - D 17
3.	Car Cruise 2022 Part 8 Amended Particulars of Claim v3 Oct23	D 18 - D 35
4.	Sealed Wolverhampton CC v PU Interim Injunction v3 to include D5 and D6 4 Oct 2023	D 36 - D 44
5.	Sealed Plan A 9 October 2023	D 45
6.	Schedule A to Injunction Index to injunction order 19 May 2023 amended 4 October 2023	D 46 - D 55
7.	Amended Power of Arrest amended 04 10 23	D 56 - D 58
8.	Sealed Plan A 9 October 2023	D 59
9.	E-mail WCC to Solicitors for Mr A Gale and Miss W Szczublińska 11 October 2023 at 13 59 hrs	D 60 - D 61
10.	16th Statement of Paul Brown 20 10 23	D 62 - D 67
11.	PB Exhibit Cover.pdf	D 68
12.	EXHIBIT PB16A	D 69 - D 83

E. SECTION E - Statements of Case for Hearing on 04 October 2023

1.	Confirmation of Filing Amended Particulars of Claim 7 June 2023.pdf	E 1
2.	Car Cruise 2022 Pt 8 Signed Amended Particulars of Claim 6 June 2023	E 2 - E 17
3.	Pt 8 Claim form amended June 2023 page 3 signature page.pdf	E 18
4.	Pt 8 Claim form amended June 2023 Page 1 to 2.pdf	E 19 - E 20
5.	Wolverhampton ats ors v PU Rep for 4OCT23.pdf	E 20a - E 20g

F. SECTION F - Evidence Filed on Behalf of the Claimants For Hearing 04 October 2023

1.	Confirmation of Filing Amended Part 8 Claim Form 7 June 2023.pdf	F 1
2.	Overarching Witness Statement Pardip Nagra (Wolverhampton City Council) 21.09.23	F 2 - F 6
3.	Exhibit PN1 Pardip Nagra Statement 21 September 2023	F 7 - F 8
4.	Exhibit PN2 (Statement of Pardip Nagra September 2023) (Sandwell MBC Overarching Statement)	F 9 - F 14
5.	Exhibit PN3A (Statement of Pardip Nagra) Dudley MBC Overarching Statement 22-09-23	F 15 - F 18
6.	Exhibit PN3B (Statement of Pardip Nagra) (Exhibit to Dudley MBC Overarching Statement)	F 19
7.	Statement of PC Karam Soomal-Goode (Wolverhampton Signs) 18 September 2023	F 20 - F 21
8.	Witness Statement of Steve Gittins (Walsall MBC) 22-09-23	F 22 - F 25
9.	Statement of PC Mark Campbell 21 September 2023	F 26 - F 30
10.	10th Witness Statement of Paul Brown.pdf	F 31 - F 35
11.	EXHIBIT PB10A.pdf	F 36 - F 58
12.	11th Witness Statement of Paul Brown 17 May 23.pdf	F 59 - F 63
13.	EXHIBIT PB11A .pdf	F 64 - F 83
14.	12th Statement of Paul Brown 16 6 23.docx	F 84 - F 91
15.	Exhibit Cover PB12A.docx	F 92
16.	EXHIBIT PB12A.docx	F 93 - F 120

17.	Exhibit Cover PB12B.docx	F 121
18.	EXHIBIT PB12B.docx	F 122 - F 123
19.	13th Statement of Paul Brown 16 6 23.docx	F 124 - F 126
20.	Exhibit Cover PB13A.docx	F 127
21.	EXHIBIT PB13A.docx	F 128
22.	Witness Statement - 14th Statement of Paul Brown 22 9 23	F 129 - F 137
23.	EXHIBIT PB14A (14th Statement of Paul Brown 22 Sept 2023)	F 138 - F 174
24.	EXHIBIT PB14B (14th Statement of Paul Brown 22 Sept 2023)	F 175 - F 176
25.	EXHIBIT PB14C (14th Statement of Paul Brown 22 Sept 2023)	F 177 - F 185
26.	Witness Statement -15th Statement of Paul Brown 22 9 23	F 186 - F 189
27.	Exhibit Cover PB15A (15th Statement of Paul Brown Sept 2023)	F 190
28.	Exhibit PB15A (15th Stat Paul Brown Sept 2023) STREET RACING STATS 19 MAY TO 15 SEPTEMBER	F 191 - F 196

G. SECTION G - Evidence Filed on Behalf of The Defendant

1.	Confirmation of No Evidence from Any Defendant	G 1
----	--	-----

H. SECTION H - Court Orders, Judgments and Transcripts of Hearings and Correspondence with the Court

1.	SEALED INJUNCTION ORDER (Order of Hill J) 22.12.22 Wolverhampton City Council and others v Unknown KB-2022-BHM-000188	H 1 - H 24
2.	SEALED POWER OF ARREST (Order of Hill J) 22.12.22 KB-2022-BHM-000188	H 25 - H 27
3.	Wolverhampton City Council v Persons Unknown and Others: KB- 2022-BHM 000188 (21.12.22) - Approved judgment of Hill J	H 28 - H 45
4.	Order 13 02 23 (sealed 16 Februray 23) Wolverhampton City Council v Persons Unknown and Others 2023 KB-2022-BHM-000188	H 46 - H 59
5.	Schedule A Index (Schedule to Order Sealed 16 February 2023)	H 60 - H 66
6.	Plan A (attached to order 16 February)	H 67
7.	TRANSCRIPT of JUDGMENT 13 February 2023 - Wolverhampton City Council v Persons Unknown (KB-2022-BHM-000188)	H 68 - H 84
8.	TRANSCRIPT of HEARING 06 February 2023 Wolverhampton City Council & Ors v Persons Unknown - KB.2022.BHM-00188	H 85 - H 143
9.	Hearing Notice - Hearing: 15 May 2023 at 10.30 a.m.	H 144
10.	Combined Directions Order 19 May 2023 (Sealed 23 May 2023).pdf	H 145 - H 160
11.	Amended Injunction Order 19 May 2023 (Sealed 23 May 2023).pdf	H 161 - H 178
12.	Amended Power of Arrest (Amended 19 May 2023; Sealed 23 May 2023).pdf	H 179 - H 181
13.	Clearer Copy of Plan A for injunction (WCC & Ors v Persons Unknown KB-2022-BHM-000188).pdf	H 182
14.	Letter From WCC to Court 07 06 2023.pdf	H 183
15.	Letter from WCC to Court 14 6 23.pdf	H 184
16.	Letter to Claimants from Court 3 July 2023.pdf	H 185
17.	Letter WCC to Her Honour Judge E. Kelly 26 July 2023.pdf	H 186 - H 187
18.	Letter From Court to WCC 26 July 2023.pdf	H 188 - H 189
19.	Order of Her Honour Judge Kelly 26 July 2023.pdf	H 190 - H 193

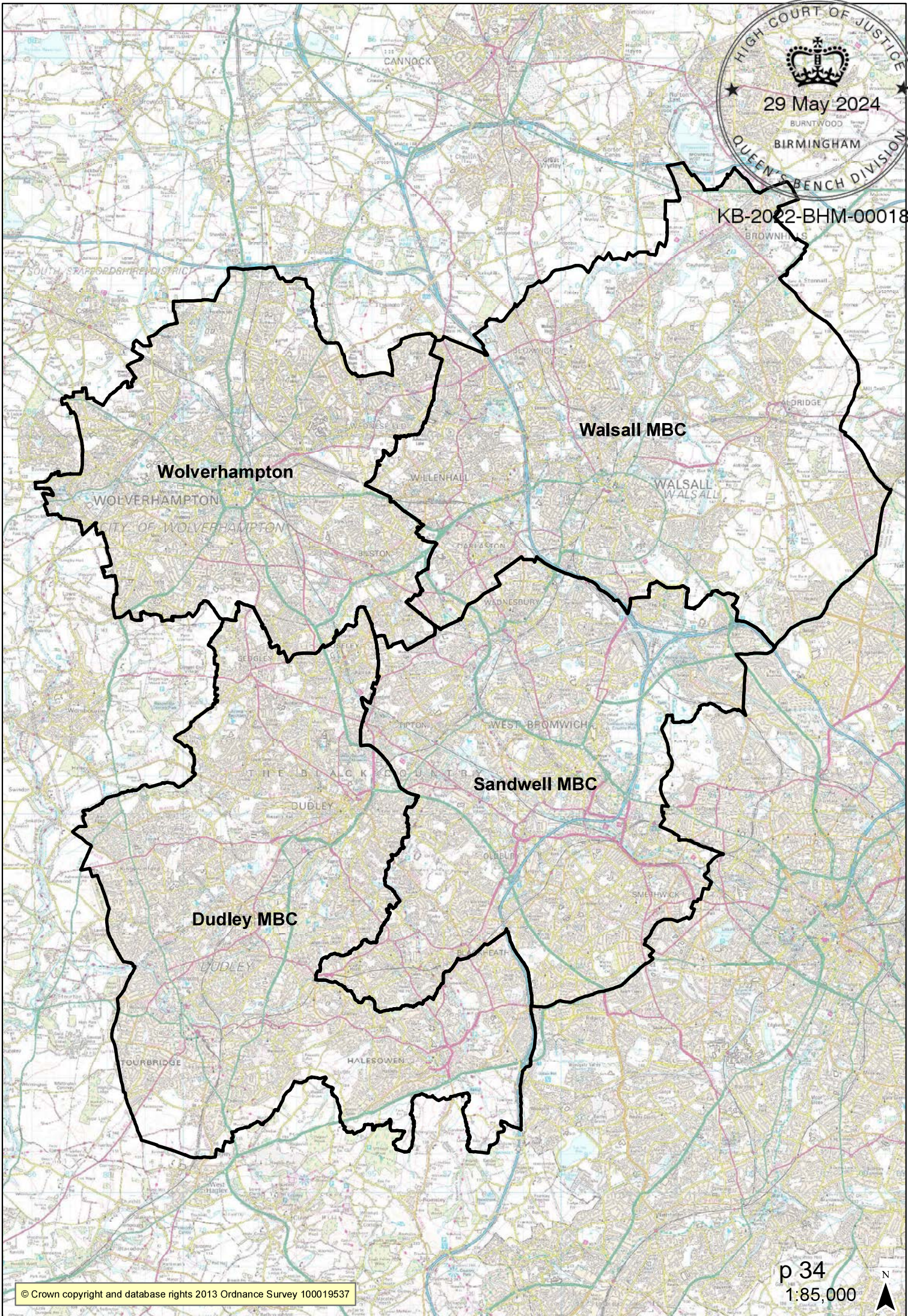
20.	Confirmation of Filing Letter From Claimants to Court 26 July 2023	H 194
21.	Letter From Claimants to Court 1 August 2023.pdf	H 195 - H 196
22.	Confirmation of Filing of Dates of Availability Aug to Sept 2023 1 August 2023 at 1202 hours.pdf	H 197
23.	Notice of Hearing 04 October 2023.pdf	H 198 - H 199
24.	Notice of Further Case Management Hearing 21 September 2023 (VACATED).pdf	H 200 - H 201
25.	Notice of Further Case Management Hearing 10 November 2023 (VACATED).pdf	H 202 - H 203

I. SECTION I - Orders from Concluded Committal Proceedings Relating to this Injunction

1.	Committal Order WCC v Gale 03 10 23	I 1 - I 4
2.	Committal Order SMBC v Szczublińska 03 10 23	I 5 - I 8
3.	Committal Order WCC v Iqbal 1 11 23	I 9 - I 12
4.	Order SMBC v Gale 03 10 23	I 13 - I 15
5.	Order SMBC v Szczublińska 03 10 23	I 16 - I 17
6.	Order WCC v Iqbal 1 11 23	I 18 - I 19
7.	Certificate of Service WCC v Iqbal 1 11 23	I 20 - I 21



KB-2022-BHM-000188



Wolverhampton

Walsall MBC

Sandwell MBC

Dudley MBC





BETWEEN:

(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL

KB-2022-BHM-000188

(1) PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

Defendants

(2) PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

(3) PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

(4) PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

(5) MR ANTHONY PAUL GALE (a Named Defendant)

(6) MISS WIKTORIA SCZCUBLINSKA (a Named Defendant)

(7) MR ISA IQBAL (a Named Defendant)

(8) MR MASON PHELPS (a Named Defendant)

(9) Ms REBECCA RICHOLD (a Named Defendant)

(10) Mr OLIVER DAVID CLARKE (a Named Defendant)

(11) Mr SIKANDER HUSSAIN (a Named Defendant)

INJUNCTION - SECTION 37(1) SENIOR COURTS ACT 1981
(PROCEEDINGS BROUGHT PURSUANT TO SECTION 222 LOCAL GOVERNMENT ACT 1972)

POWER OF ARREST (FINAL) (VERSION 2)
Under section 27 Police and Criminal Justice Act 2006

Granted by Order of the Honourable Mr Justice Julian Knowles on 27 February 2024
Amended by Orders of Her Honour Judge Emma Kelly on 21 and 23 May 2024

The Court orders that a power of arrest under section 27 Police and Criminal Justice Act 2006 applies to the following paragraph of an order made by the Honourable Mr Justice Julian Knowles on 27 February 2024 as amended by orders made by Her Honour Judge Emma Kelly on 21 and 23 May 2024.

(Here set out the provisions of the order to which this power of arrest applies and no others).

(Where marked * delete as appropriate)

IT IS FORBIDDEN for any of the Fourth Defendants or any of the Named Defendants being a driver, rider or passenger in or on a motor vehicle to participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving

“Stunts” are driving manoeuvres often undertaken at such gatherings including but not limited to:

- a. “Burnouts” – Causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed.
- b. “Donuts/Donutting” – Causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created.
- c. “Drifting” – Turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input.
- d. “Undertaking” – Passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code

**POWER OF
ARREST**

In respect of a power of arrest under section 27 Police and Criminal Justice Act 2006, the Court, upon being satisfied pursuant to section 27(3) Police and Criminal Justice Act 2006 that the relevant conduct consists of or includes the use or threatened use of violence and/or there is a significant risk of harm to a person mentioned in section 27(2) of the said Act, has ordered that a power of arrest be attached to the order.

A power of arrest is attached to the order whereby any constable may (under the power given by Section 27(4) Police and Criminal Justice Act 2006) arrest without a warrant a person whom he has reasonable cause for suspecting to be in breach of any of the provisions set out in this order or otherwise in contempt of court in relation to such provision.

**This Power of
Arrest**

Shall come into effect on 12.01 a.m. (00:01 hours) on 1 March 2024 and shall continue until 11:59 pm (23:59 hours) on 1 March 2027, unless it is extended, varied or discharged by further order of the court.

**Note to the
Arresting Officer**

Where a person is arrested under the power given by section 27(4) Police and Criminal Justice Act 2006, section 27(6) Police and Criminal Justice Act 2006 requires that:

- A constable shall, after making such an arrest, forthwith inform the person on whose application the injunction was granted;
- Such person shall be brought before the relevant judge within 24 hours beginning at the time of his arrest; And if the matter is not then disposed of forthwith, the Judge may remand such person.
- Nothing in section 155 authorises the detention of such person after the expiry of the period of 24 hours beginning at the time of his arrest, unless remanded by the court.
- In reckoning any period of 24 hours for these purposes, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Ordered by

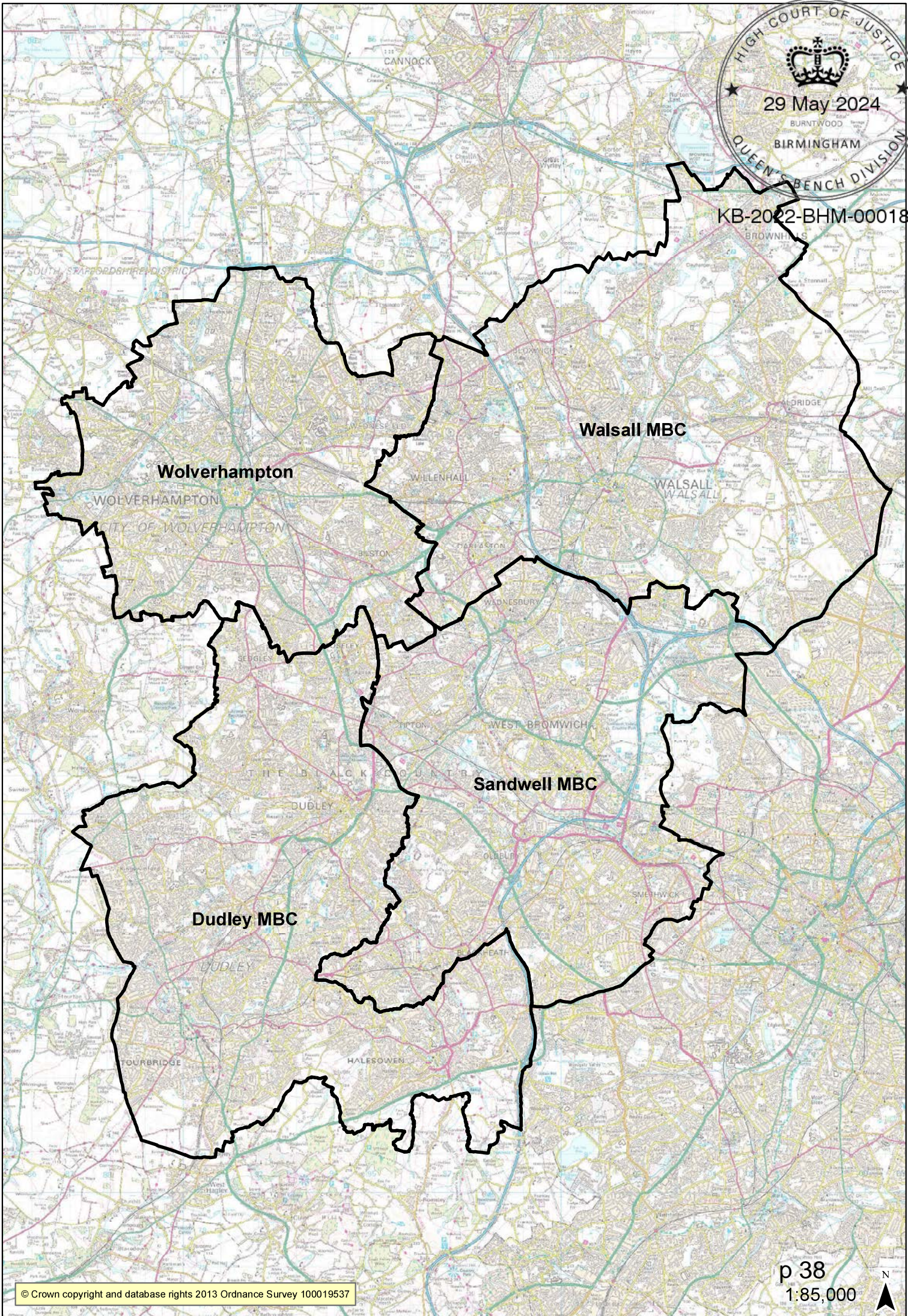
Mr Justice Julian Knowles
Her Honour Judge Emma Kelly

On

27 February 2024.
21 and 23 May 2024



KB-2022-BHM-000188



Wolverhampton

Walsall MBC

Sandwell MBC

Dudley MBC





Case No: KB-2022-BHM-000188

KB-2022-BHM-000188

**IN THE HIGH COURT OF JUSTICE
KINGS'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY**

**In the matter of an application for an injunction under s.37(1), Senior
Courts Act 1981, s.222, Local Government Act 1972 and s.130,
Highways Act 1980.**

B E T W E E N

- (1) WOLVERHAMPTON CITY COUNCIL**
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL**
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL**
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

**(1) PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE
HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE
PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON
PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT
ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER
DANGEROUS OR OBSTRUCTIVE DRIVING**

**(2) PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE
HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE
PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON
PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION
THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR
RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR
OBSTRUCTIVE DRIVING**

**(3) PERSONS UNKNOWN PROMOTING ORGANISING
PUBLICISING (BY ANY MEANS WHATSOEVER) ANY
GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2
OR MORE PERSONS WITH THE INTENTION OR EXPECTATION
THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR
RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE
DRIVING WITHIN THE BLACK COUNTRY AREA
SHOWN ON PLAN A (ATTACHED)**

**(4) PERSONS UNKNOWN BEING DRIVERS, RIDERS OR
PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE
BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING
OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA
SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH
DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS
OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING**

(5) Mr ANTHONY GALE

(6) Miss WIKTORIA SZCZUBLINSKA

(7) Mr ISA IQBAL

(8) Mr MASON PHELPS

(9) Ms REBECCA RICHOLD

Defendants

BEFORE the Honourable Mr Justice Julian Knowles , sitting in the High Court of Justice at the Birmingham District Registry, Birmingham Civil and Family Justice Centre, Priory Courts, 33 Bull Street, Birmingham B4 6DS on 27 February 2028

UPON hearing: Mr Singleton of counsel for the Claimants in Claim No. KB-2022- BHM-000188

AND UPON there being no appearance by any Defendant, and no other person having notified the Court, the Claimants that they wished to be joined as a party or heard.

AND UPON Claimants' application ,dated 9 December 2022, for an interim injunction and power of arrest pursuant to section 222 Local Government Act 1972 and section 130 Highways Act 1980.

IT IS ORDERED THAT:

1. Final Injunctions and Powers of Arrest are granted in the terms of the drafts annexed to this Order.

Case Management

2. Any person served with a copy of, or affected by, this Order including, for the avoidance of doubt, the Final Injunction and Final Power of Arrest, may apply to the Court to vary or discharge it, on 48 hours written notice to the claimants or, at the address set out at the foot of this Order. Further information is contained at paragraphs 10 to 12 of and Schedule 1 to this Order.

Service

3. Pursuant to CPR r.6.27 and CPR r.81.4, the steps that the Claimants have taken to serve the order of Hill J sealed on 22 December 2022 as amended by the order Ritchie J sealed on 16 May 2023; notice of this hearing and the further evidence filed in advance of this hearing shall amount to good and proper service on the each of the Defendants.

4. Personal service of this Order and the amended Claim Form, Particulars of Claim, Injunction and Power of arrest above is dispensed with in relation to the first, second, third and fourth Defendants

Service of this Order

5. The claimants shall serve this Order on the First, Second, Third and Fourth Defendants by completing the following steps before 16:00 on 15 March 2024:

(a) Issuing a media release highlighting the grant of a Final Injunction and Power of Arrest, such release must provide:

- (i) Details of the application and summarise the orders made;
- (ii) Any deadline for filing any documents by the Defendants;
- (iii) The date, time and location of any future hearings, if applicable;
- (iv) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
- (v) The Claimants' contact details; and
- (vi) Details of where and how copies of the Injunction, Power of Arrest, this Order, the Documents and the Evidence may be obtained.

Such release shall be made to, but is not limited to, local print publications including the Express and Star, Chronicle Week, the Birmingham Mail, Halesowen & Dudley News and Stourbridge News; local radio stations including BBC WM, Free Radio, Signal 107, WCR FM and Heart; the website Birmingham Live (aka) BLive; and the following television stations, BBC (to include the Midlands Today programme) and ITV Central.

(b) Placing on the Claimants' social media including X (previously known as Twitter), Facebook and Instagram links to the above media release.

(c) Updating the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the Injunction and Power of Arrest and this Order:

<https://www.wolverhampton.gov.uk/street-racing-injunction>

<https://www.dudley.gov.uk/residents/parking-and-roads/roadshighways-and-pavements/car-cruising-injunction>

https://www.sandwell.gov.uk/info/200284/roads_travel_and_parking/3231/street_racing

https://go.walsall.gov.uk/black_country_car_cruising_injunction

Such pages shall carry a direct link to this Order.

(d) Ensuring that the home (or landing) page of each of the Claimants' main websites have and retain a prominent direct link to the dedicated webpages referred to above.

(e) Ensuring that copies of the Injunction and Power of Arrest are available at the front desks of the Claimants' main offices by 12 March 2024.

(f) Causing to be displayed at regular intervals on the Claimants' electronic road signage the words "NEW HIGH COURT INJUNCTION PROHIBITING CAR CRUISING AND STREET RACING IN FORCE IN THIS AREA"; or words to the same effect and thereafter Causing to be displayed at regular intervals on the Claimants' electronic road signage the words "NEW HIGH COURT INJUNCTION PROHIBITING CAR CRUISING AND STREET RACING IN FORCE IN THIS AREA"; or words to the same effect and thereafter

Erecting and maintaining official road signs (fixed, and temporary) throughout the Black Country Area in locations that are, or have been, hotspots car cruising activity stating "NEW HIGH COURT INJUNCTION PROHIBITING CAR CRUISING AND STREET RACING IN FORCE IN THIS AREA";

The signage to be activated and in place by 00:01 on 15 March 2024

(g) Requesting that the police forces for the West Midlands, Warwickshire, West Mercia, Staffordshire and Leicestershire post on their website and Instagram, X (previously known as Twitter), and Facebook accounts, a link this Order.

6. The Claimants shall serve this Order on the fifth sixth seventh, eighth and ninth Defendants ('the named Defendants') by email, the named Defendants having agreed to accept service by this method. Service must be completed by 16:00 on 15 March 2024.

Amended Claim Documents, Injunction and Power of Arrest

7. The Claimants shall serve version 5 of the Claim Form, the Particulars of Claim (version 6) the Power of Arrest (version 7), and the Final Injunction on the First, Second, Third and Fourth Defendants by completing the following steps before 16:00 on 15 March 2024:

(a) Uploading copies to the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the Injunction and Power of Arrest and this Order:

<https://www.wolverhampton.gov.uk/street-racing-injunction>

<https://www.dudley.gov.uk/residents/parking-and-roads/roadshighways-and-pavements/car-cruising-injunction>

https://www.sandwell.gov.uk/info/200284/roads_travel_and_parking/3231/street_racing

https://go.walsall.gov.uk/black_country_car_cruising_injunction

(b) Placing on the Claimants' social media including X (previously known as Twitter), Facebook and Instagram links to the relevant website containing version 5 of the Claim Form, the Particulars of Claim (version 6) the Power of Arrest (version 7), and the Final Injunction.

(c) Placing hard copies of version 5 of the Claim Form, the Particulars of Claim (version 6) the Power of Arrest (version 7), and the Final Injunction at the front desks of the relevant Claimant's offices.

8. This Order shall be deemed served on the First, Second Third and Fourth Defendants at 23.59 on the date upon which, in each case, the final step in paragraph 7 has been complied with.

9. The Claimants shall serve version 5 of the Claim Form; version 6 of the Particulars of Claim, the Power of Arrest (version 7), and the Final Injunction, on the named Defendants by email. Service must be completed by 16:00 on 15 March 2024.

When providing copies of Version 7 of the Power of Arrest to the police the Claimants shall provide a copy of the Final Injunction.

Further matters

10. Without prejudice to the foregoing, any person wishing to exercise a right granted by paragraph 2 of this Order may apply to the Court at any but if they wish to do so they must inform the relevant Claimants' solicitors immediately (and in any event not less than 48 hours before the hearing of any such application) via the contact details set out below at the foot of this Order. Schedule 1 to this Order indicates the process which must be followed for any such application.

11. Any person applying to vary or discharge either Final Injunction or Power of Arrest must provide their full name and address, an address for service, and must also apply to be joined as a Named Defendant to the proceedings at the same time.

12. Any Defendant who fails to comply with paragraphs 10 and 11 above shall not be permitted to defend or take any role in these proceedings without further order of the Court and shall be liable to have injunctive relief continued against them.

Application by the Claimants to add Rebecca Richold as the Ninth Defendant

13. The application, dated 30 January 2024, by the Claimants to add Rebecca Richold as the Ninth Defendant is granted.

14. Further service of version 5 of the Claim Form, the Particulars of Claim (version 6) the Power of Arrest (version 7), the Final Injunction and this order on the Ninth Defendant is dispensed provided that paragraph 9 above is complied with.

Communications with Claimants and the Court

15. All communications to the Court about the claim (which should quote the case number) should be sent to:

Birmingham District Registry Civil Justice Centre
Priory Courts
33 Bull Street,
Birmingham B4 6DS

E: kb.birmingham@justice.gov.uk T: 0121 681 4441

DX: 701987 Birmingham 7

16. Any person who wishes to view or download copies of the documents shall contact the Claimants' solicitors via the contact details below:

The claimants' solicitors and their contact details are:

FAO: Black Country Car Cruise

Legal Services

Wolverhampton City Council

Civic Centre

St Peters Square

Wolverhampton

WV1 1RG

E: litigation@wolverhampton.gov.uk

T: T: 01902 556556

DX: 744350 Wolverhampton 27

Ref: LIT/AS/LIJ017753P

Costs

17. There be no order for costs

SCHEDULE 1 – STEPS TO VARY OR DISCHARGE THIS ORDER

If, in accordance with paragraph 2 above, any Defendant or any other person affected by this Order wishes to apply to vary or discharge this Order, to ensure effective case management by the Court the following indicative steps must be followed:

1. Any person seeking to contest the Claimants' entitlement to interim relief should file with the court (i.e. send to the court) and serve (i.e. send to the Claimants):

- (a) An N244 application form¹;
- (b) Written grounds (which may be contained in within the N244 application form or a separate document) for:
 - i. permission to bring the application; and
 - ii. the application (i.e. reasons for the proposed variation / discharge of the Order).
- (c) A witness statement(s) containing and/or appending all of the evidence to be relied upon in support of the application.

2. In order to file the above documents with the Court, the applicant should:

- (a) Send physical copies of the documents to the address at paragraph 15 of this Order; and/or
- (b) Speak to the Court to obtain an address to send electronic copies of the documents to.

3. In order to serve the above documents on the Claimants, the applicant should:

- (a) Send physical copies of the documents to the address at Paragraph 16 of this Order; and/or

¹ See the following link which provides a digital version of the form, and guidance notes:
<https://www.gov.uk/government/publications/form-n244-application-notice>

(c) Send electronic copies of the documents to the e-mail address at paragraph 16 above.

4. The person making the application should indicate to the Court and Claimants whether they consider the matter requires a court hearing or can be dealt with by the judge reviewing the paper application and any response from the Claimants.

5. Thereafter the Claimants shall have 14 days to file and serve evidence and submissions in response, including as to whether an oral hearing is required to determine the application.

6. Within 21 days the Court shall decide

(a) whether to grant permission for the application to proceed; and

(b) if permission is granted, whether a hearing is necessary, and/or may request from the parties evidence on any further matters necessary to determine the application. If the Court decides that a hearing is necessary, it shall seek to schedule the hearing (accommodating availabilities of the parties) within 42 days (6 weeks).

7. If the Court decides that further evidence is needed from any party, it may set strict deadlines by which that evidence must be filed. Both parties should be aware that the Court may restrict the use of evidence which is filed late or impose other penalties for non-compliance.