

- i) Statement of: Paul Brown
- ii) Statement No: 23
- iii) For: Claimant
- iv) Dated: 25.03.2025
- v) Exhibits: PB23A

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION**

**CLAIM NO: KB-2022-BHM-000188**

**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 to 4. **PERSONS UNKNOWN (AS DESCRIBED IN THE INJUNCTION)**

5. **Mr ANTHONY PAUL GALE**
6. **Miss WIKTORIA SCZCUBLINSKA**
7. **Mr ISA IQBAL**
8. **Mr MASON PHELPS**
9. **Miss REBECCA RICHOLD**
10. **Mr OLIVER CLARKE**
11. **Mr SIKANDER HUSSAIN**
12. **Mr OMAR TAGON**
13. **Mr TY HARRIS**
14. **Mr VIVKASH BALI**

**Defendants**

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**TWENTY SECOND WITNESS STATEMENT OF PAUL STEVEN BROWN**

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I, PAUL STEVEN BROWN of the City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton, WV1 1RG WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief. This is my 23rd statement in these proceedings.

2. The City of Wolverhampton Council is the authority which is leading the joint application of the Councils of Wolverhampton, Dudley, Sandwell and Walsall (hereinafter referred to as the “Black Country Boroughs”) seeking injunctive relief to restrain street racing (also referred to as car cruising) in the Black Country Boroughs. This is a statement on behalf of all four Claimants.
3. I have been employed since 25 June 2007 as a Senior Communications Adviser and latterly Communications Manager in the communications team of the City of Wolverhampton Council.
4. In collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services) a communications plan has been developed, initially to raise awareness of the application to the High Court for an interim street racing injunction for the Black Country Area and, after this was granted, to promote the existence of the injunction and the Power of Arrest which is in place.
5. Recognising this is a joint enterprise, I have been liaising closely with my counterparts in the communications teams of Dudley, Sandwell and Walsall Councils and West Midlands Police.
6. Schedule 2 of the High Court made by the Honourable Mr Justice Ritchie on 26 February 2025, which was subsequently amended 07 March 2025, sealed 11 March 2025 and received in its amended form by the Claimants on 11 March 2025, required the Claimants to complete a series of steps before 23:59 on 21 March 2025 to publicise the outcome of the hearing and bring it to the attention of “Persons Unknown”.
7. The order of 26 February 2025 required:

*i) Issuing a media release concerning the continuance of the final injunction, as revised, and power of arrest, which provides:*

*(a) a summary of the effect of the revised injunction and power of arrest;*

*(b) the date, time and location of the next review hearing, if known;*

- (c) the addresses of the dedicated webpages maintained by the Claimants regarding street cruising;*
- (d) The Claimants' contact details as set out above; and*
- (e) Details of where and how copies of the revised final injunction, power of arrest, this order and the claim documents 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 by 23:59 on 21 March 2025.*

I can confirm that a media release was issued by the City of Wolverhampton Council on Thursday 27 February, 2025. Please see **pages 2-3 of Exhibit PB23A attached hereto**. The media release was also featured on the websites of the four Claimant councils. Please see **pages 4-7 of Exhibit PB23A attached hereto**.

8. The Order of 26 February 2025 then required:

*(ii) Placing on the Claimants' social media including X, Facebook and Instagram links to the above media release by 23:59 on 21 March 2025.*

I can confirm that social media was published on the City of Wolverhampton Council's X, Facebook and Instagram accounts on 27 February 2025, and was either shared by or replicated by the other Claimant Councils as per the High Court's requirements on 27 February and 28 February 2025. Please see **pages 8-10 of Exhibit PB23A attached hereto**.

9. The Order of 26 February 2025 then required:

*(iii) 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:*

Wolverhampton: [www.wolverhampton.gov.uk/street-racing-injunction](http://www.wolverhampton.gov.uk/street-racing-injunction)

Walsall: [https://go.walsall.gov.uk/black\\_country\\_car\\_cruising\\_injunction](https://go.walsall.gov.uk/black_country_car_cruising_injunction)

Sandwell: [www.sandwell.gov.uk/streetracing](http://www.sandwell.gov.uk/streetracing)

Dudley: [www.dudley.gov.uk/car-cruising-injunction](http://www.dudley.gov.uk/car-cruising-injunction).

*Such pages shall carry a direct link to this Order by 23:59 on 14 March 2025.*

I can confirm that the webpages were updated by 21 March 2025. This was the date stipulated for completion of the other steps within this order; the date of 14 March 2025 for this particular step was regrettably overlooked and the applicants humbly acknowledge their shortcomings in this respect. Completion was confirmed via a visual inspection of the webpages conducted on 21 March 2025. Please see **pages 11-14 of Exhibit PB23A attached hereto**. I also received email confirmation that the order was available on the Wolverhampton website at 12:19 on 20 March 2025, Sandwell at 13:31 on 20 March 2025, Dudley at 11:16 on 21 March 2025 and Walsall at 12:15 on 21 March 2025.

10. The Order of 26 February 2025 then required:

*(iv) 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 by 23:59 on 21 March 2025.*

I can confirm that the home pages of the four Claimant councils contain this link. This was confirmed via a visual inspection of the webpages conducted on 14 March 2025.

11. The Order of 26 February 2025 then required:

*(v) Ensuring that copies of this Order are available at the front desks of the Claimants' main offices by 23:59 on 21 March 2025.*

I can confirm that copies of the order were made available as directed. I received email confirmation that the order was available at Wolverhampton at 08:35 on 20 March 2025, Sandwell at 13:31 on 20 March 2025, Dudley at 11:16 on 21 March

2025 and Walsall at 14:28 on 21 March 2025.

12. Finally, the Order of 26 February 2025 then required:

*(vi) Requesting that West Midlands Police post on their website and Instagram, X, and Facebook accounts, a link to the media release referred to at (i) above, such requests to be made by 23:59 on 21 March 2025.*

I can confirm that a request was made via email to West Midlands Police on 27 February 2025. Please see **page 15 of Exhibit PB23A attached hereto**. Information was shared on the X and Facebook accounts for Wolverhampton Police, Sandwell Police, Dudley Police and Sandwell Police, and on the Instagram account of West Midlands Police. Please see **pages 15-17 of Exhibit PB23A attached hereto**.

The Court may also wish to know that the media release referenced on **pages 2-3 of Exhibit PB23A attached hereto** received media coverage in a number of outlets including BBC News and the Express & Star. Please see examples on **pages 18-20 of Exhibit PB23A attached hereto**.

13. Based on the above I would humbly submit that the Claimants have fully complied with the requirements of the order of the High Court made by the Honourable Mr Justice Ritchie on 26 February 2025.

14. I will continue to ensure future steps in the Communications Plan are acted upon at the relevant time and will continue to liaise with my counterparts in Communications Teams of Dudley, Sandwell and Walsall Councils and West Midlands Police to ensure that they are disseminating the information as and when necessary.

### **STATEMENT OF TRUTH**

I believe that the facts stated in this Witness Statement are true. 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 and honest belief in its truth.

Full Name: PAUL STEVEN BROWN

Position: COMMUNICATIONS MANAGER

Name of Claimant: City of Wolverhampton Council

Signed: *Paul Brown*

Print Name: PAUL BROWN

Dated: 25 March 2025