

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

BETWEEN:

**(1) HIGH SPEED TWO (HS2) LIMITED
(2) THE SECRETARY OF STATE FOR TRANSPORT**

Claimants

- and -

PERSONS UNKNOWN & OTHERS

Defendants

**draft CORE BUNDLE
(Volume A)**
for hearing on 16 May 2023

TAB	DOCUMENT	PAGE
1	Claimants' Skeleton Argument for the hearing on 16 May 2023	
2	Injunction Order of Mr. Justice Julian Knowles dated 20 September 2022	
3	Judgment of Mr. Justice Julian Knowles dated 20 September 2022 - <i>High Speed Two (HS2) Ltd & Anor v Four Categories of Persons Unknown & Ors</i> [2022] EWHC 2360 (KB)	
4	<i>James Knaggs v SSfT & HS2</i> – Order of Coulson LJ and Ruling on Application for Permission to Appeal CA-2022-001952	
5	Directions Order of HHJ Kelly dated 15 March 2023	
6	Order of HHJ Kelly dated 5 April 2023	
7	N244 Application Notice dated 27 March 2023	
8	Draft Order dated 27 March 2023	
9	Indicative Plans	

10	Draft Re-Amended Particulars of Claim dated 27 March 2023	
11	First Witness Statement of James Dobson dated 27 March 2023	
12	First Witness Statement of John Groves dated 27 March 2023	
13	Eleventh Witness Statement of Julie Amber Dilcock dated 27 March 2023	
14	Twelfth Witness Statement of Julie Amber Dilcock dated 17 April 2023	
15	Schedule of Named Defendants to be removed or added	
16	Claimants' First Skeleton Argument – Legal Principles (for hearing on 26 and 27 May 2022)	
17	Claimants' Second Skeleton Argument – Merits (for hearing on 26 and 27 May 2022)	

DLA Piper UK LLP
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Solicitors for the Claimants

Claim No. QB-2022-BHM-000044

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**draft CORE BUNDLE
(Volume B)**
for hearing on 16 May 2023

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1	Exhibit JD5	
2	Exhibit JD6 – link	
3	Exhibit JG1	
4	Exhibit JAD13	
5	Exhibit JAD14	

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**draft CORE BUNDLE
(Volume C)**
for hearing on 16 May 2023

TAB	DOCUMENT	PAGE
	D6 (James Taylor Knaggs)	
1	Letter from Robert Lizar Solicitors to DLA Piper dated 29 March 2023	
2	Letter from Robert Lizar Solicitors to DLA Piper dated 11 April 2023	
3	Email from DLA Piper to Robert Lizar Solicitors dated 13 April 2023	
	D36 (Mark Keir)	
4	Email from Mark Keir to KBD (Birmingham) dated 4 April 2023 and reply email from KBD (Birmingham) to Mark Keir dated 5 April 2023	
5	Mark Keir 'Request to Vary' dated 5 April 2023	
6	Emails from DLA Piper to Mark Keir dated 6 April 2023	
7	Email from Mark Keir to DLA Piper dated 6 April 2023	
8	Email from KBD (Birmingham) to Mark Keir dated 6 April 2023	
9	Mark Keir 'Notice of intention to call witnesses' dated 11 April 2023	
10	Mark Keir 'Grounds for Defence' dated 11 April 2023 and Exhibits 1 – 6	
11	Email from DLA Piper to Mark Keir dated 13 April 2023	
12	Email from Mark Keir to DLA Piper and KBD (Birmingham) dated 13 April 2023	

13	Mark Keir 'Grounds for Defence – Second Statement' dated 13 April 2023 and Exhibits 7 – 9 (received 14 April 2023)	
	D66 (Caroline Thomson-Smith)	
14	Emails from Caroline Thomson-Smith to DLA Piper dated 2 and 5 April 2023	
15	Email from DLA Piper to Caroline Thomson-Smith dated 6 April 2023 with draft undertaking	
16	Email from DLA Piper to Caroline Thomson-Smith dated 13 April 2023	
	D67 (Christopher Paul Butcher)	
17	Email from Chris Butcher to DLA Piper dated 4 April 2023	
18	Email from Chris Butcher to KBD (Birmingham) dated 5 April 2023 and reply email from KBD (Birmingham) to Chris Butcher dated 5 April 2023	
19	Email from DLA Piper to Chris Butcher dated 6 April 2023 with draft undertaking	
20	Email from Chris Butcher to KBD (Birmingham) dated 11 April 2023	
21	Email from DLA Piper to Chris Butcher dated 13 April 2023	
22	Email from Chris Butcher to KBD (Birmingham) dated 18 April 2023	
	Alan T Cooper	
23	Email from Alan T Cooper to DLA Piper dated 1 April 2023	
	Submissions from anyone else insert here	

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BETWEEN:

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***draft* SUPPLEMENTAL BUNDLE
(Volume A)
for hearing on 16 May 2023**

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2	March 2023 Table 2 – HS2 GVDs with Title Numbers	
3	March 2023 Table 3 – HS2 Acquired Land (non-GVDs)	
4	March 2023 Table 4 – HS2 Temporary Possession Land	
5	Certificates of Service	
6	Notice of Review Hearing	
7	N244 Application Notice dated 10 March 2023 (for Directions)	
8	Claimants' Skeleton Argument for Directions	
9	Tenth Witness Statement of Julie Dilcock dated 3 March 2023	
10	Draft Order for Directions	

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***draft* SUPPLEMENTAL BUNDLE
(Volume B)
for hearing on 16 May 2023**

TAB	DOCUMENT	PAGE
1	March 2023 HS2 Land Plans – Part 1	
2	March 2023 HS2 Land Plans – Part 2	

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draft ORIGINAL APPLICATION DOCUMENTS BUNDLE (MARCH 2022)
(Volume A)
not intended for reading at the hearing on 16 May 2023

TAB	DOCUMENT	PAGE
1	Claim Form dated 25 March 2022	
2	N244 Application Notice dated 25 March 2022	
3	Amended Particulars of Claim dated 28 April 2022	
4	Schedule of Named Defendants	
5	Order of Cotter J dated 5 April 2022	
6	Order of Cotter J dated 11 April 2022	
7	Directions Order of Knowles J dated 28 April 2022	
8	Amended Draft Injunction Order dated 6 May 2022	
9	Indicative Plans	
10	Witness Statement of Richard Joseph Jordan dated 23 March 2022	

11	First Witness Statement of Julie Amber Dilcock dated 25 March 2022	
12	Second Witness Statement of Julie Amber Dilcock dated 1 April 2022	
13	Third Witness Statement of Julie Amber Dilcock dated 26 April 2022	
14	Fourth Witness Statement of Julie Amber Dilcock dated 19 May 2022	
15	Fifth Witness Statement of Julie Amber Dilcock dated 8 June 2022	
16	Sixth Witness Statement of Julie Amber Dilcock dated 13 June 2022	
17	Seventh Witness Statement of Julie Amber Dilcock dated 25 July 2022	
18	Eighth Witness Statement of Julie Amber Dilcock dated 2 September 2022	
19	Ninth Witness Statement of Julie Amber Dilcock dated 16 September 2022	
20	Witness Statement of Timothy Robins dated 26 May 2022	

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(Volume B)**

not intended for reading at the hearing on 16 May 2023

TAB	DOCUMENT	PAGE
1	Exhibit RJ1	
2	Exhibit RJ2 – link	
3	Exhibit JAD1 – Please refer to Original Application Documents Bundle (March 2022) (Volume D)	
4	Exhibit JAD2 – Please refer to Tabs 1 - 4 in Original Application Documents Bundle (March 2022) (Volume C)	
5	Exhibit JAD3	
6	Exhibit JAD4	
7	Exhibit JAD5 – link	
8	Exhibit JAD6	
9	Exhibit JAD7 – link	
10	Exhibit JAD8	
11	Exhibit JAD10	

12	Exhibit JAD11	
13	Exhibit JAD12	

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(Volume C)
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1	Revised Table 1 – HS2 Acquired Land GVDs	
2	Revised Table 2 – HS2 GVDs with Title Numbers	
3	Revised Table 3 – HS2 Acquired Land (non-GVD)	
4	Revised Table 4 – HS2 Temporary Possession Schedule 15 and Schedule 16.	
5	Certificates of Service of claim	

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draft ORIGINAL APPLICATION DOCUMENTS BUNDLE (MARCH 2022)
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TAB	DOCUMENT	PAGE
1	Revised HS2 Land Plans – Part 1	
2	Revised HS2 Land Plans – Part 2	

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draft AUTHORITIES BUNDLE
for hearing on 16 May 2023

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