

1.	Claimants
2.	Kathryn Mair Cook
3.	First
4.	None
5.	Date: 26 August 2020

Claim No: PT-2018-000098

**IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS
PROPERTY, TRUSTS AND PROBATE LIST (ChD)**

B E T W E E N:

- (1) THE SECRETARY OF STATE FOR TRANSPORT
(2) HIGH SPEED TWO (HS2) LTD

Claimants/Applicants

-and-

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANT(S) ON LAND AT HARVIL ROAD, HAREFIELD IN THE LONDON BOROUGH OF HILLINGDON SHOWN COLOURED GREEN, BLUE AND PINK AND EDGED IN RED ON THE PLANS ANNEXED TO THE RE-AMENDED CLAIM FORM

(2) PERSONS UNKNOWN SUBSTANTIALLY INTERFERING WITH THE PASSAGE BY THE CLAIMANTS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES OR EMPLOYEES WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT TO AND FROM THE LAND AT HARVIL ROAD SHOWN COLOURED GREEN, BLUE AND PINK AND EDGED IN RED ON THE PLANS ANNEXED TO THE RE-AMENDED CLAIM FORM

(3) to (35) THE NAMED DEFENDANTS LISTED IN THE SCHEDULE TO THE ORDER OF MR DAVID HOLLAND QC DATED 22 JUNE 2020

(36) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HARVIL ROAD SITE, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HARVIL ROAD SITE WITHOUT THE CONSENT OF THE CLAIMANTS

Defendants / Respondents

FIRST WITNESS STATEMENT OF KATHRYN MAIR COOK

I, **KATHRYN MAIR COOK**, of Eversheds Sutherland (International) LLP, 1 Callaghan Square, Cardiff, CF10 5BT, will say as follows:-

1. I am a solicitor of the Senior Courts of England and Wales and a Partner at Eversheds Sutherland (International) LLP. My colleague Shona Ruth Jenkins has day to day conduct of this matter under my supervision. I am authorised to make this Statement on behalf of the Claimants in this claim.

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2. I make this statement, in support of the Claimants' application dated 15 June 2020 ("the **Substantive Amendment Application**") and specifically to provide information to the Court of the costs incurred by the Claimants' in dealing with the Substantive Amendment Application.
3. Unless otherwise stated, all facts and matters set out in this Statement are made from my own knowledge. I have identified those statements which are matters of information or belief, and identified the sources of the information or belief.

The Claimant's Costs

4. The Claimants have incurred significant costs in dealing with the Substantive Amendment Application to date.
5. Whilst the total costs incurred have not been collated, I confirm the Claimants' costs and disbursements incurred to date and expected to be incurred to the conclusion of the Substantive Amendment Application, are at least £158,000.00 exclusive of VAT (being approximately £90,000.00 in solicitors' fees and £68,000.00 in disbursements including Counsel's fees, process server fees and other expenses).
6. The costs estimated at paragraph 5 do not exceed the costs which the Claimants are liable to pay in respect of the work which this statement covers.

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 an honest belief in its truth.

Signed:



KATHRYN MAIR COOK

Dated: 26 August 2020