IN THE HIGH COURT OF JUSTICE QUEEN'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

SUPPLEMENTARY BUNDLE G

for hearing on 26 and 27 May 2022

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DLA Piper UK LLP 1 St Paul's Place Sheffield **S1 2IX**

Telephone: 0114 283 3312

Email: HS2Injunction@governmentlegal.gov.uk Reference: RXS/380900/378

Solicitors for the Claimant

From: Julie Dilcock < Julie.Dilcock@hs2.org.uk>

Sent: 23 May 2022 10:00

To:

Subject: RE: [EXTERNAL] D8 - QB-2022-BHM-00044. About HS2's route-wide injunction

Attachments: Tep Greycat draft undertaking.pdf

EXTERNAL

Dear Tep Greycat

I refer to my email below, to which I have not received a response.

I would remind you that the deadline set by the Court for us to submit an updated Schedule of Defendants, having removed any Named Defendants with whom we have reached an agreement is 25 May 2022.

If you wish to be removed as a Named Defendant on the terms set out in my email below, please respond as soon as possible providing the details required to complete the drafting of the undertaking.

Kind regards

Iulie

Julie Dilcock | Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | <u>Julie.Dilcock@hs2.org.uk</u> | <u>Facebook</u> | <u>Twitter</u> | <u>LinkedIn</u>

High Speed Two (HS2) Limited , Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | www.hs2.org.uk

I sometimes choose to manage my e-mails in the evening and on weekends because I find this works best for me. I do not expect you to do the same. If you receive an e-mail from me outside working hours, I do not expect a response outside of your own working routine.

From: Julie Dilcock Sent: 16 May 2022 22:07

To:

Subject: RE: [EXTERNAL] D8 - QB-2022-BHM-00044. About HS2's route-wide injunction

Dear Tep Greycat

I refer to your email below regarding our injunction application, which has been forwarded to me by our solicitors.

You were named as a defendant to these proceedings as you had been reported by security teams as having been observed at the unauthorised encampment on the Cash's Pit Land – indeed, you are in the photograph that remains as the main image of the Facebook page: Bluebell Woods Protection Camp, which continues to encourage the unauthorised occupation of HS2 Land.

If it is the case that you do not intend to trespass on the HS2 Land again, we would be prepared to reach an agreement with you that would remove you as a Named Defendant to these proceedings and confirm that we would not seek a costs order against you if those terms are agreed. I have attached a draft of the form of undertaking to the Court that we would be prepared to agree in order to remove you as a defendant to these proceedings with no order as to costs. The same form of undertaking has been offered to and accepted by other Named Defendants. In order to complete the drafting, please confirm your name, as we are unable to complete this based purely on pseudonyms.

I look forward to hearing from you.

Kind regards

Julie

Julie Dilcock | Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | Julie.Dilcock@hs2.org.uk | Facebook | Twitter | LinkedIn High Speed Two (HS2) Limited , Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | www.hs2.org.uk

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From: Tepanie Greycat <

Sent: 16 May 2022 15:04

To: qb.birmingham@justice.gov.uk

Cc: Aaron.mooney@justice.gov.uk; HS2injunction@governmentlegal.gov.uk

Subject: QB-2022-BHM-00044. About HS2's route-wide injunction

EXTERNAL

Hello,

This is about HS2's route-wide injunction, reference number QB-2022-BHM-00044.

My name has been used in HS2's injunction proceedings schedule of defendants.

Defendant 8: Tep aka Tepcat Greycat (aka Nettle). I would like to have my name removed from the schedule of defendants and all injunction proceedings.

I have found only 3 references to D8 in the injunction proceedings documents on the government website and I am not sure than any of them are actually referring to me, Tep. Here is why:

The first in Richard Jordans statement says that D8 was escorted from Leather Lane in the Leather Lane eviction. I think I may be mistaken for someone else because there may have been some people staying at the camp that night and may have been some people escorted from that site but I had stayed somewhere else that night and arrived to Leather Lane later that morning. I have not found any evidence showing anyone being escorted off the site on that day.

The second reference to D8 in Richard Jordans statement says 'D8 and D24... in battle of beancan... Jones Hill Woods, described paragraph 44'. Later in Richard Jordans statement says something about the same moment but 'D18 and D24... in battle of beancan' and so I think the first bit is a mistake missing out a 1 and so D8 is written by accident.

Exhibit JAD3 page 7 says (ix) 'the email to the court dated 2 June 2020 from D8' I have no idea what this is about and haven't been able to find the email in the injunction proceedings documents. I am guessing this is also a mistake as I don't remember ever emailing a court before now and can't think of any reason I would have done then. I have not been able to find this email in evidence to check if it was me or not.

If I need to, to have my name removed, I agree to sign an undertaking. Before I do sign an undertaking, I want assurance that my name will be removed, that I will not be pursued for costs, and that HS2 will not pursue me any further.

Thank you, Tep Greycat

From: Julie Dilcock < Julie.Dilcock@hs2.org.uk>

Sent: 23 May 2022 10:02

To: I.C. Turner

Subject: RE: HS2 injunction proceedings **Attachments:** I.C. Turner draft undertaking.pdf

EXTERNAL

Dear Mr Turner

I refer to my email below, to which I have not received a response.

I would remind you that the deadline set by the Court for us to submit an updated Schedule of Defendants, having removed any Named Defendants with whom we have reached an agreement is 25 May 2022.

If you wish to be removed as a Named Defendant on the terms set out in my email below, please respond as soon as possible providing the details required to complete the drafting of the undertaking.

Kind regards

Iulie

Julie Dilcock | Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | <u>Julie.Dilcock@hs2.org.uk</u> | <u>Facebook</u> | <u>Twitter</u> | <u>LinkedIn</u> High Speed Two (HS2) Limited , Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | <u>www.hs2.org.uk</u>

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From: Julie Dilcock **Sent:** 17 May 20<u>22 16:03</u>

To: 'I.C. Turner'

Subject: RE: HS2 injunction proceedings

Dear Mr Turner

I refer to your email below and attached submissions regarding our injunction application, which has been forwarded to us by the Court (having not been served on us by yourself).

Firstly, I wanted to address the points you have raised in your submissions about the curbs that you perceive that the proposed injunction would place on your movements. It appears that you have

misunderstood the proposed injunction (or have been provided with incorrect information by others about the terms of the proposed injunction). For clarity, the proposed injunction does not affect:

- any person's rights to use any open public right of way;
- any person exercising their lawful rights over any public highway

You were named as a defendant to these proceedings as you had been reported by security teams as having been observed at the unauthorised encampment on the Cash's Pit Land. I note that you wish to be removed as a Named Defendant to the proceedings. Your submissions suggest that you intend only to engage in peaceful and lawful protest and, again, such protest is specifically not prohibited by the terms of the proposed injunction. That being the case, I assume that you do not intend to trespass upon the HS2 Land again (trespass being unlawful) and if that is the case, we would be prepared to reach an agreement with you that would remove you as a Named Defendant to these proceedings and confirm that we would not seek a costs order against you if those terms are agreed. I have attached a draft of the form of undertaking to the Court that we would be prepared to agree in order to remove you as a defendant to these proceedings with no order as to costs. The same form of undertaking has been offered to and accepted by other Named Defendants. In order to complete the drafting, please either confirm that your correct full first name is "I.C." or confirm your actual first name, as we are unable to complete this undertaking on the basis of your initials.

I look forward to hearing from you so that we may proceed with the undertaking.

Kind regards

Julie

Julie Dilcock | Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | Julie.Dilcock@hs2.org.uk | Facebook | Twitter | LinkedIn High Speed Two (HS2) Limited , Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | www.hs2.org.uk

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From: I.C. Turner

Sent: 16 May 2022 12:23

To: Mooney, Aaron <aaron.mooney@Justice.gov.uk>; nhall@robertlizar.com

Subject: HS2 injunction proceedings

Dear both,

Please see the attached response to my being named as a so-called 'defendant' in the above proceedings.

Yours,

I.C. Turner



Virus-free. www.avast.com

From: Julie Dilcock < Julie.Dilcock@hs2.org.uk>

Sent: 23 May 2022 09:55

To:

Subject: RE: [EXTERNAL] FW: Your Ref: Z2202274/CAN/DS3 - Submission by Named

Defendant D11

Attachments: Tony Carne Undertaking.pdf

EXTERNAL

Dear Mr Carne

I refer to my email below, to which I have not received a response.

I would remind you that the deadline set by the Court for us to submit an updated Schedule of Defendants, having removed any Named Defendants with whom we have reached an agreement is 25 May 2022.

If you wish to be removed as a Named Defendant on the terms set out in my email below, please return the attached undertaking - signed and dated where indicated – along with confirmation that you are content for us to submit it to the Court for approval once it has been signed by our solicitors on our behalf.

Kind regards

Julie

Julie Dilcock | Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | Julie.Dilcock@hs2.org.uk | Facebook | Twitter | LinkedIn

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From: Julie Dilcock Sent: 16 May 2022 15:56

To: '

Subject: RE: [EXTERNAL] FW: Your Ref: Z2202274/CAN/DS3 - Submission by Named Defendant D11

Dear Mr Carne

I refer to your email below and attached submissions regarding our injunction application.

In terms of service, the Court dealt with that question on 28 April 2022 and confirmed that service had been effected. I note that you have read some of the documents and it would therefore appear that you have been able to access them. As I expect you are aware, the documents can be viewed and downloaded here: https://www.gov.uk/government/publications/hs2-route-wide-injunctionproceedings

You were named as you had been reported by security teams as having been observed at the unauthorised encampment on the Cash's Pit Land. If it is the case that you do not intend to trespass on the HS2 Land again, we would be prepared to reach an agreement with you that would remove you as a Named Defendant to these proceedings and confirm that we would not seek a costs order against you if those terms are agreed.

Please find attached the form of undertaking to the Court that we would be prepared to agree in order to remove you as a defendant to these proceedings with no order as to costs. The same form of undertaking has been offered to and accepted by other Named Defendants.

Please do take any independent legal advice that you consider that you need and let me know if you have any queries.

Otherwise, I look forward to receiving the undertaking from you – signed and dated where indicated – along with confirmation that you are content for us to submit it to the Court for approval once it has been signed by our solicitors on our behalf.

Kind regards

Julie

Julie Dilcock | Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | <u>Julie.Dilcock@hs2.org.uk</u> | <u>Facebook</u> | <u>Twitter</u> | <u>LinkedIn</u> High Speed Two (HS2) Limited , Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA www.hs2.org.uk

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From: Tony Carne < **Sent:** 13 May 2022 14:11

To: HS2Injunction@governmentlegal.gov.uk

Cc: Resist-HS2Bluebell@protonmail.com; aaron.mooney@justice.gov.uk Subject: Your Ref: Z2202274/CAN/DS3 - Submission by Named Defendant D11

EXTERNAL

Please find attached a submission from Named Defendant D11 in response to Claim Z2202274/CAN/DS3.

Best regards, Tony Carne

From: Julie Dilcock < Julie.Dilcock@hs2.org.uk >

Sent: 23 May 2022 09:52

To:

Subject: RE: [EXTERNAL] FW: QB-2022-BHM-00044 HS2 Route Wide Injunction

EXTERNAL

Dear Mr Hooper

I refer to my email below, to which I have not received a response.

I would remind you that the deadline set by the Court for us to submit an updated Schedule of Defendants, having removed any Named Defendants with whom we have reached an agreement is 25 May 2022.

If you wish to be removed as a Named Defendant on the terms set out in my email below, please confirm to me as soon as possible.

Kind regards

Julie

Julie Dilcock | Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | <u>Julie.Dilcock@hs2.org.uk</u> | <u>Facebook</u> | <u>Twitter</u> | <u>LinkedIn</u>

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From: Julie Dilcock Sent: 16 May 2022 15:21

10:

Subject: RE: [EXTERNAL] FW: QB-2022-BHM-00044 HS2 Route Wide Injunction

Dear Mr Hooper

Thank you for your email below, which has been forwarded to me for consideration.

My first witness statement dated 25 March 2022 (to which you refer) was produced and filed with the Court before you gave your attached undertaking (dated 28 March 2022) and that is why the same comments were not made about you as were made about D24 (Dr Maxey). Dr Maxey had given a previous undertaking, which was in place at the date of my statement – referred to in the following recital in the attached undertaking:

UPON the undertaking to the Court given by the First Defendant in similar terms to those set out below on 8 November 2021 (recorded in the order of Mr Justice Marcus Smith dated 10 November 2021) in action number PT-2020-BHM-000017 being discharged in accordance with paragraph 4 below.

and which was then replaced with the attached undertaking.

Following your request below and noting that you remain bound by the attached undertaking, we are prepared to agree that you be removed as a Named Defendant to these proceedings on the basis there be no order as to costs between the Claimants and you.

Assuming that this is acceptable to you, I should be grateful if you would confirm by return email and our solicitors will submit this email exchange to the Court as evidence of our agreement.

I look forward to hearing from you.

Kind regards

Julie

Julie Dilcock | Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | <u>Julie.Dilcock@hs2.org.uk</u> | <u>Facebook</u> | <u>Twitter</u> | <u>LinkedIn</u> High Speed Two (HS2) Limited , Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | <u>www.hs2.org.uk</u>

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----- Forwarded message -----

From: Clare Dougherty

Date: Mon, 16 May 2022, 14:05

Subject: Fwd: QB-2022-BHM-00044 HS2 Route Wide Injunction

To: < HS2Injunction@governmentlegal.gov.uk >

----- Forwarded message ------

From: Clare Dougherty

Date: Mon, 16 May 2022, 14:05

Subject: Fwd: QB-2022-BHM-00044 HS2 Route Wide Injunction

To: <qb.birmingham@justice.gov.uk>

----- Forwarded message ------

From: Resist-HS2-Bluebell < Resist-HS2-Bluebell@protonmail.com >

Date: Mon, 16 May 2022, 13:55

Subject: QB-2022-BHM-00044 HS2 Route Wide Injunction

To:

QB-2022-BHM-00044 HS2 Route Wide Injunction D26 Daniel Hooper

I am applying to have my name removed from these injunction proceedings and do not know why I was named in the first place as I have already agreed to sign a wide ranging undertaking.

In Julie Dilcock's 1st Witness Statement in paragraph 43 she states that another defendant who has signed an undertaking can remove his name, "In view of the undertaking he has already given, the Claimants will consent to him being removed as a named defendant" and I do not understand why this offer has not been extended to me. I am requesting that this is also extended to me.

I would like assurance by the 20th May that a) My name is being removed from proceedings b) I will not be pursued for costs and c) HS2 is not continuing proceedings against me.

Thank you Daniel Hooper

Claim No: QB-2022-BHM-000044

Mary Barraclough	
From: Sent: To: Cc: Subject: **EXTERNAL**	terry sandson 20 May 2022 20:06 Robert Shaw 'hs2 injunction' Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Claimar Skeleton Arguments [DLAP-UKMATTERS.FID6020456]
Rob Shaw	
I Demand that You and H	S2 Provide me with PROOF of Claim Against Myself.
The Paper Work and Inju	nction is Victious and False.
What Proof have YOU OR	HS2 got.
Since the last case with JI	JDGE Marcus Smith I left Crackley Woods and away From HS2.
_	the Injuction order I would say HS2 did not do as requested and agreed like making th signage better and more frequent adds for their works in the papers and in the
	ng Stalked by you or HS2 My name shoiuld have been removed as Myself and my Brot S2 Win as it is so corrupt the courts you the police black onyex and other spying agencine planet.
I only want proof of claim solicitor to read on my be	about me not hundreds of falsified documents that I cannot understand or afford a shalf.
	ooking at prosicuting you all individually in civil claim courts for your harrasment and
invoment I have been a victim in m	any ways bullied and harrassed.
	ie Injunction order down so i can defend myself I only want evidence and acusations hole project. AS I want to stand in front of the Judge either 26th 27th or the 30th as is
On Friday, May 20, 2022	2, 04:01:19 PM GMT+1, Robert Shaw <rob.shaw@dlapiper.com> wrote:</rob.shaw@dlapiper.com>
Dear Sir/Madam,	

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors
We refer to the Directions Order in this proceedings, made by Mr. Justice Julian Knowles on 28 April 2022.
Pursuant to paragraph 14 of the Directions Order, please find attached by way of service:
1. Claimants' Skeleton Argument on applicable legal principles; and
2. Claimants' Skeleton Argument on the merits.
Copies of these documents (and all other documents served on you) have also been placed on the HS2 website, which can be found here -https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings.
If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.
Yours faithfully
DLA Piper UK LLP
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DLA Piper UK LLP

From: Sent: To: Subject:	23 May 2022 17:06 HS2Injunction Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle A [DLAP-UKMATTERS.FID6020456]
EXTERNAL	
Stop this constant threats bulling environment as requested by Jud	and harassment on behalf of HS2 I gave up Crackley woods and trying to save the lge Marcus Smith.
HS2 did not stick to law as reque regarding injunction orders	sted by his Judgment my name should have been removed from all paperwork
	d the maps on the day I attended. It understand why they are still victimising me.
As I have said show me your prod Not a ton of useless information	of of claims I broke Judgment from Marcus Smith. I cannot understand.
I do wish to speak on the days of	the court dates 26th 27th and 30th so make this happen.
On Monday, May 23, 2022, 03:5	8:01 PM GMT+1, HS2Injunction <hs2injunction@dlapiper.com> wrote:</hs2injunction@dlapiper.com>
Dear Sir/Madam	
Claim No: QB-2022-BHM-0000	44
(1) High Speed Two (HS2) Lim	ited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors
Further to our email below, we r	now attach by way of service, an updated copy of Hearing Bundle A.
This hearing bundle has been u was served on you via email on	odated to include, at Tab 15, the Claimants' Skeleton Argument on the merits, that 20 May 2022.
Yours faithfully	

From: HS2Injunction <HS2Injunction@dlapiper.com> Sent: 19 May 2022 15:18 Cc: 'hs2 injunction' <hs2injunction@governmentlegal.gov.uk> Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle [DLAP-UKMATTERS.FID60204561 Dear Sir/Madam, Claim No: QB-2022-BHM-000044 (1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors We refer to the Directions Order in this proceedings, made by Mr. Justice Julian Knowles on 28 April 2022. The Claimants have prepared hearing bundles for the court hearing that is listed for 26 and 27 May 2022. Due to the size of those bundles, they will be sent to you via a separate email, that contains a secure link to download the exhibits. That email will be sent from secure.filetransfer@comms.dlapiper.com and will say that sheffield.printroom@dlapiper.com sent you a secure message. If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau. Yours faithfully DLA Piper UK LLP

Julie Dilcock < Julie. Dilcock@hs2.org.uk> From: Sent: 23 May 2022 22:11 To: RE: [EXTERNAL] FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Subject: Others - Hearing Bundle A [DLAP-UKMATTERS.FID6020456] **Attachments:** Terry Sandison undertaking.pdf Dear Mr Sandison Thank you for your email below, which has been forwarded to me by our solicitors. By way of explanation (and as set out in the First Witness Statement of Julie Dilcock), you were named as a defendant to these proceedings because you were a named defendant to the Harvil Road proceedings. The current proceedings include an application to discharge the injunction in that case. In order to make that application, we were obliged to name all of the defendant to that claim, including yourself. There is no allegation that you breached the injunction imposed in the Crackley proceedings. Whilst you remain as a named defendant to these proceedings we are obliged to serve copies of the documents in the proceedings upon you by email ion accordance with the order made by the Court on 28 April 2022. If you wish to speak at the hearing you may attend and request the permission of the Judge to make submissions. However, if you simply wish to have your name removed from the proceedings and do not intend to trespass on HS2 Land in future, we would be prepared to reach an agreement with you that would remove you as a Named Defendant to these proceedings and confirm that we would not seek a costs order against you if those terms are agreed. Please find attached the form of undertaking to the Court that we would be prepared to agree in order to remove you as a defendant to these proceedings with no order as to costs. The same form of undertaking has been offered to and accepted by other Named Defendants. Please do take any independent legal advice that you consider that you need and let me know if you have any queries. Otherwise, I look forward to receiving the undertaking from you – signed and dated where indicated – along with confirmation that you are content for us to submit it to the Court for approval once it has been signed by our solicitors on our behalf. Please note that the deadline set by the Court for us to submit an updated Schedule of Defendants, having removed any Named Defendants with whom we have reached an agreement is 25 May 2022. I look forward to hearing from you.

Kind regards

Julie

Tel: 0121 720 4884 | Mob: 07795 062507 | <u>Julie.Dilcock@hs2.org.uk</u> | <u>Facebook</u> | <u>Twitter</u> | <u>LinkedIn</u>

High Speed Two (HS2) Limited , Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | www.hs2.org.uk

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From:

Sent: 23 May 2022 17:06

To: HS2Injunction <HS2Injunction@dlapiper.com>

Subject: Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle A [DLAP-

UKMATTERS.FID6020456]

EXTERNAL

Stop this constant threats bulling and harassment on behalf of HS2 I gave up Crackley woods and trying to save the environment as requested by Judge Marcus Smith.

HS2 did not stick to law as requested by his Judgment my name should have been removed from all paperwork regarding injunction orders

Your barristers couldn't even read the maps on the day I attended. I don't have a solicitor and cannot understand why they are still victimising me.

As I have said show me your proof of claims I broke Judgment from Marcus Smith. Not a ton of useless information I cannot understand.

I do wish to speak on the days of the court dates 26th 27th and 30th so make this happen.

On Monday, May 23, 2022, 03:58:01 PM GMT+1, HS2Injunction shs2injunction@dlapiper.com wrote:

Dear Sir/Madam

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

Further to our email below, we now attach by way of service, an updated copy of Hearing Bundle A.

This hearing bundle has been updated to include, at Tab 15, the Claimants' Skeleton Argument on the merits, that was served on you via email on 20 May 2022.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction < HS2Injunction@dlapiper.com > Sent: 19 May 2022 15:18 Cc: 'hs2 injunction' < hs2injunction@governmentlegal.gov.uk > Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle [DLAP-UKMATTERS.FID6020456]
Dear Sir/Madam,
Claim No: QB-2022-BHM-000044
(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors
We refer to the Directions Order in this proceedings, made by Mr. Justice Julian Knowles on 28 April 2022.
The Claimants have prepared hearing bundles for the court hearing that is listed for 26 and 27 May 2022.
Due to the size of those bundles, they will be sent to you via a separate email, that contains a secure link to download the exhibits.
That email will be sent from secure.filetransfer@comms.dlapiper.com and will say that sheffield.printroom@dlapiper.com sent you a secure message.
If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.
Yours faithfully
DLA Piper UK LLP

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Claim no: QB-2022-BHM-000044

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

MR JUSTICE JULIAN KNOWLES

Between:

(1) HIGH SPEED TWO (HS2) LIMITED

(2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

-and-

(D35) TERRY SANDISON

Defendant

FINAL ORDER AND UNDERTAKINGS

PENAL NOTICE

If you the within named Defendant disobey the undertakings set out in this order or instruct (which includes training, coaching, teaching or educating) others to do the acts which you have undertaken not to do, you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized.

Any other person who knows of this order and does anything which helps or permits the Defendant to breach the undertakings set out in this order may also be held in contempt of court and may be imprisoned, fined or have their assets seized.

IMPORTANT NOTICE TO THE DEFENDANT

This order prohibits you from doing the acts set out in paragraph 5 below. You should read it very carefully.

UPON the Claimants' application by an Application Notice dated 25 March 2022.

AND UPON the parties having agreed to an order in the terms set out below;

AND UPON Terry Sandison accepting that they have previously trespassed on the HS2 Land without consent; and

AND UPON Terry Sandison giving undertakings to the Court as set out below.

IT IS ORDERED THAT:

- 1. The Claimants' application as against Terry Sandison (D35) only is dismissed.
- 2. The Claimants have permission to amend the Schedule to the Particulars of Claim which lists the named defendants to remove Terry Sandison.
- 3. There be no order for costs between the parties.
- 4. Service of this Order may be effected, as an alternative, by electronic means by email to Terry Sandison at terrycommonlaw@yahoo.com and such service shall be deemed to be good and sufficient service on the Defendants.

UNDERTAKINGS TO THE COURT

In this Order the "HS2 Land" means all of the land acquired or held by the Claimants in connection with the High Speed 2 Railway Scheme shown coloured pink and green on the plans which are available electronically on the HS2 Proceedings website at:

https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings.

- 5. Terry Sandison undertakes to the Court promising as follows:
 - a. Not to enter or remain upon the HS2 Land;
 - b. Not to obstruct or otherwise interfere with the free movement of vehicles, equipment or persons accessing or egressing the HS2 Land; or
 - c. interfere with any fence or gate on or at the perimeter of the HS2 Land.

AND TO BE BOUND BY THESE PROMISES UNTIL 31 MAY 2025.

- 6. Terry Sandison's promises at paragraph 5 do not prevent Terry Sandison from:
 - a. Exercising their rights over any open public right of way over the HS2 Land; or
 - b. Exercising their lawful rights over any public highway.

I understand the undertakings that I have given, and that if I break any of my promises to the
Court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.
TERRY SANDISON
Date:
Dutc.
We consent to an order in these terms
DLA Piper (UK) LLP
Solicitors for the Claimants
Date:

From: Sent: To: Subject:	24 May 2022 09:28 Julie Dilcock Re: [EXTERNAL] FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle A [DLAP-UKMATTERS.FID6020456]
Thank you for admitting that I dic	d Not break the Injunction at Crackley Woods.
Can you or HS2 show me Proof of	f the Facts I was Camping or Protesting at Harvil Road.
I know for a Fact I have Never Sta	iyed 1 Night at Harvil Road.
I have helped removing people's	belongings during an Eviction from another Camp.
So again send myself proof of the	ese Alleged issues and crimes.
In order I can counter claim. Either by agreeing with the claim	s or denying them.
As I keep saying HS2 is Harrasing	Bullying and victimising me. And using the Courts as a weapon.
Who are the the names of the wi	tnesses and makings these False claims.
As I want to take them to Civil Co	urt.
As I am a victim Not them.	
Show me proof videos pictures d	aily logs etc
On Monday, May 23, 2022, 10:1	1:10 PM GMT+1, Julie Dilcock <julie.dilcock@hs2.org.uk> wrote:</julie.dilcock@hs2.org.uk>
Dear Mr Sandison	
Thank you for your email below,	which has been forwarded to me by our solicitors.
defendant to these proceedings	et out in the First Witness Statement of Julie Dilcock), you were named as a because you were a named defendant to the Harvil Road proceedings. The currer on to discharge the injunction in that case. In order to make that application, we

were obliged to name all of the defendant to that claim, including yourself. There is no allegation that you breached the injunction imposed in the Crackley proceedings. Whilst you remain as a named defendant to these proceedings we are obliged to serve copies of the documents in the proceedings upon you by email ion accordance with the

order made by the Court on 28 April 2022.

If you wish to speak at the hearing you may attend and request the permission of the Judge to make submissions. However, if you simply wish to have your name removed from the proceedings and do not intend to trespass on HS2 Land in future, we would be prepared to reach an agreement with you that would remove you as a Named Defendant to these proceedings and confirm that we would not seek a costs order against you if those terms are agreed.

Please find attached the form of undertaking to the Court that we would be prepared to agree in order to remove you as a defendant to these proceedings with no order as to costs. The same form of undertaking has been offered to and accepted by other Named Defendants.

Please do take any independent legal advice that you consider that you need and let me know if you have any queries.

Otherwise, I look forward to receiving the undertaking from you – signed and dated where indicated – along with confirmation that you are content for us to submit it to the Court for approval once it has been signed by our solicitors on our behalf. Please note thatthe deadline set by the Court for us to submit an updated Schedule of Defendants, having removed any Named Defendants with whom we have reached an agreement is 25 May 2022.

I look forward to hearing from you.

Kind regards

Julie

Julie Dilcock |Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | Julie. Dilcock@hs2.org.uk | Facebook | Twitter | LinkedIn

High Speed Two (HS2) Limited , Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | www.hs2.org.uk

I sometimes choose to manage my e-mails in the evening and on weekends because I find this works best for me. I do not expect you to do the same. If you receive an e-mail from me outside working hours, I do not expect a response outside of your own working routine.

From:

Sent: 23 May 2022 17:06

To: HS2Injunction < HS2Injunction@dlapiper.com >

Subject: Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle A [DLAP-

UKMATTERS.FID6020456]

EXTERNAL

Stop this constant threats bulling and harassment on behalf of HS2 I gave up Crackley woods and trying to save the environment as requested by Judge Marcus Smith.

HS2 did not stick to law as requested by his Judgment my name should have been removed from all paperwork regarding injunction orders

Your barristers couldn't even read the maps on the day I attended. I don't have a solicitor and cannot understand why they are still victimising me.

As I have said show me your proof of claims I broke Judgment from Marcus Smith. Not a ton of useless information I cannot understand.

I do wish to speak on the days of the court dates 26th 27th and 30th so make this happen.

On Monday, May 23, 2022, 03:58:01 PM GMT+1, HS2Injunction hs2injunction@dlapiper.com/ wrote:

Dear Sir/Madam

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

Further to our email below, we now attach by way of service, an updated copy of Hearing Bundle A.

This hearing bundle has been updated to include, at Tab 15, the Claimants' Skeleton Argument on the merits, that was served on you via email on 20 May 2022.

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That email will be sent from secure.filetransfer@comms.dlapiper.com and will say that sheffield.printroom@dlapiper.com sent you a secure message.
If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.
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From: Julie Dilcock < Julie.Dilcock@hs2.org.uk>

Sent: 24 May 2022 10:04

To:

Subject: RE: [EXTERNAL] FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown &

Others - Hearing Bundle A [DLAP-UKMATTERS.FID6020456]

Attachments: Order_3_May_2021_.pdf; Plan_A.pdf; Plan_B.pdf; Plan_C.pdf

EXTERNAL

Dear Mr Sandison

Thank you for your email. There was a typographical error in my email last night, which I have highlighted below: it should have referred to your having been named in the Crackley injunction proceedings and not the Harvil Rd proceedings. We are seeking to discharge both of those injunctions in the current proceedings and as a result we are required to name all of the defendants who were named in those claims as a matter of procedure. I have attached a copy of the Crackley injunction order that we are seeking to discharge and in which you are named as a defendant for your ease of reference.

If you wish to accept the offer of the undertaking, do let me know.

Kind regards

Julie

Julie Dilcock | Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | <u>Julie.Dilcock@hs2.org.uk</u> | <u>Facebook</u> | <u>Twitter</u> | <u>LinkedIn</u>

High Speed Two (HS2) Limited , Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | www.hs2.org.uk

I sometimes choose to manage my e-mails in the evening and on weekends because I find this works best for me. I do not expect you to do the same. If you receive an e-mail from me outside working hours, I do not expect a response outside of your own working routine.

From:

Sent: 24 May 2022 09:28

To: Julie Dilcock < Julie.Dilcock@hs2.org.uk>

Subject: Re: [EXTERNAL] FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle A

[DLAP-UKMATTERS.FID6020456]

Thank you for admitting that I did Not break the Injunction at Crackley Woods.

Can you or HS2 show me Proof of the Facts I was Camping or Protesting at Harvil Road.

I know for a Fact I have Never Stayed 1 Night at Harvil Road.

I have helped removing people's belongings during an Eviction from another Camp.

So again send myself proof of these Alleged issues and crimes.

In order I can counter claim.

Either by agreeing with the claims or denying them.

As I keep saying HS2 is Harrasing Bullying and victimising me. And using the Courts as a weapon.

Who are the the names of the witnesses and makings these False claims.

As I want to take them to Civil Court.

As I am a victim Not them.

Show me proof videos pictures daily logs etc

On Monday, May 23, 2022, 10:11:10 PM GMT+1, Julie Dilcock < julie.dilcock@hs2.org.uk > wrote:

Dear Mr Sandison

Thank you for your email below, which has been forwarded to me by our solicitors.

By way of explanation (and as set out in the First Witness Statement of Julie Dilcock), you were named as a defendant to these proceedings because you were a named defendant to the Harvil Road proceedings. The current proceedings include an application to discharge the injunction in that case. In order to make that application, we were obliged to name all of the defendant to that claim, including yourself. There is no allegation that you breached the injunction imposed in the Crackley proceedings. Whilst you remain as a named defendant to these proceedings we are obliged to serve copies of the documents in the proceedings upon you by email ion accordance with the order made by the Court on 28 April 2022.

If you wish to speak at the hearing you may attend and request the permission of the Judge to make submissions. However, if you simply wish to have your name removed from the proceedings and do not intend to trespass on HS2 Land in future, we would be prepared to reach an agreement with you that would remove you as a Named Defendant to these proceedings and confirm that we would not seek a costs order against you if those terms are agreed.

Please find attached the form of undertaking to the Court that we would be prepared to agree in order to remove you as a defendant to these proceedings with no order as to costs. The same form of undertaking has been offered to and accepted by other Named Defendants.

Please do take any independent legal advice that you consider that you need and let me know if you have any queries.

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I look forward to hearing from you.
Kind regards
Julie
Julie Dilcock Litigation Counsel (Land & Property) HS2 Ltd
Tel: 0121 720 4884 Mob: 07795 062507 Julie.Dilcock@hs2.org.uk Facebook Twitter LinkedIn
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Claim No: PT-2020-BH № 0000 07 May 2021

IN THE HIGH COURT OF JUSTICE BUSINESS AND PROPERTY COURTS PROPERTY, TRUSTS AND PROBATE LIST BIRMINGHAM DISTRICT REGISTRY

Before: Mr Justice Marcus Smith

On: 13 April 2021

PT-2020-BHM-000017

BETWEEN:

(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 SOUTH CUBBINGTON WOOD, SOUTH OF RUGBY ROAD, CUBBINGTON, LEAMINGTON SPA SHOWN COLOURED GREEN, BLUE AND PINK AND EDGED IN RED ON PLAN A ANNEXED TO THE PARTICULARS OF CLAIM
- (2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANT(S) ON LAND AT CRACKLEY WOOD, BIRCHES WOOD AND BROADWELLS WOOD, KENILWORTH, WARWICKSHIRE SHOWN COLOURED GREEN, BLUE AND PINK AND EDGED IN RED ON PLAN B ANNEXED TO THE PARTICULARS OF CLAIM
 - (5) ELLIOTT CUCIUREAN
 - (6) LARCH MAXEY
 - (7) PAUL SANDISON
 - (8) TERRY SANDISON

Defendants / Respondents

ORDER

EXTENDING THE DURATION OF THE INJUNCTION MADE BY MARCUS SMITH J ON 19 JANUARY 2021

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR 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.

FURTHER TO the Order made in these proceedings by Andrews J on 17 March 2020 ("the **March 2020 Order**"), **AND** the extensions made by Marcus Smith J on 17 December 2020 ("the **December 2020 Order**") and on 19 January 2021 (sealed on 28 January) ("the **January 2021 Order**").

AND UPON the Claimants' application by Application Notice dated 26 March 2021, pursuant to the provisions at paragraphs 11-15 of the January 2021 Order, to extend the duration of the injunction contained at paragraphs 3 to 5 of the January 2021 Order and to add the Sixth to Eighth named Defendants ("the **Substantive Amendment Application**").

AND UPON hearing Mr Michael Fry and Mr Jonathan Welch, counsel for the Claimants; and Fifth Defendant, Seventh Defendant and Eighth Defendant (appearing in person without representation).

AND UPON reading the Application Notice dated 26 March 2021 and the two witness statements of Mr Richard Jordan (dated 26 March 2021 and 9 April 2021).

AND UPON the Claimants indicating that they are content to provide to any named Defendants or persons unknown copies of further evidence or other documents filed in these proceedings from time-to-time at an email address provided to the Claimants, and place all such documents online to be publicly accessible.

AND UPON the Court accepting the Claimants' renewed undertaking that the Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the court finds that the Defendant ought to be compensated for that loss.

IT IS ORDERED THAT:

Continuation of January 2021 Order

1. The long-stop date of 30 April 2021 at paragraph 5 of the January 2021 Order be deleted, and the injunctions at paragraphs 3 to 5 of the January 2021 Order shall continue until 31 October 2022 or further order.

2. The injunction at paragraphs 3 to 5 of the January 2021 Order (as amended by paragraph 1 above) shall, further, apply to the Fifth to Eighth Defendants as well as the First and Second Defendants. Accordingly, the injunction which continues as against the First and Second and Fifth to Eighth Defendants is – for the avoidance of doubt - henceforth as set out in paragraphs 3 to 5 of this order.

Injunction in force

- 3. With immediate effect, and save for the matters set out in paragraph 4 of this Order:
 - 3.1 The First Defendant and Fifth to Eighth Defendants and each of them are forbidden from entering or remaining upon the Cubbington Land, being the land shaded green, blue and pink and outlined red on Plan A ("the **Cubbington Site**"); and
 - 3.2 The Second Defendant and Fifth to Eighth Defendants and each of them are forbidden from entering or remaining upon the Crackley Land, being the land shaded green, blue and pink and outlined red on Plan B ("the Crackley Site").
- 4. Nothing in paragraph 3 of this Order:
 - 4.1 Shall prevent any person from exercising their rights over any open public right of way over the land. Those public rights of way shall, for the purposes of this Order, include the "unofficial footpath" between two points of the public footpath "PROW 130" in the location indicated on Plan C annexed to the Particulars of Claim and reproduced as an annexe to this Order;
 - 4.2 Shall affect any private rights of access over the Land held by any neighbouring landowner.
- 5. The order at paragraph 3 above shall remain in effect until trial or further order or, if earlier, a long-stop date of 31 October 2022.

Service

6. Pursuant to CPR r.6.27, the steps taken by the Claimants to serve this Substantive Amendment Application on the First, Second and Fifth to Eighth

- Defendants shall amount to good and proper service of the Substantive Amendment Application on those defendants.
- 7. Pursuant to CPR r. 6.27 and r. 81.4(c) and (d) service of this Order on the First and Second Defendants shall be dealt with as follows:
 - 7.1 The Claimants shall affix sealed copies of this Order in transparent envelopes in at least one location within the Cubbington Land and in at least one location within the Crackley Land.
 - 7.2 The Claimants shall position (four) 4 signs, at the four locations marked on Plans A and B with red crosses, which are approximately 1.5m x 1m in size, advertising the existence of this Order (together with a map of the Land of at least A2 size) and providing a web link and the Claimant's solicitors contact details for copies of the Order (or further information in relation to it.)
 - 7.3 The Claimants shall email a copy of the Order to the following email addresses:
 - (i) crackleyresidents@hotmail.co.uk
 - (ii) peter.delow@ntlworld.com
 - (iii) wendyhoulston@hotmail.com
 - (iv)helpstophs2@gmail.com
 - 7.4 The Claimants shall further advertise the existence of this order in a prominent location on the websites:
 - (i) https://hs2inwarwicks.commonplace.is/; and
 - (ii) https://www.gov.uk/government/organisations/high-speed-two-limited,
 - together with a link to download an electronic copy of this Order.
 - 7.5 The Claimants shall also leave sealed copies of this Order at the protestor campsite marked "Camp 2" on the Plans.
 - 7.6 The Claimants shall, every six months, secure publication of a notice and map of the injunction in the Leamington Observer.

- 8. The taking of such steps set out at paragraph 7 shall be good and sufficient service of this Order on the First and Second Defendants and each of them. This Order shall be deemed served on those Defendants the date that the last of the above steps is taken, and shall be verified by a certificate of service.
- 9. Pursuant to CPR r. 6.27 and r. 81.4(c) and (d) 8 service of this Order on the Fifth to Eighth Defendants shall be dealt with by sending a copy of this Order to:
 - 9.1 in the case of the Fifth Defendant, his solicitors by email to: nhall@robertlizar.com;
 - 9.2 in the case of the Sixth to Eighth Defendants, personally by email to those email addresses held by the Claimants' solicitors.
- 10. The Court will provide sealed copies of this Order to the Claimants' solicitors for service (whose details are set out below).

Further directions

- 11. The Defendants or any other person affected by this order 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 by emailing rob.shaw@dlapiper.com. Schedule A to this Order indicates the process which should be followed for any such application.
- 12. Any person applying to vary or discharge this order 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 (unless they are already named as a defendant).
- 13. Any person wishing for this matter to proceed to trial and to defend the claim must serve an Acknowledgment of Service pursuant to CPR Part 8.3. Schedule B to this Order provides an indicative process for this course of action.
- 14. The Claimants have liberty to apply to extend or vary this Order or for further directions.

15. Save as provided for above, the Claim be stayed generally with liberty to restore.

16. Costs reserved. If the Claimants intend to seek a costs order against any person in respect of any future applications in these proceedings or any future hearing, then they shall seek to give reasonable advance notice of that fact to that person.

Communications with the Court and Claimants

17. All communications to the Court about this Order (which should quote the case number) should be sent to:

Court Manager
Birmingham Civil and Family Justice Centre
High Court of Justice
Chancery Division
Priory Courts
33 Bull Street
Birmingham B4 6DS

The telephone number is 0121 681 4441. The offices are open weekdays 10.00am to 4.00pm.

18. The Claimants' solicitors and their contact details are:

DLA Piper UK LLP of: 1 St Paul's Place Sheffield S1 2JX

Tel: +44 114 283 3312 Email: rob.shaw@dlapiper.com

Ref: RXS/380900/346

Dated: 3 May 2021

SCHEDULE A - STEPS TO VARY OR DISCHARGE THIS ORDER

If, in accordance with paragraph 10 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 are expected to be followed (although these are not binding directions):

- 1. Any party seeking to contest the Claimants' entitlement to interim relief should <u>file</u> with the court (i.e. send to the court) and <u>serve</u> (i.e. send to the Claimants):
 - (a) An N244 application form¹;
 - (b) Written grounds for the application (i.e. reasons for the proposed variation/discharge of the Order) this may be contained within the N244 application form or on in a separate document; and
 - (c) A witness statement(s) containing and/or appending <u>all</u> 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 17 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 18 of this Order; and/or
 - (b) Send electronic copies of the documents to the e-mail address at paragraph 18 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.

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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;

- 5. Thereafter the Claimants (i.e. HS2) 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 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 either 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.

SCHEDULE B - STEPS TO BRING MATTER TO TRIAL

If, in accordance with paragraph 12 above, any Defendant or other person affected by this Order wishes to apply bring the Claimant's proceedings (whether as a whole or in part) to final trial, to ensure effective case management by the Court the following indicative steps are expected to be followed (although these are not binding directions):

- If not already so, the party must apply to become a named defendant to the claim. This can be done by <u>filing</u> with the court (i.e. send to the court) and <u>serving</u> (i.e. send to the Claimants)
 - (a) An N244 Application form²; and
 - (b) a short statement explaining the reason for applying to become a named defendant (i.e. in order to contest the Claimants' claim).
- 2. In order to file the above with the Court, the applicant should:
 - (a) Send physical copies to the address at paragraph 17 of this Order; and/or
 - (b) Speak to the Court to obtain an address to send electronic copies to.
- 3. In order to serve the above on the Claimant, the applicant should:

8

² 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 physical copies to the address at paragraph 18 of this Order; and/or
- (d) Send electronic copies to the to the e-mail address at paragraph 18 above.
- 4. The party seeking to contest the claim and bring the matter to trial must then file and serve (see above as to how this is to be done):
 - (a) An Acknowledgement of Service using form N210,³ explaining the reasons for contesting the claim (whether as a whole or in part); and
 - (b) A witness statement(s) containing and/or appending all the evidence to be relied upon in support of the Acknowledgment of Service (i.e. evidence explaining the basis for contesting the claim).
- 5. Thereafter the Claimants (HS2) shall have 14 days to file and serve any evidence in reply.
- 6. The Court shall then list a hearing date for the final trial of this matter or a hearing date for a Case Management Conference, at which it will give directions to parties for any further steps required prior to the final trial (such as filing further evidence). The Court may set strict deadlines by which the further steps must be taken and 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.

SCHEDULE C - USEFUL REFERENCES AND RESOURCES

The attention of all parties is drawn to the following references and resources:

Bar Pro Bono Unit - A possible avenue for obtaining free legal advice and/or representation: https://weareadvocate.org.uk/

Support Through Court (formerly Personal Support Unit) – An organisation supporting litigants in person: https://www.supportthroughcourt.org/

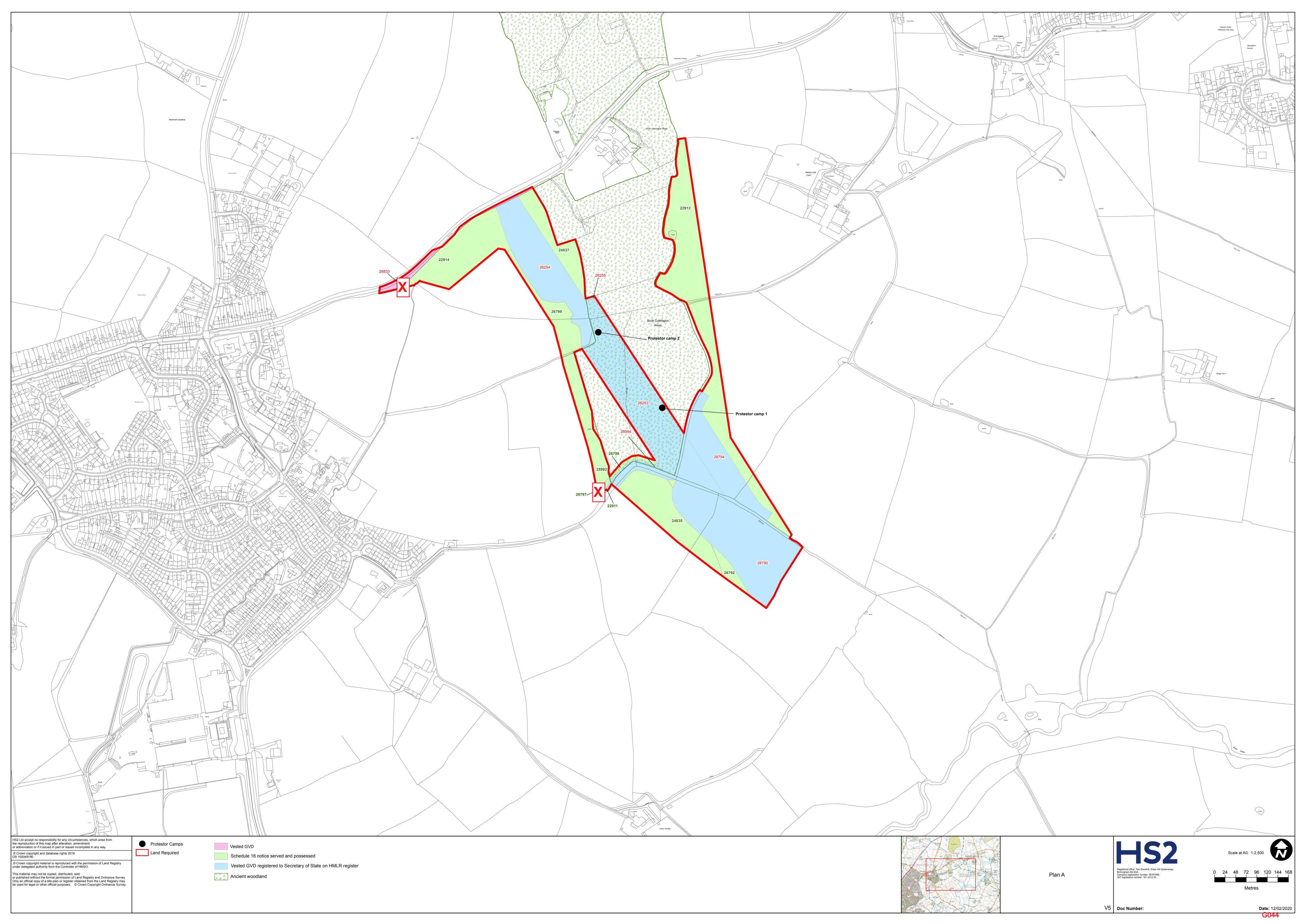
³ https://www.gov.uk/government/publications/form-n210-acknowledgment-of-service-cpr-part-8

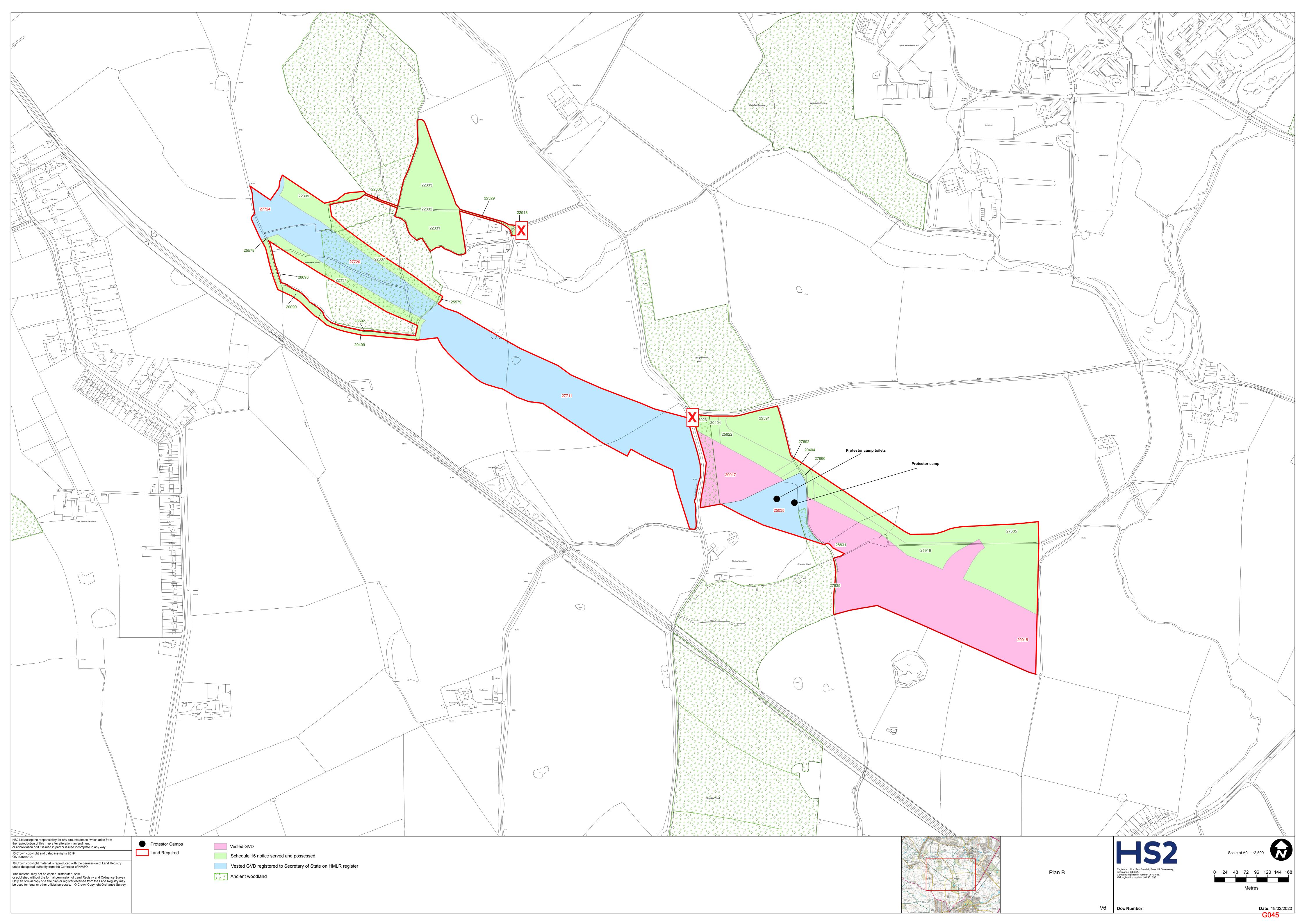
Chancery Division Guide: https://www.gov.uk/government/publications/chancery-guide

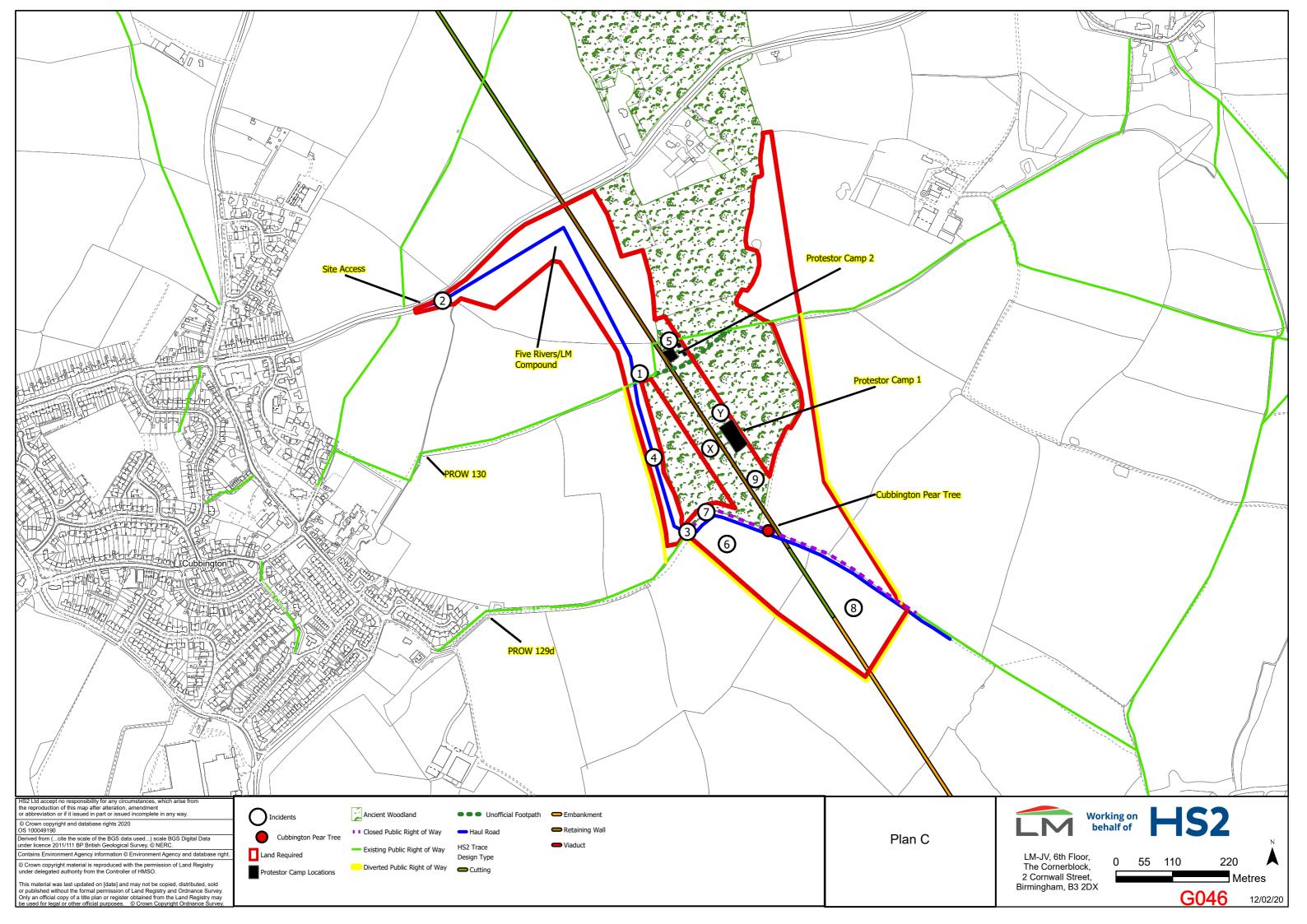
Chancery Division Interim Applications Guide for Litigants in Person: https://www.judiciary.uk/publications/guide-litigants-person-chancery/

Civil Procedure Rules Part 8: https://www.justice.gov.uk/courts/procedure-rules/civil/rules/part08

Help with Court Fees website: https://www.gov.uk/get-help-with-court-fees







Mary Barraclough

 From:
 24 May 2022 11:14

 To:
 Julie Dilcock

Subject: Re: [EXTERNAL] FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown &

Others - Hearing Bundle A [DLAP-UKMATTERS.FID6020456]

I cannot sign this as my phone will not allow it.

Also HS2 is a vast area regarding Trespass as they are continuing to buy land and working in many areas.

Majority of HS2 works are not sign posted or fenced off.

There is lack of understanding regarding maps and notices of their works.

Their staff and contractors don't talk and constantly abusive.

Thinking they are above the law.

Judge Marcus Smith said in the orders that myself attended that their staff would be trained to Talk to people about their interests and intentions of the working practices.

And better Signage would be in locations for the security to take the public and Trespassers to so it can be explained instead of causing Extra Alarm and Distress.

They was told to put as much information out on weekly basis in the local papers on TV etc so dog walkers etc would ore understanding.

To my knowledge this has Not been the case.

If I am wrong please provide proof that the order and agreements was kept.

Your solicitors on the day could Not understand the maps and show the Tresspass area or Even find the Crackley Woods Camp.

So how are the public supposed to.

And their contractors.

I will not sign myself to Jail as HS2 are everywhere expanding at the time land grabbing without notification and full clarity.

There security are bullies and constantly filming myself where ever I go. At court cases nothing to do with HS2 I have been assaulted and ignored property damaged. Evidence ignored.

Charges brought by the courts dropped.

When appealed.

There contractors have been seen taking drugs and drinking alcohol.

Security Net Digger drivers Tree felling contractors.

If random tested Not by the rail companies medical services would fail.

Myself passed a test many years ago but I refused to go for it and a manager turned up at my house and told me he would put a good word in.

I smoked two Spliffs and still passed.

The police and courts are paid off as we all know.

So I want it in writing if they are caught filming me goading or being abusive they will be sacked.

Also my video footage will be fully investigated.

They will not to be within 50 meters of me.

The National Eviction Team and security hand over all footage to myself.

And the Eviction team Security firms and police are fully investigated and charged including imprisonment if necessary.

Agreement that the Ecologists works with the public and watches videos etc

The badgers etc are removed properly and new sets are made and cameras are available for public viewing. They stop felling trees in nesting season.

And they allow the public to film and clarify that they are working within the law.

On Tuesday, May 24, 2022, 10:05:04 AM GMT+1, Julie Dilcock <julie.dilcock@hs2.org.uk> wrote:

Dear Mr Sandison

Thank you for your email. There was a typographical error in my email last night, which I have highlighted below: it should have referred to your having been named in the Crackley injunction proceedings and not the Harvil Rd proceedings. We are seeking to discharge both of those injunctions in the current proceedings and as a result we are required to name all of the defendants who were named in those claims as a matter of procedure. I have attached a copy of the Crackley injunction order that we are seeking to discharge and in which you are named as a defendant for your ease of reference.

ľ	f you	wish	า to	accep	t th	e offer	of	the	unde	rta	king,	do	let	t me	know	٧.

Kind regards

Julie

Julie Dilcock |Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | Julie. Dilcock@hs2.org.uk | Facebook | Twitter | LinkedIn

High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA |www.hs2.org.uk

I sometimes choose to manage my e-mails in the evening and on weekends because I find this works best for me. I do not expect you to do the same. If you receive an e-mail from me outside working hours, I do not expect a response outside of your own working routine.

From:

Sent: 24 May 2022 09:28

To: Julie Dilcock <Julie.Dilcock@hs2.org.uk>

Subject: Re: [EXTERNAL] FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle

A [DLAP-UKMATTERS.FID6020456]

Thank you for admitting that I did Not break the Injunction at Crackley Woods.

Can you or HS2 show me Proof of the Facts I was Camping or Protesting at Harvil Road.

I know for a Fact I have Never Stayed 1 Night at Harvil Road.

I have helped removing people's belongings during an Eviction from another Camp.

So again send myself proof of these Alleged issues and crimes.

In order I can counter claim.

Either by agreeing with the claims or denying them.

As I keep saying HS2 is Harrasing Bullying and victimising me. And using the Courts as a weapon.

Who are the the names of the witnesses and makings these False claims.

As I want to take them to Civil Court.

As I am a victim Not them.

Show me proof videos pictures daily logs etc

On Monday, May 23, 2022, 10:11:10 PM GMT+1, Julie Dilcock < julie.dilcock@hs2.org.uk > wrote:

Dear Mr Sandison

Thank you for your email below, which has been forwarded to me by our solicitors.

By way of explanation (and as set out in the First Witness Statement of Julie Dilcock), you were named as a defendant to these proceedings because you were a named defendant to the Harvil Road proceedings. The current proceedings include an application to discharge the injunction in that case. In order to make that application, we were obliged to name all of the defendant to that claim, including yourself. There is no allegation that you breached the injunction imposed in the Crackley proceedings. Whilst you remain as a named defendant to these proceedings we are obliged to serve copies of the documents in the proceedings upon you by email ion accordance with the order made by the Court on 28 April 2022.

If you wish to speak at the hearing you may attend and request the permission of the Judge to make submissions. However, if you simply wish to have your name removed from the proceedings and do not intend to trespass on HS2 Land in future, we would be prepared to reach an agreement with you that would remove you as a Named Defendant to these proceedings and confirm that we would not seek a costs order against you if those terms are agreed.

Please find attached the form of undertaking to the Court that we would be prepared to agree in order to remove you as a defendant to these proceedings with no order as to costs. The same form of undertaking has been offered to and accepted by other Named Defendants.

Please do take any independent legal advice that you consider that you need and let me know if you have any queries.

Otherwise, I look forward to receiving the undertaking from you – signed and dated where indicated – along with confirmation that you are content for us to submit it to the Court for approval once it has been signed by our solicitors on our behalf. Please note thatthe deadline set by the Court for us to submit an updated Schedule of Defendants, having removed any Named Defendants with whom we have reached an agreement is 25 May 2022.

I look forward to hearing from you.

Kind regards

Julie

Julie Dilcock |Litigation Counsel (Land & Property) |HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | Julie. Dilcock@hs2.org.uk | Facebook | Twitter | LinkedIn

High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | www.hs2.org.uk

I sometimes choose to manage my e-mails in the evening and on weekends because I find this works best for me. I do not expect you to do the same. If you receive an e-mail from me outside working hours, I do not expect a response outside of your own working routine.

From:

Sent: 23 May 2022 17:06

To: HS2Injunction < HS2Injunction@dlapiper.com >

Subject: Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle A [DLAP-

UKMATTERS.FID6020456]

EXTERNAL

Stop this constant threats bulling and harassment on behalf of HS2 I gave up Crackley woods and trying to save the environment as requested by Judge Marcus Smith.

HS2 did not stick to law as requested by his Judgment my name should have been removed from all paperwork regarding injunction orders

Your barristers couldn't even read the maps on the day I attended.

I don't have a solicitor and cannot understand why they are still victimising me.

As I have said show me your proof of claims I broke Judgment from Marcus Smith. Not a ton of useless information I cannot understand.

I do wish to speak on the days of the court dates 26th 27th and 30th so make this happen.

On Monday, May 23, 2022, 03:58:01 PM GMT+1, HS2Injunction < hs2injunction@dlapiper.com > wrote:

Dear Sir/Madam

Claim No: QB-2022-BHM-000044

(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors

Further to our email below, we now attach by way of service, an updated copy of Hearing Bundle A.

This hearing bundle has been updated to include, at Tab 15, the Claimants' Skeleton Argument on the merits, that was served on you via email on 20 May 2022.

Yours faithfully

DLA Piper UK LLP

From: HS2Injunction < HS2Injunction@dlapiper.com >

Sent: 19 May 2022 15:18

Cc: 'hs2 injunction' < hs2injunction@governmentlegal.gov.uk >

Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle [DLAP-UKMATTERS.FID6020456]

Dear Sir/Madam,

Claim No: QB-2022-BHM-000044 (1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors We refer to the Directions Order in this proceedings, made by Mr. Justice Julian Knowles on 28 April 2022. The Claimants have prepared hearing bundles for the court hearing that is listed for 26 and 27 May 2022. Due to the size of those bundles, they will be sent to you via a separate email, that contains a secure link to download the exhibits That email will be sent fromsecure.filetransfer@comms.dlapiper.com and will say thatsheffield.printroom@dlapiper.com sent you a secure message. If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau. Yours faithfully

DLA Piper UK LLP

This email is from DLA Piper UK LLP. The contents of this email and any attachments are confidential to the intended recipient. They may not be disclosed to or used by or copied in any way by anyone other than the intended recipient. If this email is received in error, please contact DLA Piper UK LLP on +44 (0) 20 7349 0296 quoting the name of the sender and the email address to which it has been sent and then delete it. For more information on how we process personal data please seewww.dlapiper.com/privacy-policy. Please note that neither DLA Piper UK LLP nor the sender accepts any responsibility for viruses and it is your responsibility to scan or otherwise check this email and any attachments. DLA Piper UK LLP is a limited liability partnership registered in England and Wales (registered number OC307847) which provides services from offices in England, Belgium, Germany and the People's Republic of China. A list of members is open for inspection at its registered office and principal place of business 160 Aldersgate Street London EC1A 4HT. Partner denotes member of a limited liability partnership. DLA Piper UK LLP is authorised and regulated by the Solicitors Regulation Authority and is part of DLA Piper, a global law firm, operating through various separate and distinct legal entities. For further information, please refer towww.dlapiper.com.

Mary Barraclough

From: Julie Dilcock < Julie.Dilcock@hs2.org.uk>

Sent: 24 May 2022 12:29

To:

Subject: RE: [EXTERNAL] FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown &

Others - Hearing Bundle A [DLAP-UKMATTERS.FID6020456]

EXTERNAL

Dear Mr. Sandison

Thank you for your email.

I have explained why you have been named as a party to these proceedings and that if you wish to speak at the hearing this week you may attend and request the permission of the Judge to make submissions.

We will also make a hard copy of the undertaking that has been offered available for you to sign at court, should you wish to take up that proposal.

As our solicitors have previously recommended, if you are unsure about any of the documents you have received you should consider obtaining independent legal advice from a solicitor or citizens advice bureau.

Kind regards

Julie

Julie Dilcock | Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | <u>Julie.Dilcock@hs2.org.uk</u> | <u>Facebook</u> | <u>Twitter</u> | <u>LinkedIn</u>

High Speed Two (HS2) Limited , Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | www.hs2.org.uk

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Sent: 24 May 2022 11:14

To: Julie Dilcock < Julie. Dilcock@hs2.org.uk>

Subject: Re: [EXTERNAL] FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle A

[DLAP-UKMATTERS.FID6020456]

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And their contractors.

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There contractors have been seen taking drugs and drinking alcohol.

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If random tested Not by the rail companies medical services would fail.

Myself passed a test many years ago but I refused to go for it and a manager turned up at my house and told me he would put a good word in.

I smoked two Spliffs and still passed.

The police and courts are paid off as we all know.

So I want it in writing if they are caught filming me goading or being abusive they will be sacked.

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They will not to be within 50 meters of me.

The National Eviction Team and security hand over all footage to myself.

And the Eviction team Security firms and police are fully investigated and charged including imprisonment if necessary.

Agreement that the Ecologists works with the public and watches videos etc

The badgers etc are removed properly and new sets are made and cameras are available for public viewing. They stop felling trees in nesting season.

And they allow the public to film and clarify that they are working within the law.

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If you wish to accept the offer of the undertaking, do let me know.

Kind regards

Julie

Julie Dilcock |Litigation Counsel (Land & Property) | HS2 Ltd

Tel: 0121 720 4884 | Mob: 07795 062507 | Julie. Dilcock@hs2.org.uk | Facebook | Twitter | LinkedIn

High Speed Two (HS2) Limited, Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA | www.hs2.org.uk

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From:

Sent: 24 May 2022 09:28

To: Julie Dilcock < <u>Julie.Dilcock@hs2.org.uk</u>>

Subject: Re: [EXTERNAL] FW: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle

A [DLAP-UKMATTERS.FID6020456]

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I know for a Fact I have Never Stayed 1 Night at Harvil Road.

I have helped removing people's belongings during an Eviction from another Camp.

So again send myself proof of these Alleged issues and crimes.

In order I can counter claim.

Either by agreeing with the claims or denying them.

As I keep saying HS2 is Harrasing Bullying and victimising me. And using the Courts as a weapon.

Who are the the names of the witnesses and makings these False claims.

As I want to take them to Civil Court.

As I am a victim Not them.

Show me proof videos pictures daily logs etc

On Monday, May 23, 2022, 10:11:10 PM GMT+1, Julie Dilcock <julie.dilcock@hs2.org.uk> wrote:

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Thank you for your email below, which has been forwarded to me by our solicitors.

By way of explanation (and as set out in the First Witness Statement of Julie Dilcock), you were named as a defendant to these proceedings because you were a named defendant to the Harvil Road proceedings. The current proceedings include an application to discharge the injunction in that case. In order to make that application, we were obliged to name all of the defendant to that claim, including yourself. There is no allegation that you breached the injunction imposed in the Crackley proceedings. Whilst you remain as a named defendant to these proceedings we are obliged to serve copies of the documents in the proceedings upon you by email ion accordance with the order made by the Court on 28 April 2022.

If you wish to speak at the hearing you may attend and request the permission of the Judge to make submissions. However, if you simply wish to have your name removed from the proceedings and do not intend to trespass on HS2 Land in future, we would be prepared to reach an agreement with you that would remove you as a Named Defendant to these proceedings and confirm that we would not seek a costs order against you if those terms are agreed.

Please find attached the form of undertaking to the Court that we would be prepared to agree in order to remove you as a defendant to these proceedings with no order as to costs. The same form of undertaking has been offered to and accepted by other Named Defendants.

Please do take any independent legal advice that you consider that you need and let me know if you have any queries.

Otherwise, I look forward to receiving the undertaking from you – signed and dated where indicated – along with confirmation that you are content for us to submit it to the Court for approval once it has been signed by our solicitors on our behalf. Please note thatthe deadline set by the Court for us to submit an updated Schedule of Defendants, having removed any Named Defendants with whom we have reached an agreement is 25 May 2022.

I look forward to hearing from you.						
Kind regards						
Julie						
Julie Dilcock Litigation Counsel (Land & Property) HS2 Ltd						
Tel: 0121 720 4884 Mob: 07795 062507 Julie. Dilcock@hs2.org.uk Facebook Twitter LinkedIn						
High Speed Two (HS2) Limited , Two Snowhill, Snow Hill Queensway, Birmingham, B4 6GA www.hs2.org.uk						
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From:

Sent: 23 May 2022 17:06

To: HS2Injunction < HS2Injunction@dlapiper.com >

Subject: Re: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle A [DLAP-

UKMATTERS.FID6020456]

EXTERNAL

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HS2 did not stick to law as requested by his Judgment my name should have been removed from all paperwork regarding injunction orders

Your barristers couldn't even read the maps on the day I attended. I don't have a solicitor and cannot understand why they are still victimising me.

As I have said show me your proof of claims I broke Judgment from Marcus Smith. Not a ton of useless information I cannot understand.

I do wish to speak on the days of the court dates 26th 27th and 30th so make this happen.

On Monday, May 23, 2022, 03:58:01 PM GMT+1, HS2Injunction < hs2injunction@dlapiper.com > wrote:
Dear Sir/Madam
Claim No: QB-2022-BHM-000044
(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors
Further to our email below, we now attach by way of service, an updated copy of Hearing Bundle A.
This hearing bundle has been updated to include, at Tab 15, the Claimants' Skeleton Argument on the merits, that was served on you via email on 20 May 2022.
Yours faithfully
DLA Piper UK LLP
From: HS2Injunction < HS2Injunction@dlapiper.com > Sent: 19 May 2022 15:18 Cc: 'hs2 injunction' < hs2injunction@governmentlegal.gov.uk > Subject: QB-2022-BHM-000044 HS2 & SSfT v Persons Unknown & Others - Hearing Bundle [DLAP-UKMATTERS.FID6020456]
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Claim No: QB-2022-BHM-000044
(1) High Speed Two (HS2) Limited & (2) The Secretary of State for Transport -v- Persons Unknown & Ors
We refer to the Directions Order in this proceedings, made by Mr. Justice Julian Knowles on 28 April 2022.
The Claimants have prepared hearing bundles for the court hearing that is listed for 26 and 27 May 2022.

Due to the size of those bundles, they will be sent to you via a separate email, that contains a secure link to download the exhibits.
That email will be sent from secure.filetransfer@comms.dlapiper.com and will say that secure.filetransfer@comms.dlapiper.com and secure.filetransfer@comms.dlapiper.com are a secure.filetransfer@comms.dlapiper.
If you are unsure about any of the documentation you have received we recommend that you seek independent legal advice from a solicitor or citizens advice bureau.
Yours faithfully
DLA Piper UK LLP

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Mary Barraclough

From:

Sent: 20 May 2022 23:31

To: Aaron.mooney@justice.gov.uk; Nhall@robertlizar.com;

qb.birmingham@justice.gov.uk; HS2Injunction

Subject: Claim number, QB-2022-BHM-000044

BE AWARE

This message appears to have come from a freemail domain.

Be sure to check that you know and trust the sender.

Dear Sir,

I have very recently found out about HS2's country wide injunction on HS2 protests. I realise I may be too late to register my interest, and to log my opinion as an unknown person. (As you will see, I have personal reasons as to why I want to remain an unknown person).

I live in a small semi-rural village and I first became aware HS2 was going to affect the village in 2017. The village held a public consultation meeting on what the plans were. The HS2 meeting was chaired by a Parish Councillor.

When I entered the village hall, HS2 had laid out around the room a map of where HS2 was going. I located my village and took a look. Standing behind the desk were HS2 representatives. These representatives were just bystanders, and took no part in the public consultation. I asked a few questions but was quickly ushered away. I have an engineering background and I am familiar with technical drawings. The drawings presented to me huge quarries in my village. My first thoughts at this time were trucks.

The meeting progressed to a QA. The first question I asked is what route would HS2 trucks take, considering in my village there are 3 schools situated next to the main road. The pavements, at that time, were very uneven and there were lots of elderly and disabled as well as children who walked on them. I was also concerned with the air pollution it would create, especially with my village already exceeding legal air pollution limits.

HS2, at the time, backed up with assurances from the Parish Councillor, siad the trucks would go nowhere near the village. A lady in the audience gave them a credible alternative - open up an old coal mining railway and use that instead.

The years passed and I gave it little thought, thinking what we said in the public consultation was enough to save my village. The Parish councillor also remained quiet, again an indicator our village was safe.

I sat at home watching a House of Lords debate on HS2. A baroness from the next county stood up and said, HS2 had no other alternative to (what was revealed as 500 trucks a day) the trucks passing through a village in her county, and a neighbouring village to mine. I thought this strange because I sent the village Parish Council an email the following day from the 2017 public consultation, warning them of the trucks and that there was a credible alternative. (I still have this email if required).

I started to become vocal asking the Parish Council and Councillor questions. As time progressed I felt as though I was being watched - the same faces kept appearing in my village and on protests. I read an article on three HS2 heavies getting physical with people - one of these heavies I recognised from being in my village.

I got paranoid and anxious. I also found out about a Russian oligarch link and HS2. One of the Parish Councillors was connected with the old Russian ambassador - (details I am not yet comfortable with giving).

HS2 is going to have a devastating impact on my village and residents are being gaslighted by HS2 and councillors as to what impacts it is going to have. I am under no doubt, money, contracts and backhanders are at play. My only way to safely convey to people what is about to happen, is through protest. My village and I have been severely let down by local and national politics for a wider agenda - please do not take my last breath of democracy away from me - protect my Human right to protest and to at least inform my village so they can make that democratic decision.

I have since learned the Parish Councillor was in 2017 and still is today, an HS2 liaison. I have also been told he takes money indirectly from HS2 through his business.

Yours sincerely,

Unknown Person.

Mary Barraclough

From: HS2Injunction
Sent: 24 May 2022 21:26

To:

Subject: RE: Claim number, QB-2022-BHM-000044 [DLAP-UKMATTERS.FID6020456]

Dear Sir / Madam

Thank you for your email of 20 May 2022 below.

A copy of your email will be placed in a bundle of documents that will be made available to the court at the hearing on 26 and 27 May 2022.

Should you wish to see any of the documents served in these court proceedings to date, such documents can be found on the HS2 website here - https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings.

If you require any of these documents to be provided to you directly, please let us know and we can email them to you.

If you wish to attend the court hearing of this matter on 26 and 27 May 2022 you may do so. If you wish to speak at the hearing you will need to request the permission of the Judge to make submissions.

We recommend that you obtain independent legal advice if you are unsure about any aspect of the proceedings or the documentation that is available to you.

Yours faithfully

DLA Piper UK LLP

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Sent: 20 May 2022 23:31

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<HS2Injunction@dlapiper.com>

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Unknown Person.

Mary Barraclough

From:	
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Sent: 22 May 2022 01:56

To: aaron.mooney@justice.gov.uk

Cc:Nhall@robertlizar.com; qb.birmingham@justice.gov.uk; HS2InjunctionSubject:Claim number QB-2022-BHM-000044 submission by person unknown

EXTERNAL

Hi

I was unaware of the injunction application. This shows a complete improper service by HS2 Ltd of the paperwork to those affected and interested parties. HS2 Ltd assume they are above the law which they are certainly not. They break the rules and step over livelihoods, disturbing everyone and everything which has taken years to establish namely businesses and the environment. Hs2Ltd totally roughshod over the public and have no respect for anyone namely by using an awful security firm called the NET (National Eviction Team) and the Police.

The public protest in order to care for the things they love and protect the innocent against the Real Weapons of Mass Destruction, namely heavy plant machinery in the beautiful countryside.

I would like to guess that the majority of the UK population do not want High Speed Rail; a complete waste of time, money and resources.

The right to protest is freedom of speech and an injunction has no room in our 'democracy'. Think again about what the injunction will cause. The government have never been so unpopular, and Boris Johnson has proposed to build back better. This is not sustainable and it has many drawbacks.

This injunction is a fools errand, it will promote more anger and hostility.

Regards, Claire Matthews.

Mary Barraclough

From: HS2Injunction
Sent: 24 May 2022 21:26
To:

Subject: RE: Claim number QB-2022-BHM-000044 submission by person unknown [DLAP-

UKMATTERS.FID6020456]

Dear Ms Matthews

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A copy of your email will be placed in a bundle of documents that will be made available to the court at the hearing on 26 and 27 May 2022.

Should you wish to see any of the documents served in these court proceedings to date, such documents can be found on the HS2 website here - https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings.

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Yours sincerely

DLA Piper UK LLP

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Regards, Claire Matthews.

HS2 route-wide linjunction

Witness Statement of Michael Simon Haville

My name is Michael Haville & I have have been a committee member at Southam Rugby Club for over 30 years, in 2012 the HS2 route was announced & it went through 3 out 4 of our pitches. Two of us on the committee were asked to look into our options, one with the RFU & I was asked to look at the government side. The route was adjusted in 2015 and now misses the club by 180m, but we are still affected by road closures, bad signage & the lack of a finalised design for the bridge ramp, which could seriously affect road access to the club, as to the injunction the question arises, would it be trespass if we fetched a stray ball off HS2 land.

For the last 10 years, I have closely followed the HS2 project & while not my bag, I support the protesters, as I feel they have every right to protest against what I consider to be an illegal project.

I present specific evidence, based on FOIs, minutes, the HS2 NAO Report & other documents regarding the phase 2a bill and the misleading of the public, select committees, parliamentary committees & MPs in the lead up to final phase 2a vote on July 15th 2019.

In 2019 Nus Ghani was a Junior Minister of the Crown employed by the DfT:-

At the Jul 15 2019 - HofC debate – Nus Ghani misled parliament by stating the current HS2 budget of £55.6bn, when asked directly & repeatedly about HS2 actual current costs. Ms Ghani failed to inform parliament of the known £30bn increase, which was lying by omission & Ms Ghani also lied to parliament by stating that the HS2 Benefit Cost Ratio was steady at 2.3:1, when she knew it was much lower at 1.0-1.5.

As MPs were misinformed prior to the phase 2a vote on the true status of the HS2 project ie the £30bn (56%) cost increase, the 5 year delay from 2026 to 2031 and DfT current Benefit Cost Ratio (2.3 down to 1.5), all of which was crucial information, I would submit that the phase 2a bill was passed illegally.

The DfT has argued that at the time of the debate, ministers wished to continue to test whether remedial action could be taken to hold the existing budget & schedule, but have significantly produced no evidence to back up that argument. HS2 Ltd Board Minutes show that the HS2 Stocktake was materially finished by April 2019 & the NAO HS2 report, shows

that by the time of the July 15th debate, the DfT had received the HS2 draft Stocktake & the IPA review, which both concluded that HS2 could not be achieved within the current budget.

The phase 2a bill was passed on July 15th 2019 & 4 days after the debate, details of the HS2 Stocktake were leaked to the FT announcing the £30bn overspend and the 5 year delay.

Nus Ghani misled select committees & parliament a total of 5 times from Jan – July 2019. I believe that Ms Ghani carried out this deception so that MP's would not become aware of the £30bn cost increase, the 5 year delay & the massive reduction in the project benefits, before & during the HS2 phase 2a final debate.

I submit that Nus Ghani has potentially broken the Ministerial Code regarding openness, honesty & leadership, and potentially committed Misconduct in Public Office without reasonable excuse or justification.

Bernadette Kelly is a Civil Servant & the PPM at the DfT:-

May 15 2019 – Commons PAC Oral Evidence – Ms Kelly mislead the committee, when asked directly about HS2 costs & delays, she failed to inform the committee about the known £7bn increase & the known 3 year delay, which is lying by omission & she also lied to the committee by stating that the HS2 Benefit Cost Ratio was solid at 2.3:1 as she had calculated it was lower at 2.1:1, a month before in her HS2 Accounting Assessment 1 on Mar 8.

Ms Kelly has since argued that commercially sensitive negotiations were continuing with contractors throughout this period, and internal policy options to make savings were under consideration – but minutes of the meeting with the SofS on Apr 3 2019, at which Allan Cook & Nus Ghani were present, do not support that argument, what is more those minutes state that 'assessments had already been made about other (cheaper) options' & the minister was reminded that the bill was linked to the current route, ie that any changes to route or scope might result in the bill being brought back to the HofC.

Also there is no evidence of any negotiations with contractors, the Stocktake was started in Feb 2019 & was materially finished in April 2019 & HS2 Ltd Board Minutes show that presentation of the Stocktake was the only option being pursued internally. Externally the NAO HS2 report shows that while several bodies looked for savings, none were found.

I believe that Ms Kelly mislead the Commons PAC & parliament for the sole reason that the Commons PAC would not become aware of the then known £7bn cost increase, the then known 3 year delay & the reduction in benefits before the HS2 phase 2a debate. It should also be noted that Ms Kelly sought no Minsterial Direction with respect to the HS2 project.

I submit Ms Kelly has potentially broken the Civil Service Code regarding integrity, honesty & objectivity and has potentially committed Misconduct in Public Office without reasonable excuse or justification.

HS2 Chairman Allan Cook & HS2 CEO Mark Thurston were in 2019 public officials (HS2 Ltd is an executive non-departmental public body):-

Dec 18 2018 – BBC Panorama - Mark Thurston lied to parliament & public when he stated on BBC Panorama that 'HS2 was on time & on budget', when he knew HS2 was delayed & over budget

Mar 13 2019 - Transport Select Committee – Oral Evidence Allan Cook mislead the committee when he stated that the HS2 Benefit Cost ratio was still 2.3:1, when he knew that it was lower at 2.1:1. Allan Cook also mislead the Committee when he stated that the project was on schedule, when he knew it was delayed by at least 3 years

Jul 18 2019 – HS2 Annual Report - Allan Cook & Mark Thurston passed off the 2018-19 Annual Report, with no mention of the cost increase & delays in the Strategic Report. The annual report would have been written from April onwards & was not published until July 18th & the May board minutes confirm that the Stocktake was materially finished & as such AC & MT would be fully aware of the £30bn cost increase & the 5 year delay, however this was not reported in Strategic Report section of the Annual report, which is in breach of the Companies Act 2006

I believe that Mr Cook & Mr Thurston misled the public, parliament & select committees for the sole reason that MP's would not become aware of the £30bn cost increase & the 5 year delay before the HS2 phase 2a debate.

I believe that Mr Cook & Mr Thurston have potentially broken the Civil Service Code regarding integrity, honesty & objectivity, and have potentially committed Misconduct in Public Office without reasonable excuse or justification.

All the above shows that HS2 Ltd, the DfT & Transport Ministers were well aware of major problems with HS2 project, and although they had informed the Treasury, the National Audit Office, the Infrastructure & Projects Authority, the Major Projects Review Group & Wider Stakeholders of the significant cost overruns & delays, they intentionally did not inform parliament & MPs, making the passing of the phase 2a bill illegal.

With regard to the BCR, FOIs have eventually established that the BCR of 1.5:1 is based on passenger numbers of 342,000 / day for 60 years, but the DfT / HS2 Business case forecasts for 2040 are 56,000 – 115,000. The crucial 342,000 figure was carefully not made available in the HS2 Business case or any of multiple supporting documents. This is significant as the claimed £95bn benefits on which the BCR ratio is calculated could not be peer reviewed. The DfT / HS2 forecast passenger numbers indicates that the true HS2 BCR is below 0.5:1.

STATEMENT OF TRUTH

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without honest belief in its truth.

I believe the facts stated in this witness statement are true.

Signed

Michael Simon Haville

Dated 24/05/2022

Timeline

Jan 2018 - NAO HS2 Progress Report

Main civil construction contractors report that the forecast cost of tunnels, earthworks and structures could exceed the target price.

Mar 2018 - NAO HS2 Progress Report

Main civil construction contractors report poorer ground conditions than assumed, the need for further ground investigations and cost estimate increases.

Jul 2018 - NAO HS2 Progress Report

HS2 Ltd engages consultants to help review and challenge emerging estimates from contractors where forecast costs exceed the target price and delays against schedule are forecast

From July 2018, the project representative reported consistently that Phase One was not deliverable within available funding and schedule, recommending that the Department reset the programme and examine its strategic case and value for money – this was obviously ignored by the DfT.

Oct 2018 - NAO HS2 Progress Report

HS2 Ltd's contractors estimated that main civil construction costs were 83% above the target price and HS2 Ltd formally notified the Department that there were significant challenges to the affordability of the programme.

The Department informs the Secretary of State of the cost and schedule pressures on Phase One

NAO High-Speed-Two-A-progress-update.pdf Section 1.13

Oct 2018 – Commons PAC Oral evidence

Sir Geoffrey Clifton-Brown: - I have one final question, on the lessons to be learned from this. Can we have your assurance, on behalf of the Department, that there will be a culture of honesty in relation to HS2? If the thing is falling behind schedule, will you come to the Committee and Parliament and be completely honest when you first know that there are delays?

Bernadette Kelly: I certainly owe it to the Committee to be completely honest with it—you would not expect anything else of me or any other witness in front of you.

Ms Kelly commits to keeping the Commons PAC informed on HS2 delays

Dec 18 2018 - BBC Panorama

Mark Thurston stated "HS2 is on time & on budget"

Mark Thurston mislead public & parliament on state of the project as previously he had stated nobody knows

https://www.youtube.com/watch?v=LCh7WIRuT1g&ab_channel=StopHS2

Jan 22 2019 – Lords EAC Oral Evidence

Q5 The Chairman: So you think it will be within budget. I notice that you said you did not agree with the reports that it would be double.

Sir Terry Morgan: They have a lot of work to do.

The Chairman: You must know.

Sir Terry Morgan: I do not. Nobody knows yet.

Lord Hollick: Given that it has a funding envelope to work in, can HS2, on its own initiative, say that this is one of the measures that it has to take if it is to get anywhere near that funding envelope?

Sir Terry Morgan: This is always dangerous territory. I think, in the triangle of scope, cost and time, something has to give.

Q18 Baroness Kingsmill: It was thought that HS2 would be a high-risk proposition, there would be an overspend and there would be a failure to deliver value for money. Do you think HS2 will be delivered within the budget and on time?

Nusrat Ghani MP: I believe that Sir Terry responded to a similar question. We are committed to ensuring that we can continue to drive down costs with HS2 Ltd and **that the budget will be delivered within the envelope provided at £55.7 billion**.

That sentence does not actually make sense

http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/economic-affairs-committee/HS2-follow-up/oral/95531.html

Feb 14 2019 - BBC

Mark Thurston – We have always said that we will really only know what it going to cost when we get our contractors mobilised

Mar 8 2019 - HS2 Phase 1 Accounting Officers Assessment 1

Additional DfT analysis suggested a neutral BCR of 1.0 would be achieved if the current scheme scope was delivered in 2029 for £6 billion over the funding.

However, the enabling nature of the Phase One scheme means that the value for money positions for the 'full Y' HS2 scheme remains high (BCR 2.1 including WEIs) provided that the Phase 2a and 2b schemes could be delivered within their respective funding envelope

It should be noted that this accounting assessment was not released to the public & MPs until June 2021.

https://www.gov.uk/government/publications/government-major-projects-portfolio-accounting-officer-assessments/high-speed-2-hs2-phase-one-accounting-officer-assessments-march-to-december-2019

Bernadette Kelly, Allan Cook & Nus Ghani knew that HS2 full BCR had dropped to a maximumum of 2.1:1 & the phase 1 BCR had dropped to 1:1, before their select committee / HofC statements that the HS2 BCR remained at 2.3:1.

Mar 13 2019 - Transport SC - Oral Evidence

Q46 Allan Cook: As with any complex and challenging programme, it is a large sum of money; £55.7 billion is a huge amount of money, but the cost benefits are clear for everybody to see. For every £1 we invest, we get a return of £2.30

AC stated BCR was 2.3 when he knew that was incorrect as was then <= 2.1 & that phase 1 was £6bn over budget.

Q80 Chair: But, at this moment, you are anticipating that you will be able to deliver the full scope of the project and the speed it is meant to go at, because that is being talked about. People have talked about the speed being 50 kilometres per hour less. At the moment, you are working to the assumption that the project will be delivered at the speed that is set out, on the network that is set out and to the timeframe set out.

Allan Cook: I am working to that assumption, exactly as you have said.

AC stated that they were working on the assumption of the timeframe set out (delivery of HS2 Phase 1 in 2026), knowing that he had passed onto BK that schedule was 3 years delayed

file:///C:/Users/lenovo/Documents/HS2/Misconduct/Transport%20SC%20Allan%20Cook.pd f

Mar 27 2019 - HS2 Board Minutes

3.1 The Board noted that the Chairman is undertaking a Stocktake of the HS2 programme 3.3 The Board noted that there will be input into this assessment from Board Members, Executive and Management, the Department for Transport (DfT) and independent experts.

https://webarchive.nationalarchives.gov.uk/20200204050620/https://www.gov.uk/government/organisations/high-speed-two-limited/about/our-governance#board-meeting-minutes

Mar 2019 - NAO HS2 Report - Figure 6

HS2 Ltd formally notifies the Department that it has breached the terms of the development agreement because it cannot deliver Phase One on time or within available funding.

Response: The Department responds to HS2 Ltd's formal notification of a breach of the development agreement in April. It determines that HS2 Ltd requires more time to complete its plan of actions.

The Secretary of State is advised that actions to make Phase One affordable within the available funding have not worked.

Apr 3 2019 - Meeting between DfT SofS and Allan Cook (Chair of HS2)

Attendees: Michael Bradley (CFO HS2 Ltd), Clive Maxwell, Nusrat Ghani

AC updated SoS on the cost and schedule position of the programme. He said that he had concluded that phase 1 could not be delivered to the current scope within the current schedule and budget. The HS2 Ltd board had been told by the exec that the latest point estimate for phase 1 was approximately £28bn, with a £6-7 billion gap in the forecast, and a 2-3 year change to the schedule. This means no contingency in the funding envelope. SoS asked if an alternative scheme would be cheaper.

AC replied that he was unable to answer that.

CM added that assessments had been made a while ago about other options.

CM also reminded the meeting that the bill was linked to the current route.

AC added that through all the discussions he'd had, no one had suggested the current scheme was the incorrect route.

AC stated that with the current scope, HS2 could not meet the current cost and R15 schedule.

AC would be reporting to Bernadette on a monthly basis.

Clive Maxwell makes the 2 points:-

- 1) That assessments had been made a while ago about other options ie by April 2019 the DfT had already looked alternatives to save money.
- 2) If they change route / scope the bill would have to be changed & that would require going back to parliament for review they did not want to risk that as by then the true cost of > £88bn & the 5 year delay would be public knowledge & MP's might vote to cancel.

https://www.whatdotheyknow.com/request/714209/response/1710337/attach/html/3/FOI %20F0019296%20Mr%20Mike%20Haville%20response.pdf.html

Apr 19 2019 – HS2 Board Minutes

3.6.2 The team who have supported the stocktake production confirmed that there was nothing material missing or withheld in producing the draft report, but that there could always be more information to add.

The draft of the report was requested as an output for May 2019 following discussions with the Department of Transport.

Confirms that Stocktake was materially complete in early April 2019 & the DfT had a draft of the HS2 Stocktake report in May 2019.

Also, it shows that Allan Cook / Thurston / HS2 Ltd knew that they were over budget by at least £20bn & delayed at least 5 years, before April 1st 2019, in the period covered by 2018-19 Annual Report – but did not mention it in the strategic case which is fraud

Apr 29 2019 - Hof C - HS2 Buckinghamshire Debate - Column 58

Nus Ghani was asked about HS2 spiralling costs by Cheryl Gillan, Rachel Maskell, Dominic Grieve, Andrew Bridgen, Jim Cunningham, Yvette Cooper & William Cash. Ms Ghani did not inform MP's of the known £7bn increase & instead restated the current budget "HS2 has one budget: £55.7 billion" & "There is only one budget—£55.7 billion"

https://hansard.parliament.uk/Commons/2019-04-29/debates/83D4E291-90D7-42ED-A338-5F056CDEEB68/HS2Buckinghamshire#contribution-ED9B6DDD-F311-4270-B0AE-33B6156A39B1

April 2019 – NAO HS2 Report

In April 2019, when HS2 Ltd's action plan had not achieved an affordable programme, the Department and HS2 Ltd determined that HS2 Ltd required more time to try to reduce forecast costs and schedule delays.

May 15 2019 - Commons PAC - Oral Evidence

Q8 Chair: If there is not a spending review, is there a possibility of further delay to HS2?

Bernadette Kelly: I don't think that the delivery of the project is dependent on the spending review. The question is, when is it sensible to put into the public domain revised business cases and so on? It is more sensible to do so, obviously, when you have gone through those significant moments of public spending and everything else.

Ms Kelly did not tell Commons PAC that she knew phase 1 was 3 years late, when asked the direct question "is there a possibility of further delay to HS2?"

Q15 Bernadette Kelly: Those are exactly the assessments that are currently being made about this project—the sensible steps that need to be taken to manage cost, the impact those steps will have on the benefits and whether we are still confident that this project has a solid BCR. It has a BCR of 2.3 on current parameters, which is pretty solid.

Q19 Chair: Again, as the accounting officer for the Department, you must be looking closely at the business case to make sure that the BCR ratio that you talked about stays at a good level.

Bernadette Kelly: Correct.

Q20 Chair: Is there a point at which you would have concerns?

Bernadette Kelly: Clearly, if this project was getting close to no longer having a positive BCR, absolutely, as accounting officer, I would have concerns. As I say, given that it has a BCR of 2.3, I think you would have to see a very large increase in costs and a very large decrease in benefits to get to that point.

Ms Kelly stated the current BCR was 2.3 when she had calculated that as of 3/4/19 knew that BCR was already lower at a maximum of 2.1 & with the figures available in the draft Stocktake she would have known it was much lower at 1.5: 1 & note it is Benefit COST Ratio NOT Benefit CURRENT BUDGET Ratio

May 2019 – NAO HS2 Report – Figure 6

HS2 Ltd estimates that forecast costs for Phase One have further increased

The Department concludes that Phase One could be made affordable within the available funding with significant changes, including a combination of savings, scope reductions and alternative financing.

HM Treasury informs the Department that it agrees HS2 Ltd should be given six more weeks to scrutinise costs for savings opportunities.

The Secretary of State directs that preparations are made for a pre-summer parliamentary recess decision on whether, and if so, how to progress with the programme.

The SofS asks for a decision on 'whether to progress with HS2'

The above show that the SofS, DfT & the Treasury decided to push the formal decision on HS2 past the final debate on phase 2a on July 15th 2019.

May 2019 - NAO HS2 Report - 1.16

In May 2019, the Department recognised that it needed to prepare for a fundamental decision on how to proceed with the programme before the summer 2019 parliamentary recess. It assessed that Phase One could be made affordable with significant changes, including a combination of applying savings and scope reductions and securing alternative financing. The Department recognised that these changes carried risks, **and would require the consent of Parliament and stakeholder support**. For example, savings identified to date were based on estimates and may not be achieved and scope changes could adversely affect the value for money of the programme.

Again it is noted that if they changed the route / scope it would require a return to parliament for review – it was mentioned by Clive Maxwell & it is mentioned in the NAO report – but significantly nowhere is it discussed further. Also it should be noted that any reduction in scope would adversely affect the value for money ie the benefit cost ratio (BCR) – the largest user benefit is time saved at £39bn – as such factors such as reducing the speed, which would generate significant savings ie no slab track, cheaper tunnels & cheaper trains could not be considered or the BCR would fall well below 1:1

Jun 7 2019 - HS2 Preliminary draft stocktake delivered to DfT

https://www.whatdotheyknow.com/request/725357/response/1740820/attach/html/4/F0019437%20and%20F0019493%20Annex%20a.pdf.html

Jun 25 2019 - HS2 Phase 2a Debate (Second Sitting) - Column 45

Nus Ghani was again asked about spiralling costs & again did not inform MP's of the known increase & answered "The total funding envelope for HS2 remains at £55.7 billion in 2015 prices. The Department is keeping a firm grip on costs, and HS2 Ltd is working with its supply chain to ensure that that continues".

Ms Ghani would have read the draft Stocktake by this debate & know that costs were now at least £20bn over budget, so she knew that the department was NOT keeping a firm grip on costs.

https://hansard.parliament.uk/Commons/2019-06-25/debates/1a3aa6f5-cf1a-440e-877b-3a55bd8bf435/HighSpeedRail(WestMidlands-

Crewe)Bill(SecondSitting)?highlight=hs2#contribution-34048D1D-B87B-4FFF-930F-

740D48F19D06

Jun 26 2019 - HS2 Board Minutes

3.1.1 Engagement with DfT and wider stakeholders on the interim draft Stocktake;

Shows Allan Clarke discussed the Stocktake with DfT & major stakeholders, but not Commons PAC, Transport SC & MP's

Jun 2019 – NAO HS2 Report – Figure 6

Chairperson of HS2 Ltd informs the accounting officer that there is no prospect of HS2 Ltd being able to deliver Phase One within the available funding or on time and provides the Department with a draft report from their review of the programme (Stocktake).

The Infrastructure and Projects Authority undertakes a review and concludes that successful delivery is unachievable. HM Treasury undertakes a progress review suggesting further scrutiny of risks to the programme and contingency is needed.

Major Projects Review Group (MPRG) discusses programme options to present to ministers, with a preference to maintain work on Phase One while continuing to look at ways of making savings.

Jul 10 2019 - Westminster Hall Debate

HS2 costs were questioned multiple times by Andrea Leadsom, Barry Sheerman, Andrew Bridgen, Kelvin Hopkins & Rachel Maskell

Ms Ghani - We need to ensure that we are always using taxpayers' money properly and transparently.

HS2 will continue on track

Hardly transparent as HS2 was not on track and Ms Ghani failed to inform the debate that she had been informed 3 months before on Apr 3 HS2 phase 1 was at least £7bn over budget & delayed by at least 3 years & she had also seen the draft Stocktake delivered to DfT on Jun 7 which showed that HS2 was at least £20bn over budget & delayed by 5-7 years, but she inferred that the current cost was still £55.7bn by stating "HS2 will continue on track"

https://hansard.parliament.uk/Commons/2019-07-10/debates/D1711C1B-3AF7-492D-9802-2FF0AC25266C/HighSpeed2#contribution-1948F956-D175-4737-A1CC-71BCC8571B66

Jul 15 2019 – HofC HSR Debate (WM – Crewe)

HS2 spiralling costs were questioned by Jim Cunningham, Rachael Maskell, John Redwood, Steve McCabe, Ivan Lewis, Jeremy Lefroy, William Cash, Mike Amesbury, Fiona Bruce, William Wragg, Antoinette Sandbach & Owen Paterson,

Jeremy Lefroy - We started off with a figure of about £35 billion or £36 billion. The latest figure is somewhere around £55 billion. My hon. Friend and I have seen credible estimates upwards of £80 billion. Should the House not know what it is actually voting for tonight? How much will it be?

Ms Ghani (7.15pm Column 647): I can confirm for my hon. Friend and others that there is only one budget for HS2, and it is £55.7 billion. The bit we are talking about today, phase 2a, is £3.5 billion. The benefit-cost ratio is £2.30 for every £1 spent.

Ms Ghani was asked about costs by 14 MP's & asked directly about current costs by Jeremy Lefroy, she mislead the house by restating the current budget as if it were the current cost & lied to the house when she stated that the BCR was 2.3 when she knew it was then much lower at 1.5:1.

https://hansard.parliament.uk/Commons/2019-07-15/debates/493EDA4B-046B-4270-A747-EF3133D99573/HighSpeedRail(WestMidlands-Crewe)Bill#contribution-2AAFD6DC-69AE-4ACC-B884-7352609A06A4

July 17 2019 – HS2 Stocktake formally delivered DfT

It should be noted that the HS2 Stocktake was conveniently 'formally' delivered to the DfT 2 days after the phase 2a debate, even though it had been materially finished 3 months prior in March / April 2019 & the DfT had already received 2 draft copies in June & July

https://webarchive.nationalarchives.gov.uk/20200204050620/https://www.gov.uk/government/organisations/high-speed-two-limited/about/our-governance#board-meeting-minutes

July 19 2019 – FT Stocktake figure leaked

Allan Cook, the new chairman of HS2 who took over in December last year, has written to Bernadette Kelly, permanent secretary at the Department for Transport, to warn that the entire rail project cannot be completed for the official £56bn budget. Mr Cook's preliminary findings predict the final cost of building the line could now rise to between £70bn and £85bn, according to two people close to the HS2 project.

https://www.ft.com/content/27ab2f5c-a976-11e9-984c-fac8325aaa04

Jul 23 2019 – HS2 Phase 1 Accounting Officers Assessment 2

However, the enabling nature of the Phase One scheme means that the value for money position for the 'Full Y' HS2 scheme remained intact.

Despite this, the value for money category fell to 'low' (BCR of 1.3 including WEIs).

Jul 2019 - NAO HS2 Report - Figure 6

Officials provide the accounting officer and HS2 Ltd chief executive with updated advice, which concludes that Phase One is unaffordable but the value for money of the programme remains compelling.

The Department concludes that it has sufficient evidence on the revised cost forecast and schedule developed by HS2 Ltd to conclude that Phase One is not affordable within the available funding and scope requirements and that it was no longer feasible for Phase One to open in 2026.

Chairperson of HS2 Ltd provides the Department with their final report from their review of the programme.

Nov 2019 - NAO HS2 Report - Figure 6

The Infrastructure and Projects Authority undertakes a review and concludes that, until Phase One's schedule and budget are reset, successful delivery of the programme appears to be unachievable.

Based on HS2 Ltd's completed estimate, the Department approves a cost and schedule estimate for Phase One setting a range of between £31 billion and £40 billion, between £3.9 billion and £12.9 billion more than the available funding. HS2 Ltd's point estimate is £30.1 billion.

Dec 16 2019 - HS2 Phase 1 Accounting Officers Assessment 3

Phase One is designated 'low' value for money by the DfT, with a BCR of 1 including WEIs.

The 'full Y' network, which comprises all three phases of the scheme delivers 'medium' value for money with a BCR of 1.6.

FOIs have eventually established that the BCR of 1.6:1 is based on passenger numbers of 342,000 / day for 60 years, but the 'do nothing' pfmV9 DfT forecast for 2040 on the HS2 main routes is only 56,000 / day (3.2.4) & the HS2 Business Case (Fig 1.11)only forecasts 115,000 passengers / day on HS2 main routes. The crucial 342,000 figure was not made

available in the HS2 Business case or any of the pfmv9 multiple documents. This indicates that the true HS2 BCR is around 0.5:1

https://www.whatdotheyknow.com/request/788947/response/1890012/attach/html/3/FOI %204381%20Response..pdf.html

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902098/PFMv9 Forecasting Report Revision1.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/939905/full-business-case-hs2-phase-one.pdf

Mar 4 2020 - Commons PAC HS2 Spring Update - Oral Evidence

Q41 Huw Merriman: The challenge here is that when I refer to HS2's most recent annual report, from July 2019, it reads that everything is going swimmingly. There are 95 pages and "delay" is not mentioned once. Back in 2019, everything was running to budget and going well, despite the undercurrent of issues we are talking about. Yet, all of a sudden, it just blows up. I want to ask Ms Kelly, when was the Department aware? How much of the Department was aware? Were Ministers aware of these overruns as well? Why was there such little transparency?

Q42 Huw Merriman: The NAO Report is, but I was challenging you on HS2's most recent report, published back in July 2019, which reads very differently from the NAO Report, which was six months later.

Allan Cook & Mark Thurston passed off the 2018-19 Annual Report, with the no mention of the cost increase & delays in the Strategic Report. The annual report would have been written from April onwards & was not published until July 18th & the April board minutes confirm that the Stocktake was materially finished & as such AC & MT would be fully aware of the £22bn cost increase & 5 – 7 year delay, however this was not reported in Strategic Report section of the Annual report, which is an offence under the Companies Act 2006

Bernadette Kelly:. You are quite right that we did know from that point on and all through 2019 that there were very significant cost pressures. As I say, we were pursuing actions that we hoped might lead to us finding a way to manage those cost pressures. That is the reason why Ministers did not necessarily wish to report and announce them publicly while those plans were being pursued.

There is no evidence of any pursuing of actions to manage cost pressures, the Stocktake was started in Feb 2019 & materially finished in April 2019 & HS2 Ltd Board Minutes / DfT communications & the NAO Report show that drafting of the Stocktake was the only action being pursued

Q50 Sir Geoffrey Clifton-Brown: Sorry, Ms Kelly, I am going to have to ask you a fairly direct question. You came before this Committee twice: in October 2018, when you had had the formal warning notice; and then on 15 May 2019, when you had had the formal notification that the terms had been breached. On both occasions you assured the Committee that the budget of £55.7 billion was on track. I put it to you—you may shake your head—that, in answer to question 10 on 15 May 2019, you said, "That is absolutely a key parameter and I don't see it changing in any other way than in a spending review and quite probably not then." I put it to you that you had serious knowledge that this project was off track and you didn't inform the Committee.

Bernadette Kelly: I did not say that the project was on track. I said that £55.7 billion remained the budget, which it was. I think I alluded to the possibility that that parameter would need to be changed in the spending review, which was obviously something that we were contemplating internally at that point. Ministers had not determined at that point how they wanted to proceed with this project. Alternatives and options were still being pursued, in good faith I think, to see whether there were choices that could be made to bring the project back within budget around scope, and those decisions had not been concluded.

There is no evidence of any alternatives & options being pursued, the Stocktake was started in Feb 2019 & materially finished in April 2019 & HS2 Ltd Board Minutes / DfT communications show that presentation of the Stocktake was the only option being pursued internally & whilst several bodies reviewed the budget externally no savings were found.

https://committees.parliament.uk/oralevidence/116/default/

7/05/20

Commons Public Accounts Committee - HS2 Spring 2020 Update

Summary-

At best, the Department for Transport's (the Department's) previous evidence to the Committee has been less than clear.

The Department withheld information from us which would have given a clearer and more accurate picture of the budget and schedule pressures the project was facing.

With so many peoples' homes and livelihoods affected by the construction of the railway, there is no justification for the Department and HS2 Ltd having been so opaque about the delays and budget overruns.

Conclusions and recommendations-

- 1. The Department and HS2 Ltd's lack of transparency has undermined public confidence in the programme. The Department and HS2 Ltd were aware of the scale of the issues facing the programme as early as October 2018. In March 2019 HS2 Ltd formally notified the Department that it could not deliver Phase One to budget and schedule. Despite being aware of these issues, the Permanent Secretary withheld from us that the programme was in significant difficulty when she appeared before the previous Committee in October 2018 and May 2019, even in response to specific questions about the programme's delivery timeline and budget. HS2 Ltd's annual report and accounts for the year ending 31 March 2019 similarly failed to give an accurate account of the programme's problems. The Department and HS2 Ltd defended their actions, stating that there were commercial sensitivities, and that options were still being pursued to remedy the situation. While we recognise that ministers had not yet decided how to proceed, no adequate excuse was provided for not disclosing to this Committee and Parliament the risk and uncertainty the programme was facing. We are disappointed by the Permanent Secretary's response to our concerns about her failure to explicitly inform the Committee of the programme's delays and overspend when asked about the general health of the project. This was something that an accounting officer should share with the Committee. Failure of an Accounting Officer to provide accurate information to Parliament is potentially a breach of the Civil Service Code and a breach of Parliamentary Privilege. Lack of clarity and obfuscation about the budget issues with HS2 risks jeopardising the trust between Parliamentary committees and Government officials
- 2. The Department failed to provide Parliament with clear warning that the programme was going off-course and value for money was at risk. Accounting Officer assessments are a tool for providing assurance over public spending by considering whether a programme is justified against the four standards of feasibility, regularity, propriety, and value for money. HM Treasury requires that updated assessments should be produced when a programme departs from these standards or the plan agreed when the programme was first approved. A summary of each assessment should then be shared with Parliament. However, the Department did not fulfil this requirement, and failed to share with Parliament summaries of any of the four Accounting Officer assessments on Phase One of the programme made in 2019. Therefore, Parliament did not know the difficulties the programme was facing or the actions being taken in response. We are deeply concerned that the High Speed 2: Spring 2020 update Accounting Officer appeared not to know that summaries of these assessments should be shared with Parliament, despite publishing a summary on the East Coast Main Line Enhancements Programme in January 2019, and despite multiple calls from this Committee to do so in recent years.

Transparency & Oversight -

5. We questioned the Department on why it had not informed Parliament about the true status of the programme, despite the significant issues it was facing. In October 2018, the Permanent Secretary appeared before the Committee and stated that the delay to notice to update proceed to construction would not affect the overall programme She appeared again in May 2019, after the breach notice had been served by HS2 Ltd, and alluded that scope options were being examined to manage the affordability of the programme. She did not clearly set out that the programme was facing serious difficulties. In our most recent session we asked the Department and HS2 Ltd why the HS2 Ltd annual report and accounts for 2018–19 did not set out a forthright account of the programme's status. There is no mention of delays or that costs had exceeded the budget. Instead, there were minor references to "cost and schedule pressures" leading to the revision of notice to proceed, which has allowed "better definition of the scope, cost and schedule."

8. HM Treasury guidance states that, in addition to producing an Accounting Officer assessment for projects or programmes within the Government's Major Projects Portfolio alongside an approval of the Outline Business Case, it is good practice to prepare an assessment for "each novel and contentious transaction or proposal". An assessment should also be prepared if a project departs from the four standards of regularity, propriety, value for money and feasibility, or the agreed plan in terms of cost, benefits, timescales, or level of risk. HM Treasury guidance says that Parliament should be provided with a summary of the key points of an Accounting Officer assessment, which is then shared on the Government website, deposited in the Library of the House of Commons, and sent to the C&AG and HM Treasury Officer of Accounts. If the content is too sensitive for publication, the Accounting Officer should instead inform the Chair of the Committee of Public Accounts. The Department and HS2 Ltd can only authorise the start of main civil construction when certain criteria have been met, including assurance that the programme is affordable and value for money

https://committees.parliament.uk/publications/1113/documents/9542/default/

Chair's comments

Commenting on the report, Committee Chair Meg Hillier MP said:

"The Committee is concerned about how open the Department and HS2 Ltd executives have been in their account of this project. It is massively over budget and delayed before work has even begun. There is no excuse for hiding the nature and extent of the problems the project was facing from Parliament and the taxpayer. The Department and HS2 appear to have been blindsided by contact with reality – when Phase One started moving through Parliament, the predicted costs of necessary commitments to the communities affected have exploded from £245 million to £1.2 billion.

Member's comments

The Committee's Deputy Chair Sir Geoffrey Clifton-Brown MP said:

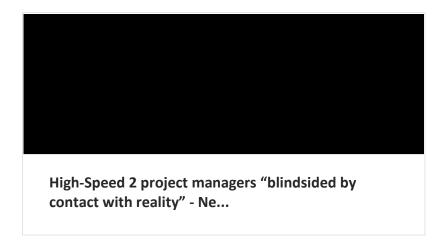
"This PAC report on HS2 is one of the most critical, in both the transparency of Government and the handling of a project, that I have seen in my nine years in total on the committee.

"The Permanent Secretary appeared before the committee in October 2018 and again in May 2019. In March 2019 HS2 Ltd formally told the Department it had breached the terms of the Development Agreement, and would be unable to deliver the programme to cost and schedule – yet the Permanent Secretary did not inform the committee on either appearance that the programme was in trouble.

"This is a serious breach of the department's duty to Parliament and hence to the public, which as the report says, will undermine confidence. Furthermore, the PAC was in the dark about serious cost overruns and was therefore unable to do its duty to inform Parliament that value for money on the project was at risk.

"The cost overruns have been blamed partly on the speed that the hybrid Bill committee for Phase One proceeded with. I was a member of that committee, which lasted for 20 months: this is complete nonsense."

High-Speed 2 project managers "blindsided by contact with reality" - News from Parliament



Committee publish report on High Speed 2: Spring 2020 Update

19/05/20

Baroness Vere confirmed that no DFT Ministerial Directions have been sought by either accounting officer with respect to HS2.

June 10 2020 - Letter from B. Kelly to Commons PAC

When I appear to provide evidence, I have to balance my responsibilities as a witness to Parliament, as a civil servant accountable to Ministers and acting on their behalf, and as an Accounting Officer with a responsibility to protect value for money

As the project cost to the public rose by 56%, the above statement makes no sense – Ms Kelly clearly failed in her responsibility to protect value for money

Ministers had not taken decisions on how they wished to proceed or informed Parliament on these matters. In such circumstances, I believe it would have been inappropriate for me to volunteer detailed information to the Committee, which questioning did not seek.

Ms Kelly did volunteer detailed information on the BCR, which she knew was incorrect & the Committee did seek specific information on project delays & Ms Kelly did not inform them of the known 3 year delay.

As set out above and in the NAO report, commercially sensitive negotiations were continuing with contractors throughout this period, and internal policy options to make savings were under consideration.

There is no evidence of any negotiations with contractors or options to make savings, the Stocktake was started in Feb 2019 & materially finished in April 2019 & HS2 Ltd Board Minutes / DfT communications show that presentation of the Stocktake was the only option being pursued.

CM had told the SofS that assessments had been made a while ago about other options & that the bill was linked to the current route

Reply from Bernadette Kelly to Lord Berkley Aug 4 2021

From the Permanent Secretary Lord Berkeley House of Lords London SW1A 0PW [Sent via email] 4 August 2021

Dear Lord Berkeley,

I am writing in response to your letter to the Cabinet Secretary dated 9 July 2021. He has asked me to respond to the points in your letter.

Before addressing the concerns in your letter dated 9 July 2021, I set out in the table below cost estimates for HS2 Phase One and Phase 2a (all in 2019 prices, rounded to the nearest billion). Those estimates have been set out in reports to Parliament, including the latest report to Parliament on the progress of HS2 published in March 2021.

HS2 Phase Cost Estimate Range (2019 prices) Phase One £35bn - £45bn Phase 2a £5bn - £7bn

The Department does not accept the cost estimates prepared by Mr Byng which are referenced in your letter dated 9 July 2021. Mr Byng previously provided cost estimates as evidence to the Oakervee Review and there is commentary on these estimates in section 7 of the Review's report.

In respect of the points set out in your letter, I would like briefly to address each of these in turn:

- Parliament was not misled during the passage of the Phase One Act. Genuine cost estimates were provided at the time of the Act's passage. In resetting the budget for HS2 in February 2019, the Government acknowledged that, historically, there has been over-optimism about the costs of delivering HS2. Lessons have been directly applied to the way we have now reset the project with our cost estimates expressed as a range and including an appropriate level of contingency.
- My letter of the 10 June 2020 to the Public Accounts Committee sets out my position in relation to the evidence that I provided to the Committee in March 2019 so I shall not repeat it in detail here. At the time, and indeed at the time that Nusrat Ghani MP was speaking in a debate in the House of Commons in July 2019, the budget for the project remained £55.7bn. Cost and schedule pressures were known and work was continuing to identify options to ensure the overall affordability of the HS2 project this is detailed in the National Audit Office's January 2020 HS2 progress report. This work culminated with further advice on strategic options later in July 2019.
- Parliament has not been misled during the passage of the Phase 2a Act. As indicated in the first bullet above, lessons have been learnt on how costs are estimated. Costs of Phase 2a are expressed as a range, and also include sensible contingency to accommodate unforeseen issues that may emerge during construction, and which are to be expected in major infrastructure projects of this scale and complexity. Updated cost estimates will be also provided for Phase 2b once the Integrated Rail Plan is concluded.

In respect of Old Oak Common Station, my letter to the Public Accounts Committee dated 22 June 2021 was in response to an article in the Financial Times on 20 June which referred to a £1.7bn cost pressure across HS2 Phase One. As stated in that letter the Department does not recognise this figure. This is entirely distinct from Baroness Vere's written answer, HL 14250 (of 25 March) which confirmed the budget allocated by HS2 Ltd for Old Oak Common station only (£1.67bn in 2019 prices).

As you are aware, as part of the Government's decision to proceed with the project new governance arrangements were put in place to significantly increase Ministerial oversight, transparency, and accountability of the HS2 project. The Department has committed to providing six-monthly updates on HS2 to Parliament with the next update due to be provided later this Autumn. We will continue to keep the public, and Parliament, closely informed on the progress of the project.

Yours sincerely,

Bernadette Kelly CB Permanent Secretary

Ms Kelly states 'genuine COST estimates were provided', but at all times when Allan Cook, Ms Kelly & Nus Ghani were asked about costs they replied with 'the current budget is'. She also miskakenly states that the budget was reset in Feb 2019 when it was actually reset in 2020.

Ms Kelly states 'Updated cost estimates will be also provided for Phase 2b once the Integrated Rail Plan is concluded' – IRP was Nov 2021 & updated cost estimates have not appeared.

HIGH COURT OF JUSTICE QB-2022-BHM-QUEEN'S BENCH DIVISION 000044 **Name of Claimant** (1) High Speed Two (HS2) Limited On what day did 9 0 5 2 0 2 2 you serve? (2) The Secretary of State for Transport The date of Name of Defendant 2 0 2 2 9 0 5 service is Persons Unknown & Ors What documents did you serve? Fourth Witness Statement of Julie Dilcock 1. Please attach copies of the documents you 2. Exhibit JAD8 have not already filed with the court. On whom did you serve? The Defendants (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box)] by first class post or other service which provides for By uploading to website: delivery on the next business day https://www.gov.uk/government/publications/hs2-] by delivering to or leaving at a permitted place route-wide-injunction-proceedings [] by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify) [✓] defendant's Being the [] claimant's [] solicitor's [] litigation friend] by other means permitted by the court [] usual residence (please specify) [✓] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] By Document Exchange [] principal office of the partnership [] principal office of the corporation [] by fax machine (.....time sent, where document [] principal office of the company is other than a claim form) (you may want to enclose a copy of the transmission sheet) [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [✓] by other electronic means (..09:49....time sent, where to claim document is other than a claim form) (please specify) [✓] other (please specify) Place of service ordered by the Court in the order made on 28 April 2022 I believe that the facts stated in this certificate of service 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. Full name JULIE AMBER DILCOCK Position or Litigation Counsel (Land & Property) Signed office held (If signing on behalf of firm or

Name of court

Certificate of service

Claimant's Solicitor

Claim No.

company)

Date

1 9 0 5 2 0 2 2

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service					
First class post or other service which provides for delivery on the	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not,					
next business day	the next business day after that day					
Document exchange	The second day after it was left with, delivered to or collected by the					
	relevant service provider provided that day is a business day; or if not, the next business day after that day					
Delivering the document to or	If it is delivered to or left at the permitted address on a business day					
leaving it at a permitted address	before 4.30pm, on that day; or in any other case, on the next business day after that day					
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted					
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent					
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day					

DETAILS OF SERVICE

I, **JULIE AMBER DILCOCK**, of High Speed Two (HS2) Limited, Two Snowhill., Snow Hill Queensway, Birmingham, B4 6GA state as follows:

- 1. I am a solicitor of the Senior Courts of England and Wales and employed by the First Claimant as Litigation Counsel (Land & Property).
- 2. Unless otherwise stated, all facts and matters set out in this Witness Statement are 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.
- 3. On 19.05.2022 I instructed Nick Jones, Senior Digital Media and Content Manager for the First Claimant to upload the following documents to the website: https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings:
 - (a) Fourth Witness Statement of Julie Dilcock; and
 - (b) Exhibit JAD8.
- 4. Copies of all of the above documents have already been filed with the Court.
- 5. At 12:21 on 19.05.2022, Nick Jones confirmed to me that the upload was complete and I checked the website and noted that the documents were available to view and download. A screenshot of the website showing the documents is here:

Notice

GOV.UK

HS2 route-wide injunction proceedings

Information regarding HS2 route-wide injunction proceedings. These exhibits contain strong and/or abusive language and scenes of violence that some may find disturbing.

From: High Speed Two (HS2) Limited

Published 30 March 2022

Last updated 19 May 2022 — See all updates



Documents



43. Exhibit JAD8

PDF, 35.5 MB, 169 pages



42. Fourth Witness Statement of Julie Dilcock

PDF, 126 KB, 14 pages



41. Amended draft order (6 May 2022)

PDF, 77.7 KB, 13 pages

and a screen shot of the section of the website that shows when updates are made is here:

Published 30 March 2022 Last updated 19 May 2022 - hide all updates

19 May 2022

These documents were added: 42. Fourth Witness Statement of Julie Dilcock, and 43. Exhibit IADR

6 May 2022

New document added: 41. Amended draft order (6 May 2022)

4 May 2022

New document added: 40. Notice of Change of Legal Representative

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:

JULIE AMBER DILCOCK

Dated: 19 May 2022

Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION **Name of Claimant** (1) High Speed Two (HS2) Limited On what day did 2 9 5 0 2 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 9 5 2 2 2 Persons Unknown & Ors What documents did you serve? Fourth Witness Statement of Julie Dilcock; and Please attach copies of the documents you have not Exhibit JAD8 already filed with the court. On whom did you serve? Deborah Mallender (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place Being the [] claimant's [X] defendant's [] by personally handing it to or leaving it with (.....time left, where document is other than a] solicitor's [] litigation friend claim form) (please specify) [] usual residence [] last known residence [] place of business] by other means permitted by the court [] principal place of business (please specify) [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] By Document Exchange [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [] by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy to claim of the transmission sheet) [X] other (please specify) [X] by other electronic means (12:30 and 14:59 time sent, where document is other than a claim form) (please specify) By Email and Secure File Transfer Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name Position Signed M. E. Ramaelough or office Senior Associate Solicitor

Name of court

Claim No.

held

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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Certificate of service										Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044					
On what day did you serve? 1 9 / 0 5 / 2 0 2 2										Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport					
The date of service is	1 9	/	0	5	/	2	0	2	2		Name of Defendant				
		_			•						Persons Unknown & Ors				
What documents di Please attach copies of the already filed with the cou	e docume			ve no	ot				1. 2.		rth Witness Statement of Julie Dilcock; and ibit JAD8				
On whom did you so (If appropriate include the director).		n e.g.	partn	er,		F	layd	n C	hick						
How did you serve to (please tick the appropried by first class posterior delivery on the by delivering to	te box) ost or otl next bu	ner s	servio ss da	У				es f	or		Give the address where service effected, include fax or DX number, e-mail address or other electronic identification				
[] by personally h (tim claim form) (ple	anding i e left, w	t to here	or le	avin	ıg it	with	า	tha	n a		Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend [] usual residence				
[] by other mean (please specify)	[] by other means permitted by the court (please specify)							 [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership 							
[] By Document E	xchange	9									 [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim [X] other (please specify) 				
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Signed	g. R	ja	ma	ele	OU	51	,				Position or office Senior Associate Solicitor held				

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Cartifica	to c	٠f ،	60	rvi	icc								Name of court Claim No.			
Certificate of service											IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION					
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On what day of you serve?	- 1 9 7 0 5 7 7 0 7 7 7) 2	(1) High Speed Two (HS2) Limited(2) The Secretary of State for Transport					
The date of se	rvice	1	9	/	0	5	/	2	C) 2	!	2	Name of Defendant			
				,									Persons Unknown & Ors			
										rth Witness Statement of Julie Dilcock; and ibit JAD8						
On whom did (If appropriate incodirector).	-			e.g.	partn	er,		ı	Нау	yley	Pit	well	54)			
How did you s				nen	ts?								Give the address where service effected, include fax or DX number, e-mail address or other electronic			
(please tick the ap [] by first cl delivery c	ass pos	st or next	oth bus	ines	s da	у					for		identification			
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claim for	m) (plea	ise sp	ecity,)												
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[] by other	means	neri	mitt	ed h	ov th	ie c	ourt						[] place of business			
(please spec		PC.			,,								[] principal place of business[] last known place of business			
													[] last known principal place of business			
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[] By Docun	nent Ex	cha	nge										[] principal office of the company			
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[] by fax ma is other th		•											corporation within the jurisdiction with a connection to claim			
of the transi				11 7 ()	you n	iuy	wan	10 61	icio	73E U	LUP	У	[X] other (please specify)			
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	that p	roc	eed	ing	s fo	r c	onte	mp	t o	of co	ur	t m	are true. be brought against anyone who makes, or causes to be ment of truth without an honest belief in its truth.			
Full name	MARY I	ELIZ	ABE ⁻	TH E	BARF	RAC	LOL	IGH								
Signed	M. 8		B	a	ma	el	CU	SI	_				Position or office Senior Associate Solicitor held			

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certificate of service		IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION			
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		Persons U	nknown & Ors		
What documents did you serve? Please attach copies of the documents you have not already filed with the court.		rth Witnes ibit JAD8	s Statement of .	Julie Dilcock;	and
On whom did you serve? (If appropriate include their position e.g. partner, director).	Hazel Ball (D9)	1			
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[] by personally handing it to or leaving it w (time left, where document is claim form) (please specify)		Ве		claimant's] solicitor's	[X] defendant's [] litigation friend
[] by other means permitted by the court (please specify) [] By Document Exchange] [] [] []		sidence ness e of business ace of busine incipal place e of the part e of the corp te of the com ness of the pa	ess of business nership poration pany artnership/company/
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Signed M. F. Ramaelous	1,		Position or office held	Senior Asso	ociate Solicitor

Name of court

Cartificate of service

Claim No.

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Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION **Name of Claimant** (1) High Speed Two (HS2) Limited On what day did 2 0 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 9 5 0 2 2 Persons Unknown & Ors What documents did you serve? Fourth Witness Statement of Julie Dilcock; and Please attach copies of the documents you have not Exhibit JAD8 already filed with the court. On whom did you serve? Jacob Harwood (D55) (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place Being the [] claimant's [X] defendant's [] by personally handing it to or leaving it with (.....time left, where document is other than a [] solicitor's [] litigation friend claim form) (please specify) [] usual residence [] last known residence [] place of business] by other means permitted by the court [] principal place of business (please specify) [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] By Document Exchange [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [] by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy to claim of the transmission sheet) [X] other (please specify) [X] by other electronic means (12:30 and 14:59 time sent, where document is other than a claim form) (please specify) By Email and Secure File Transfer Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name Position Signed H. E. Ramaelous or office Senior Associate Solicitor held

Name of court

Claim No.

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service				
First class post or other service	The second day after it was posted, left with, delivered to or collected by				
which provides for delivery on the	the relevant service provider provided that day is a business day; or if not,				
next business day	the next business day after that day				
Document exchange	The second day after it was left with, delivered to or collected by the				
	relevant service provider provided that day is a business day; or if not, the				
	next business day after that day				
Delivering the document to or	If it is delivered to or left at the permitted address on a business day				
leaving it at a permitted address	before 4.30pm, on that day; or in any other case, on the next business day				
	after that day				
Fax	If the transmission of the fax is completed on a business day before				
	4.30pm, on that day; or in any other case, on the next business day after				
	the day on which it was transmitted				
Other electronic method	If the email or other electronic transmission is sent on a business day				
	before 4.30pm, on that day; or in any other case, on the next business day				
	after the day on which it was sent				
Personal service	If the document is served personally before 4.30pm on a business day, it is				
	served on that day; or in any other case, on the next business day after				
	that day				

Certificate of service	Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION	Claim No. QB-2022-BHM- 000044
On what day did you serve? 1 9 / 0 5 / 2 0 2 2	Name of Claimant (1) High Speed Two (HS2) Limite (2) The Secretary of State for Tra	
The date of service 1 9 / 0 5 / 2 0 2 2	Name of Defendant Persons Unknown & Ors	
Please attach copies of the documents you have not already filed with the court. 2. Exh	orth Witness Statement of Julie Dilcock Aibit JAD8	; and
On whom did you serve? (If appropriate include their position e.g. partner, director). How did you serve the documents? (please tick the appropriate box)	Give the address where service DX number, e-mail address or identification	
[] by first class post or other service which provides for delivery on the next business day[] by delivering to or leaving at a permitted place	oweng@gclaw.co.uk and nhal	l@robertlizar.com
[] by personally handing it to or leaving it with (time left, where document is other than a claim form) (please specify)	Being the [] claimant's [X] solicitor's	
[] by other means permitted by the court (please specify)	 [] usual residence [] last known residence [] place of business [] principal place of busines [] last known place of busin [] last known principal place [] principal office of the part 	ess e of business tnership
 [] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet) [X] by other electronic means (12:33 and 14:59 time sent, when the content of the co	to claim [X] other (please specify)	npany
document is other than a claim form) (please specify) By Email and Secure File Transfer	Email address for service order order made on 28 April 2022	red by the Court in the
I believe that the facts stated in this certificate of service I understand that proceedings for contempt of court may made, a false statement in a document verified by a state Full name MARY ELIZABETH BARRACLOUGH	be brought against anyone who m	

Name of court

Claim No.

Signed

M. E. Rawaelough

Position or office held

Senior Associate Solicitor

(If signing on behalf of firm or company)

Date

2 0 0 5 2 0 2 2

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

Claimant's Solicitor

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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held

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

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Name of court Claim No. Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION Name of Claimant (1) High Speed Two (HS2) Limited On what day did 2 9 0 5 0 2 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 9 5 0 2 2 Persons Unknown & Ors What documents did you serve? Fourth Witness Statement of Julie Dilcock; and Please attach copies of the documents you have not Exhibit JAD8 already filed with the court. On whom did you serve? Joe Rukin (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place Being the [] claimant's [X] defendant's [] by personally handing it to or leaving it with (.....time left, where document is other than a] solicitor's [] litigation friend claim form) (please specify) [] usual residence [] last known residence [] place of business] by other means permitted by the court [] principal place of business (please specify) [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] By Document Exchange [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [] by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy to claim of the transmission sheet) [X] other (please specify) [X] by other electronic means (12:30 and 14:59 time sent, where document is other than a claim form) (please specify) By Email and Secure File Transfer Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name Position Signed M. E. Ramaelough or office Senior Associate Solicitor held

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

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Name of court Claim No. Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION **Name of Claimant** (1) High Speed Two (HS2) Limited On what day did 2 9 0 5 0 2 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 9 5 2 0 2 2 Persons Unknown & Ors What documents did you serve? Fourth Witness Statement of Julie Dilcock; and Please attach copies of the documents you have not Exhibit JAD8 already filed with the court. On whom did you serve? Larch Maxey (D32) (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place Being the [] claimant's [X] defendant's [] by personally handing it to or leaving it with (.....time left, where document is other than a] solicitor's [] litigation friend claim form) (please specify) [] usual residence [] last known residence [] place of business] by other means permitted by the court [] principal place of business (please specify) [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] By Document Exchange [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [] by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy to claim of the transmission sheet) [X] other (please specify) [X] by other electronic means (12:30 and 14:59 time sent, where document is other than a claim form) (please specify) By Email and Secure File Transfer Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name Position Signed M. E. Ramaelous or office Senior Associate Solicitor held

	Claimant's Solicitor	(If signing on behalf of firm or
		company)
Date	2 0 0 5 2 0 2 2	

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	served on that day; or in any other case, on the next business day after			
	that day			

Certificate of service									Name of court Claim No. IN THE HIGH COURT OF JUSTICE QB-2022-BHM-0000				
											QUEEN'S BENCH DIVISION		
											Name of Claimant		
On what day did you serve?	1	9	/	0	5	/	2	0	2	2	(1) High Speed Two (HS2) Limited(2) The Secretary of State for Transport		
The date of service is	1	9	/	0	5	/	2	0	2	2	Name of Defendant		
									Persons Unknown & Ors				
What documents did	d vou	Sei	ve?	•						1.	ourth Witness Statement of Julie Dilcock; and		
Please attach copies of th already filed with the cour	e docu				ive n	ot				2.	xhibit JAD8		
On whom did you se			e.g.	partr	ner,		I	_eah	n Old	dfiel	D7)		
director).											Give the address where service effected, include fax		
How did you serve t	he do	cur	ner	ıts?							DX number, e-mail address or other electronic		
(please tick the appropria											identification		
[] by first class po delivery on the						/nic	n pr	OVIC	des i	ror			
[] by delivering to					-	nitte	ed p	lace	è				
[] by personally h											Being the [] claimant's [X] defendant's		
(time claim form) (ple	-			dod	cum	ent	IS O	ther	tha	ın a	[] solicitor's [] litigation frier		
											[] usual residence		
											[] last known residence		
											[] place of business		
[] by other means (please specify)	perr	nitt	ed l	by th	ne co	ourt					[] principal place of business		
([] last known place of business		
											[] last known principal place of business[] principal office of the partnership		
											[] principal office of the corporation		
[] By Document E	xchar	nge									[] principal office of the company		
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made, a false state	emer	nt ir	n a	doc	um	ent	ver	ifie	d b	y a	tement of truth without an honest belief in its truth.		
Full name MARY	ELIZA	ABE ⁻	TH E	BARI	RAC	LOU	IGH						
Signed	0 -	D			n.l.		0				Position		
Signed M.		5	a	M C	EI.	UU	9 (or office Senior Associate Solicitor held		

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

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Claimant's Solicitor	(If signing on behalf of firm or
Date 2 0 0 5 2 0 2 2	company)

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	Claimant's Solicitor	(If signing on behalf of firm or
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Name of court Claim No. Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION **Name of Claimant** (1) High Speed Two (HS2) Limited On what day did 2 9 0 5 0 2 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 9 5 0 2 2 Persons Unknown & Ors What documents did you serve? Fourth Witness Statement of Julie Dilcock; and Please attach copies of the documents you have not Exhibit JAD8 already filed with the court. On whom did you serve? Mark Keir (D36) (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place Being the [] claimant's [X] defendant's [] by personally handing it to or leaving it with (.....time left, where document is other than a] solicitor's [] litigation friend claim form) (please specify) [] usual residence [] last known residence [] place of business] by other means permitted by the court [] principal place of business (please specify) [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] By Document Exchange [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [] by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy to claim of the transmission sheet) [X] other (please specify) [X] by other electronic means (12:30 and 14:59 time sent, where document is other than a claim form) (please specify) By Email and Secure File Transfer Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name Position Signed M. E. Ramaelough or office Senior Associate Solicitor held

	Claimant's Solicitor	(If signing on behalf of firm or
		company)
ate	2 0 0 5 2 0 2 2	

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Certific	Certificate of service									Name of court Claim No. IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044					
										QUEEN'	S BENCH DIVISIO	N			
												Name o	f Claimant		
On what day you serve?	y did	1 9	/	0	5	/	2	0	2	2			High Speed Two The Secretary of		
			7			, I									
The date of is	service	1 9	/	0	5	/	2	0	2	2		Name o	f Defendant		
10			J									Persons	Unknown & Ors		
What docun Please attach co already filed wit	opies of th	e docume			ve n	ot				1. 2.		rth Witn ibit JAD8	ess Statement of	Julie Dilcock;	and
On whom di			ı e.g.	partne	er,		N	lico	ola V	Vood	hou	se			
director).												G	ve the address w	here service	effected, include fax or
How did you (please tick the			mei	nts?								D	K number, e-mail entification		
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[] by pers	sonally h	anding i	t to	or lea	avir	ng it	with	า				ı	Being the [] claimant's	[X] defendant's
(tim orm) (ple	e left, w	here						r tha	an a]] solicitor's	[] litigation friend
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Full name	MARY		TLI	DADD	۸۲۰	O١	Сh								
Full name	IVIAKY	ELIZABE	ıΠ	DAKK	AU	.00	JΠ								
Signed	M.	e.P	a	may	ele	ou	n						Position or office	Senior Asso	ociate Solicitor
	H. E. Ramaelough								held						

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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Certificate of service										Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Rame of Claimant Claim No. QB-2022-BHM-000044			
On what day die you serve?	d	1	9	/	0	5	/	2	0	2	2	(1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
The date of servise	/ice	1	9	/	0	5	/	2	0	2	2	Name of Defendant Persons Unknown & Ors	
What documen Please attach copies already filed with th	of the d	-			u hav	re no	ot				1. 2.	rth Witness Statement of Julie Dilcock; and ibit JAD8	
On whom did you (If appropriate includirector).			ion e	2.g. p	artne	er,		S	ally	Bro	oks		
How did you se (please tick the app. [] by first cla delivery on [] by deliveri	ropriate ss post the ne	box) or o	othe ousii	er se	ervic s day	/					for	Give the address where service effected, include for DX number, e-mail address or other electronic identification	
[] by persona (claim form	.time l	left,	whe				_			tha	n a	Being the [] claimant's [X] defendar [] solicitor's [] litigation f	
[] by other means permitted by the court (please specify) [] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)							ourt		 [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership 				
							vant	to er	iclos	 [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim [X] other (please specify) 			
[X] by other of document By Email and S	is othe	r th	an a	cla	im f						sent	Email address used by the Defendant	
made, a false s	hat pr	oce	edi t in	ngs a d	for	co	nte	mp veri	t of	со	urt i	be brought against anyone who makes, or causes to ment of truth without an honest belief in its truth.	
Signed	1.8	.]	3	an	ray	ele	TU,	91				Position or office Senior Associate Solicitor held	

Name of court

Claim No.

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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or office

held

Senior Associate Solicitor

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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	Claimant's Solicitor		(If signing on behalf of firm or
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Date	1 2 1 0 1 1 0 1 5 1 1	2 0 2 2	

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	or service		IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION	QB-2022-BHM-000044
On what day did you serve?	1 9 / 0 5	2 0 2 2	Name of Claimant (1) High Speed Two (HS2) Limit (2) The Secretary of State for To	
The date of service is	1 9 / 0 5	2 0 2 2	Name of Defendant	
			Persons Unknown & Ors	
What documents di Please attach copies of the already filed with the cou	he documents you have not		urth Witness Statement of Julie Dilcocl	x; and
On whom did you s (If appropriate include th		The Chiltern Soc	iety	
How did you serve to the appropriet the appropriet to the appropri			Give the address where service DX number, e-mail address or identification	
delivery on the	ost or other service when next business day	·		and
	o or leaving at a perminanding it to or leaving	·		and
	ne left, where documer			
			Being the [] claimant's	
[] by other mean	s permitted by the cou	ırt	[] solicitor's	[] litigation friend
(рісизе зресіду)			[] last known residence [] place of business	
			[] principal place of busines [] last known place of busines	
[] By Document I	Exchange		[] last known principal plac	
	e (time sent, claim form) (you may wo		[] principal office of the co	
of the transmission		nt to enclose a copy	[] place of business of the p	
	ronic means (12:30 an ther than a claim form)		to claim	isdiction with a connection
By Email and Secu	re File Transfer		[X] other (please specify) Email address used by the De	fendant
I understand that	-	tempt of court ma	e are true. y be brought against anyone who ement of truth without an honest	
Full name MARY	ELIZABETH BARRACLO	UGH		

Name of court

Claim No.

Certificate of service

Signed

H. E. Ramaelough

Position or office Senior A

Senior Associate Solicitor

Date

2 0 0 5

Claimant's Solicitor

2 0 2 2

(If signing on behalf of firm or company)

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

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Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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Name of court Claim No. Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION **Name of Claimant** (1) High Speed Two (HS2) Limited On what day did 2 9 5 0 2 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 9 5 2 2 Persons Unknown & Ors What documents did you serve? Fourth Witness Statement of Julie Dilcock; and Please attach copies of the documents you have not Exhibit JAD8 already filed with the court. On whom did you serve? Timothy Chantler (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place Being the [] claimant's [X] defendant's [] by personally handing it to or leaving it with (.....time left, where document is other than a] solicitor's [] litigation friend claim form) (please specify) [] usual residence [] last known residence] place of business] by other means permitted by the court [] principal place of business (please specify) [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] By Document Exchange [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [] by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy to claim of the transmission sheet) [X] other (please specify) [X] by other electronic means (12:30 and 14:59 time sent, where document is other than a claim form) (please specify) By Email and Secure File Transfer Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name Position Signed M. E. Ramaelough or office Senior Associate Solicitor held

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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Name of court

Claim No.

	Claimant's Solicitor	(If signing on behalf of firm or
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	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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Name of court

Claim No.

	Cla	iman	t's	Soli	citor					(If signing on behalf of firm or
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Date	2	0		0	5	2	0	2	2	

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Certificate	of s	ervic	е			Name of court Claim No. HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION 000044							
							ne of Claimant	000044					
On what day did you serve?	1 9	/ 0	5 /	2 0	2 2		(1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport						
The date of service is													
What documents did you serve? Please attach copies of the documents you have not already filed with the court. 1. Hearing Bundles													
On whom did you s (If appropriate include director).		sition e.g. _l	partner,	The	Defendants	S							
How did you serve (please tick the approp [] by first class p delivery on the [] by delivering t [] by personally (tin	oriate boo ost or con e next boo or lead handing ne left,	x) ther serv usiness c ving at a g it to or l where do	vice whi day permit	ted plac	ce		Give the address where service DX number, e-mail address or didentification By uploading to website: https://www.gov.uk/governm.route-wide-injunction-proceed	ent/publications/hs2-					
claim form) <i>(p</i>	lease sp	ecify)					Being the [] claimant's [] solicitor's	[✓] defendant's					
[] by other mear (please specify)	ns perm	itted by t	the cou	rt			 [] usual residence [✓] last known residence [] place of business [] principal place of busines 						
[] By Document	Exchan	ge					 [] last known place of business [] last known principal place of business [] principal office of the partnership 						
 [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet) [✓] by other electronic means (15:59time sent, where document is other than a claim form) (please specify) 						 [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connectio to claim [✓] other (please specify) 							
							Place of service ordered by the on 28 April 2022	e Court in the order made					
made, a false stat	proce ement	edings f	or con	tempt	of court m	nay be	true. brought against anyone who nt of truth without an hones						
Signed	ant's Sc	Ricitor			<u></u>		office held	Counsel (Land & Property)					

Name of court

Claim No.

company)

Date

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Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

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	served on that day; or in any other case, on the next business day after
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Published 30 March 2022 Last updated 23 May 2022 - hide all updates

23 May 2022

Document 44 updated.

20 May 2022

New document added: 73. Claimant's Skeleton Argument (Merits)

20 May 2022

New document added: 72. Claimant's Legal Principles Skeleton Argument

19 May 2022

Documents 42-71 uploaded.

19 May 2022

These documents were added: 42. Fourth Witness Statement of Julie Dilcock, and 43. Exhibit JAD8.

6 May 2022

New document added: 41. Amended draft order (6 May 2022)



71. Authorities Bundle

PDF, 15.6 MB, 517 pages



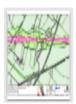
70. Bundle F – Part 4

PDF, 29.6 MB, 73 pages



69. Bundle F - Part 3

PDF, 31.5 MB, 71 pages



68. Bundle F – Part 2

PDF, 27.5 MB, 69 pages



67. Bundle F - Part 1

PDF, 29.3 MB, 71 pages



66. Bundle E

PDF, 41 MB, 494 pages



65. Bundle D – Volume G

PDF, 44.7 MB, 249 pages



64. Bundle D – Volume F – Part 2

PDF, 45.6 MB, 302 pages



63. Bundle D - Volume F - Part 1

PDF, 3.66 MB, 299 pages



62. Bundle D - Volume E - Part 5

PDF, 35.1 MB, 201 pages



61. Bundle D – Volume E – Part 4

PDF, 4.34 MB, 52 pages



60. Bundle D – Volume E – Part 3.3

PDF, 35.2 MB, 11 pages



59. Bundle D – Volume E – Part 3.2

PDF, 41 MB, 13 pages



58. Bundle D – Volume E – Part 3.1

PDF, 48.5 MB, 14 pages



57. Bundle D – Volume E – Part 3.0

PDF, 39.8 MB, 11 pages



56. Bundle D – Volume E – Part 2

PDF, 38.7 MB, 99 pages



55. Bundle D - Volume E - Part 1

PDF, 39.1 MB, 200 pages



54. Bundle D – Volume D

PDF, 19.9 MB, 86 pages



53. Bundle D - Volume C

PDF, 27.9 MB, 601 pages



52. Bundle D – Volume B – Part 2

PDF, 13.3 MB, 302 pages



51. Bundle D - Volume B - Part 1

PDF, 27.6 MB, 299 pages



50. Bundle D - Volume A

PDF, 33.5 MB, 177 pages



49. Bundle C - Volume B - Part 3

PDF, 26.7 MB, 169 pages



48. Bundle C – Volume B – Part 2

PDF, 42.9 MB, 86 pages



47. Bundle C - Volume B- Part 1

PDF, 18.2 MB, 206 pages



46. Bundle C – Volume A

PDF, 47.7 MB, 279 pages



45. Bundle B

PDF, 4.72 MB, 210 pages



44. Bundle A

PDF, 5.59 MB, 326 pages

Certificate (of s	erv	∕ic∈)							Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044
On what day did you serve?	1	9 /	/ 0	5	/	2	0	2	2	2	Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport
The date of service is	1	9 /	0	5	/	2	0	2	2	2	Name of Defendant Persons Unknown & Ors
What documents dic Please attach copies of the already filed with the cour	e docu			ve no	t				1.	Bu	dles for the Hearing on 26 & 27 May 2022: a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and
On whom did you se (If appropriate include the director). How did you serve the served that the appropriate include the appropriate in the served that the appropriate is appropriate in the served that the appropriate is appropriate in the served that th	ir posit ne do te box) st or (next l	other busine	ents? servid	ce w		n pro	ovid			other	Give the address where service effected, include fax or DX number, e-mail address or other electronic identification
[] by personally had (time claim form) (please specify) [] by other means (please specify)	andin e left, ase spe	ng it to where ecify)	o or le	avin _i	g it nt i	with	1	tha	ın a		Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the company
[] by fax machine is other than a confident transmission	claim sheet)	form)	(you n	nay w	ant	to en	close	e a 0	сору		 [] place of business of the partnership/company/ corporation within the jurisdiction with a connectio to claim [X] other (please specify)
[X] by other electr where document is oth									3 ti	me s	t,
By Email and Secure					1 (P	·cuse	υριι	·4 <i>y)</i>			Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Ramaeloust	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor		(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		• "

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The date of service 1 9 / 0 5	2 0 2 2	Name of Defendant Persons Unknown & Ors						
What documents did you serve? Please attach copies of the documents you have not already filed with the court.	1. Bu	a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and						
On whom did you serve? (If appropriate include their position e.g. partner, director).	Caroline Thomse	g. Authorities Bundle. on-Smith Give the address where service	o offected include fax or					
How did you serve the documents? (please tick the appropriate box) [] by first class post or other service who delivery on the next business day [] by delivering to or leaving at a permit [] by personally handing it to or leaving (time left, where document claim form) (please specify)	it with	DX number, e-mail address or identification Being the [] claimant's [] solicitor's	other electronic [X] defendant's					
[] by other means permitted by the council (please specify) [] By Document Exchange	rt	 [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company 						
[] by fax machine (time sent, is other than a claim form) (you may wo of the transmission sheet)		[] place of business of the	[] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim					
[X] by other electronic means (15:18; 15 where document is other than a claim form)								

By Email and Secure File Transfer

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.

Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Rawaeloust	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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On what day did you serve? 1 9 / 0 5 / The date of service 1 9 / 0 5 /	2 0 2 2	Name of Claimant (1) High Speed Two (HS (2) The Secretary of Sta Name of Defendant Persons Unknown & Ors	•				
What documents did you serve? Please attach copies of the documents you have not already filed with the court.		dles for the Hearing on 26 & 2 a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & E d. Bundle D (Volumes A – G e. Bundle E; f. Bundle F; and g. Authorities Bundle.	3);				
On whom did you serve? (If appropriate include their position e.g. partner, director).	Daniel Hooper (D2		e service effected, include fax or				
How did you serve the documents? (please tick the appropriate box) [] by first class post or other service which delivery on the next business day [] by delivering to or leaving at a permitted [] by personally handing it to or leaving it to compare the document is the document i	d place with	Being the [] cla	aimant's [X] defendant's				
claim form) (please specify) [] by other means permitted by the court (please specify) [] By Document Exchange		[] usual residence [] last known reside [] place of business [] principal place of [] last known place [] last known princi [] principal office of [] principal office of	ence f business of business ipal place of business f the partnership f the corporation f the company				
[] by fax machine (time sent, whis other than a claim form) (you may want to of the transmission sheet)		 place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim X other (please specify) 					
[X] by other electronic means (15:18; 15:43) where		nt,					

By Email and Secure File Transfer

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.

Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Ramaeloust	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	_	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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Certificate of service						Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044														
	On what day did you serve?	1	9]/	0	5	/	2	0	2	2		Nan		Speed		(HS2) Limite f State for Tra		oort	
	The date of service is	1	9	/	0	5	/	2	0	2	2			ne of Defe						
	What documents did Please attach copies of the already filed with the court	doci				ve no	ot				1.	Bu	ndles a. b. c. d. e. f.	for the He Bundle A Bundle B Bundle C Bundle D Bundle E Bundle F; Authoriti	; ; (Volur (Volur ; ; and	nes A		022	:	
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	document is oth By Email and Secure					10111	ι (<i>(</i>	ieuse	spec	.цу)				Email	addres	s use	ed by the Def	end	ant	

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Ramaeloust	Position or office held	Senior Associate Solicitor
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The date of service 1 9 / 0 5 / 2 0 2 2	Name of Defendant Persons Unknown & Ors
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On whom did you serve? (If appropriate include their position e.g. partner, director). How did you serve the documents? (please tick the appropriate box)	<u> </u>
 [] by first class post or other service which provides for delivery on the next business day [] by delivering to or leaving at a permitted place [] by personally handing it to or leaving it with (time left, where document is other than a claim form) (please specify) 	Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend
[] by other means permitted by the court	[] usual residence [] last known residence [] place of business
(please specify) [] By Document Exchange	[] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company
 [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet) [X] by other electronic means (15:18; 15:43 and 17:03 times) 	to claim [X] other (please specify)
where document is other than a claim form) (please specify) By Email and Secure File Transfer	Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. S. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
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certificate of service		IN THE HIGH COURT OF JUSTICE QB-2022-BHM-0000		
		QUEEN'S BENCH DIVISION		
		Name of Claimant		
On what day did		(1) High Speed Two (HS2) Limite	- d	
you serve? 1 9 / 0 5 /	2 0 2 2	(2) The Secretary of State for Tr		
you serve.		(=, = = =, = = = =		
The date of service		Name of Defendant		
is 1 9 / 0 5 /	2 0 2 2			
		Persons Unknown & Ors		
What documents did you serve?	1. Bu	indles for the Hearing on 26 & 27 May 2	2022:	
Please attach copies of the documents you have not		a. Bundle A;		
already filed with the court.		b. Bundle B;		
		c. Bundle C (Volumes A & B);		
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		e. Bundle E;		
		f. Bundle F; and g. Authorities Bundle.		
On whom did you serve?	Haydn Chick	g. Authorities Bundle.		
(If appropriate include their position e.g. partner,	Trayuri Cirick			
director).		1		
		Give the address where service		
How did you serve the documents?		DX number, e-mail address or identification	other electronic	
(please tick the appropriate box)[] by first class post or other service which	provides for	identification		
delivery on the next business day	provides for			
[] by delivering to or leaving at a permitted	l place			
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[] by personally handing it to or leaving it v	vith	Being the [] claimant's	[X] defendant's	
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claim form) (please specify)		[] solicitor s	[] intigation intend	
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		[] last known residence		
L		[] place of business		
[] by other means permitted by the court		[] principal place of busines	SS	
(please specify)		[] last known place of busin		
		[] last known principal place		
		[] principal office of the par		
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[] By Document Exchange		[] place of business of the p		
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is other than a claim form) (you may want to		to claim	isaiction with a conficction	
of the transmission sheet)	s erretose a copy	[X] other (please specify)		
[X] by other electronic means (15:18; 15:43	and 17:02 time s			
where	anu 17.05 time S	CIII,		
document is other than a claim form) (ple	ase specify)			
By Email and Secure File Transfer	1 07	Email address used by the Def	fendant	

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor		(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		• •

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Certificate of service	Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044
On what day did you serve? 1 9 / 0 5 / 2 0	Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport Name of Defendant
is 1 9 / 0 5 / 2 0	Persons Unknown & Ors
What documents did you serve? Please attach copies of the documents you have not already filed with the court.	 Bundles for the Hearing on 26 & 27 May 2022: a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and g. Authorities Bundle.
On whom did you serve? (If appropriate include their position e.g. partner, director). How did you serve the documents? (please tick the appropriate box)	Give the address where service effected, include fax or DX number, e-mail address or other electronic identification
 by first class post or other service which provides delivery on the next business day by delivering to or leaving at a permitted place by personally handing it to or leaving it with (time left, where document is other the claim form) (please specify) 	Being the [] claimant's [X] defendant's
[] by other means permitted by the court (please specify)	[] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership
 [] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a confidence of the transmission sheet) [X] by other electronic means (15:18; 15:43 and 17:10) 	[] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim [X] other (please specify)
where document is other than a claim form) (please specify By Email and Secure File Transfer	Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	M. E. Karraelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

Calculation of deemed day of service of a claim

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Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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	that day

Certificate of	of service	11	N THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION	QB-2022-BHM-000044
On what day did you serve?	1 9 / 0 5 / 2	0 2 2	lame of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Tra	
The date of service is	1 9 / 0 5 / 2	0 2 2	lame of Defendant ersons Unknown & Ors	
What documents did Please attach copies of the already filed with the cour On whom did you se (If appropriate include the.	e documents you have not t.	a k c		022:
delivery on the i	e box) st or other service which propert business day or leaving at a permitted planding it to or leaving it with	ace n	Give the address where service DX number, e-mail address or o identification Being the [] claimant's [] solicitor's	
	permitted by the court		 [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of busine [] last known principal place [] principal office of the part [] principal office of the corp 	ess of business nership poration
is other than a c of the transmission	(time sent, where	nclose a copy	 [] principal office of the com [] place of business of the pactor corporation within the jurito claim [X] other (please specify) 	artnership/company/
where	ner than a claim form) (please		Email address used by the Defe	endant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. S. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	•	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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Certificate of service							IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044					
On what day did you serve?	1	9 /	0	5	/	2	0		2	2		Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport
The date of service is	1 9	9 /	0	5	/	2	0		2	2		Name of Defendant Persons Unknown & Ors
What documents did Please attach copies of the already filed with the cour	docum			ve no						1.	Bu	dles for the Hearing on 26 & 27 May 2022: a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and g. Authorities Bundle.
On whom did you set (If appropriate include the director). How did you serve the (please tick the appropriate [] by first class pool delivery on the [] by delivering to	ir positic ne doc e box) st or of next bu	ther so	i ts? ervio	ce wh		pro	vid	les		er (I	D10	Give the address where service effected, include fax or DX number, e-mail address or other electronic identification
[] by personally had (time claim form) (plea	e left, v	where						th	an	ı a		Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend [] usual residence [] last known residence
[] by other means (please specify)	permi	itted b	by th	ie co	urt							 [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership
 By Document Ex by fax machine is other than a cof the transmission X by other electrowhere 	(laim fo sheet)	t orm) ()	you n	nay w	ant t	o en	clos	e a	со	ру		 [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim [X] other (please specify)
document is oth				form	(ple	rase_	spec	cify,)			Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH										
Signed	H. E. Ramaelough	Position or office held	Senior Associate Solicitor								
	Claimant's Solicitor		(If signing on behalf of firm or company)								
Date	2 0 0 5 2 0 2 2										

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Certificate of service		Name of court Claim No.				
certificate of service		IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION	QB-2022-BHM-000044			
		Name of Claimant				
On what day did	2 0 2 2	(1) High Speed Two (HS2) Limite	ed			
you serve?	2 0 2 2	(2) The Secretary of State for Tr	ansport			
The date of service 1 9 / 0 5 /	2 0 2 2	Name of Defendant				
		Persons Unknown & Ors				
What documents did you serve?	1. Bui	ndles for the Hearing on 26 & 27 May 2	2022:			
Please attach copies of the documents you have not		a. Bundle A;				
already filed with the court.		b. Bundle B;				
		c. Bundle C (Volumes A & B);				
		d. Bundle D (Volumes A – G);				
		e. Bundle E;				
		f. Bundle F; and				
		g. Authorities Bundle.				
On whom did you serve? (If appropriate include their position e.g. partner,	lain Oliver (D39)					
director).						
How did you serve the documents? (please tick the appropriate box) [] by first class post or other service which delivery on the next business day [] by delivering to or leaving at a permitte [] by personally handing it to or leaving it (time left, where document is claim form) (please specify)	d place with	Being the [] claimant's	and [X] defendant's			
		[] solicitor's	[] litigation friend			
		[] usual residence				
[] by other means permitted by the court		[] last known residence				
(please specify)		place of business				
		[] principal place of busines	S			
		[] last known place of busin				
		[] last known principal place				
		, , ,				
[] By Document Exchange		[] principal office of the par	·			
		[] principal office of the cor	•			
[] by fax machine (time sent, w	here document	[] principal office of the cor				
is other than a claim form) (you may want	to enclose a copy	[] place of business of the p				
of the transmission sheet)		· ·	risdiction with a connection			
[X] by other electronic means (15:18; 15:4	3 and 17:03 time se	ent, to claim				
where		[X] other (please specify)				
document is other than a claim form) (p	ease specify)		1			
By Email and Secure File Transfer		Email address used by the Def	fendant			

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. S. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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Certificate of service							Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Name of Claimant Claim No. QB-2022-BHM-000044							
On what day did you serve?	1 9 /	0	5 /	2	0	2	2		(1) High Speed (2) The Secret					
The date of service is	1 9 /	0	5 /	2	0	2	2	Name of Defendant Persons Unknown & Ors						
What documents did Please attach copies of the already filed with the cour	e documents y		ve not				1. B	a. b. c. d. e. f.	for the Hearing Bundle A; Bundle B; Bundle C (Volu Bundle D (Volu Bundle E; Bundle F; and Authorities Bur	mes . mes	A & B);	022:		
On whom did you se (If appropriate include the director). How did you serve the	ir position e.g.		er,		Jaco	b Ha	rwoo	d (D55)				effected, include fax or ther electronic		
(please tick the appropriate)[] by first class podelivery on the left[] by delivering to	te box) st or other s next busine	servic ss day	У	·			or		identification					
[] by personally had (time claim form) (plea	e left, where					thai	n a	7 1	Being the	[] claimant's] solicitor's	[X] defendant's		
[] by other means (please specify)	permitted	by the	e cou	t					[] last kno [] place of [] principa [] last kno [] last kno	own r f bus al pla own p own p	esidence	of business		
[] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)									 [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim [X] other (please specify) 					
[X] by other electr where document is oth							time	sent,						
By Email and Secure			J. 111)	picus	ic spe	cijy)]	Email addre	ss us	ed by the Defe	ndant		

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	M. E. Ramaeloust	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor		(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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Certificate of service									IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM- 000044			
On what day did you serve?	1	9]/	0	5	/	2	0	2	2		Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport
The date of service is	1	9	/	0	5	/	2	0	2	. 2		Name of Defendant Persons Unknown & Ors
What documents did Please attach copies of the already filed with the count of the already filed with the count of the diagraph of the diagrap	rve? r position and in left, isse sp	othe busiceaviruments, who pecify)	ee.g. peese.g. peese pee	ts? ervices da t a p or le doc	ce w y perm avin ume	hick itte g it ent i	n proed pl	ovid ace n her	es f	n a	or K	dles for the Hearing on 26 & 27 May 2022: a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and g. Authorities Bundle. Iggs (D6) Give the address where service effected, include fax or DX number, e-mail address or other electronic identification oweng@gclaw.co.uk and nhall@robertlizar.com Being the [] claimant's [X] defendant's [X] solicitor's [] litigation frience [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/corporation within the jurisdiction with a connection
is other than a c of the transmission s [X] by other electro where	sheet))									ne s	to claim [X] other (please specify) nt,
document is oth					form) (p	lease	spec	ify)			Email address for service ordered by the Court in the

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.

order made on 28 April 2022

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. F. Rawaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	_	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		. "

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Certificate	of service		Name of court Claim No. IN THE HIGH COURT OF JUSTICE QB-2022-BHM-00004				
			QUEEN'S BENCH DIVISION				
On what day did you serve?	1 9 / 0 5 /	2 0 2 2	Name of Claimant (1) High Speed Two (HS2) Lii (2) The Secretary of State fo				
The date of service is	1 9 / 0 5 /	2 0 2 2	Name of Defendant				
			Persons Unknown & Ors				
What documents die Please attach copies of the already filed with the countries. On whom did you see	e documents you have not urt.	1. Bu Jessica Maddiso	ndles for the Hearing on 26 & 27 M a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and g. Authorities Bundle.	ay 2022:			
delivery on the	the documents?		Give the address where ser DX number, e-mail address identification	rvice effected, include fax or s or other electronic			
[] by personally h	nanding it to or leaving it le left, where document	with	Being the [] claimal [] solicit [] usual residence [] last known residence				
[] by other means (please specify)	s permitted by the court		[] place of business [] principal place of bus [] last known place of bus [] last known principal public of the	usiness place of business			
is other than a of the transmission	e (time sent, w claim form) (you may want a sheet)	to enclose a copy	corporation within the to claim [X] other (please specify)	•			
[X] by other election where	ronic means (15:18; 15:4	3 and 17:03 time so	ent,				
document is otl By Email and Secur	<u>her than a claim form) (p</u> e File Transfer	lease specify)	Email address used by the	Defendant			

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	M. S. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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Certificate of service							IN Q	IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044												
On what day did you serve?	1 9	/ 0	5	/	2	0	2	2	N	(:	1) Hi	aimant gh Spec e Secre	ed Tv	•	•		sport			
The date of service is	1 9	/ 0	5	/	2	0	2	2				efenda								
What documents did you serve? Please attach copies of the documents you have not already filed with the court.						Bundle a. b.	Persons Unknown & Ors Indles for the Hearing on 26 & 27 May 2022: a. Bundle A; b. Bundle B;													
					10	e Rı	ukir		c. d. e. f. g.	. B	Bundle Bundle Bundle	C (Vol D (Vol E; F; and	ume	s A –						
On whom did you ser (If appropriate include their director).		e.g. partr	ner,		10	ек	UKII	1		1	Give	the add	dress	whe	re serv	vice e	effecte	ed, incl	ude fax	or
How did you serve th (please tick the appropriate [] by first class posicility on the r [] by delivering to [] by personally had (time claim form) (plea	e box) st or oth next bus or leavi anding it	ner servi siness da ng at a p t to or le nere doo	ay perm eavin	itte	d pla with	ce					ident	umber, ificatio	n] c	laiman	t's	[X] defe	endant's	
										ľ	[]	usual last kr			lence					
[] by other means permitted by the court (please specify)								[]	last kr last kr princij	oal place of the color of the c	lace on place of prince of the	s of busing of busing cipal pl of the p of the c	sines ace c partn	of busi ership)					
[] By Document Ex	change										[]	princi	oal o	ffice	of the o	omp	any		mpany/	
by fax machine (is other than a cl of the transmission s	laim for sheet)	m) (you i	may v	vant i	to enc	lose	а сс	ру				corpor to claii] othe	m			juris	diction	າ with	a conne	ection
[X] by other electrowhere								tim	e sent,											
document is other than a claim form) (please specify) By Email and Secure File Transfer								Ema	il addr	ess u	ised b	y the [Defer	ndant						

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. S. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		. //

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Personal service	If the document is served personally before 4.30pm on a business day, it is
	served on that day; or in any other case, on the next business day after
	that day

Certificate of service	Name of court N THE HIGH COURT OF JUSTICE QB-2022-BHM-00004- QUEEN'S BENCH DIVISION				
On what day did you serve? 1 9 / 0 5 / 2 0 2 2	Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport				
The date of service is 1 9 / 0 5 / 2 0 2 2	Name of Defendant Persons Unknown & Ors				
What documents did you serve? Please attach copies of the documents you have not already filed with the court.	ndles for the Hearing on 26 & 27 May 2022: a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and g. Authorities Bundle.				
On whom did you serve? (If appropriate include their position e.g. partner, director). How did you serve the documents? (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day [] by delivering to or leaving at a permitted place [] by personally handing it to or leaving it with (time left, where document is other than a claim form) (please specify)	Give the address where service effected, include fax or DX number, e-mail address or other electronic identification Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend				
[] by other means permitted by the court (please specify) [] By Document Exchange	 [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ 				
 [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet) [X] by other electronic means (15:18; 15:43 and 17:03 time se where document is other than a claim form) (please specify) [By Email and Secure File Transfer 	corporation within the jurisdiction with a connection to claim [X] other (please specify) ent, Email address used by the Defendant				

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	M. E. Karraelough	Position or office neld	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

Calculation of deemed day of service of a claim

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Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service					
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	that day					

Certificate of service										IN ⁻	me of court FHE HIGH COUR [*] EEN'S BENCH DI	_		Claim No. QB-2022-BHM-000044
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On what day did	1 9	/	0	5	/	2	0	2	2		(1) High Speed(2) The Secret			
you serve?											(2) The Secret	ary c	of State for Trai	isport
The date of service is	1 9	/	0	5	/	2	0	2	2	Na	me of Defendan	t		
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direday filed with the cour	ι.										Bundle B;		A Q D).	
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										f.	Bundle F; and			
										g.	Authorities Bui	ndle.		
On whom did you se (If appropriate include the			n artin	~-		L	.eah	Old	field	(D7)				
director).	ιι ρυзιιιυι	re.y.	partire	ег,										
How did you serve the (please tick the appropriate [] by first class post delivery on the incomplete [] by delivering to	te box) st or ot next bu	her s	servic ss da	У					or			e-ma		effected, include fax or ther electronic
[] by personally ha	anding i	it to	or lea	avin	ıg it	witl	h				Being the	[] claimant's	[X] defendant's
(time								tha	n a				1 1: 1: 1	f 1 lbs - c - f - 1
claim form) (plea	ase specij	y)								_		L] solicitor's	[] litigation friend
] usual re	eside	ence	
											[] last known residence			
											[] place of business			
[] by other means	permit	ted	by th	e co	ourt						[] principal place of business			
(please specify)											[] last known place of business			
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											[] principa	al off	ice of the parti	nership
											[] principa	al off	ice of the corp	oration
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By Email and Secure	rne if	ausī	ei .							1	Linan addre	JJ UJ	ca by the bell	

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Ramaeloust	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	_	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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Certificate of service										Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-00004	
On what day did you serve?								Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport			
The date of service is	1	9	/	0	5	/	2	0	2	2	Name of Defendant Persons Unknown & Ors
What documents did Please attach copies of the already filed with the cour of the already filed with the cour of the director). How did you serve the director). How did you serve the (please tick the appropriate include the director). [] by first class pool delivery on the [] by delivering to [] by personally he (time claim form) (please specify)	e doccit. errve? ir pos he de box st or next or le andii	ocur ocur oth busi eavir ng it	ee.g. p ment er se ines: ng at to co	ervices da tapor le doc	er, y erm avin ume	hicl litte g it ent	n pro	ovid ace	es f	or	Bundles for the Hearing on 26 & 27 May 2022: a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and g. Authorities Bundle. ridge (D62) Give the address where service effected, include fax of DX number, e-mail address or other electronic identification Being the [] claimant's [X] defendant's [] solicitor's [] litigation frien [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business
[] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy									 last known principal place of business principal office of the partnership principal office of the corporation principal office of the company place of business of the partnership/company/ corporation within the jurisdiction with a connect 		
of the transmission [X] by other electry where	sheet onic	mea	ans ((15::	18; 1	L5:4	3 ar	nd 1	7:03		to claim [X] other (please specify) sent,
document is oth By Email and Secure					10111	1) (P	ieuse	spec	.цу)		Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. S. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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Certificate (of service		Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION	Claim No. QB-2022-BHM-000044			
On what day did you serve?	1 9 / 0 5 /	2 0 2 2	Name of Claimant (1) High Speed Two (HS2) Limite (2) The Secretary of State for Tr				
The date of service is	1 9 / 0 5 /	2 0 2 2	Name of Defendant Persons Unknown & Ors				
What documents did Please attach copies of the already filed with the cour	e documents you have not	1. Bu	undles for the Hearing on 26 & 27 May 2022: a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and g. Authorities Bundle.				
On whom did you see (If appropriate include the director).		Maren Strandev	<u> </u>	a offected include fav or			
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where	sheet) conic means (15:18; 15:43		[X] other (please specify) ent,				

By Email and Secure File Transfer

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.

Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Rawaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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Certificate of	of service		IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044			
On what day did you serve?	1 9 / 0 5 /	2 0 2 2	Name of Claimant (1) High Speed Two (HS2) Limite (2) The Secretary of State for Tra			
The date of service is	1 9 / 0 5 /	2 0 2 2	Name of Defendant Persons Unknown & Ors			
What documents did Please attach copies of the already filed with the court	e documents you have not	1. Bu	a. Bundle A;b. Bundle B;c. Bundle C (Volumes A & B);	dles for the Hearing on 26 & 27 May 2022: a. Bundle A; b. Bundle B;		
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(If appropriate include their director).		Mark Keir (D36)	Give the address where service	e effected, include fax or		
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is other than a cl of the transmission s		o enclose a copy	to claim [X] other (please specify)			
where	conic means (15:18; 15:4		ent,			
By Email and Secure	ner than a claim form) (pla e File Transfer	ruse specijy)	Email address used by the Def	endant		

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. F. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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Certificate of service		Name o		Claim No.
certificate of service			HIGH COURT OF JUSTICE S BENCH DIVISION	QB-2022-BHM-000044
		QUEEN	3 BENCIT BIVISION	
			f Claimant	
On what day did 1 9 / 0 5 /	2 0 2 2		High Speed Two (HS2) Limite	
you serve?		(2)	The Secretary of State for Tra	ansport
The date of service 1 9 / 0 5 /	2 0 2 2	Name o	f Defendant	
is 1 3 / 0 3 /		D	Halman O One	
		Persons	Unknown & Ors	
What documents did you serve?				022
Please attach copies of the documents you have not	1.		the Hearing on 26 & 27 May 2 ndle A;	022:
already filed with the court.			ndle B;	
		c. Bur	ndle C (Volumes A & B);	
			ndle D (Volumes A – G);	
			ndle E; ndle F; and	
			thorities Bundle.	
On whom did you serve?	Nicola Woodł			
(If appropriate include their position e.g. partner, director).				
unector).		Gi	ive the address where service	effected, include fax or
How did you serve the documents?			X number, e-mail address or o	
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delivery on the next business day	م مام م			
[] by delivering to or leaving at a permitted	a piace			
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claim form) (please specify)		_	[] Solicitor S	[] litigation friend
] usual residence	
] last known residence	
		_ [] place of business	
[] by other means permitted by the court (please specify)		[] principal place of business	S
(рісизе зресіју)] last known place of busine	ess
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document is other than a claim form) (ple	ease specify)	_ _		
By Email and Secure File Transfer		[Email address used by the Defe	endant
1		1 1 1		

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. F. Rawaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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The date of service is	1	9 /	/ 0	5	/	2	0	2	2	Name of Defendant Persons Unknown & Ors	
What documents did Please attach copies of the already filed with the coun	docur			ave n	ot				1.	undles for the Hearing on 26 & 27 May 2022: a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and g. Authorities Bundle.	
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[] by first class post delivery on the r[] by delivering to[] by personally has	next b or lea	ousin aving	iess da g at a ¡	ay pern	nitte	ed p	lace		or	Being the [] claimant's [X] defendant's	
(time claim form) (pled			re do	cum	ent	is ot	:her	tha	n a	[] solicitor's [] litigation friend [] usual residence [] last known residence	
[] by other means permitted by the court (please specify)							 [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership 				
 [] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet) [X] by other electronic means (15:18; 15:43 and 17:03 time sent) 							nclos	 [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim [X] other (please specify) 			
where document is oth By Email and Secure	er th	an a	claim							Email address used by the Defendant	

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Rawaeloust	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	_	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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Certificate of service									Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044		
On what day did you serve?	1	9	/	0	5	/	2	0	2	2	Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport
The date of service is	1	9	/	0	5	/	2	0	2	2	Name of Defendant Persons Unknown & Ors
What documents die Please attach copies of the already filed with the coun	e docı				ave n	ot				1.	Bundles for the Hearing on 26 & 27 May 2022: a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and g. Authorities Bundle.
On whom did you se (If appropriate include the director).			e.g. _i	partr	ner,		S	am	anth	a Sr	thson (D57) Give the address where service effected, include fax or
How did you serve t (please tick the appropria by first class podelivery on the by delivering to	te box st or next	oth bus	ner s sines	ervi ss da	ау					or	DX number, e-mail address or other electronic identification
[] by personally h (time claim form) (ple	e left	, wh	nere						tha	n a	Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend
[] by other means permitted by the court (please specify)							t		 [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/corporation within the jurisdiction with a connection to claim [X] other (please specify) 		
 [] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet) 											
[X] by other electrons where document is other										3 tin	

By Email and Secure File Transfer

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.

Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service	The second day after it was posted, left with, delivered to or collected by
which provides for delivery on the	the relevant service provider provided that day is a business day; or if not,
next business day	the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the
	relevant service provider provided that day is a business day; or if not, the
	next business day after that day
Delivering the document to or	If it is delivered to or left at the permitted address on a business day
leaving it at a permitted address	before 4.30pm, on that day; or in any other case, on the next business day
	after that day
Fax	If the transmission of the fax is completed on a business day before
	4.30pm, on that day; or in any other case, on the next business day after
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Other electronic method	If the email or other electronic transmission is sent on a business day
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	served on that day; or in any other case, on the next business day after
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The date of service 1 9 / 0 5 /	2 0 2 2	Name of Defendant Persons Unknown & Ors				
What documents did you serve? Please attach copies of the documents you have not already filed with the court.	1. Bu	ndles for the Hearing on 26 & 27 May a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and g. Authorities Bundle.	2022:			
On whom did you serve? (If appropriate include their position e.g. partner, director).	Steve Colclough	and Ros Colclough Give the address where service	a offerhad include for an			
How did you serve the documents? (please tick the appropriate box) [] by first class post or other service which delivery on the next business day [] by delivering to or leaving at a permitted	l place	DX number, e-mail address or identification Being the [] claimant's				
[] by personally handing it to or leaving it w (time left, where document is claim form) (please specify)		[] solicitor's				
[] by other means permitted by the court (please specify)		 [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection 				
By Document Exchange	oro do cum ont					
[] by fax machine (time sent, whis other than a claim form) (you may want to of the transmission sheet)		to claim [X] other (please specify)	nsaiction with a connection			
[X] by other electronic means (15:18; 15:43 where document is other than a claim form) (ple		ent,				

By Email and Secure File Transfer

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Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Rawaeloust	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		,

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Certificate of service	IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044
On what day did you serve? 1 9 / 0 5 / 2 0 2 2 The date of service 1 9 / 0 5 / 2 0 2 2	Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport Name of Defendant
	Persons Unknown & Ors
What documents did you serve? Please attach copies of the documents you have not already filed with the court. On whom did you serve? (If appropriate include their position e.g. partner, director). How did you serve the documents? (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day [] by delivering to or leaving at a permitted place [] by personally handing it to or leaving it with (time left, where document is other than a claim form) (please specify) [] by other means permitted by the court (please specify) [] By Document Exchange	a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle E; f. Bundle F; and g. Authorities Bundle. (D8) Give the address where service effected, include fax or DX number, e-mail address or other electronic identification Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] principal office of the partnership [] principal office of the company [] place of business of the partnership/company/
[] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)	corporation within the jurisdiction with a connection to claim [X] other (please specify)
[X] by other electronic means (15:18; 15:43 and 17:03 time se where document is other than a claim form) (please specify)	
By Email and Secure File Transfer	Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. F. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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Certificate of service											Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044
On what day did you serve?	1	9 /	0	5	/	2 0 2 2					Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport
The date of service is	1	9 /	0	5	/	2	0	2	2		Name of Defendant Persons Unknown & Ors
Please attach copies of the documents you have not already filed with the court.								dles for the Hearing on 26 & 27 May 2022: a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B); d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and g. Authorities Bundle.			
On whom did you se (If appropriate include the director).		on e.ç	ı, partn	ier,		T	erry	/ Sar	ndisor	า ([
How did you serve the documents? (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day [] by delivering to or leaving at a permitted place [] by personally handing it to or leaving it with (time left, where document is other than a claim form) (please specify)							DX number, e-mail address or other electronic identification and Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend				
[] by other means permitted by the court (please specify)								 [] usual residence [] last known residence [] place of business [] principal place of business [] last known principal place of business 			
[] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a conv.)									 [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ 		
 is other than a claim form) (you may want to enclose a copy of the transmission sheet) [X] by other electronic means (15:18; 15:43 and 17:03 time sent, where document is other than a claim form) (please specify) 							corporation within the jurisdiction with a connection				

By Email and Secure File Transfer

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.

Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	-	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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	4.30pm, on that day; or in any other case, on the next business day after
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Name of court Claim No. Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION Name of Claimant (1) High Speed Two (HS2) Limited On what day did 2 2 5 0 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 9 5 0 2 2 Persons Unknown & Ors What documents did you serve? Bundles for the Hearing on 26 & 27 May 2022: Please attach copies of the documents you have not Bundle A; already filed with the court. b. Bundle B; Bundle C (Volumes A & B); Bundle D (Volumes A - G); Bundle E; f. Bundle F; and Authorities Bundle. On whom did you serve? The Chiltern Society (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or How did you serve the documents? DX number, e-mail address or other electronic identification (please tick the appropriate box) by first class post or other service which provides for delivery on the next business day and [] by delivering to or leaving at a permitted place [] by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify) Being the [] claimant's [X] defendant's] solicitor's [] litigation friend [] by other means permitted by the court [] usual residence (please specify) [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] By Document Exchange [] principal office of the partnership [] principal office of the corporation by fax machine (.....time sent, where document [] principal office of the company is other than a claim form) (you may want to enclose a copy of the transmission sheet) [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [X] by other electronic means (15:18; 15:43 and 17:03 time sent, to claim

I believe that the facts stated in this certificate of service are true.

document is other than a claim form) (please specify)

By Email and Secure File Transfer

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.

[X] other (please specify)

Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. F. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor		(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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	the day on which it was transmitted			
Other electronic method	If the email or other electronic transmission is sent on a business day			
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Certificate of	of service		Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044		
On what day did you serve?	1 9 / 0 5 /	2 0 2 2	Name of Claimant (1) High Speed Two (HS2) Li (2) The Secretary of State for		
The date of service is	1 9 / 0 5 /	2 0 2 2	Name of Defendant Persons Unknown & Ors		
What documents did Please attach copies of the already filed with the cour	e documents you have not	1. Bu	undles for the Hearing on 26 & 27 M a. Bundle A; b. Bundle B; c. Bundle C (Volumes A & B);	es for the Hearing on 26 & 27 May 2022: Bundle A; Bundle B;	
			 d. Bundle D (Volumes A – G); e. Bundle E; f. Bundle F; and g. Authorities Bundle. 		
On whom did you se (If appropriate include the director).	ir position e.g. partner,	Timothy Chantl	Give the address where se	rvice effected, include fax or	
delivery on the		•	DX number, e-mail address identification		
	anding it to or leaving it we left, where document is ase specify)		Being the [] claima		
			[] usual residence [] last known residence [] place of business	•	
[] by other means (please specify)	permitted by the court		[] principal place of bus [] last known place of b [] last known principal [] principal office of the [] principal office of the	ousiness place of business e partnership	
[] By Document Ex	xchange		[] principal office of the		
is other than a confitne transmission	·	o enclose a copy	to claim [X] other (please specify)	e jurisdiction with a connectior	
where	onic means (15:18; 15:43		sent,		
document is oth By Email and Secure	ner than a claim form) (ple e File Transfer	ase specify)	Email address used by the	e Defendant	

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	_	(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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On what day did you serve? 1 9 / 0 5 / 2 0 2 2 The date of service is	Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport Name of Defendant Persons Unknown & Ors
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[] by other means permitted by the court (please specify) [] By Document Exchange	[] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the company
 [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet) [X] by other electronic means (15:18; 15:43 and 17:03 time 	 place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim X other (please specify)
where document is other than a claim form) (please specify) By Email and Secure File Transfer	Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor		(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

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How did you serve the documents? (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day [] by delivering to or leaving at a permitted place [] by personally handing it to or leaving it with (time left, where document is other than a claim form) (please specify)	Give the address where service effected, include fax or DX number, e-mail address or other electronic identification Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend
[] by other means permitted by the court (please specify)	 [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation
[] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)	 [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim [X] other (please specify)
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By Email and Secure File Transfer	Email address used by the Defendant

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Ramaelough	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor	_	(If signing on behalf of firm or company)
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	4.30pm, on that day; or in any other case, on the next business day after		
	the day on which it was transmitted		
Other electronic method	If the email or other electronic transmission is sent on a business day		
	before 4.30pm, on that day; or in any other case, on the next business day		
	after the day on which it was sent		
Personal service	If the document is served personally before 4.30pm on a business day, it is		
	served on that day; or in any other case, on the next business day after		
	that day		

Certificate of service		Name of court	Claim No.	
certificate of service		IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION	QB-2022-BHM-000044	
		Name of Claimant		
On what day did	0 2 2	(1) High Speed Two (HS2) Lir		
you serve? 1 9 / 0 5 / 2	0 2 2	(2) The Secretary of State for	r Transport	
The date of service		Name of Defendant		
is 1 9 / 0 5 / 2	0 2 2	Name of Belendant		
		Persons Unknown & Ors		
What documents did you serve?		dles for the Hearing on 26 & 27 M	ay 2022:	
Please attach copies of the documents you have not		a. Bundle A;		
already filed with the court.		b. Bundle B;		
		c. Bundle C (Volumes A & B);		
		d. Bundle D (Volumes A – G);e. Bundle E;		
		e. Bundle E; f. Bundle F; and		
		g. Authorities Bundle.		
On whom did you serve?	Wiktoria Paulina	<u> </u>		
(If appropriate include their position e.g. partner,				
 by first class post or other service which predelivery on the next business day by delivering to or leaving at a permitted p by personally handing it to or leaving it with (time left, where document is of 	lace n	Being the [] claimar	nt's [X] defendant's	
claim form) (please specify)	iller tilali a	[] solicite	or's [] litigation friend	
		[] usual residence		
		[] last known residence		
	<u> </u>	[] place of business		
[] by other means permitted by the court		[] principal place of business [] last known place of business		
(please specify)				
		[] last known principal p	place of business	
		[] principal office of the		
		[] principal office of the		
By Document Exchange		[] principal office of the	•	
[] by bocument exchange			ne partnership/company/	
[] by fax machine (time sent, wher	e document		e jurisdiction with a connection	
is other than a claim form) (you may want to e		to claim	,	
of the transmission sheet)		[X] other (please specify)		
[X] by other electronic means (15:18;15:43 ar where		t,		
document is other than a claim form) (please	specify)	Ferral III	Defendant	
By Email and Secure File Transfer		Email address used by the	perendant	

I believe that the facts stated in this certificate of service 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.

Full name	MARY ELIZABETH BARRACLOUGH		
Signed	H. E. Ramaeloust	Position or office held	Senior Associate Solicitor
	Claimant's Solicitor		(If signing on behalf of firm or company)
Date	2 0 0 5 2 0 2 2		

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service		
First class post or other service	The second day after it was posted, left with, delivered to or collected by		
which provides for delivery on the	the relevant service provider provided that day is a business day; or if not,		
next business day	the next business day after that day		
Document exchange	The second day after it was left with, delivered to or collected by the		
	relevant service provider provided that day is a business day; or if not, the		
	next business day after that day		
Delivering the document to or	If it is delivered to or left at the permitted address on a business day		
leaving it at a permitted address	before 4.30pm, on that day; or in any other case, on the next business day		
	after that day		
Fax	If the transmission of the fax is completed on a business day before		
	4.30pm, on that day; or in any other case, on the next business day after		
	the day on which it was transmitted		
Other electronic method	If the email or other electronic transmission is sent on a business day		
	before 4.30pm, on that day; or in any other case, on the next business day		
	after the day on which it was sent		
Personal service	If the document is served personally before 4.30pm on a business day, it is		
	served on that day; or in any other case, on the next business day after		
	that day		

HIGH COURT OF JUSTICE QB-2022-BHM-QUEEN'S BENCH DIVISION 000044 **Name of Claimant** (1) High Speed Two (HS2) Limited On what day did 0 0 5 2 0 2 2 you serve? (2) The Secretary of State for Transport The date of Name of Defendant 2 0 2 2 0 0 5 service is Persons Unknown & Ors What documents did you serve? Claimant's Legal Principles Skeleton Argument 1. Please attach copies of the documents you Claimant's Skeleton Argument (Merits) have not already filed with the court. On whom did you serve? The Defendants (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box)] by first class post or other service which provides for By uploading to website: delivery on the next business day https://www.gov.uk/government/publications/hs2-] by delivering to or leaving at a permitted place route-wide-injunction-proceedings [] by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify) [✓] defendant's Being the [] claimant's [] solicitor's [] litigation friend] by other means permitted by the court [] usual residence (please specify) [✓] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] By Document Exchange [] principal office of the partnership [] principal office of the corporation [] by fax machine (.....time sent, where document [] principal office of the company is other than a claim form) (you may want to enclose a copy of the transmission sheet) [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [✓] by other electronic means (15:17 and 15:59...time sent, where to claim document is other than a claim form) (please specify) [✓] other (please specify) Place of service ordered by the Court in the order made on 28 April 2022 I believe that the facts stated in this certificate of service 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. Full name JULIE AMBER DILCOCK Position or Litigation Counsel (Land & Property) Signed office held Claimant's Solicitor (If signing on behalf of firm or

Name of court

Certificate of service

Claim No.

company)

Date

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l .		ı					l .	

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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Delivering the document to or	If it is delivered to or left at the permitted address on a business day
leaving it at a permitted address	before 4.30pm, on that day; or in any other case, on the next business day
	after that day
Fax	If the transmission of the fax is completed on a business day before
	4.30pm, on that day; or in any other case, on the next business day after
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	served on that day; or in any other case, on the next business day after
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Published 30 March 2022 Last updated 23 May 2022 - hide all updates

23 May 2022

Document 44 updated.

20 May 2022

New document added: 73. Claimant's Skeleton Argument (Merits)

20 May 2022

New document added: 72. Claimant's Legal Principles Skeleton Argument

19 May 2022

Documents 42-71 uploaded.

19 May 2022

These documents were added: 42. Fourth Witness Statement of Julie Dilcock, and 43. Exhibit JAD8.

6 May 2022

New document added: 41. Amended draft order (6 May 2022)



73. Claimant's Skeleton Argument (Merits)

PDF, 523 KB, 24 pages



72. Claimant's Legal Principles Skeleton Argument

PDF, 420 KB, 13 pages

Name of court Claim No. Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION **Name of Claimant** (1) High Speed Two (HS2) Limited On what day did 2 2 0 5 0 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 0 5 2 2 2 Persons Unknown & Ors What documents did you serve? Claimants' Skeleton Argument on applicable legal principles; and Please attach copies of the documents you have not Claimants' Skeleton Argument on the merits. already filed with the court. On whom did you serve? Caroline Thomson-Smith (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place Being the [] claimant's [X] defendant's [] by personally handing it to or leaving it with (.....time left, where document is other than a] solicitor's [] litigation friend claim form) (please specify) [] usual residence [] last known residence [] place of business] by other means permitted by the court [] principal place of business (please specify) [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] By Document Exchange [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [] by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy to claim of the transmission sheet) [X] other (please specify) [X] by other electronic means (...15:59......time sent, where document is other than a claim form) (please specify) By Email Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name

N215 Certificate of service (09.11) This form is reproduced from http://hmctsformfinder.justice.gov.uk/HMCTS/FormFinder.do and is subject to Crown copyright protection. Contains public sector information licensed under the Open Government Licence 2.23

Signed

M. E. Ramaelous

Position

or office

held

Senior Associate Solicitor

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION Name of Claimant (1) High Speed Two (HS2) Limited On what day did 2 2 2 0 5 0 2 (2) The Secretary of State for Transport you serve? The date of service Name of Defendant 2 0 5 0 2 2 Persons Unknown & Ors What documents did you serve? Claimants' Skeleton Argument on applicable legal principles; and Please attach copies of the documents you have not Claimants' Skeleton Argument on the merits. already filed with the court. On whom did you serve? Daniel Hooper (D24) (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place Being the [] claimant's [X] defendant's [] by personally handing it to or leaving it with (.....time left, where document is other than a] solicitor's [] litigation friend claim form) (please specify) [] usual residence [] last known residence] place of business] by other means permitted by the court [] principal place of business (please specify) [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] By Document Exchange [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [] by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy to claim of the transmission sheet) [X] other (please specify) [X] by other electronic means (...15:59......time sent, where document is other than a claim form) (please specify) By Email Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name Position Signed M. E. Ramaelous or office Senior Associate Solicitor held

Name of court

Claim No.

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

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Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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Name of court Claim No. Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION **Name of Claimant** (1) High Speed Two (HS2) Limited On what day did 2 0 5 0 2 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 0 5 2 2 2 Persons Unknown & Ors What documents did you serve? Claimants' Skeleton Argument on applicable legal principles; and Please attach copies of the documents you have not Claimants' Skeleton Argument on the merits. already filed with the court. On whom did you serve? Deborah Mallender (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place Being the [] claimant's [X] defendant's [] by personally handing it to or leaving it with (.....time left, where document is other than a] solicitor's [] litigation friend claim form) (please specify) [] usual residence [] last known residence [] place of business by other means permitted by the court [] principal place of business (please specify) [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] By Document Exchange [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [] by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy to claim of the transmission sheet) [X] other (please specify) [X] by other electronic means (...15:59......time sent, where document is other than a claim form) (please specify) By Email Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name Position Signed M. E. Ramaelough

or office

held

Senior Associate Solicitor

	Claimant's Solicitor	(If signing on behalf of firm or
		company)
Date	2 0 0 5 2 0 2 2	

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	Claimant's Solicitor	(If signing on behalf of firm or
		company)
Date	2 0 0 5 2 0 2 2	

Calculation of deemed day of service of a claim

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	Claimant's Solicitor	(If signing on behalf of firm or
		company)
Date	2 0 0 5 2 0 2 2	

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	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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Certificat	മ of	ς Δ	rvi	ice							Name of court Claim No.
Certificat	C 01	36	ıvı	ICC	-						IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION
											Name of Claimant
On what day did you serve?	2	0	/	0	5	/	2	0	2	2	(1) High Speed Two (HS2) Limited(2) The Secretary of State for Transport
The date of servi	ice 2	0	,	0	5	7	2	0	2	2	Name of Defendant
is											Persons Unknown & Ors
What documents: Please attach copies already filed with the	of the do				ve r	not				1. 2.	aimants' Skeleton Argument on applicable legal principles; and aimants' Skeleton Argument on the merits.
On whom did yo (If appropriate includ- director).			e.g. _ļ	oartn	er,		ŀ	Haze	el Ba	II (D	
How did you serve (please tick the approximate) [] by first class delivery on the control of t	opriate bo s post o the nex	<i>x)</i> r oth t bus	er so	ervio s da	y		-		es fo	or	Give the address where service effected, include fax or DX number, e-mail address or other electronic identification
[] by personal (claim form)	ly hand time lef	ing it t, wh	to d	or le	avi	ng it	witl	h	thaı	n a	Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend
[] by other me (please specify)	-	rmitt	ed b	y th	ne c	ourt	:				 [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership
[] By Docume		_	t	ime	se	nt, w	/her	e do	cum	nent	 [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection
is other than of the transmis			m) ()	ou n	nay	want	to er	nclos	2 a co	ру	to claim [X] other (please specify)
[X] by other el										vhei	
By Email											Email address used by the Defendant
	at pro	ceed	ing	s fo	r c	onte	mp	t of	cou	ırt r	e are true. y be brought against anyone who makes, or causes to be ement of truth without an honest belief in its truth.
	ARY ELIZ										
Signed	[8.	B	a	ra	el	cu	gl				Position or office Senior Associate Solicitor held

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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Certificate	. 01	3 C	ıv	ICC	•								GH COURT OF J BENCH DIVISIO		QB-2022-BHM-000044
											Nan	ne of C	Claimant		
On what day did			١.			١.					IVali		igh Speed Two	(HS2) Limited	d
you serve?	2	0	/	0	5	/	2	0	2	2			he Secretary of		
The date of servic	e 2	0	/	0	5	/	2	0	2	2	Nan	ne of D	Defendant		
IS										Pers	ons U	nknown & Ors			
What documents	did yoı	u ser	ve?				Г			1.	Claiman	ts' Ske	leton Argumen	nt on applicab	le legal principles; and
Please attach copies of already filed with the c		umer	its yc	ou ha	ve no	ot				2.	Claiman	ts' Ske	leton Argumen	nt on the meri	ts.
On whom did you	serve	•					Г	.C. 7	Γurr	er (10)				
(If appropriate include director).	their pos	ition	e.g.	partn	er,							•			
How did you serve	e the d	ocur	nen	ts?											effected, include fax or ther electronic
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made, a false sta								itie	d by	/ a s	atemen	t of ti	ruth without	an honest b	ellet in its truth.
Full name MAI	RY ELIZ	ABE [*]	TH E	BARF	RACI	.OU	IGH								
Signed	0 -	D			. 1	_	0						Position		
10	8.	5	qu	A C	er.	UU	9 (or office held	Senior Ass	ociate Solicitor

	Claimant's Solicitor	(If signing on behalf of firm or
		company)
Date	2 0 0 5 2 0 2 2	

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Name of court Claim No. Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION Name of Claimant (1) High Speed Two (HS2) Limited On what day did 2 0 0 5 0 2 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 0 5 2 0 2 2 Persons Unknown & Ors What documents did you serve? Claimants' Skeleton Argument on applicable legal principles; and Please attach copies of the documents you have not Claimants' Skeleton Argument on the merits. already filed with the court. On whom did you serve? Iain Oliver (D39) (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place [] by personally handing it to or leaving it with (.....time left, where document is other than a Being the [] claimant's [X] defendant's claim form) (please specify)] solicitor's [] litigation friend [] usual residence by other means permitted by the court [] last known residence (please specify) [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] By Document Exchange [] principal office of the corporation [] principal office of the company [] by fax machine (.....time sent, where document [] place of business of the partnership/company/ is other than a claim form) (you may want to enclose a copy of the transmission sheet) corporation within the jurisdiction with a connection to claim [X] by other electronic means (...15:59......time sent, where [X] other (please specify) document is other than a claim form) (please specify) By Email Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name Position Signed M. E. Ramaelous or office Senior Associate Solicitor

held

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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or office

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Senior Associate Solicitor

M. E. Ramaelous

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						IN THE HIGH COURT OF JUSTICE QB-2022-BHM- QUEEN'S BENCH DIVISION 000044					
On what day did you serve?	2	0	/	0	5	/	2	0	2	2	Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport
The date of service is	2	0	/	0	5	/	2	0	2	2	Name of Defendant Persons Unknown & Ors
What documents did Please attach copies of the already filed with the court	docu				ve nc	ot				1. 2.	Claimants' Skeleton Argument on applicable legal principles; and Claimants' Skeleton Argument on the merits.
On whom did you se (If appropriate include thei director).			e.g. p	partn	er,		J	ame	s Ta	aylo	(naggs (D6)
How did you serve the operation of the appropriate [] by first class postule of the appropriate [] by the delivery on the results of the appropriate of the appropr	e box st or next	oth bus	er se ines	ervio s da	У				es fo	or	Give the address where service effected, include fax of DX number, e-mail address or other electronic identification oweng@gclaw.co.uk and nhall@robertlizar.com
[] by personally ha	 [] by delivering to or leaving at a permitted place [] by personally handing it to or leaving it with (time left, where document is other than a claim form) (please specify) 					with	Being the [] claimant's [X] defendant's [X] solicitor's [] litigation frie				
[] by other means permitted by the court (please specify)								 [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership 			
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document is oth By Email				-							Email address for service ordered by the Court in the order made on 28 April 2022
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Name of court

Claim No.

Certificate of service

Signed

H. E. Ramaelough

Position or office held

Senior Associate Solicitor

(If signing on behalf of firm or company)

Date

2 0 0 5 2 0 2 2

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

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Claimant's Solicitor

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Name of court Claim No. Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION **Name of Claimant** (1) High Speed Two (HS2) Limited On what day did 2 0 0 5 0 2 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 0 5 2 0 2 2 Persons Unknown & Ors What documents did you serve? Claimants' Skeleton Argument on applicable legal principles; and Please attach copies of the documents you have not Claimants' Skeleton Argument on the merits. already filed with the court. On whom did you serve? Larch Maxey (D32) (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place Being the [] claimant's [X] defendant's [] by personally handing it to or leaving it with (.....time left, where document is other than a] solicitor's [] litigation friend claim form) (please specify) [] usual residence [] last known residence [] place of business by other means permitted by the court [] principal place of business (please specify) [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] By Document Exchange [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [] by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy to claim of the transmission sheet) [X] other (please specify) [X] by other electronic means (...15:59......time sent, where document is other than a claim form) (please specify) By Email Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name Position Signed M. E. Ramaelous or office Senior Associate Solicitor held

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

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Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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	Claimant's Solicito	r					(If signing on behalf of firm or
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Date	2 0 0 5		2	0	2	2	

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or office

held

Senior Associate Solicitor

	Claimant's Solicitor	(If signing on behalf of firm or
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Signed	MARY ELIZABETH BARRACLOUGH M. & Ramanian														Posit or of held	_	Senior Asso	ociate Solicitor

	Claimant's Solicitor	(If signing on behalf of firm or
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leaving it at a permitted address	before 4.30pm, on that day; or in any other case, on the next business day				
	after that day				
Fax	If the transmission of the fax is completed on a business day before				
	4.30pm, on that day; or in any other case, on the next business day after				
	the day on which it was transmitted				
Other electronic method	If the email or other electronic transmission is sent on a business day				
	before 4.30pm, on that day; or in any other case, on the next business day				
	after the day on which it was sent				
Personal service	If the document is served personally before 4.30pm on a business day, it is				
	served on that day; or in any other case, on the next business day after				
	that day				

Name of court Claim No. Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION **Name of Claimant** (1) High Speed Two (HS2) Limited On what day did 2 2 0 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 2 0 5 0 2 2 Persons Unknown & Ors What documents did you serve? 1. Claimants' Skeleton Argument on applicable legal principles; and Please attach copies of the documents you have not Claimants' Skeleton Argument on the merits. already filed with the court. On whom did you serve? Steve Colclough and Ros Colclough (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place Being the [] claimant's [X] defendant's [] by personally handing it to or leaving it with (.....time left, where document is other than a [] solicitor's [] litigation friend claim form) (please specify) [] usual residence [] last known residence [] place of business] by other means permitted by the court [] principal place of business (please specify) [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] By Document Exchange [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [] by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy

I believe that the facts stated in this certificate of service 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.

Full name	
-----------	--

By Email

of the transmission sheet)

MARY ELIZABETH BARRACLOUGH

[X] by other electronic means (...15:59......time sent, where document is other than a claim form) (please specify)

Signed



Position or office held

to claim

[X] other (please specify)

Email address used by the Defendant

Senior Associate Solicitor

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

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Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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next business day	the next business day after that day		
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Certificate of service							Name of court Claim No.										
Certificate of service							HIGH COU I'S BENCH I			QB-2022-BHM-000044							
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director).													l d	Sive the ad	dress w	here service	effected, include fax or
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Signed	H. 8		B	ρı	ra	el	a	51							ition office	Senior Ass	ociate Solicitor

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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held

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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Name of court Claim No. Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION Name of Claimant (1) High Speed Two (HS2) Limited On what day did 2 5 2 0 2 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 0 5 0 2 2 Persons Unknown & Ors What documents did you serve? Claimants' Skeleton Argument on applicable legal principles; and Please attach copies of the documents you have not Claimants' Skeleton Argument on the merits. already filed with the court. On whom did you serve? The Chiltern Society (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for and delivery on the next business day by delivering to or leaving at a permitted place [] by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify) Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend by other means permitted by the court [] usual residence (please specify) [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] By Document Exchange [] principal office of the partnership [] principal office of the corporation by fax machine (.....time sent, where document [] principal office of the company is other than a claim form) (you may want to enclose a copy [] place of business of the partnership/company/ of the transmission sheet) corporation within the jurisdiction with a connection [X] by other electronic means (...15:59......time sent, where to claim document is other than a claim form) (please specify) [X] other (please specify) By Email Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name

Signed

H. E. Ramaelough

Position or office held

Senior Associate Solicitor

(If signing on behalf of firm or company)

Date

2 0

Claimant's Solicitor

0 5

2 0 2 2

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

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held

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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Name of court

Claim No.

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

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Date	2 0 0 5 2 0 2 2			

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Method of service	Deemed day of service				
First class post or other service	The second day after it was posted, left with, delivered to or collected by				
which provides for delivery on the	the relevant service provider provided that day is a business day; or if not,				
next business day	the next business day after that day				
Document exchange	The second day after it was left with, delivered to or collected by the				
	relevant service provider provided that day is a business day; or if not, the				
	next business day after that day				
Delivering the document to or	If it is delivered to or left at the permitted address on a business day				
leaving it at a permitted address	before 4.30pm, on that day; or in any other case, on the next business day				
	after that day				
Fax	If the transmission of the fax is completed on a business day before				
	4.30pm, on that day; or in any other case, on the next business day after				
	the day on which it was transmitted				
Other electronic method	If the email or other electronic transmission is sent on a business day				
	before 4.30pm, on that day; or in any other case, on the next business day				
	after the day on which it was sent				
Personal service	If the document is served personally before 4.30pm on a business day, it is				
	served on that day; or in any other case, on the next business day after				
	that day				

Name of court Claim No. Certificate of service IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION **Name of Claimant** (1) High Speed Two (HS2) Limited On what day did 2 0 5 0 2 2 (2) The Secretary of State for Transport you serve? Name of Defendant The date of service 0 5 2 2 2 Persons Unknown & Ors What documents did you serve? Claimants' Skeleton Argument on applicable legal principles; and Please attach copies of the documents you have not Claimants' Skeleton Argument on the merits. already filed with the court. On whom did you serve? Beth Farbrother (If appropriate include their position e.g. partner, director). Give the address where service effected, include fax or DX number, e-mail address or other electronic How did you serve the documents? identification (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day by delivering to or leaving at a permitted place [X] defendant's Being the [] claimant's [] by personally handing it to or leaving it with (.....time left, where document is other than a] solicitor's [] litigation friend claim form) (please specify) [] usual residence [] last known residence [] place of business by other means permitted by the court [] principal place of business (please specify) [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] By Document Exchange [] place of business of the partnership/company/ corporation within the jurisdiction with a connection [] by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy to claim of the transmission sheet) [X] other (please specify) [X] by other electronic means (...15:59......time sent, where document is other than a claim form) (please specify) By Email Email address used by the Defendant I believe that the facts stated in this certificate of service 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. MARY ELIZABETH BARRACLOUGH Full name Position Signed M. E. Ramaelous or office Senior Associate Solicitor

held

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 0 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

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	relevant service provider provided that day is a business day; or if not, the					
	next business day after that day					
Delivering the document to or	If it is delivered to or left at the permitted address on a business day					
leaving it at a permitted address	before 4.30pm, on that day; or in any other case, on the next business day					
	after that day					
Fax	If the transmission of the fax is completed on a business day before					
	4.30pm, on that day; or in any other case, on the next business day after					
	the day on which it was transmitted					
Other electronic method	If the email or other electronic transmission is sent on a business day					
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	that day					

Certificate	0. 5		,,,,,						GH COURT OF JU EEN'S BENCH DI		QB-2022-BHM- 000044		
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What documents d Please attach copies of have not already filed	of the doc	umei				1.	Update	ed Bu	ndle A				
On whom did you s (If appropriate include director).		ition (e.g. pai	rtner,	Th	e Def	endants	5	1				
How did you serve the documents? (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day [] by delivering to or leaving at a permitted place [] by personally handing it to or leaving it with (time left, where document is other than a									DX number, e-nidentification By uploading thttps://www.s	nail address or o	ent/publications/hs2-		
claim form) (p.	lease sp	ecify)						7	Being the	[] claimant's	[✓] defendant's		
										[] solicitor's	[] litigation friend		
[] by other means permitted by the court (please specify)									 [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business 				
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[] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)									 [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection 				
[✓] by other electronic means (16:49time sent, where document is other than a claim form) (please specify)									to claim [✓] other (plea	ase specify) e ordered by the	e Court in the order made		
	proce	edin	gs for	cont	emp	t of c	ourt m	ay be	brought agains	-	makes, or causes to be belief in its truth.		
Full name JULIE	AMBER	DILC	ОСК										
Signed) //	r	2		<u> </u>			Position office h	ield	Counsel (Land & Property)		

Name of court

Claim No.

Certificate of service

company)

Date

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l .		ı					l .	

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

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	after that day					
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	served on that day; or in any other case, on the next business day after					
	that day					

Published 30 March 2022 Last updated 23 May 2022 - hide all updates

23 May 2022

Document 44 updated.

20 May 2022

New document added: 73. Claimant's Skeleton Argument (Merits)

20 May 2022

New document added: 72. Claimant's Legal Principles Skeleton Argument

19 May 2022

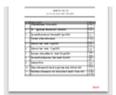
Documents 42-71 uploaded.

19 May 2022

These documents were added: 42. Fourth Witness Statement of Julie Dilcock, and 43. Exhibit JAD8.

6 May 2022

New document added: 41. Amended draft order (6 May 2022)





44. Bundle A

PDF, 5.59 MB, 326 pages

Certificate (of s	<u>ا</u>	rvi	ica						Name of court Claim No.						
Certificate	01 3		·		•					IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION						
											Name of Claimant					
On what day did				_] ,					(1) High Speed Two (HS2) Limited					
you serve?	2	3	/	0	5	/	2	0	2	2	(2) The Secretary of State for Transport					
The date of service	2	3	/	0	5	/	2	0	2	2	Name of Defendant					
is		,								Persons Unknown & Ors						
What documents did you serve? 1.											Indated Hearing Bundle A (to include the Claimants' Skeleton					
Please attach copies of the	Please attach copies of the documents you have not already filed with the court.										Jpdated Hearing Bundle A (to include the Claimants' Skeleton Argument on the merits).					
On whom did you se	rve?						(Carc	line	Tho	nson-Smith					
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											[] usual residence					
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[] by other means (please specify)	perm	nitt	ed b	y th	ie co	ourt	:				[] place of business[] principal place of business					
(рієйзе зресіју)											[] last known place of business					
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	proce	ed	ing	s fo	r co	nte	emp	t of	co	urt ı	ce are true. ay be brought against anyone who makes, or causes to be atement of truth without an honest belief in its truth.					
Full name MARY	ELIZA	BET	ГН Е	BARI	RACI	LOU	IGH									
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Signed M.	· .]	5	<i>a</i> u	W C	el	Cu	91				or office Senior Associate Solicitor held					

	Claimant's Solicitor	(If signing on behalf of firm or		
Date	2 3 0 5 2 0 2 2	company)		

Calculation of deemed day of service of a claim

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	that day				

Certificate of service										Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Name of Claimant	Claim No. QB-2022-BHM-000044						
On what day did you serve?	2	3	/	0	5	/	2	0	2	2	(1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport						
The date of service is	2	3	/	0	5	/	2	0	2	2	Name of Defendant Persons Unknown & Ors						
									ated Hearing Bundle A (to include the ument on the merits).	Claimants' Skeleton							
On whom did you serve? (If appropriate include their position e.g. partner, director). Daniel Hoope									24)								
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[] by personally handing it to or leaving it with (time left, where document is other than a claim form) (please specify)									Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership								
[] by other means permitted by the court (please specify)																	
 [] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet) [X] by other electronic means (15:57time sent, where document is other than a claim form) (please specify) 									 [] principal office of the corp [] principal office of the com [] place of business of the pacorporation within the jurito claim [X] other (please specify) 	pany artnership/company/							
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Name of court

Claim No.

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

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Certificate of service										Name of court Claim No.							
Certificate of Service												IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION	QB-2022-BHM-000044				
												Name of Claimant					
On what day did												(1) High Speed Two (HS2) Limite	d				
you serve?	2	3	/	0	5	/	2	(0 2		2	(2) The Secretary of State for Transport					
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What documents of	id vo	u sei	rve?)						1.		ndated Hearing Rundle A (to include the	Claimants' Skeleton				
Please attach copies of already filed with the co	the doc				ve r	not						rgument on the merits).	odated Hearing Bundle A (to include the Claimants' Skeleton gument on the merits).				
On whom did you	serve	?						Del	bora	h N	1al	nder					
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How did you serve (please tick the appropri			men	its?								DX number, e-mail address or of identification	other electronic				
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[] by personally	handi	ng it	t to	or le	avi	ng it	wit	h				Being the [] claimant's	[X] defendant's				
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Signed		_	_									Position					
M	8.	K	a	nr o	el	CU	51					or office Senior Ass	sociate Solicitor				
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	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

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Certific	ate of service	IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION				
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	er electronic means (15:57time s ent is other than a claim form) <i>(please sp</i>		Em	nail address usec	l by the Defe	endant
I understan	at the facts stated in this certificat d that proceedings for contempt of se statement in a document verific	of court may	be broug			
Full name	MARY ELIZABETH BARRACLOUGH					
Signed	H. E. Rawaelough			Position or office held	Senior Asso	ociate Solicitor

Cartificate of service

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

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Certificate of service											Name of court Claim No.					
Certificate of Service												IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION	QB-2022-BHM-000044			
												Name of Claimant				
On what day did												(1) High Speed Two (HS2) Limi	ted			
you serve?	2	3	/	0	5	/	2	0	2	2		(2) The Secretary of State for Transport				
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[] By Document E	vehe											[] principal office of the corporation[] principal office of the company				
[] By Document E	XCIIa	iige										[] place of business of the partnership/company/				
[] by fax machine											t	corporation within the jurisdiction with a connection				
is other than a of the transmission			m) (you r	nay	want	to er	nclos	e a c	ору		to claim [X] other (please specify)				
[X] by other electric				-						whe	re	[X] Other (please speedy)				
By Email	ici ti	11011	u Cli	u1111	.011	, (ρ	icuse	spe	uly)			Email address was district	ofondant			
												Email address used by the De	erendant			
												1				
I believe that the f																
												y be brought against anyone who ement of truth without an honest				
Full name MARY	ELIZ	ABE ⁻	TH E	BARF	RAC	LOU	GH									
Signed	۶.	P	a	ma	el	ou	51					Position or office Senior A	ssociate Solicitor			
_												held				

	Claimant's Solicitor	(If signing on behalf of firm or
		company)
Date	2 3 0 5 2 0 2 2	

Calculation of deemed day of service of a claim

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Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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	relevant service provider provided that day is a business day; or if not, the
	next business day after that day
Delivering the document to or	If it is delivered to or left at the permitted address on a business day
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	that day

Certific	ate of service		IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION				
On what day you serve?	did 2 3 / 0 5 /	2 0 2 2		Claimant High Speed Two The Secretary of			
The date of s	ervice 2 3 / 0 5 /	2 0 2 2		Defendant Inknown & Ors			
	ents did you serve? Dies of the documents you have not a the court.	-		ing Bundle A (to the merits).	include the	Claimants' Skeleton	
On whom did (If appropriate in director).	I you serve? clude their position e.g. partner,	Hayley Pitwell (I	D54)				
(please tick the control of the cont	serve the documents? Appropriate box) Class post or other service which on the next business day ering to or leaving at a permitte	•	DX	e the address wi number, e-mail ntification		effected, include fax or ther electronic	
(onally handing it to or leaving ittime left, where document rm) (please specify)		Ве	_	claimant's	[X] defendant's[] litigation friend	
[] by other	r means permitted by the court		 [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership 				
[] by fax m is other of the tran	ment Exchange nachine (time sent, w than a claim form) (you may want smission sheet)	to enclose a copy			e of the com ess of the pa ithin the juri		
	er electronic means (15 : 57 $ m nt$ is other than a claim form) $ m (ho$		En	nail address used	d by the Defe	endant	
I understan	at the facts stated in this cer d that proceedings for conte e statement in a document	mpt of court may	be broug				
Full name	MARY ELIZABETH BARRACLOU	GH					
Signed	H. F. Rawaelou	st.		Position or office held	Senior Asso	ociate Solicitor	

Cartificate of service

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

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Certiii	cate of service		IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION					
On what dayou serve?	y did 2 3 / 0	5 / 2 0 2 2		Claimant High Speed Two The Secretary of				
The date of is		5 / 2 0 2 2	Name of	Defendant				
			Persons U	Jnknown & Ors				
	nents did you serve? opies of the documents you have th the court.		odated Hear gument on	-	include the	Claimants' Skeleton		
	id you serve? include their position e.g. partner,	Hazel Ball (D9)						
(please tick the [] by first deliver	a serve the documents? appropriate box) class post or other service y on the next business day vering to or leaving at a pe	·	DX	e the address w number, e-mail ntification		effected, include fax or other electronic		
(sonally handing it to or leav time left, where docur orm) (please specify)	=	Ве	_	claimant's	[X] defendant's[] litigation friend		
[] by oth	er means permitted by the pecify)	court]] usual residence] last known re] place of busin] principal place] last known place] last known pr	sidence less e of business ace of busine	ess		
[] by fax is other	ument Exchange machine (time so r than a claim form) (you ma	y want to enclose a copy			e of the corp e of the com ess of the pa ithin the juri	ooration		
	ner electronic means (15: ent is other than a claim fo		En	nail address use	d by the Defe	endant		
I understar	nat the facts stated in the nd that proceedings for a lse statement in a docur	contempt of court ma	y be broug					
Full name	MARY ELIZABETH BARRA							
Signed	M. E. Rarae	lough		Position or office	Senior Asso	ociate Solicitor		
				held	22.1137 71331			

Cartificate of service

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

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Certificate	or service		IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION				
On what day did you serve?	2 3 / 0 5 / 2 0 2 2	(1)	Claimant High Speed Two The Secretary of				
The date of service is	2 3 / 0 5 / 2 0 2 2		Defendant Jnknown & Ors				
What documents did Please attach copies of the already filed with the court.	documents you have not	Updated Hea Argument on	-	include the	Claimants' Skeleton		
On whom did you ser (If appropriate include their director).	· · · · · · · · · · · · · · · · · · ·	010)					
delivery on the n	box) t or other service which provides for	DX	re the address w number, e-mail ntification		effected, include fax or other electronic		
	nding it to or leaving it with left, where document is other than a see specify)	В		claimant's	[X] defendant's[] litigation friend		
[] by other means (please specify)	permitted by the court]] usual resident] last known re] place of busin] principal place] last known place] last known pr] principal offic] principal offic	sidence ness e of business ace of busine rincipal place e of the part	ess of business :nership		
	time sent, where document aim form) (you may want to enclose a copy	1] principal offic] place of busin	e of the com ness of the parithin the juri			
	onic means (15:57time sent, wherer than a claim form) (please specify)	٦ <u> </u> _	mail address used	d by the Defe	endant		
I understand that p	cts stated in this certificate of serv roceedings for contempt of court n ment in a document verified by a s	nay be broug					
Full name MARY E	LIZABETH BARRACLOUGH						
Signed	Rangelough		Position or office held	Senior Ass	ociate Solicitor		

Cartificate of service

	Claimant's Solicitor	(If signing on behalf of firm or
		company)
Date	2 3 0 5 2 0 2 2	

Calculation of deemed day of service of a claim

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	that day

Certificate of service										Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Name of Claimant Claim No. QB-2022-BHM-000044				
On what day did you serve?	2	3	/	0	5	/	2	0	2	2	(1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport			
The date of service 2 3 / 0 5 / 2 0 2 2										Name of Defendant Persons Unknown & Ors				
What documents d Please attach copies of t already filed with the co	he doci				ve no	ot				1.	ated Hearing Bundle A (to include the Claimants' Skeleton ment on the merits).			
On whom did you s (If appropriate include the director).			e.g. µ	oartn	er,		la	ain (Olive	er (C				
How did you serve (please tick the approprie) by first class p delivery on the) by delivering t	ate boo ost or next	oth bus	er so	ervio s da	У		-		es fo	or	Give the address where service effected, include fax or DX number, e-mail address or other electronic identification and			
[] by personally (tin claim form) (p.	ne left	, wh	ere			_			thar	n a	Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend			
[] by other mear (please specify) [] By Document [] by fax machine is other than a of the transmission	Excha e (nge 	t	ime	sen	t, w	here				 [] usual residence [] last known residence [] place of business [] principal place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/corporation within the jurisdiction with a connection 			
[X] by other elected document is of By Email										vher	to claim [X] other (please specify) Email address used by the Defendant			
Full name MAR	proc	eed nt ir	ings n a c	s for	r co ume	nte ent OU	mp veri	t of	cou	ırt r	Position			
11.	\$.		, vi	1	et.	-	9				or office Senior Associate Solicitor held			

	Claimant's Solicitor	(If signing on behalf of firm or
		company)
Date	2 3 0 5 2 0 2 2	

Calculation of deemed day of service of a claim

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	served on that day; or in any other case, on the next business day after
	that day

Certificate of	of d	2	r\/	ica	_						Name of court Claim No.
Certificate	OI S)	ıv	ice	3				IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION		
											Name of Claimant
On what day did											(1) High Speed Two (HS2) Limited
you serve?	2	3	/	0	5	/	2	0	2	2	(2) The Secretary of State for Transport
The date of service is	2	3	/	0	5	/	2	0	2	2	Name of Defendant
IS , , , , , , , , , , , , , , , , , , ,										Persons Unknown & Ors	
What documents did	d you	ser	ve?	•			Г			1.	Updated Hearing Bundle A (to include the Claimants' Skeleton
Please attach copies of the already filed with the cour		ımer	nts yo	ou ha	ive n	ot					rgument on the merits).
On whom did you se	rve?							lacc	b H	arw	d (D55)
(If appropriate include the director).		tion	e.g.	partr	ner,		L				
·	ما ما										Give the address where service effected, include fax or DX number, e-mail address or other electronic
How did you serve to (please tick the appropriate	te box))									identification
[] by first class po delivery on the						/hic	h pr	ovi	des 1	or	
[] by delivering to					-	nitt	ed p	lace	е		
[] by personally h	andin	ng it	to	or le	avir	ng it	wit	h			Being the [] claimant's [X] defendant's
(time claim form) (ple				dod	cum	ent	is o	the	r tha	n a	[] solicitor's [] litigation friend
(pte	0.0C 3P	c c (1)	/								[] usual residence
											[] last known residence
[] by other means	perr	nitt	ed l	by th	ne co	our	t				[] place of business [] principal place of business
(please specify)											[] last known place of business
											[] last known principal place of business
											[] principal office of the partnership [] principal office of the corporation
[] By Document E	xchar	nge									[] principal office of the company
[] by fax machine	(1	time	ser	nt v	vher	e d	ocur	nen	[] place of business of the partnership/company/ corporation within the jurisdiction with a connection
is other than a c	laim	fori									to claim
of the transmission				1 1	r.r-	7	+:		on+	بطيي	[X] other (please specify)
[X] by other electr document is oth				-						wne	_
By Email											Email address used by the Defendant
	proce	eed	ing	s fo	r cc	nte	emp	t o	f co	urt	ce are true. ay be brought against anyone who makes, or causes to be atement of truth without an honest belief in its truth.
Full name MARY	ELIZA	ABE ⁻	ТН Е	BARI	RAC	LOL	JGH				
Signed											Position
Signed	.]	5	a	nr o	el	CV	51				or office Senior Associate Solicitor held

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

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Certificate of service									IN THE	of court E HIGH COURT OF JUSTICE N'S BENCH DIVISION	Claim No. QB-2022-BHM- 000044				
On what day did you serve? 2 3 / 0 5 / 2 0 2 2							0		Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport						
The date of service is	2 3	3 /	0	5	/	2	0	2	2			of Defendant ns Unknown & Ors			
What documents did Please attach copies of the already filed with the court	docume			ve no	t				1.		odated Hearing Bundle A (to include the Claimants' Skeleton gument on the merits).				
On whom did you sel (If appropriate include their director).		n e.g.	partn	er,		J	ame	es T	aylo	r Kna	ggs (D	6)			
How did you serve th (please tick the appropriate [] by first class pos	e box)			ce wl	nich	ı pro	ovid	es f	or			Give the address where ser DX number, e-mail address identification	vice effected, include fax or or other electronic		
delivery on the r [] by delivering to				-	itte	d pl	ace					oweng@gclaw.co.uk and nhall@robertlizar.com			
[] by personally ha (time claim form) (plea	left, w	here						tha	n a			Being the [] claima [X] solici			
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[] by other means permitted by the court (please specify)										 [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership 					
[] By Document Ex	change	e									 [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company, 		company		
[] by fax machine (is other than a cl of the transmission s	aim fo												e jurisdiction with a connection		
[X] by other electro									whe	e -					
By Email												Email address for service of order made on 28 April 20	ordered by the Court in the 22		
-	rocee	ding	s fo	r coi	nte	mp	t of	COI	urt	nay	be bro		o makes, or causes to be st belief in its truth.		
Full name MARY E	LIZAB	ETH	BARF	RACL	OU	GH									

Signed

M. E. Rawaelough

Position or office held

Senior Associate Solicitor

(If signing on behalf of firm or company)

Date

2 3 0 5 2 0 2 2

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

Claimant's Solicitor

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Certificate of service									Name of court Claim No.					
Continuate of Service										IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION				
											Name of Claimant			
On what day did			١,					1			(1) High Speed Two (HS2) Limited			
you serve?	2	3	/	0	5	_ /	2	С) 2	2	(2) The Secretary of State for Transport			
The date of service	2	3	/	0	5	,	2	C) 2	2	Name of Defendant			
is											Persons Unknown & Ors			
What documents did	l vou	ı ser	ve?							1.	pdated Hearing Bundle A (to include the Claimants' Skeleton			
Please attach copies of the already filed with the cour	doci				ve n	ot					rgument on the merits).			
On whom did you se	rve?							less	sica ľ	Лad	on (D29)			
(If appropriate include the director).	ir pos	ition	e.g. _l	partn	er,									
How did you serve th	ne do	ocun	nen	ts?							Give the address where service effected, include fax or DX number, e-mail address or other electronic			
(please tick the appropriat	e box	()			20.14	hic	h nr	ov.i	doc f	or	identification			
delivery on the						VIIIC	n pr	OVI	ues i	Oï				
[] by delivering to	or le	eavir	ng a	tap	ern	nitte	ed p	lace	e					
[] by personally ha									v +b.o		Being the [] claimant's [X] defendant's			
(time claim form) (plea				uoc	um	ent	15 01	.ne	r tria	II d	[] solicitor's [] litigation friend			
											[] usual residence			
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(please specify)											[] last known place of business			
											[] last known principal place of business			
											[] principal office of the partnership [] principal office of the corporation			
[] By Document Ex	vcha	ngo									[] principal office of the company[] place of business of the partnership/company/			
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document is oth	er th	nan	a cla	aim	forr	n) (p	lease	spe	ecify)					
By Email	By Lilian									Email address used by the Defendant				
I believe that the fa	acts	sta	ted	in t	his	cer	tific	at	e of	ser	e are true.			
I understand that p	oroc	eed	ing	s fo	r cc	nte	mp	t o	of co	urt	y be brought against anyone who makes, or causes to be tement of truth without an honest belief in its truth.			
Full name MARY														
Cionad											Decition			
Signed		B	au	ra	el	cu	51				Position or office Senior Associate Solicitor held			

	Claimant's Solicitor	(If signing on behalf of firm or
		company)
Date	2 3 0 5 2 0 2 2	

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service	The second day after it was posted, left with, delivered to or collected by
which provides for delivery on the	the relevant service provider provided that day is a business day; or if not,
next business day	the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the
	relevant service provider provided that day is a business day; or if not, the
	next business day after that day
Delivering the document to or	If it is delivered to or left at the permitted address on a business day
leaving it at a permitted address	before 4.30pm, on that day; or in any other case, on the next business day
	after that day
Fax	If the transmission of the fax is completed on a business day before
	4.30pm, on that day; or in any other case, on the next business day after
	the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day
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	after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is
	served on that day; or in any other case, on the next business day after
	that day

Certificate of service									Name of court Claim No.					
Certificate of Service											IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION	QB-2022-BHM-000044		
											Name of Claimant			
On what day did		T	١.								(1) High Speed Two (HS2) Limit	ed		
you serve?	2	3]/	0	5	/	2	0	2	2	(2) The Secretary of State for T	ransport		
The date of service is	2	3	/	0	5	/	2	0	2	2	Name of Defendant			
			J								Persons Unknown & Ors			
What documents di Please attach copies of the already filed with the cou	ne doci				ive i	not					odated Hearing Bundle A (to include the Claimants' Skeleton gument on the merits).			
On whom did you so (If appropriate include the			e.g.	partn	er,		J	oe I	Ruki	n				
director).											Give the address where service	e effected, include fax or		
How did you serve t	he d	ocur	nen	ts?							DX number, e-mail address or			
(please tick the appropri											identification			
[] by first class po						whic	h pr	ovid	es f	or				
delivery on the					-	aa i++ a	امام							
[] by delivering to	01 10	zavii	ig a	ιαμ	eri	mille	eu pi	ace			L			
[] by personally h	andi	ng it	to (or le	avi	ng it	witl	h			Being the [] claimant's	s [X] defendant's		
(tim									thai	n a	[] calisina	a [] likinakian fuiand		
claim form) (ple	ease sp	ecify,)								[] solicitor's [] litigation friend			
											[] usual residence			
											[] last known residence			
											[] place of business			
[] by other mean	s per	mitt	ed k	y th	ie c	ourt					[] principal place of business			
(please specify)			—								[] last known place of busing	ness		
											[] last known principal plac	ce of business		
											[] principal office of the pa	rtnership		
											[] principal office of the co	rporation		
[] By Document E	xcha	nge									[] principal office of the company [] place of business of the partnership/company/			
[] by fax machine	•											risdiction with a connection		
is other than a of the transmission			m) ()	you r	nay	want	to er	nclos	2 a co	ру	to claim			
						_					[X] other (please specify)			
[X] by other elect document is ot										vner				
By Email	וופו נו	Iaii	a Cic	a1111	101	Π) (ρ	ileuse	spec	.цу)					
,											Email address used by the De	efendant		
											'			
I believe that the	facts	sta	hat	in t	hic	COL	+ific	ate	οf	SARV	are true			
											be brought against anyone who r	makes, or causes to be		
	-		_				_				ement of truth without an honest			
									-					
Full name MARY	ELIZ	ABE	TH E	BARE	RAC	CLOU	GH	-	-					
Signed	0 -		,				0				Position			
Signed M.	٠.	5	a	W C	E	CU	9 (-				ssociate Solicitor		
											held			

	Claimant's Solicitor	(If signing on behalf of firm or
		company)
Date	2 3 0 5 2 0 2 2	

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

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certificate of service			GH COURT OF JUBENCH DIVISION		QB-2022-BHM-000044	
On what day did you serve?	2 0 2 2	, ,	Claimant High Speed Two The Secretary of			
The date of service 2 3 / 0 5 /	2 0 2 2		Defendant			
		Persons U	Inknown & Ors			
What documents did you serve? Please attach copies of the documents you have not already filed with the court.	-		ing Bundle A (to the merits).	include the	Claimants' Skeleton	
On whom did you serve? (If appropriate include their position e.g. partner, director).	Larch Maxey (D	1				
How did you serve the documents? (please tick the appropriate box) [] by first class post or other service which delivery on the next business day [] by delivering to or leaving at a permitte		DX	e the address wi number, e-mail ntification		effected, include fax or ther electronic	
[] by personally handing it to or leaving it (time left, where document i claim form) (please specify)		Ве		claimant's	[X] defendant's [] litigation friend	
[] by other means permitted by the court (please specify)		 [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/corporation within the jurisdiction with a connection to claim [X] other (please specify) 				
 [] By Document Exchange [] by fax machine (time sent, which is other than a claim form) (you may want of the transmission sheet) 						
[X] by other electronic means (15:57 document is other than a claim form) (pl		En	nail address used	d by the Defe	endant	
I believe that the facts stated in this cert I understand that proceedings for conte made, a false statement in a document	mpt of court may	be broug				
Full name MARY ELIZABETH BARRACLOUGH	GH .					
Signed M. F. Ramaelou	n.		Position or office held	Senior Asse	ociate Solicitor	

Cartificate of service

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

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Certificate of Service	IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION
On what day did you serve? 2 3 / 0 5 / 2 0 2 2	Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport
The date of service is 2 3 / 0 5 / 2 0 2 2	Name of Defendant Persons Unknown & Ors
	Updated Hearing Bundle A (to include the Claimants' Skeleton Argument on the merits).
On whom did you serve? (If appropriate include their position e.g. partner, director).	(D7)
How did you serve the documents? (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day [] by delivering to or leaving at a permitted place	Give the address where service effected, include fax or DX number, e-mail address or other electronic identification
[] by personally handing it to or leaving it with (time left, where document is other than a claim form) (please specify)	Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend
[] by other means permitted by the court (please specify)	[] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership
 [] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet) 	 [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim [X] other (please specify)
[X] by other electronic means (15:57time sent, where document is other than a claim form) (please specify) By Email	Email address used by the Defendant
I believe that the facts stated in this certificate of service I understand that proceedings for contempt of court made, a false statement in a document verified by a statement verified	ay be brought against anyone who makes, or causes to be
Full name MARY ELIZABETH BARRACLOUGH	
Signed M. E. Ramaelough	Position or office held Senior Associate Solicitor

Cartificate of service

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

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	that day

Cartificate	٦f (6	rvi	ice							Name of court Claim No.			
Certificate of service									IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION					
			1		1			1			Name of Claimant			
On what day did	2	3	/	0	5	/	2	0	2	2	(1) High Speed Two (HS2) Limited(2) The Secretary of State for Transport			
you serve?			J			J	L	<u> </u>			(2) The Secretary of State for Transport			
The date of service	2	3	,	0	5	,	2	0	2	2	Name of Defendant			
is			′			′		U			Develop Halvasius 9 Ora			
											Persons Unknown & Ors			
What documents dic	vou	ıser	ve?				Г			1.	dated Hearing Bundle A (to include the Claimants' Skeleton			
Please attach copies of the	doci				ve r	not				1.	gument on the merits).			
already filed with the cour	t.										,			
On whom did you so	r. (0.)	,							200	C2	Aco (DC2)			
On whom did you se (If appropriate include the			e.g. į	partn	er,			Leai	nne	swa	dge (D62)			
director).	,		5 1											
How did you serve th	d	aciin	non	+c2							Give the address where service effected, include fax or DX number, e-mail address or other electronic			
(please tick the appropriat			nen	13:							identification			
[] by first class po			er s	ervi	ce v	vhic	h pr	ovio	des f	or				
delivery on the					-									
[] by delivering to	or le	eavir	ng a	tap	eri	mitte	ed p	lace	!					
[] by personally ha	andii	ng it	to o	or le	avi	ng it	wit	h			Being the [] claimant's [X] defendant's			
(time									tha	n a				
claim form) (pled	ise sp	ecify))								[] solicitor's [] litigation friend			
											[] usual residence			
											[] last known residence			
											[] place of business [] principal place of business			
[] by other means (please specify)	peri	mitte	ed k	y th	e c	ourt								
(picuse specify)											[] last known place of business			
											[] last known principal place of business			
											[] principal office of the partnership			
[] [] [] []											[] principal office of the corporation[] principal office of the company			
By Document Ex	cna	nge									[] place of business of the partnership/company/			
[] by fax machine	(t	ime	se	nt. v	/her	e do	ocun	nent	corporation within the jurisdiction with a connection			
is other than a c											to claim			
of the transmission	sheet,)									[X] other (please specify)			
[X] by other electr	onic	mea	ans	(1	5:5	7	.tim	e se	ent, v	whe				
document is oth	er th	nan a	a cla	aim '	for	m) (p	lease	spe	cify)					
By Email											Email address used by the Defendant			
											I			
I hallare sheet to		-1-	he J	: ·	۴.		Tit.							
I believe that the fa											are true.			
											ement of truth without an honest belief in its truth.			
,)					
Full name MARY	ELIZ	ABE	TH E	BARF	RAC	LOL	IGH							
Signed	-	D	_		, I	_	0				Position			
Signed H.	-	5	fu	1 6	E/I	UU	9 (-			or office Senior Associate Solicitor			
											held			

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

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Certificate of service									Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044								
												Name of Claimant					
On what day did you serve?	d	2	3	/	0	5	/	2 0 2 2 (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport									
The date of servise	/ice	2	3	/	0	5	/	2	0	2	Name of Defendant Persons Unknown & Ors						
							ot		lated Hearing Bundle A (to include the Claimants' Skeleton ument on the merits).								
On whom did you (If appropriate includedirector).				e.g.	partn	er,		N	/lare	en S	tran	old					
How did you set (please tick the app) [] by first class delivery on [] by deliveri [] by personal (ropriate ss post the ring to ally hautime in the ring to hears by)	e box, st or next or le andir left, perr	oth bus eaviluing it where the control of the contr	er sines	ervio	oerm avir cumo	ng it ent i	d pl with s ot	ace n her	tha	n a	Give the address where service effected, include fax or DX number, e-mail address or other electronic identification Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend [] usual residence [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim					
of the transm [X] by other of document By Email	electro	onic	me								whe	[X] other (please specify) Email address used by the Defendant					
Full name M	hat p state	mer	eed nt in	ling n a ·	s fo doc	r co ume	onte ent	mp veri	t of	co	urt	are true. be brought against anyone who makes, or causes to be ment of truth without an honest belief in its truth. Position					
	M. E. Ramaelough								or office Senior Associate Solicitor held								

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

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Certifica	ate of service			GH COURT OF JU BENCH DIVISION		QB-2022-BHM-000044
On what day or you serve?	2 3 / 0 5 / 2	0 2 2		Claimant ligh Speed Two (he Secretary of S		
The date of se	rvice 2 3 / 0 5 / 2	0 2 2		Defendant nknown & Ors		
	ents did you serve? ies of the documents you have not the court.	-		ing Bundle A (to he merits).	include the	Claimants' Skeleton
On whom did (If appropriate inc director).	you serve? Make their position e.g. partner,	ark Keir (D36)	1			
(please tick the ap by first cl delivery c	erve the documents? Spropriate box) Sass post or other service which provon the next business day ring to or leaving at a permitted place		DX r	e the address who the second in the second i		effected, include fax or ther electronic
(nally handing it to or leaving it with time left, where document is othe m) (please specify)	er than a	Bei		claimant's solicitor's	[X] defendant's
(please spec	means permitted by the court ify) ment Exchange] []]]]	usual residence last known res place of busing principal place last known pla last known pri principal office principal office principal office	sidence ess e of business ace of busine ncipal place e of the part e of the corp	ess of business nership oration pany
is other t	achine (time sent, where of han a claim form) (you may want to encl mission sheet)			- •	ithin the juri	artnership/company/ sdiction with a connection
	electronic means (15:57time : t is other than a claim form) (please sp		Em	nail address used	l by the Defe	endant
I understand	t the facts stated in this certifica that proceedings for contempt e statement in a document verifi	of court may b	e brough			
Full name	MARY ELIZABETH BARRACLOUGH					
Signed	H. E. Rawaelough			Position or office held	Senior Asso	ociate Solicitor

Cartificate of service

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

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Certificate	of servi	ice			court GH COURT OF JU BENCH DIVISION		Claim No. QB-2022-BHM-000044
On what day did you serve?	2 3 /	0 5	2 0 2 2		Claimant High Speed Two The Secretary of		
The date of service is	2 3 /	0 5	2 0 2 2		Defendant Inknown & Ors		
What documents die Please attach copies of the already filed with the cou	e documents yo				ed Hearing Bundle A (to include the Claimants' Skeleton nent on the merits).		
On whom did you se (If appropriate include the director).		partner,	Nicola Woodho				
[] by other means (please specify) [] By Document E	te box) st or other so next busines or leaving a anding it to ce left, where ase specify) s permitted b xchange (tclaim form) (sheet) cronic means (ervice whose day t a permit or leaving documen by the cou	ted place it with t is other than a rt where document at to enclose a copy time sent, where	Be	ing the [] usual residence last known residence principal place last known pri last known pri principal office principal office principal office principal office principal office	claimant's claimant's solicitor's ce sidence ess e of business ace of business ace of the partr e of the comp ess of the pai	[X] defendant's [] litigation friend ss of business nership oration
By Email				Em	nail address used	d by the Defe	ndant
made, a false state	proceedings	s for con documen	empt of court ma t verified by a sta	ay be broug			akes, or causes to be elief in its truth.
Signed	Ra	raelo	yr.		Position or office held	Senior Asso	ociate Solicitor

	Claimant's Solicitor	(If signing on behalf of firm or
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	4.30pm, on that day; or in any other case, on the next business day after				
	the day on which it was transmitted				
Other electronic method	If the email or other electronic transmission is sent on a business day				
	before 4.30pm, on that day; or in any other case, on the next business day				
	after the day on which it was sent				
Personal service	If the document is served personally before 4.30pm on a business day, it is				
	served on that day; or in any other case, on the next business day after				
	that day				

Certificate of service							Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044			
		1			1					Name of Claimant
On what day did you serve?	2 3	/	0	5	/	2	0	2	2	(1) High Speed Two (HS2) Limited(2) The Secretary of State for Transport
The date of service is	2 3	/	0	5	/	2	0	2	2	Name of Defendant Persons Unknown & Ors
							dated Hearing Bundle A (to include the Claimants' Skeleton gument on the merits).			
_	On whom did you serve? (If appropriate include their position e.g. partner,									
How did you serve t (please tick the appropria [] by first class po delivery on the [] by delivering to	te box) ost or oth next bus	ier s	servio ss da	У				es f	or	Give the address where service effected, include fax or DX number, e-mail address or other electronic identification
[] by personally h	anding it	t to nere	or le	avir	ng it	with	1	tha	n a	Being the [] claimant's [X] defendant's [] solicitor's [] litigation friend
[] by other means (please specify)	s permitt	ed I	by th	ie co	ourt	;				 [] usual residence [] last known residence [] place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation
 [] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy 							[] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim			
of the transmission [X] by other election	sheet) ronic me	ans	(1	5:57	7	.time	e se	nt, v		[X] other (please specify)
document is otl	ner than	a cl	<u>aim f</u>	forn	n) (p	lease	spec	cify)		Email address used by the Defendant
	proceed	ling	s fo	r co	nte	mp	t of	CO	urt	are true. y be brought against anyone who makes, or causes to be ement of truth without an honest belief in its truth.
Full name MARY	ELIZABE	TH E	3ARR	RACI	LOU	GH				
Signed H. E. Ramaelous						g l	Position or office Senior Associate Solicitor held			

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service	The second day after it was posted, left with, delivered to or collected by
which provides for delivery on the	the relevant service provider provided that day is a business day; or if not,
next business day	the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the
	relevant service provider provided that day is a business day; or if not, the
	next business day after that day
Delivering the document to or	If it is delivered to or left at the permitted address on a business day
leaving it at a permitted address	before 4.30pm, on that day; or in any other case, on the next business day
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Fax	If the transmission of the fax is completed on a business day before
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Personal service	If the document is served personally before 4.30pm on a business day, it is
	served on that day; or in any other case, on the next business day after
	that day

Certificate of service		Name of court Claim No.						
certificate of service		IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION						
	Na	me of Claimant						
On what day did you serve? 2 3 / 0 5 / 2 0 2	2	(1) High Speed Two(2) The Secretary of		sport				
The date of service 2 3 / 0 5 / 2 0 2	2 N a	me of Defendant						
	Pe	rsons Unknown & Ors						
What documents did you serve? Please attach copies of the documents you have not already filed with the court.	Updated Hearing Bundle A (to include the Claimants' Skeleto Argument on the merits).							
On whom did you serve? Samanth	a Smithson	(D57)						
(If appropriate include their position e.g. partner, director).	3111113011	(637)						
How did you serve the documents?		Give the address w DX number, e-mail		ffected, include fax or ner electronic				
(please tick the appropriate box)		identification						
[] by first class post or other service which provides t	or							
delivery on the next business day								
[] by delivering to or leaving at a permitted place								
[] by personally handing it to or leaving it with		Being the []	claimant's	[X] defendant's				
(time left, where document is other tha	n a		1 1: 1: /	f 1 live or fr 1				
claim form) (please specify)		l] solicitor's	[] litigation friend				
		[] usual residen	ce					
		[] last known re						
		[] place of busir	ness					
[] by other means permitted by the court (please specify)		[] principal plac	e of business					
(pieuse specijy)		[] last known pl	ace of business	5				
			incipal place o					
			e of the partne	•				
			e of the corpo					
[] By Document Exchange		[] principal office of the company[] place of business of the partnership/company/						
[] by fax machine (time sent, where docur	nont		•	liction with a connection				
is other than a claim form) (you may want to enclose a c		to claim	itimi tile julise	metion with a connection				
of the transmission sheet)	- 1- 3	[X] other (please	specify)					
[X] by other electronic means (15:57time sent, document is other than a claim form) (please specify)	where		, ,,,					
By Email								
		Email address use	d by the Defen	dant				
I believe that the facts stated in this certificate of I understand that proceedings for contempt of comade, a false statement in a document verified by	urt may be	brought against any						
Full name MARY ELIZABETH BARRACLOUGH								
Signed H. F. Parraelous		Position or office held	Senior Assoc	ciate Solicitor				

	Claimant's Solicitor				(If signing on behalf of firm or
					company)
Date	2 3 0 5	2	0 2	2	

Calculation of deemed day of service of a claim

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	that day

Certificate	of service		IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION	QB-2022-BHM-000044			
On what day did you serve?	2 3 / 0 5 /	2 0 2 2	Name of Claimant (1) High Speed Two (HS2) Limits (2) The Secretary of State for State				
The date of service is	2 3 / 0 5 /	2 0 2 2	Name of Defendant Persons Unknown & Ors				
What documents di Please attach copies of the already filed with the cou	ne documents you have not		odated Hearing Bundle A (to include the graph of the merits).	ne Claimants' Skeleton			
On whom did you so (If appropriate include the director).		Steve Colclough	n and Ros Colclough				
delivery on the [] by delivering to [] by personally h	ost or other service which next business day o or leaving at a permitte nanding it to or leaving it e left, where document	ed place with	Give the address where servi DX number, e-mail address o identification Being the [] claimant	r other electronic 's [X] defendant's			
[] by other mean (please specify)	s permitted by the court		 [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation 				
is other than a of the transmissior [X] by other elect document is ot	: (time sent, w claim form) (you may want	to enclose a copy	[] principal office of the co	ompany			
By Email			Email address used by the D	efendant			
I understand that made, a false stat	ement in a document	empt of court ma verified by a sta	e are true. y be brought against anyone who tement of truth without an hones				
Full name MARY	ELIZABETH BARRACLOU	GH					
Signed	P. Ramaelou	st.	Position or office Senior A	Associate Solicitor			

	Claimant's Solicitor			(If signing on behalf of firm or
				company)
Date	2 3 0 5	2 0 2	2	

Calculation of deemed day of service of a claim

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Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service					
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which provides for delivery on the	the relevant service provider provided that day is a business day; or if not,					
next business day	the next business day after that day					
Document exchange	The second day after it was left with, delivered to or collected by the					
	relevant service provider provided that day is a business day; or if not, the					
	next business day after that day					
Delivering the document to or	If it is delivered to or left at the permitted address on a business day					
leaving it at a permitted address	before 4.30pm, on that day; or in any other case, on the next business day					
	after that day					
Fax	If the transmission of the fax is completed on a business day before					
	4.30pm, on that day; or in any other case, on the next business day after					
	the day on which it was transmitted					
Other electronic method	If the email or other electronic transmission is sent on a business day					
	before 4.30pm, on that day; or in any other case, on the next business day					
	after the day on which it was sent					
Personal service	If the document is served personally before 4.30pm on a business day, it is					
	served on that day; or in any other case, on the next business day after					
	that day					

Certifica	ate c	Л ;)EI	VI	LE									GH COURT OF JI BENCH DIVISION		QB-2022-BHM-000044
On what day o	did	2	3	/	0	5	/	2	0	2	2			Claimant High Speed Two The Secretary of		
The date of se	ervice	2	3	/	0	5	/	2	0	2	2			Defendant		
What docume	ents did	you	ser	/e?				Г			1.	Up		Jnknown & Ors ring Bundle A (to	include the	Claimants' Skeleton
Please attach cop already filed with			ıment	s yo	u ha	ve no	ot					Ar	gument on	the merits).		
On whom did (If appropriate inc director).	-			r.g. p	artn	er,		٦	Гера	inie	Gre	yca	t (D8)			
How did you s (please tick the ap [] by first cl delivery c [] by delive	opropriate lass pos on the r ering to	e box it or next or le	othe busii eavin	er se nes: g at	ervio s da t a p	y erm	itte	d pl	ace	es f	or		DX ide	number, e-mail ntification		effected, include fax or ther electronic
[] by person	time	left	, whe							tha	n a] solicitor's	[] litigation friend
[] by other (please special) [] By Docur [] by fax mais other the special of the trans. [X] by other document.	ment Exachine (han a cl	aim heet)	nge form	ti	ime ou m	sen nay w	t, w	to er	nclose e ser	? a c	ору] [] [] []		esidence thess ace of business ace of busine ce of the part ace of the com ace of the part ace of the com ace of the juri	ess of business nership poration
By Email													Er	mail address use	d by the Defe	endant
made, a false	that p	roc mer	eedi nt in	ngs a d	foi locu	ıme	nte ent v	mp veri	t of	co	urt ı	may	be broug	ruth without a		akes, or causes to be elief in its truth.
Signed	H. 8		3	a	ra	ele	ощ	1						Position or office held	Senior Ass	ociate Solicitor

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service	The second day after it was posted, left with, delivered to or collected by
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Delivering the document to or	If it is delivered to or left at the permitted address on a business day
leaving it at a permitted address	before 4.30pm, on that day; or in any other case, on the next business day
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Fax	If the transmission of the fax is completed on a business day before
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Other electronic method	If the email or other electronic transmission is sent on a business day
	before 4.30pm, on that day; or in any other case, on the next business day
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Personal service	If the document is served personally before 4.30pm on a business day, it is
	served on that day; or in any other case, on the next business day after
	that day

How did you serve the documents? (please tick the appropriate box) [] by first class post or other service which provides for delivery on the next business day [] by delivering to or leaving at a permitted place [] by personally handing it to or leaving it with (time left, where document is other than a claim form) (please specify) DX number, e-mail address or other electronic identification [identification Being the [] claimant's [X] defendant's	Certificate of service									Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044				
### Persons Unknown & Ors What documents did you serve? Persons decay field with the count. On whom did you serve? Of appropriate include their position e.g. partner, others(s) Terry Sandison (D35)	-	did did	2 3	/	0	5	/	2	0	(1) High Speed Two (HS2) Limited				
What documents did you serve? Please attach copies of the documents you have not already filed with the court. On whom did you serve? Of appropriate include their position e.g. partner, directory. How did you serve the documents? (please that the appropriate boo) [] by first class post or other service which provides for delivery on the next business day [] by delivering to or leaving at a permitted place [] by personally handing it to or leaving it with (date of service									2	Name of Defendant		
Argument on the merits). Argument on the merits. Argument on the suddens where service effected, include fax on DX number, e-mail address or other electronic identification By and argument a	What docum	nents dic	l you se	ervei	•						1.	U		
Give the address where service effected, include fax on DX number, e-mail address or other electronic identification				≥nts y	ou hav	/e no	t					Α	gument on the merits).	
How did you serve the documents? (please ack the appropriate box) [] by gressonally handing it to or leaving at a permitted place [] by personally handing it to or leaving it with (time left, where document is other than a claim form) (please specify) [] by other means permitted by the court (please specify) [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet) [X] by other electronic means (15:57time sent, where document is other than a claim form) (please specify) [X] by other electronic means (15:57time sent, where document is other than a claim form) (please specify) [X] by other electronic means (15:57time sent, where document is other than a claim form) (please specify) [X] by other electronic means (15:57time sent, where document is other than a claim form) (please specify) [X] by other electronic means (15:57time sent, where document is other than a claim form) (please specify) [X] by other electronic means (15:57time sent, where document is other than a claim form) (please specify) [X] other (please specify) [X] other (please specify) [X] other (please specify) [X] other (please specify)	(If appropriate i	-		n e.g.	partne	er,		Te	erry	Sa	ndis	on	(D35)	
[] solicitor's [] litigation friend [] usual residence [] last known residence [] place of business [] principal place of business [] last known principal place of business [] last known principal place of business [] last known principal place of business [] principal office of the partnership [] principal office of the corporation [] principal office of the company [] place of business [] principal office of the partnership [] principal office of the company [] place of business of the partnership [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connect to claim [X] other (please specify) I believe that the facts stated in this certificate of service 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.	(please tick the [] by first delivery [] by deliv [] by pers (appropriated class poor on the repring to onally had appropriate to the reprinciple of th	e box) st or ot next bu or leav anding	ther solutions the second the sec	ervices dans	y erm avin	itted	d pla	ice				identification and	
[] By Document Exchange [] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet) [X] by other electronic means (15:57time sent, where document is other than a claim form) (please specify) By Email [] last known place of business [] last known principal place of business [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/ corporation within the jurisdiction with a connect to claim [X] other (please specify) Email address used by the Defendant I believe that the facts stated in this certificate of service 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.	[] by other means permitted by the court									[] usual residence[] last known residence[] place of business				
By Email I believe that the facts stated in this certificate of service 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.	[] by fax machine (time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)									 last known place of business last known principal place of business principal office of the partnership principal office of the corporation principal office of the company place of business of the partnership/company/ corporation within the jurisdiction with a connect 				
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.		ent is oth	er thar	1 a cl	aim f	orm) (ple	ease s	spec	ify)				
TAILTIGE WANT ELIZABETT BANNACEOUGT	I understan made, a fal	d that p se state	rocee	ding in a	s for docu	coi	nter nt v	npt erif	of	со	urt	ma	y be brought against anyone who makes, or causes to be	
Signed Position or office held Senior Associate Solicitor								1					or office Senior Associate Solicitor	

	Claimant's Solicitor	(If signing on behalf of firm or
		company)
Date	2 3 0 5 2 0 2 2	

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Certificate	of se	ervice		Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000044				
On what day did you serve?	2 3	3 / 0 5 /	2 0 2 2	Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport				
The date of service is	2 3	3 / 0 5 /	2 0 2 2	Name of Defendant				
				Persons Unknown & Ors				
What documents di Please attach copies of the already filed with the cou	e docum			pdated Hearing Bundle A (to include the gument on the merits).	Claimants' Skeleton			
On whom did you so (If appropriate include the director).		on e.g. partner,	The Chiltern So	ciety				
How did you serve t (please tick the approprio	te box)			Give the address where service DX number, e-mail address or or identification				
[] by first class po delivery on the			ch provides for		and			
[] by delivering to	or leav	ving at a permit	ed place		and			
	e left, w	g it to or leaving i where document 道沙						
				Being the [] claimant's	[X] defendant's			
				[] solicitor's	[] litigation friend			
[] by other mean (please specify)	s permit	itted by the cour	t	[] usual residence [] last known residence				
				[] place of business				
				[] principal place of business	5			
				[] last known place of busine				
[] By Document E	xchang	ge		[] last known principal place [] principal office of the part				
[] by fay machine	1	time cent	where document	[] principal office of the corp	•			
	-	orm) (you may war		[] principal office of the com	npany			
of the transmission	sheet)			[] place of business of the pa				
[X] by other elect document is ot		neans (15:57 In a claim form) (to claim	isdiction with a connection			
By Email				[X] other (please specify) Email address used by the Defe	andant I			
				Email address used by the Dele	endant			
	procee	edings for cont	empt of court ma	e are true. By be brought against anyone who net By tement of truth without an honest l				
Full name MARY	ELIZABI	BETH BARRACLO	JGH					

Signed

H. E. Ramaelough

Position or office held

Senior Associate Solicitor

(If signing on behalf of firm or company)

Date

2 3

0 5

Claimant's Solicitor

2 0 2 2

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

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	that day

Certificate	of	se	rv	ice)			Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Claim No. QB-2022-BHM-000	044						
On what day did you serve?	2	3	/	0	5	/	2	0	2	2	Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport				
The date of service is	2	3	/	0	5	/	2	0	Name of Defendant Persons Unknown & Ors						
What documents di Please attach copies of the already filed with the cou	ie doci				ve r	not				1.	dated Hearing Bundle A (to include the Claimants' Skeleton gument on the merits).				
On whom did you so (If appropriate include the director).			e.g. _i	partn	er,		7	Timo	thy	Cha	Give the address where service effected, include fax	or			
How did you serve to (please tick the appropried [] by first class pot delivery on the [] by delivering to	nte box ost or next	oth bus	er s ines	ervio	У		-		es f	or	DX number, e-mail address or other electronic identification				
[] by personally h (tim claim form) (ple	ıandiı e left	ng it , wh	to o	or le	avi	ng it	witl	h	thaı	n a	Being the [] claimant's [X] defendant's [] solicitor's [] litigation frie				
[] by other mean (please specify)	s peri	mitt	ed l	by th	ie c	ourt	:				 [] last known residence [] place of business [] principal place of business [] last known place of business [] last known principal place of business [] principal office of the partnership 				
[] By Document E	claim sheet,	for	m) (ans	you n	nay 5:5	want 7	to er	nclose e se	e a co	ору	 [] principal office of the corporation [] principal office of the company [] place of business of the partnership/company/corporation within the jurisdiction with a connet to claim [X] other (please specify) 				
By Email											Email address used by the Defendant				
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Full name MARY	ELIZ	ABE ⁻	TH E	BARF	RAC	LOU	IGH								
Signed	£	B	a	ma	el	cu	gl				Position or office Senior Associate Solicitor held				

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

Calculation of deemed day of service of a claim

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Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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Certificate of	of s	erv	/ice	9				Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION	Claim No. QB-2022-BHM-000044					
On what day did you serve?	2	3 /	/ 0	5	/	2	0	2	2	Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Tra				
The date of service 2 3 / 0 5 / 2 0 2 2										(2) The Secretary of State for Transport Name of Defendant				
										Persons Unknown & Ors				
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MARY ELIZABETH BARRACLOUGH Signed									Position or office Senior Asso	ociate Solicitor				

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

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Certificate	of	se	rvi	ice	•				Name of court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION Name of Claimant Claim No. QB-2022-BHM-000044						
On what day did you serve?	2	3	/	0	5	/	2	0	2	2	(1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport				
The date of service is	2	3	/	0	5	/	2	0	2	2	Name of Defendant Persons Unknown & Ors				
What documents d Please attach copies of t already filed with the cou	he doci				ve no	ot				1.	ated Hearing Bundle A (to include the Claimants' Skeleton ment on the merits).				
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	Claimant's Sc	licitor					(If signing on behalf of firm or
							company)
Date	2 3 0	5	2	0	2	2	

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certificate	J I .	3 C	ıvı		•						IN THE HIGH COURT OF JUSTICE QB-2022-BHM-000044 QUEEN'S BENCH DIVISION			
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On what day did you serve?	2	3	/	0	5	/	2	0	2	2	(2) The Secretary of State for Transport			
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Signed		5	qu	W E	E1	UU	9 (or office Senior Associate Solicitor held			

	Claimant's Solicitor	(If signing on behalf of firm or
Date	2 3 0 5 2 0 2 2	company)

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Certificate	OI.	3 C	ıv	ice	3							IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION QB-2022-BHI	√1-000044		
												Name of Claimant			
On what day did												(1) High Speed Two (HS2) Limited			
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Please attach copies of	What documents did you serve? Please attach copies of the documents you have not already filed with the court.						Updated Hearing Bundle A (to include the Claimants' Skeleton Argument on the merits).								
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