

Application notice

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Name of court High Court of Justice King's Bench Division Birmingham District Registry		Claim no. QB-2022-BHM-000044										
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)											
PBA:0087960	<table border="1"> <tr> <td>H</td> <td>W</td> <td>F</td> <td>-</td> <td></td> <td></td> <td>-</td> <td></td> <td></td> <td></td> </tr> </table>		H	W	F	-			-			
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Warrant no. (if applicable)												
Claimant's name (including ref.) (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport (Ref: RXS/380900/401)												
Defendant's name (including ref.) (1)–(4) Four Categories of Persons Unknown (5) – Ross Monaghan and 60 other Named Defendants												
Date	27 March 2023											

1. What is your name or, if you are a legal representative, the name of your firm?

DLA Piper UK LLP

2. Are you a Claimant Defendant Legal Representative

Other (please specify)

If you are a legal representative whom do you represent?

Claimant

3. What order are you asking the court to make and why?

An order in the form of the draft order enclosed seeking, inter alia:

- 1) a continuation of the injunction imposed by the Order of Mr Justice Julian Knowles dated 20.09.2022 (the “**Injunction**”), for a further 12 months;
- 2) to amend the definition of HS2 Land to cover the land shown coloured pink and green on the “March 2023 HS2 Land Plans” (as defined in the draft order), to extend the protection afforded by the Injunction to land that has come into the Claimants’ possession for the purposes of the HS2 Scheme since the Claimants’ original application was made in March 2022; and
- 3) to prohibit the Defendants from obstructing, impeding, hindering or delaying works or activities authorised by the “HS2 Acts” (as defined in the draft order) by unlawful means, in express or implied agreement or in combination with another person with the intention of causing damage to the Claimants.

4. Have you attached a draft of the order you are applying for? Yes No

5. How do you want to have this application dealt with? at a hearing without a hearing

6. How long do you think the hearing will last?

Day

Is this time estimate agreed by all parties?

Yes

No

7. Give details of any fixed trial date or period

16 May 2023

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

(1)–(4) Four Categories of Persons Unknown
(5) – Ross Monaghan and 60 other Named Defendants

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

The Claimant will deal with effecting service of this Application on the Defendants in accordance with the Directions Order dated 15 March 2023.

10. What information will you be relying on, in support of your application?

the attached witness statement

the statement of case

the evidence set out in the box below

If necessary, please continue on a separate sheet.

Please see the attached witness statements of James Dobson, Julie Dilcock and John Groves.

Statement of Truth

The applicant believes that the facts stated in this section (and any continuation sheets) are true. The applicant understands 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

DLA Piper UK LLP
Applicant's legal representative

Dated **27 March 2022**

Full name: **Robert Shaw**

Name of applicant's legal representative's firm: **DLA Piper UK LLP**

Position or office held: **Solicitor**
(if signing on behalf of firm or company)

11. Signature and address details

Signed

DLA Piper UK LLP
Applicant's legal representative

Dated **27 March 2022**

Position or office held: **Solicitor**
(if signing on behalf of firm or company)

Applicant's address to which documents about this application should be sent

DLA Piper UK LLP 1 St. Paul's Place Sheffield		If applicable					
		Phone no.	0114 283 3312				
		Fax no.					
		DX no.	DX 708580 Sheffield 10				
		Ref no.	RXS/388900/401				
Postcode		S	1	2	J	X	
E-mail address	rob.shaw@dlapiper.com / mary.barraclough@dlapiper.com						