

N244

Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

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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	H W F - -
Warrant no. (if applicable)	
Claimant's name (including ref.) (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport (Ref: RXS/380900/441)	
Defendant's name (including ref.) (1) – Not Used (2) - (4) Three Categories of Persons Unknown (5) – Ross Monaghan and 60 other Named Defendants	
Date	1 March 2024

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 Ritchie dated 31.05.2023 (the “**Injunction**”), for a further 12 months;
- 2) permission to amend the definition of the “March 2023 HS2 Land Plans” to that in the draft order, so that it now refers to the plans provided by the Claimants’ geographic information system mapping;
- 3) permission to update the definition of “HS2 Land” to reflect land may be declared by HM Government to be surplus to the requirements of the HS2 Scheme; and
- 4) to prohibit the Defendants from causing an object (such as a drone) to enter or remain without the consent of the Claimants on, in, under or over the HS2 Land.

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

at a remote hearing

6. How long do you think the hearing will last? Is this time estimate agreed by all parties?

Day

Yes No

7. Give details of any fixed trial date or period

15 May 2024

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

(2)–(4) Three 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

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.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

No

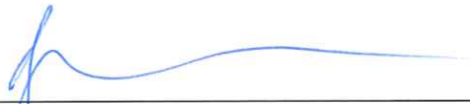
Statement of Truth

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 an honest belief in its truth.

I believe that the facts stated in section 10 (and any continuation sheets) are true.

The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature



Applicant

Litigation friend (where applicant is a child or a Protected Party)

Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day

1

Month

March

Year

2024

Full name

Robert Shaw

Name of applicant's legal representative's firm

DLA Piper UK LLP

If signing on behalf of firm or company give position or office held

Solicitor

Applicant's address to which documents should be sent.

Building and street

DLA Piper UK LLP

Second line of address

Two Chamberlain Square

Town or city

Birmingham

County (optional)

Postcode

B	3		3	A	X	
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If applicable

Phone number

0114 283 3312

Fax phone number

DX number

DX 708580 Sheffield 10

Your Ref.

RXS/3809003/441

Email

rob.shaw@dlapiper.com / mary.barraclough@dlapiper.com