

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

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & OTHERS

Defendants

**CORE BUNDLE
(Volume B)**
for hearing on 15 May 2024

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Sheffield
S1 2IX**

**Telephone: 0114 283 3312
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Reference: RXS/380900/441**

Solicitors for the Claimants

On behalf of: Applicants/Claimants
J.Dobson
2nd statement of witness
Exhibits: JD7
Date: 28 February 2024

Claim No. QB-2022-BHM-000044

**IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY**

Between:

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

Claimants

-and-

- (1) NOT USED**
- (2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER THE HS2 LAND WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES**
- (3) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS**
- (4) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS**
- (5) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE)**

AND 60 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM

Defendants

EXHIBIT JD7

TO THE

SECOND WITNESS STATEMENT OF JAMES DOBSON

CORE-B-2

<https://www.facebook.com/photo/?fbid=6816681498388993&set=a.830787036978499>



Carl Woods

October 6, 2023 · 🌐



I beseech you all to continue to protest for a FULL scrapping of #HS2. The devastation from Euston to Litchfield is beyond comprehension: it's destruction of the most wicked kind.

While scrapping the whole of HS2 will not fully restore what has been needlessly vandalised, we can rewild where we can, give back to rightful land and property owners where desired and reuse elsewhere in ways that are beneficial to the environment and communities...AND....importantly, stop further destruction, biodiversity loss and carbon emissions from the continuing construction and then use of HS2.

Sunak is already reneging on his £34 Bn commitment to Network North and private investment is being sought to finance completion of Phase 1 from Euston to Birmingham. This ignores the fact that private investors will be reluctant to invest in a clearly unstable and undeliverable project - never mind the fact that Euston simply isn't big enough to accommodate the platforms and station HS2 Phase1 demands! And with 80% of the budget for Phase 1 already blown with at best only 20% of itnot including the most expensive tracklaying part for which they will struggle to find the skilled workforce leading to yet further delays, Iwhere is the money for completing Phase 1 going to come from?

I don't want to quote Penny Mordant, erm, unusually repetitive conference speech....but we must continue the fight together. Indeed now is the time for a final push, for increasing the momentum and exploiting the traction that has been presented by cancelling Phase 2 and a recognition by Rishi in his speech that we the protesters, had it right all along.

Let's [#StopHS2](#)





👍👎👤 13

10 comments 13 shares

👍 Like

🔄 Share

All comments ▾



Jim Knaggs

It's all destroyed in phase 1. May as well get a train line and the planned mitigation. There are no trees to save, if they cancel phase 1, they'l cancel their so called mitigation.

19w Like Edited



Carl Woods

Jim Knaggs You are not considering the financial and carbon implications. In my comment I talk about what should be done with the land to include mitigation and reparations.

19w Like



Jim Knaggs

Carl Woods The ecology has been lost, it may as well be mitigated. A train is better than a road. I don't care about the finances. Most the concrete sections have been made regarding carbon. Neither of us know the figures or projections for phase1 as a stand alone.

19w Like



Carl Woods

Jim Knaggs I agree we should mitigate for the lost ecology. Rewilding is better than a road. And what about the steel yet to be made? The most expensive element. Plus there isn't the skilled workforce to see it through leading to just more delays.

19w Like Edited



Jim Knaggs

I'm not bothered about their economy or delays. We are in three trillion of debt. It's the ecology. steel is an issue because it uses to coal to make it. But no one (apart from me) uses that argument when it comes to other so called green infrastructure such as wind turbines.

I'm not pro hs2 because of the environmental damage it would cause, and did. We can't get it back. So I dare say a train and mitigation is the greenest possible solution and who knows maybe even profitable between London and Birmingham.

19w Like



Carl Woods

Jim Knaggs I'm not sure where you made the leap a road instead of a train as a consequence of scrapping Phase 1

19w Like



Jim Knaggs

Carl Woods it's a consequence of stopping Phase 2, why wouldn't it be for 1? It will reduce some car journeys as well

19w Like



Val Saunders

If you can make shareable can share to more! X

19w Like



Carl Woods

Val Saunders done. Xx

19w Like

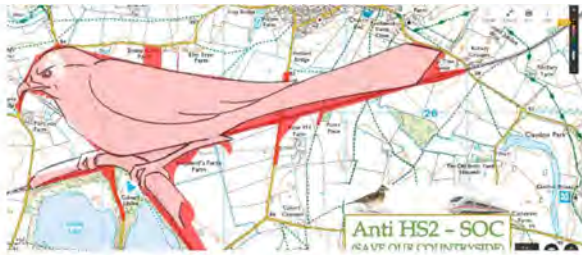


Helen Dangerfield

completely agree!

19w Like

The Same post shared to Anti HS2 - SOC (Save Our Countryside):
<https://www.facebook.com/groups/384792308986381/posts/1481687582630176/>



Anti HS2 - SOC (Save our Countryside)

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Carl Woods
October 6, 2023

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Let's #StopHS2



23 [Like](#) [Comment](#) [Share](#) 1 comment 2 shares



   19

1 comment 1 share

 Like

 Comment

 Share

All comments ▼



Sebastian Sandys

I've said this from the off.

Even if we don't stop them in time and they fell every single tree between Bloomsbury and Birmingham we can stop the fu* kers making money from doing so.

(And on the bright side the bill for blowing up the bits they do finish is dropping all the time.)

Like Reply Share 2d

Same post shared to the Stop HS2 Facebook group by another user:

<https://www.facebook.com/groups/119007471490656/posts/6808750872516249>



STOP HS2

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 **Charlotte Griffin**
October 7, 2023 · [...](#)



 **Carl Woods**
October 6, 2023 · [...](#)

👍👎 51

9 comments 7 shares

👍 Like

💬 Comment

🔗 Share

All comments ▾



Philip Sutton

That photograph just about sums up the senseless vandalism of HS2. ...

20w Like Reply Share

👍 4



Delia Sedgwick

Will continue to protest 🙄 ...

20w Like Reply Share



Tim Chantler

HS2 is down. Now is the perfect time to kick it!
Don't forget their injunction rarely covers the sections of road they close, which can often be freely protested at 🙄 ...

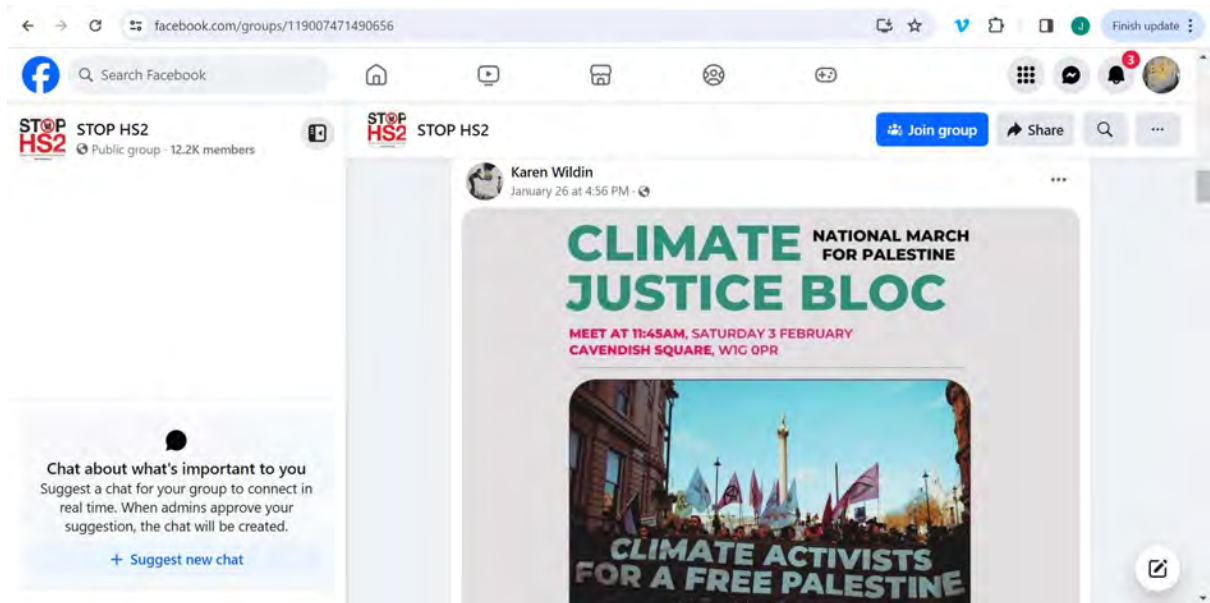


20w Like Reply Share

👍 2

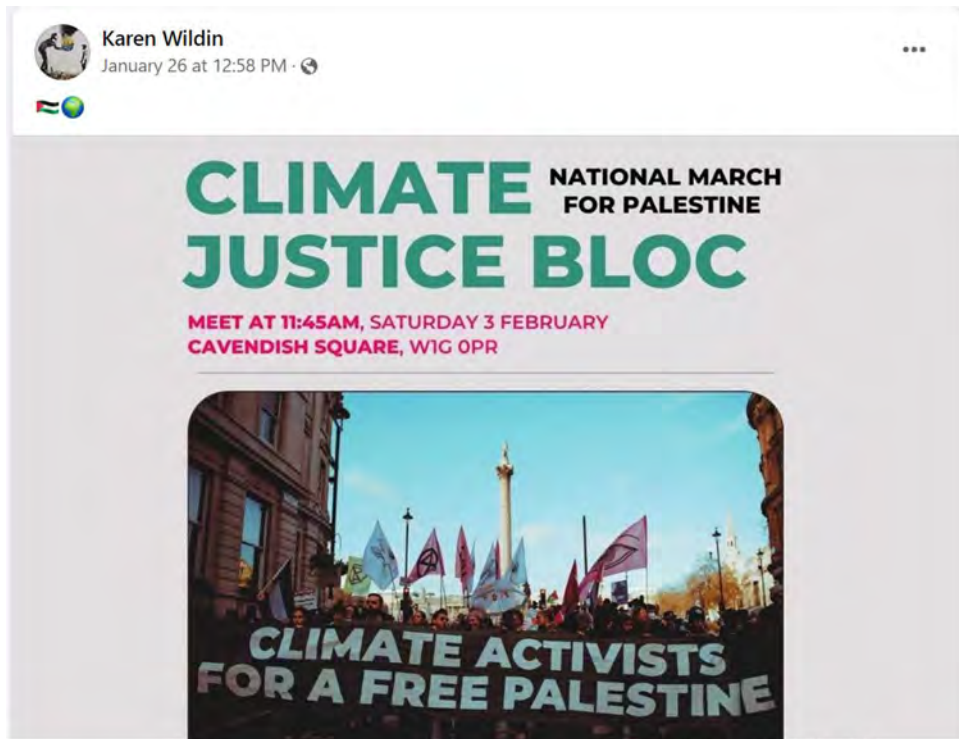
<https://www.facebook.com/groups/119007471490656>

(Post subsequently removed)



Original Post:

https://www.facebook.com/permalink.php?story_fbid=pfbid0CBoPyFPCSBgsuAV5Q8pQBxYNF2mjdir tqkMtkP3aCtd7EWyYy8EysBm51TF19Eul&id=100008144808673



D16 at DLA Piper 06.12.2023

<https://juststopoil.org/2023/12/07/are-you-discussing-genocide-injunction-injustice-targets-dla-piper/>



“Are you discussing genocide?”: Injunction Injustice targets DLA Piper

Press / December 7, 2023

Five people from Injunction Injustice disrupted a corporate presentation event at the offices of the law firm DLA Piper on Tuesday evening before they were ejected by security guards. The city law firm is profiting the most from the civil law injunctions brought by the government against Insulate Britain, Stop HS2 and Just Stop Oil. [1]

Tuesday evening at around 6pm, five people from Injunction Injustice stood outside the DLA Piper and Times newspaper sponsored event 'A Year In Review' at 160 Aldersgate, London. They displayed banners, spoke to guests and at one point entered the foyer of the building before they were forcibly ejected by security guards. Guests included lawyers, consultants and DLA Piper clients from The Times, The Telegraph, the Spectator and The Guardian amongst others.

The Injunction Injustice supporters were raising awareness of the role of law firms such as DLA Piper in helping the government to silence dissent and repress peaceful protest through the means of civil injunctions. As well as criminal charges, incarceration and tagging, climate defenders who may have breached an injunction simply by standing outside an oil terminal with a sign, face oppressive financial costs.

The use of injunctions is having a chilling effect on peaceful protest; protest against new oil and gas licensing which will kill hundreds of millions of people. Scientists warn of untold suffering and death, of the collapse of whole nations, and the eradication by manmade global heating of entire peoples and cultures. New oil and gas means genocide and lawyers who are supporting the government in suppressing protest are complicit.

Injunction Injustice supporter Karen Wildin said:

"The role of lawyers and journalists is critical in these times. Most don't seem to want to acknowledge this, probably because it requires significant shifts of attitude and mindset. However, they have huge power and therefore huge responsibility.

"The most important thing any of us can do is acknowledge that business as usual is killing us. If we continue down the current path we face annihilation. This is especially true for young people and those in the global south for whom continuing with our fossil fuel addiction means genocide.

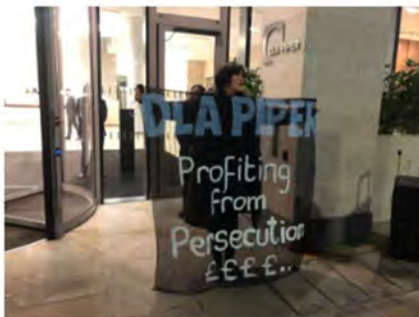
"We asked the participants are you discussing genocide tonight ? And if not, why not ?"

Injunction Injustice was started by people who have previously taken action with Just Stop Oil but who are now banned from participating in Just Stop Oil actions by draconian bail conditions.

A spokesperson for Just Stop Oil said

"More and more ordinary people understand what these lawyers apparently do not and that is that no-one is safe from the consequences of runaway global heating. Your fat salary might give you a few months respite from extreme heat waves and mass crop failure, but in the end we will all see our children starve and have to face riots and war.

"Why, then, are lawyers aiding and abetting our criminal government in persecuting ordinary people trying to protect humanity when we should all be working together to deal with the impacts of climate breakdown and societal collapse? Lawyers must be responsible. Stop profiting from genocide"



DLA Piper is an international Law firm that claims to have green credentials and yet they are the firm profiting the most from the civil law injunctions brought by the government against Insulate Britain, Stop HS2 and Just Stop Oil.

Lawyers for DLA Piper charge the government between £90 and £412 per hour for their services, fees which the government then seeks to recoup from the people named on injunctions in the form of legal costs. For example, lawyers acting for the government in respect of the National Highways Ltd M25 injunction originally sought costs of £727,574 against the 133 defendants. People named on injunctions are frequently faced with huge legal bills whether or not they broke the injunction. [2]

In addition to legal costs running to tens of thousands, those convicted of breaking an injunction face up to 2 years in prison, an unlimited fine and seizure of assets. Many of those in court this week have already spent long periods on remand, experienced restrictive bail conditions and ankle tags and, in an apparent case of double jeopardy face trial for public nuisance in criminal courts in 2024/5. [3][4]

Continued expansion of new oil and gas will bring about the wholesale destruction of ordered society and an end to the rule of law. We are not prepared to watch while the government continues to serve the interests of a few, at the expense of everyone else. It's up to all of us to come together and resist. It is the will of the overwhelming majority of people that we take the actions necessary to ensure our survival and together we can make it happen.

Our government is waging war on its people, and we're fighting back. They're the real criminals – imprisoning peaceful people for taking proportionate action to protect their communities, whilst licensing more than 100 new oil and gas projects, which will destroy everything we value. We're coming together to demand an end to new oil and gas. It's not a case of 'if' we will win; but 'when'.

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: <https://juststopoil.org/press-media>

Website: <https://juststopoil.org/>

Facebook: <https://www.facebook.com/JustStopOil/>

Instagram: <https://www.instagram.com/just.stopoil/>

Twitter: https://twitter.com/JustStop_Oil

Youtube: <https://juststopoil.org/youtube>

Notes to Editors

[1] Just Stop Oil is a coalition of groups working together to demand that the government immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK. Just Stop Oil is a member of the A22 Network of civil resistance projects. Climate Emergency Fund is Just Stop Oil's primary funder for recruitment, training, and capacity building.

Just Stop Oil 'Blue Lights' policy: our policy is, and has always been, to move out of the way for emergency vehicles with siren sounding and 'blue lights' on.

[2] Further information on injunctions and the repercussions of breaking them can be found here: <https://docs.google.com/document/d/1-k-JlmOgk6UvIphNhEilRg9UcIqeSpCQIF5pHDYJmLM/edit?usp=sharing>

[3] **Climate activists face 'crippling' legal fees for injunctions banning protest**

Protesters facing criminal convictions are being punished twice as National Highways and TfL seek costly injunctions: <https://www.opendemocracy.net/en/civil-injunctions-just-stop-oil-insulate-britain-extinction-rebellion-punishment-protests/>

[4] **Punishment without trial: Britain's latest weapon in the war against dissent**
<https://www.theguardian.com/commentisfree/2023/jun/29/punishment-without-trial-britain-civil-injunctions-climate-activists>

https://www.facebook.com/permalink.php?story_fbid=pfbid02qXKthVV1oWk4hYzipJWzWzFupmotmFkrrLuPCvoHTUo1aaepjH37CBumVbKsWwo3l&id=100008144808673



Karen Wildin

September 23, 2023 · 🌐



What did a well know environmentalist say ?

'Is it time to break the law ?'

Who is gaining what from being law abiding and putting up with climate and ecological collapse , the cost of living crisis etc etc ...??? Public money in its Billions wasted on a so called green HS2 , £2.4million a day subsidising DRAX to cut down the worlds trees for so called green energy... and in Leicestershire more road expansion with the Expressway. Bankruptcy across public authorities nationwide...

We don't like disruption ?

Do we prefer total climate and societal collapse ?

Short term disruption to prevent long term total climate , ecological and societal breakdown. Rise up !!

Take direct action

First they came for (a, b, c...)

Then they came for me'

(Martin Niemoller)

Community and solidarity over Individualism and self interest

Join the resistance !

Try juststopoil.org

Try your union

Take action !!



BBC.COM

Leicestershire County Council warns of 'dire' £100m funding gap

The authority says the government must step in if big council tax rises are to be avoided.

👍 4

1 share

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Karen Wildin
September 14, 2023 · 🌐

At Water Orton phase 1 and Lea Marston phase 2a is powering ahead ...



0:30 / 0:45



0:08 / 0:19

👍❤️ 18 17 comments 3 shares

👍 Like 💬 Comment ➦ Share

Top comments ▾

Write a public comment...

Karen Wildin *Author*
As a people us Brits are too obedient. People will not protest with their feet on the ground. This nightmare along with the Cost of Living Crisis and Climate and Ecological Breakdown is the responsibility of the masses as well as the responsibility of corrupt politicians and business and media tycoons

23w Like Reply Share 7

Val Saunders
Karen Wildin yr so right! ...
22w Like Reply Share

Scarah Snooks
Karen Wildin If everyone had your guts, they wouldn't stand a chance! It would be like France ...
22w Like Reply Share

Karen Wildin Author
Scarah Snooks Vive la France
🍷🍷🍷🍷🍷🍷!!!
We need a leader like Lula ... someone who gets that the Natural World is more important than money .
Our politicians and most educated and privileged and powerful people are disconnected , as are many many others in the West thanks to capitalism ...
We don't know our own power potential
22w Like Reply Share

Write a public reply...

Sue Castle
Carnage everywhere caused by HS2, the residents of Burton Green are constantly faced with road closures. It must be very worrying for Kinsbury Water Park, such an asset on so many levels, and it could all be destroyed for some tin pot railway!
23w Like Reply Share

Scarah Snooks
Sue Castle everywhere is affected by hs2s constant road closures. It seems to be the only bit that bothers many people. Those that were not interested when we tried to warn them years ago are now moaning. Some people seemed more bothered by protest camps appearing than hs2s mass destruction
23w Like Reply Share

Sue Castle
Scarah Snooks only too aware of the warnings that were given out years ago, and few listened. Have witnessed the destruction of the Offchurch area in particular, and protested, and have made views known on the subject! All pull together people.
23w Like Reply Share

Tim Chantler
Scarah Snooks the road closures are an odd one..
HS2 still need access..
But the closure points are usually outside of the injunction zone..
Maybe an HS2 oversight?
23w Like Reply Share

Sue Castle
Tim Chantler road closures involve the old railway bridge in Burton Green, HS2 going thro/underneath, road closures fairly regular. Looks like a new bridge, whether permanent or temporary is being constructed to one side. Ad soon as the main road was ... See more
23w Like Reply Share

Kath Skermer
Scarah Snooks no different to where I live Scarah, large industrial units being built right next to a housing estate
Folks woken up now that they are up and overpowering 'Nobody told us'... See more
22w Like Reply Share

Scarah Snooks
Kath Skermer some of these people deserve the disruption. Even early on there were people who ridiculed anyone campaigning against it
22w Like Reply Share

Kath Skermer
Scarah Snooks nooooooooooooo that's ridiculous ...
😡😡😡😡😡😡😡



Ian Mann

this is a corrupt project supported by rich politicians of both parties it should never have been started in the first place a disaster to the countryside people wont forget just whats been done as i said corrupt from top to bottom.

...

23w Like Reply Share Edited



Kath Skermer

Good luck to you all the disruption must be horrendous 🤔🤔

...

22w Like Reply Share



Nick Colloff

Dreading the probable carnage when they get to Kingsbury Water Park. 🙄

...

23w Like Reply Share



Tracey Clarke

...



23w Like Reply Share



<https://www.facebook.com/groups/stophs2staffordshire/permalink/1499522387502217/>



Group by Stop HS2 Staffordshire

Stop HS2 Staffordshire - Group

Join group

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Discussion People Events Media Files



Karen Wildin

September 14, 2023 · 🌐



Karen Wildin

September 14, 2023 · 🌐

At Fradley Junction , the spur to phase 2b was silent with no work . Broken Down Wood has had its middle totally removed. The substantial section of Fradley woods that was destroyed is now a silent store for sands and aggregate.

Along the canal path heading to the ravaged Ravenshaw Wood are the remnants of where a community of humans lived low carbon lifestyles as boaters with allotments along this jetty. The lock keepers cottage is Heras fenced off and empty.

Many silver birch saplings, with dead tree stumps interspersed, can be seen where the cutting machines and security vehicles used to be stored for tearing out the heart of Ravenshaw Wood where the ancient deer herds fled from there to Fradley Village one foggy morning in Feb 2021.

Camp Isla is now a new but empty compound . Opposite, the house is gone and so is what was the temporary compound. Just a green 6 ft security fence and nature reclaiming flattened land where there was previously thriving hedges and a diverse mix of mature trees.

Ran out of time to document the other woodlands felled along Wood End Lane



3 comments

Like

Comment

Share

All comments



Jan Don Elson

I read that the government are to have a meeting as they refuse to guarantee the future of hs2 Birmingham to Manchester. Here's hoping its cancelled

22w Like Reply Share



Karen Wildin Author

Jan Don Elson this is what is odd.... when you witness how much is in place already around Water Orton and Coleshill. Maybe a few protests would help ensure it doesn't go ahead ..

22w Like Reply Share



Karen Wildin Author



22w Like Reply Share



Karen Wildin Author

Jan Don Elson



22w Like Reply Share



Karen Wildin Author



22w Like Reply Share

D17 and D20 Arrest at Fisher German, Manchester 22.11.23

<https://www.facebook.com/groups/384926985723985/permalink/1142595386623804/>



Ken Bennett

November 23, 2023 · 🌐



ROOFTOP DRAMA CHARGE

Charges have been authorised following reports of a man on the roof of a premises in Deansgate, Manchester yesterday (22/11/23).

Andrew McMaster (11/08/88) of Uppingham, Skelmersdale, has been charged with aggravated trespassing, criminal damage, and the possession of a Class C drug.

He was remanded in custody to appear at Manchester and Salford Magistrates court today (23/11/23).

In addition, George Keeler (08/02/00), of no fixed abode, has been charged with a public order offence, and assault of an emergency worker.

He was released on bail to attend court on 5 January 2024.

A 27-year-old woman arrested as part of the same incident on suspicion of assaulting an emergency worker has been released on bail.

1 share



Like



Comment



Share

<https://www.gmp.police.uk/news/greater-manchester/news/news/2023/november/two-charged-following-reports-of-a-man-on-the-roof-in-manchester-city-centre/>

Charges authorised following reports of a man on the roof of a premises in Manchester city centre

News

🕒 Published: 14:49 23/11/2023

Charges have been authorised following reports of a man on the roof of a premises in Deansgate, Manchester yesterday (22/11/23).

Andrew McMaster (11/08/88) of Uppingham, Skelmersdale, has been charged with aggravated trespassing, criminal damage, and the possession of a Class C drug.

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<https://www.manchestereveningnews.co.uk/news/greater-manchester-news/pro-palestine-protester-brought-down-28155929>

News • Greater Manchester News • Manchester City Centre

Pro-Palestine protester brought down from roof of city centre offices and arrested

He has been held on suspicion of aggravated trespass

NEWS By **Ethan Davies** Local Democracy Reporter

18:11, 22 NOV 2023 UPDATED 18:22, 22 NOV 2023

Bookmark



Pro-Palestine protesters on the roof of Centurion House, Deansgate, Manchester city centre

A protester who climbed onto the roof of a city centre office block has been arrested and lowered down on a cherry picker.

The man, a pro-Palestine demonstrator, climbed onto the roof of Centurion House on [Deansgate](#) this morning (November 22). The man, who started the protest shortly after 8am according to police, was arrested and lowered down in the mid-afternoon.

Images of the protest have been shared on social media. They showed a group of people holding Palestinian flags and banners, while the protester shouted messages from the roof.

The group, Manchester Palestine Action, said the building was targeted because it houses offices for Fisher German, a property firm which rents out offices for Elbit Systems, a weapons company. The man was brought down via a cherry picker from the roof of the entrance, and was then arrested.

A statement from [Greater Manchester Police](#) said: "Shortly after 8am today (Wednesday 22 November 2023), officers were called to reports of a man on the roof of a premises in Deansgate, Manchester. Officers engaged with a man, who has since been arrested on suspicion of aggravated trespass."

<https://www.facebook.com/groups/119007471490656/permalink/6788498197874850/>



Drew Robson
October 2, 2023 · 🌐

...

HS2 NORTH CANCELLED!!!

Mixed feelings BUT mostly happy!

Sad because of the damage that HS2 has already done, but happy that it appears they are pulling out of anything North after Birmingham.

Stop HS2 (was and still is) a massive part of my life, that I will remember with great fondness. Trying to protect ancient woodland's, waking up to the sound of felling and then hearing 100+ year old trees hitting the floor while the wildlife living in the area fled with horror.

I watched my friends (locals and StopHS2 activists) get beaten, injuncted, arrested, robbed, kidnapped and imprisoned..to me, you are all heroes!

The tunnelers below the woodland, the tree occupiers, the lock-on-ists ALL of YOU should be proud!

So many memories and so many friends who mostly I now consider as family.

Let's take a minute to think about all the people that have lost their homes, businesses, green spaces and memories. Let's think about all those ecosystems that have been obliterated and replaced with a pointless vanity project!

HS2 fuck you.

Carl Harrison and HS2... Drew AKA Arnie or D17 is smiling right at you...and yes, I'll still be back 😊



Comrades I love you all!

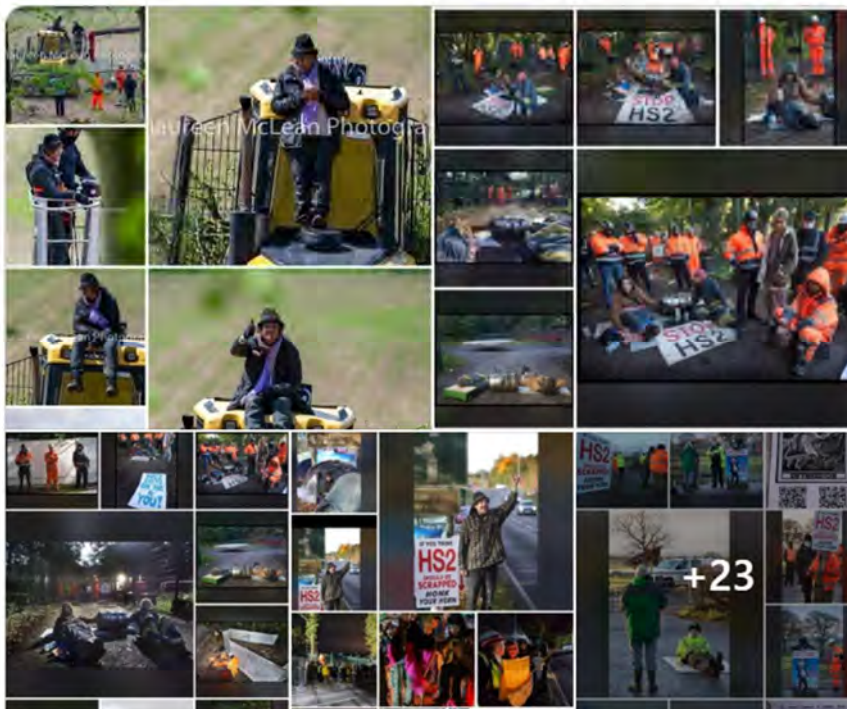
Also, big shout out in solidarity with #stopthetink who came to our aid when the shit hit the fan and we were sieged in by the bailiffs!

#StopHS2

Credit to the photographers that took shit of bailiffs, carrots and HS2'S private security dogs. Your help and determination to highlight our cause is priceless.

Thank you to Mo, Martin and Debbie for your efforts 🙌🙌🙌🙌.

The fight continues.



<https://www.facebook.com/photo/?fbid=1467480964102525&set=a.140181693499132>



Charlie Chaser

September 9 · 🌐



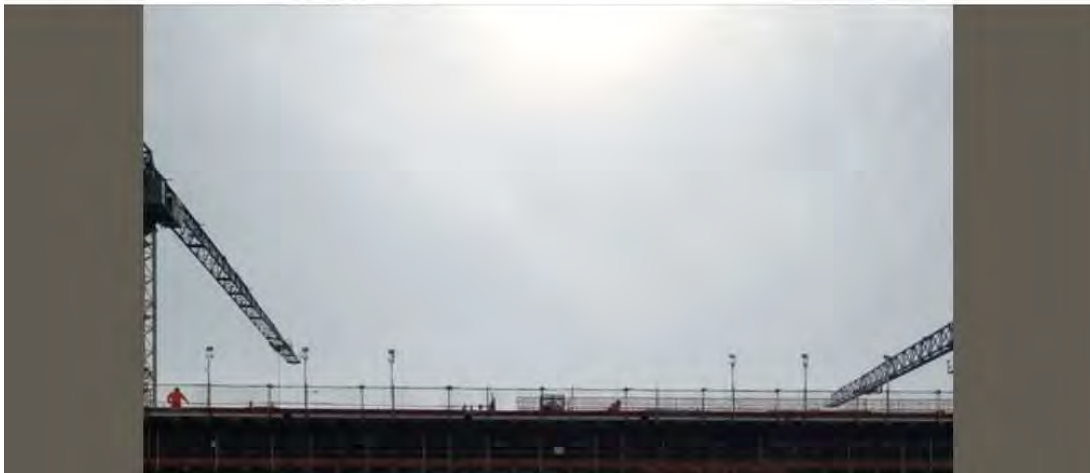
When I took this foto ov #HS2 Curzon Street, The carrot Security shit himself and nearly had a heart attack, when he saw me.



I said "Don't worry mate, I'm not gonna do any activism on you today, the damage haz already been done. Am just taking fotos".

We laughed, and laughed and I god blessed him and wished him a good day.

Fuck am I going against that HS2 super injunction. Not one person cares from #StopHS2. Their words about wellbeing are bullshit



3 comments



Like



Comment



Share

Most relevant ▾



April Hazel Showers

i think teh problem is that no body wants to risk a conviction when it comes down to it, the price is just to high for some people. with the new laws they can use if they need too you can end well screwed , protesting has been fun up to now but now teh game has changed i think an dpeople beginning to realise they could loose every thing if they are not careful x

23w Like Reply



Author

Charlie Chaser

April Hazel Showers my last arrest woz weird az fuck, pulling mental health cards. it reminded me about Wally Hope. I also have been in the police/court system long enough to now and see how evil these royalist elites are.

23w Like Reply



April Hazel Showers

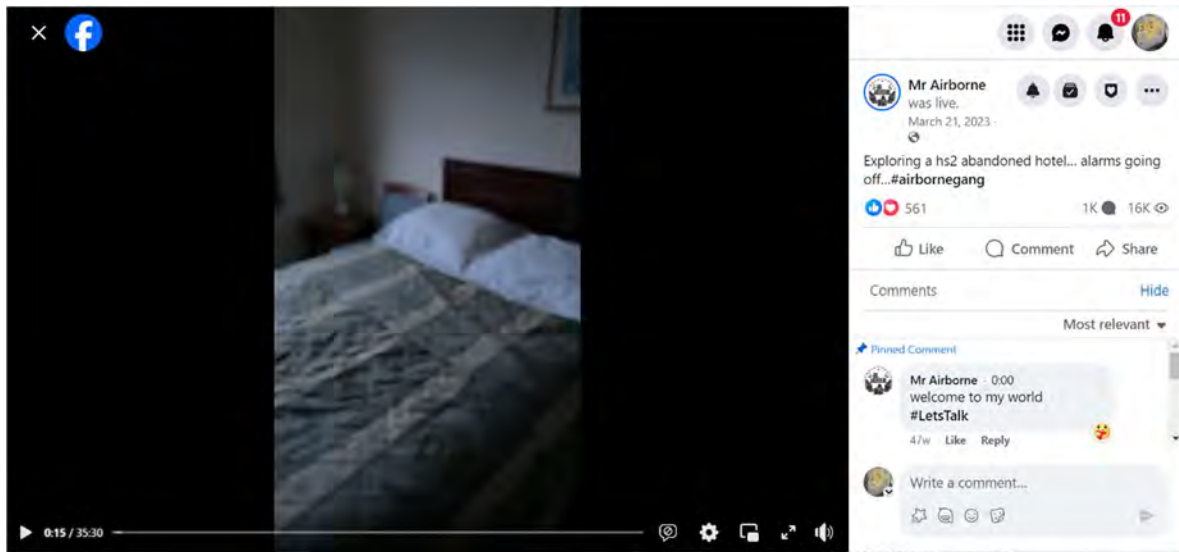
Charlie Chaser several people were locked up under teh mental health act onteh Convoy sadly for some of them it didnt end to well teh mental health act is a very dangerous thing it has diffrent forms of control if yoru nicked undwer it that can be life changing if yoru not careful i dont think alot of people quite understand that x

23w Like Reply



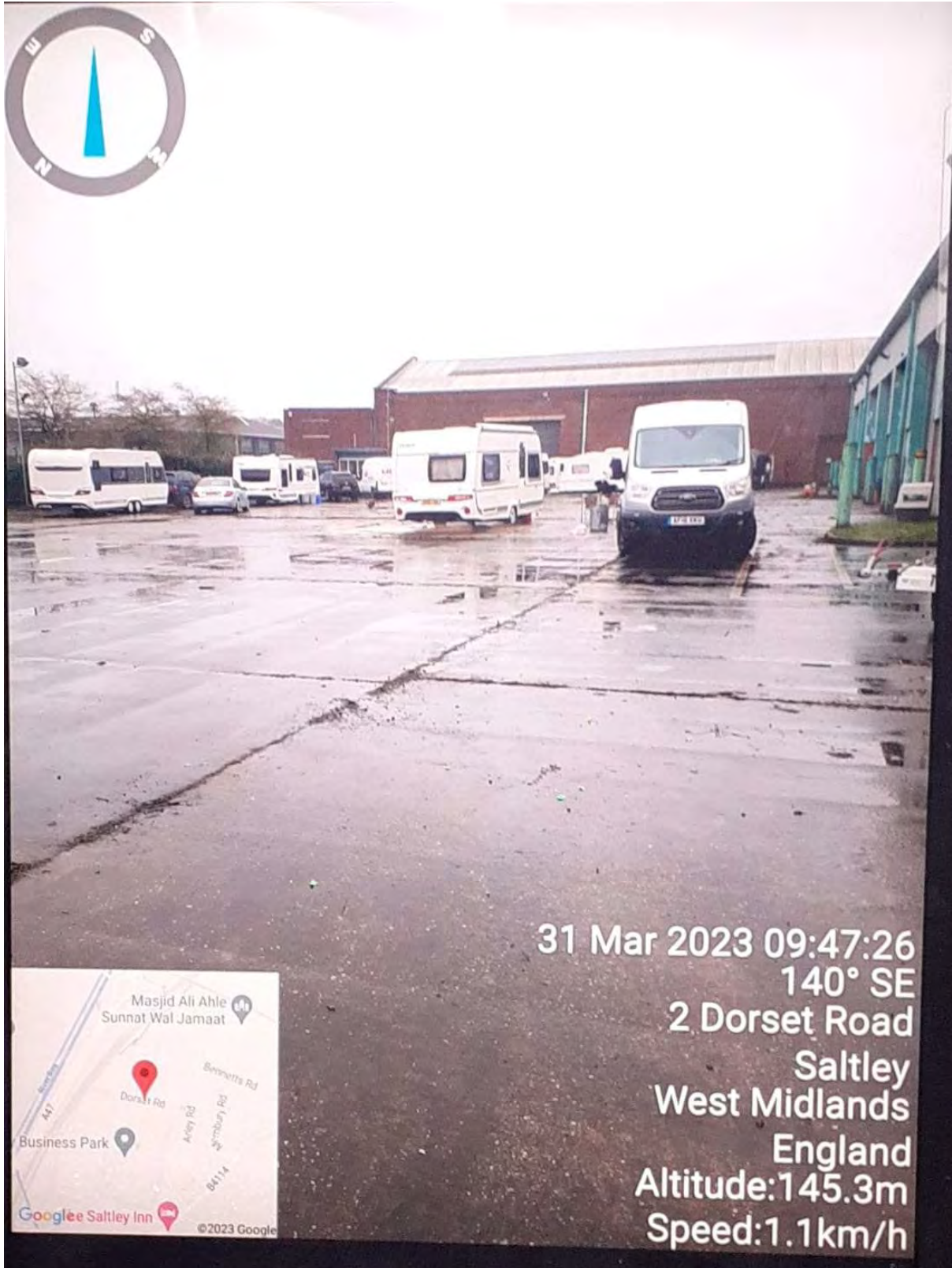
21 March 2023 - Hotel on Gilson Road, Birmingham

<https://www.facebook.com/mrairborne66/videos/938971827250802>

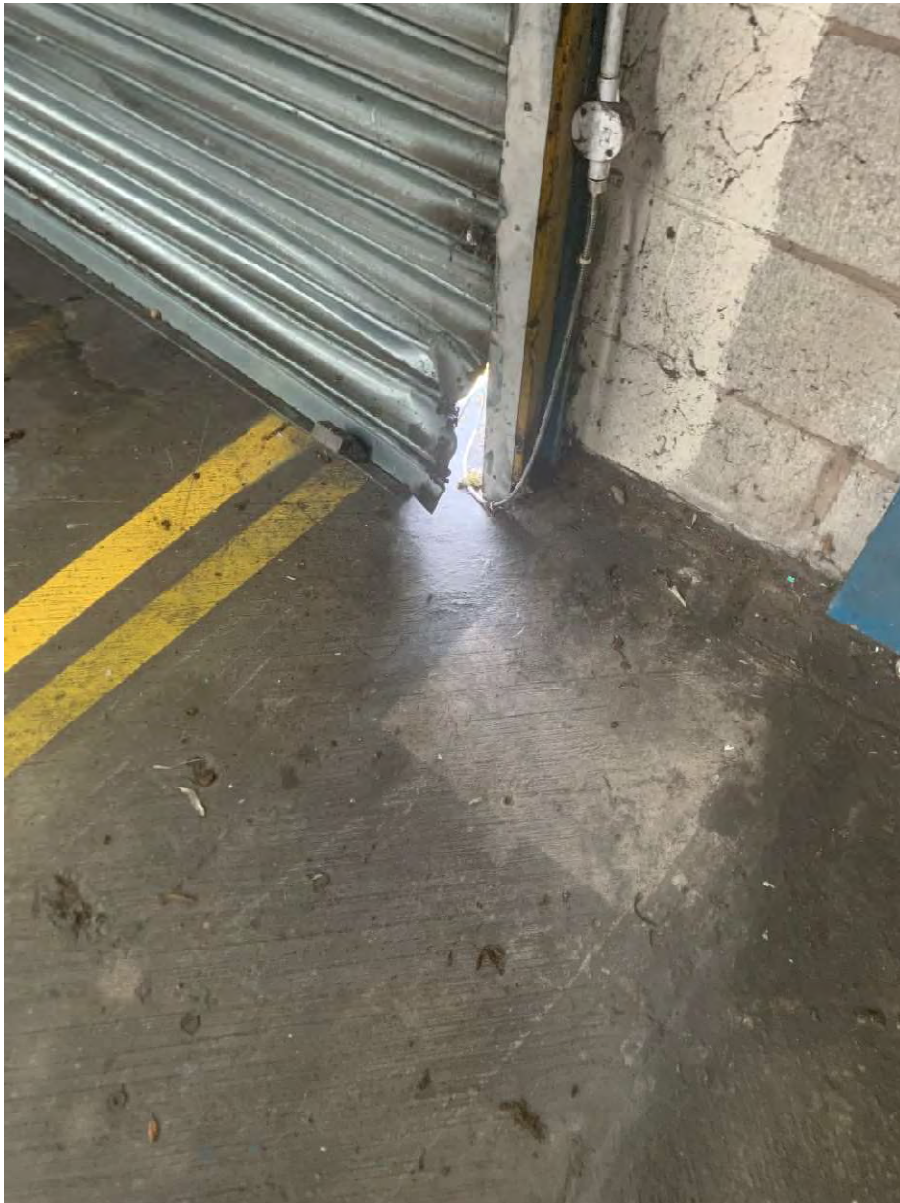


The image is a screenshot of a Facebook video player. The video content shows a dimly lit hotel room with a bed covered in a patterned blanket and white pillows. The video player interface includes a close button (X), the Facebook logo, a progress bar at the bottom left showing 0:15 / 35:30, and various control icons (comment, settings, full screen, share, volume) at the bottom right. To the right of the video is the post's metadata and interaction area. It shows the user 'Mr Airborne' with a profile picture, a notification that they 'was live' on 'March 21, 2023', and the video title 'Exploring a hs2 abandoned hotel... alarms going off...#airbornegang'. Below the title are 561 likes, 1K comments, and 16K shares. There are buttons for 'Like', 'Comment', and 'Share'. The 'Comments' section is visible, showing a 'Pinned Comment' by 'Mr Airborne' that says 'welcome to my world #LetsTalk' with a timestamp of '4/w' and options to 'Like' or 'Reply'. A 'Write a comment...' input field is also present.

Saltley, 31.02.2023



Damage to Shutter



Old Oak Common, 28 May 2023





1 July 2023 – Westbury Viaduct – Trespass and vandalism



Network: 3 Jul 2023 08:50:17 BST
Local: 3 Jul 2023 08:50:17 BST
52°0'58.59"N -1°6'35.52"W
Buckinghamshire
England

 **SUNBELT**
RENTALS®

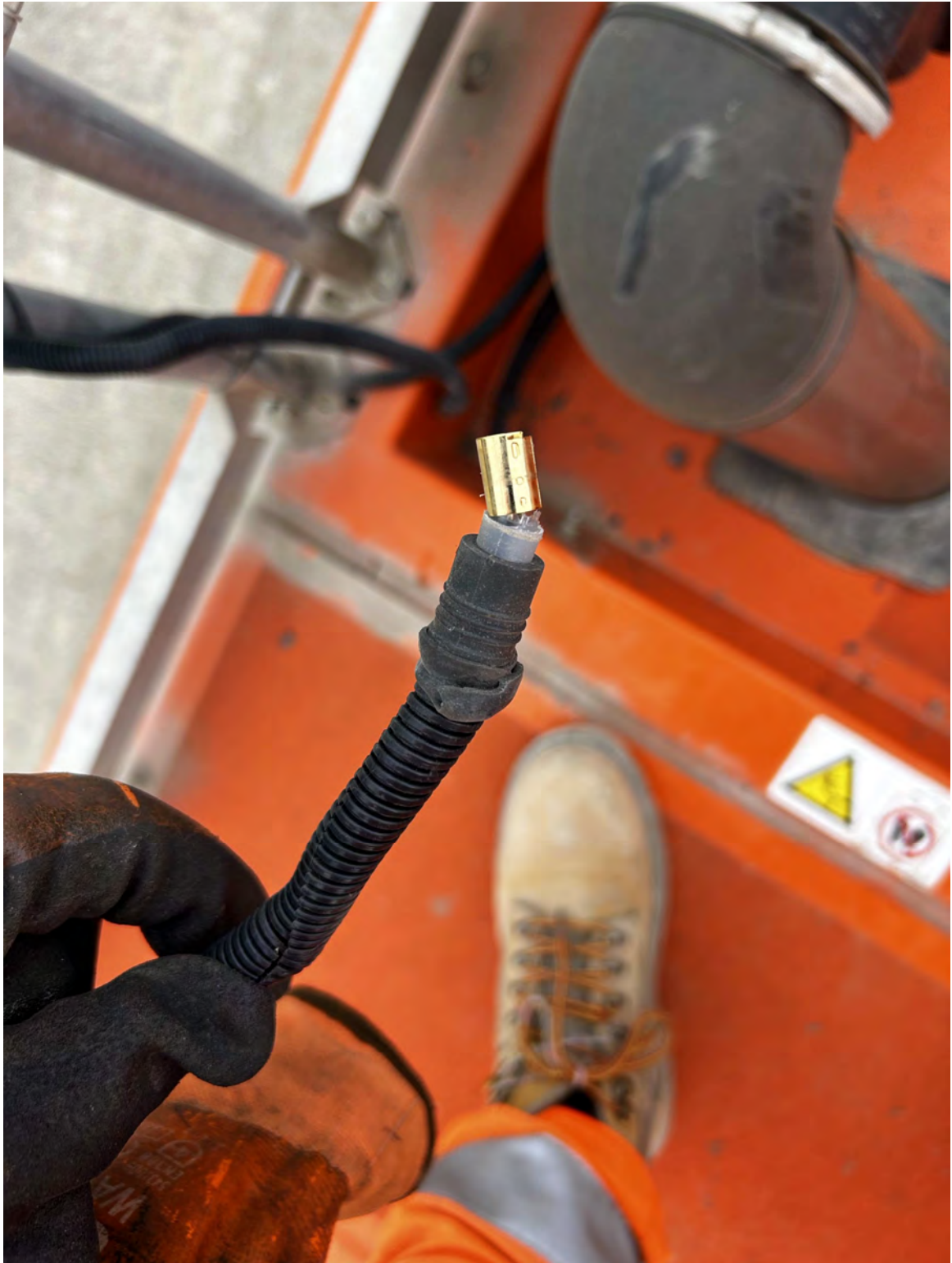
Genie

SLH

Z-62

Network: 3 Jul 2023 08:50:06 BST
Local: 3 Jul 2023 08:50:06 BST
52°0'58.746"N -1°6'35.766"W
A422
Northamptonshire
England





Network: 3 Jul 2023 08:50:25 BST
Local: 3 Jul 2023 08:50:25 BST
52°0'58.722"N -1°6'35.37"W
Buckinghamshire
England










Calvert, 08.08.2023

<https://www.facebook.com/ingrid.hodges.9/posts/pfbid02MfTDrM9RyF4YNF9UhLuXuFknAAPvenC6YJM1AfC3qMurYBUSWJx1EqpD6Yasw5egl>

 **Ingrid Hodges**
August 8, 2023 · 🌐

The boys in the Wood.....
Right now three of the Hodges boys have pitched their tent in their wood to try and stop HS2 & EKFB from destroying it. Can anyone help? Please share.....
[#angelamcphearson](#) [#mpgregsmith](#) [#mphuwmerman](#) [#StopHS2](#)



   73

14 comments 97 shares

 Like  Share

Oldest ▾

-  **Helen Day**
Ingrid Hodges please make it shareable ...
28w Like 
-  **Ingrid Hodges**
Helen Day thank you x ...
28w Like
-  **Rebecca Hine**
This is so bad. Near me we have protesters out all the time but it doesn't stop them. ...
They have destroyed the country side. X
28w Like 
-  **Anna Taylor**
You must be proud of your boys 🥰. ...
Hopefully others will join them x
28w Like   2
-  **Ingrid Hodges**
Anna Taylor thank you yes I am, although it's very intimidating up there, they ...
are brave! X
28w Like 
-  **Anna Taylor**
Ingrid Hodges I can imagine X ...
28w Like 
-  **Carly Barnes**
Brave boys. An absolute disgrace. I will share this now xx ...
28w Like 
-  **Jackie Card**
This is just so awful, good for them let's just pray someone listens x ...
28w Like 
-  **Jeanette Dumbleton**
   ...
28w Like 
-  **Naomi Powell**
So sad all for a project thats unlikely to ever come to fruition. Go boys. ...
28w Like 
-  **Lucy Goodey**
Go on boys 🙌 ...
28w Like 
-  **Sally Maher**
Go Hodges boys 🙌🙌🙌 ...
28w Like 
-  **Rebecca Lodge**
Greg Smith MP please can your Landy Tour visit these brave boys, very close to your ...
Marsh Gibbon and Steeple Claydon stops. Can you help them with this issue that is
having a huge impact on so much of your constituency?
28w Like  4
-  **Ingrid Hodges**
Rebecca Lodge thank you x ...
28w Like

13 August 2023 – Halse Copse - Trespass







15 August 2023 - Partially Dressed Rambler in the area of Oatleys Farm, Turweston


Still image taken from video



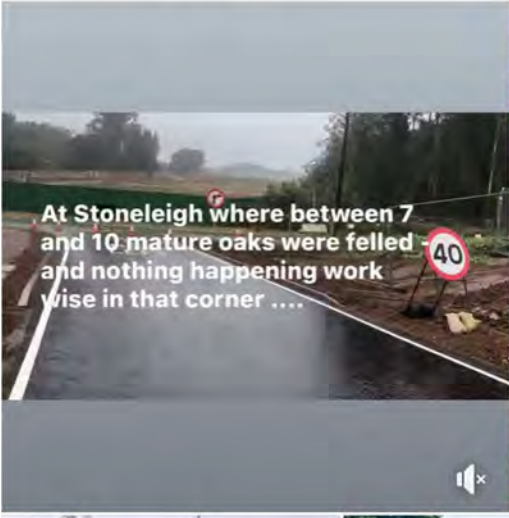





Long Itchington

https://www.facebook.com/permalink.php?story_fbid=pfbid0hvzSPPrNaXfMSooEbyfCA2QkcUChPf74VrNVqxCZHjEdZtXQJiOHNkfeG1PjTH3Krl&id=100008144808673

 **Karen Wildin**
September 12, 2023 · 🌐

2 years after the traumatic HS2 environmental desecration of Warwickshire's trees and hedges and landscape [Denise Laura Baker](#) suggested we revisit some of the locations. My particular interest was where trees and hedges were removed unnecessarily. Below are a few shots of how sections of sites at Rugby Rd, Hunningham, Fosse Way, Long Itchington , Stoneleigh and Balsall Common look today. Much of what we claimed was plain 'theft of trees for cash' looks to have been correct. ... [See more](#)


 


 

🙄🙄🙄 8 8 comments 16 shares

Like Comment Share

Most relevant ▾

 **Charlotte Griffin**
Thanks for posting this Karen. I suspect the same story along the route. So much unnecessary clearance. 2

 **Karen Wildin**
Charlotte Griffin Yes. None of the workers we spoke with today had been working

- Karen Wildin**
Charlotte Griffin Yes. None of the workers we spoke with today had been working for hS2 for more than 3 months.. and the line looks far from being straight or flat
....
22w Like Reply  3
- Charlotte Griffin**
Karen Wildin I wish we could take them to court. I wish we had more photos and more detailed ones of the areas before they were attacked by HS2. They took so much more than anyone expected everywhere to such an extent that a lot came by surprise and wasn't recorded. Sadly though it wouldn't get any of it back. X
22w Like Reply Edited  3
- Martina Irwin**
Charlotte Griffin I have lots of photos of most of these and other areas too. Enough to make a film - maybe that's what we should do some day x
22w Like Reply   4

Water Orton and Lea Marston

<https://www.facebook.com/groups/119007471490656/permalink/6718771238180880/>





18

17 comments 3 shares

Like

Comment

Share



Karen Wildin Author

As a people us Brits are too obedient. People will not protest with their feet on the ground. This nightmare along with the Cost of Living Crisis and Climate and Ecological Breakdown is the responsibility of the masses as well as the responsibility of corrupt politicians and business and media tycoons

22w Like Reply Share

7



Val Saunders

Karen Wildin yr so right!

22w Like Reply Share



Sarah Snooks

Karen Wildin If everyone had your guts, they wouldn't stand a chance! It would be like France

22w Like Reply Share



Karen Wildin Author

Sarah Snooks Vive la France

🍷🍷🍷🍷🍷!!!

We need a leader like Lula ... someone who gets that the Natural World is more important than money .

Our politicians and most educated and privileged and powerful people are disconnected , as are many many others in the West thanks to capitalism ...

capitalism ...
We don't know our own power potential ...

22w Like Reply Share

Write a public reply...

Write a public reply...

Sue Castle

Carnage everywhere caused by HS2, the residents of Burton Green are constantly faced with road closures. It must be very worrying for Kinsbury Water Park, such an asset on so many levels, and it could all be destroyed for some tin pot railway!

22w Like Reply Share



Sarah Snooks

Sue Castle everywhere is affected by hs2s constant road closures. It seems to be the only bit that bothers many people. Those that were not interested when we tried to warn them years ago are now moaning. Some people seemed more bothered by protest camps appearing than hs2s mass destruction

22w Like Reply Share

View all 6 replies

Sue Castle everywhere is affected by hs2s constant road closures. It seems to be the only bit that bothers many people. Those that were not interested when we tried to warn them years ago are now moaning. Some people seemed more bothered by protest camps appearing than hs2s mass destruction

22w Like Reply Share



Sue Castle

Sarah Snooks only too aware of the warnings that were given out years ago, and few listened. Have witnessed the destruction of the Offchurch area in particular, and protested, and have made views known on the subject! All pull together people.

22w Like Reply Share



Tim Chantler

Sarah Snooks the road closures are an odd one..
HS2 still need access..
But the closure points are usually outside of the injunction zone..
Maybe an HS2 oversight?

22w Like Reply Share



Sue Castle

Tim Chantler road closures involve the old railway bridge in Burton Green, HS2 going thro/underneath, road closures fairly regular. Looks like a new bridge, whether permanent or temporary is being constructed to one side. As soon as the main road was open again, another road, near to bridge, was closed, probably demolishing properties which back onto the works, access for residents seems very limited. I don't live in Burton Green, but travel through there, I don't think anyone was aware, or thought, there would be so much disruption, and yes, carnage!

22w Like Reply Share



Kath Skermer

Sarah Snooks no different to where I live Scarah, large industrial units being built right next to a housing estate
Folks woken up now that they are up and overpowering
'Nobody told us'... See more

22w Like Reply Share



Sarah Snooks

Kath Skermer some of these people deserve the disruption. Even early on there were people who ridiculed anyone campaigning against it

22w Like Reply Share

 **Kath Skermer**
Scarah Snooks noooooooooooooo that's ridiculous
😞😞😞😞😞😞😞

22w Like Reply Share


 Write a public reply...     

 Write a public reply...     


 **Ian Mann**
this is a corrupt project supported by rich politicians of both parties it should never have been started in the first place a disaster to the countryside people wont forget just whats been done as i said corrupt from top to bottom.


22w Like Reply Share Edited  3


 **Kath Skermer**
Good luck to you all the disruption must be horrendous 😞😞

 **Nick Colloff**
Dreading the probable carnage when they get to Kingsbury Water Park. 😞😞

22w Like Reply Share

 **Tracey Clarke**



22w Like Reply Share  2

Fradley

https://www.facebook.com/permalink.php?story_fbid=pfbid02x7LoSidMioSXUUWgU8gndsXQ4j9fFiDY7X8YcBNuWZ9KYdfWWiQz4JfpCFKMDdNSl&id=100008144808673



Karen Wildin

September 14, 2023 · 🌐



At Fradley Junction , the spur to phase 2b was silent with no work . Broken Down Wood has had its middle totally removed. The substantial section of Fradley woods that was destroyed is now a silent store for sands and aggregate.

Along the canal path heading to the ravaged Ravenshaw Wood are the remnants of where a community of humans lived low carbon lifestyles as boaters with allotments along this jetty. The lock keepers cottage is Heras fenced off and empty.

Many silver birch saplings, with dead tree stumps interspersed, can be seen where the cutting machines and security vehicles used to be stored for tearing out the heart of Ravenshaw Wood where the ancient deer herds fled from there to Fradley Village one foggy morning in Feb 2021.

Camp Isla is now a new but empty compound . Opposite, the house is gone and so is what was the temporary compound. Just a green 6 ft security fence and nature reclaiming flattened land where there was previously thriving hedges and a diverse mix of mature trees.

Ran out of time to document the other woodlands felled along Wood End Lane





👍👎👍 33

29 27

👍 Like

💬 Comment

➦ Share



Tracey Elizabeth Forbes

Is this to do with HS2 ...just upping n going ?

22w Like Reply



Scarah Snooks

Tracey Elizabeth Forbes they haven't gone, not down south anyway.

22w Like Reply



Karen Wildin

Tracey Elizabeth Forbes it is unclear. There is loads of activity on the first stages of phase 2a around Coleshill and Water Orton , so how this is okay if the train is to stop at Birmingham Is anyone's guess. Some local people at Water Orton - their blood is boiling

22w Like Reply



Tracey Elizabeth Forbes

https://m.facebook.com/story.php?story_fbid=708234471320887&id=100064030201021&sfnsn=scwspmo


22w Like Reply




Tracey Elizabeth Forbes

Did you see this link so awful 🤢 we don't stand a chance need new Tactics 😞


22w Like Reply

 **Tracey Elizabeth Forbes**
Karen don't blame them we a small island all this is madness 😞


22w Like Reply

 **Fiona Banks**
Tracey new tactics? 👍


22w Like Reply

 **Trudi Warner**
Heartbreaking post. Admire your courage for witnessing this terrible destruction.


22w Like Reply

 **Colleen Molloy**
Rage and grief! 👍

22w Like Reply

 **Rocky Rex**
Shocking destruction for this absurd project.

22w Like Reply

 **Scarah Snooks**
They cut down part of the wood only to store the machines used to destroy the rest of the wood? Not that I'm surprised.

22w Like Reply

 **Carl Woods**
Appalling destruction, waste and exploitation. ...

22w Like Reply

 **Simon Beavis**
Beyond sad

22w Like Reply

 **David Farmer**
May I reproduce on twitter? **Karen Wildin** no names

22w Like Reply

 **David Farmer**
Does any one 👍👍 STILL 👍👍 wonder why we had to stand 6 feet part and wear masks. Even for this bunch of looters its pretty blatant.

22w Like Reply

 **David Farmer**
Just sayin 😊 👍

22w Like Reply

 **Karen Wildin**
David Farmer yes, from March 23 rd 2020 we wondered this ...

22w Like Reply

David Farmer
I do need to know the date of photographs _
location for accuracy was this 2020 or in the last
week? yes wont do. **Karen Wildin**

22w Like Reply Edited

Karen Wildin
David Farmer these photos were taken Wednesday
Sept 13 th 2023 ...

22w Like Reply

Cllr Robert Elliott
Heartbreaking

22w Like Reply

David Farmer
Are we saying the activity has ceased **Carl Woods Karen
Wildin**

22w Like Reply

Carl Woods
David Farmer well, according to the grapevine,
work is being scaled back for the next 2 years north
of Birmingham but its still full steam south of Brum.
Unfortunately.

22w Like Reply Edited

David Farmer

David Farmer
Carl Woods So may I use the images on twitter and
say that? **Karen Wildin** with an NHS Doctors strike
many people feel the allocation of funds by a very
well fed mr barclay is relevant. Thats a polite way of
saying ppl are prerrty fed up with it all. a... [See
more](#)

22w Like Reply Edited

Karen Wildin
David Farmer sadly not on phase 2 a as above

22w Like Reply

David Farmer
Karen Wildin Are those current images **Karen
Wildin**

22w Like Reply

Karen Wildin
David Farmer all photos on recent post taken
Monday 11-Wed 13 th Sep 2023

22w Like Reply



Lynda Davies ...
TRAGIC!!

22w Like Reply



Hannah White
Show Boris Johnsons dad as he is supposed to be a Wildlife Ambassador unlike his son who has sanctioned this!

22w Like Reply



Jacky Deeming
Absolutely disgusting... Shame the boaters can't live there... But there is a massive empty barge on the coast... Free for illegal migrants...?

22w Like Reply



Write a comment...



2 October 2023 – Addison Rd, Calvert



///handed.rapport.crescendo



///bashed.bounding.wagers

8 October 2023 – Drayton Lane, Tamworth

<https://www.facebook.com/groups/Urbexau/permalink/7354643807888730/>

 **Urban Exploration Brothers UK**
October 8, 2023 · 🌐

Hi people - As HS2 has been cancelled many villages are left with many empty farms....We came across a couple today.
Enjoy 😊

#HS2 #urban #explore #fypシ #birmingham #farming #sadtosee





15 October 2023 - Whitmore Heath, Whitmore

<https://www.facebook.com/Peakyexpo2019/posts/pfbid0RZX2HrhyHcduqdNPUZWvoJFCMssRqbuMYeg388TzHbZtYxsqOkkzaW42Jkhz3nFJI>



Peaky Explorers

January 26 at 6:08 PM · 🌐



35 abandoned mansions bought under a compulsory purchase by the government for the build of the HS2 line and now it has been scrapped and they all sit empty and rotting away to this day. We spoke to a few locals and they have had nothing but problems ever since they started to get bought. There is some very nice houses here such a shame and hope they get a new lease of life. Please enjoy..... explored with [Forbidden footsteps](#) #Urbex @followers





26 October 2023 - Leather Lane, Great Missenden

First firework being thrown top right



First firework bouncing (top right)



First firework exploding



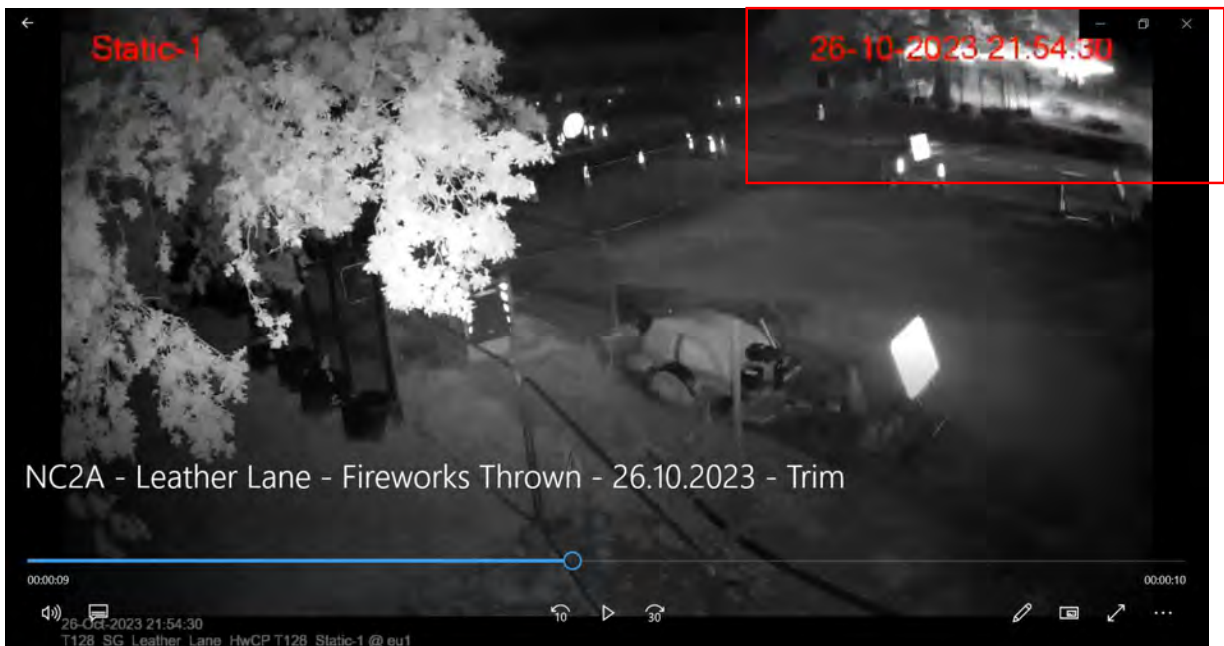
Second firework being thrown (top right)



Second firework exploding (top right)



Third firework being thrown (top right)



Third firework exploding (top right off screen)



Fourth firework exploding



Fifth firework exploding



Sixth Firework



2 November 2023 - Old Oak Common



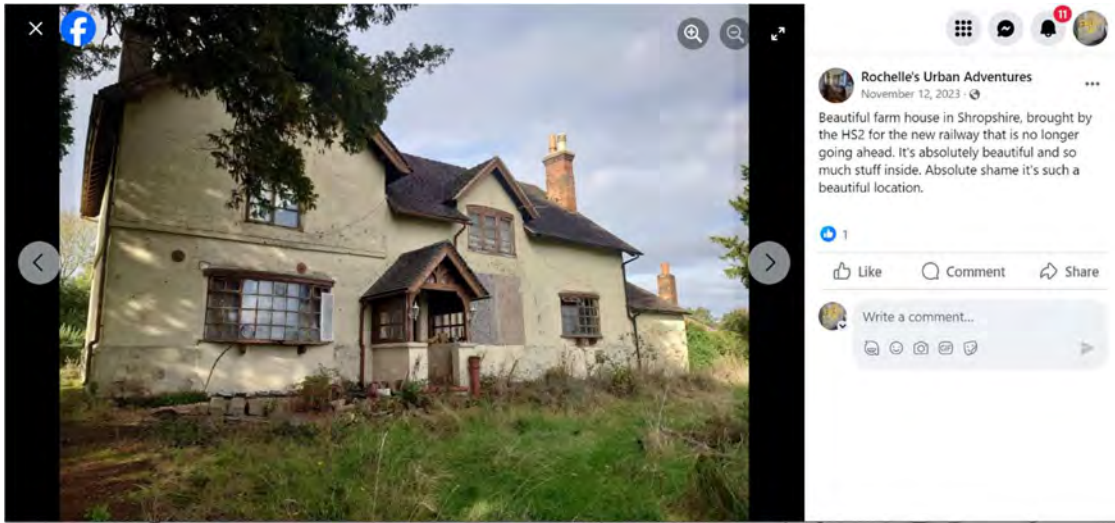
High Speed Two Phase One/ Phase 2A Injunction Mapping
Map Number: 13
Page 14 of 277 Internal





14 November 2023 – Swynnerton, Staffordshire

<https://www.facebook.com/photo/?fbid=122109987614097410&set=a.122094873626097410>



22 November 2023 – Willesden logistics Hub, Channel Gate Rd, London

<https://www.facebook.com/mark.soave.9/posts/pfbid02n8K27swb2VGVRMstbEn162TM1qHoc79NWDzd2f3YpykNybFxcM22xmC49UoNgTiil>

 **Mark Soave**
November 22 at 2:48 PM · 🌐

Today's HS2 protest thanks to the Unite Community Branches for coming to support the Construction Sector. 🌟👊👊🌟

The collage consists of three photographs. The top photo shows a group of people, some wearing high-visibility vests, holding a banner that reads "SHAME ON YOU SKANSKA" and "STOP UNION-BUSTING NOW!". They are standing in front of a building with a sign that says "Area South Logistics Hub" and "Willesden Euro Terminal". The bottom-left photo is a closer view of the same group and banner. The bottom-right photo is a close-up of a sign that reads "SKANSKA STOP UNION-BUSTING NOW!" and "From blacklisting to union-busting - Skanska's shameful history."



29 December 2023 – Oxford Rd, Aylesbury



22 January 2024 - Birmingham Interchange Station site

<https://www.youtube.com/watch?v=IxcINIP-Xlk&t=1042s>



YouTube^{GB}

Search



***THE HAUNTED HORROR FARM HOUSE* WE GOT CAUGHT BY THE HS2 WORKERS** #abandoned #creepy #hauntedhouse



Night Terror TV
494 subscribers

Subscribe

9



Share



CORE-B-74

23 January 2024 - Drayton Lane, Tamworth

https://www.facebook.com/permalink.php?story_fbid=pfbid02qtOKGuEDTjMRXkRmyWhkghPeyRtZCHKgCw9Pg6YqrdssuAKbALciNbK9wwxojk3Ql&id=100091769620408

 **Dark Explores UK**
January 23 at 1:30 PM · 🌐

THE FAMILY HOUSE THAT GOT TAKEN.

We had to stop along the Hs2 routes after seeing this 1, sadly this family home was taken by the Department of transport for newer roads, but now sits abandoned after the routes have been slashed, what got me with this 1 was the location, then the damage that had been caused inside, random holes in walls very strange how a lovely home can be turned upside down within months, this house would of been very grand before the Hs2 got involve. Not much to see but still another explore.

Enjoy & please give our page [Dark Explores UK](#) a follow 👍 and share.
🤪





140

44 5

Like

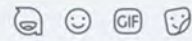
Comment

Share

Most relevant



Write a comment...



Maria Najane

Go talk to "Dalock Recovery" on Instagram about your account; I'm sure he can help! He fixed my main account

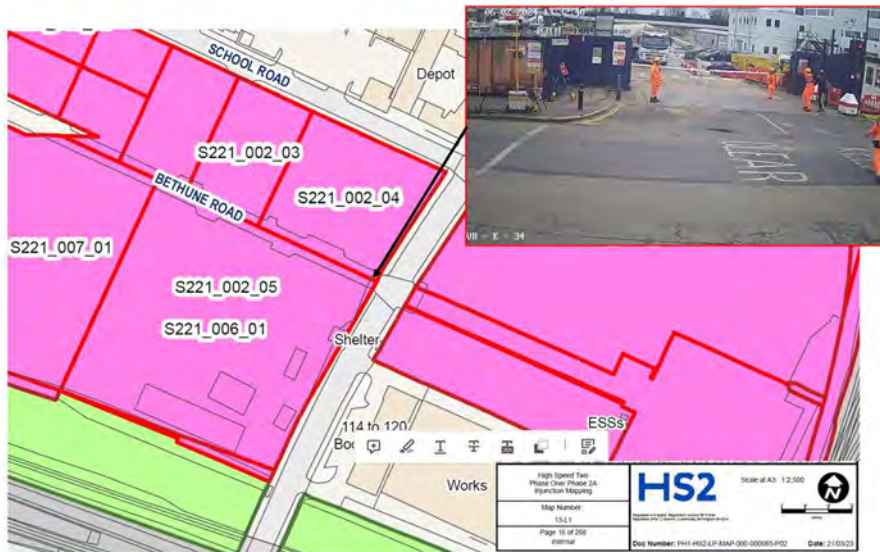
16h Like Reply



Top fan

Juno Gimpley

6 February 2024 - Victoria Road, London - Trespass and Assaulting Security Officer



Strikes security officer first time



Strikes security officer a second time



Strikes security officer a third time



Strikes security officer a fourth time



Strikes security officer a fifth time





Need Meeting?

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MINISTRY OF REMEDIES

IN TRUTH WE TRUST

Welcome to the Universal Law Community Trust. We stand for Law, and it is in that we communally Trust. We are a collective of indefinable family Trusts of secured parties that are un a lien able, literally, a lien cannot be attached to our beneficiaries. Meaning we cannot be alienated from our inherent rights. Rights are not privileges to be licensed back which we pay rent for, rights are not granted they are inherent in you. We were created by the people of the people and for the people as our previous trustees, (the government) became corporate entities and in doing so made themselves untrustworthy. A corporation cannot hold assets in Trust because by very definition they aren't a Trust any longer. By default, every living thing is a part of the Universal Law Community by its very being. Universal Law is written in the DNA, it is what a heart cell resonates too and what you are centred around. You already are in the Universal Community and every single one of your trillions of cells is governed by the Universal Law, it's just that due to indoctrination of fiction and the "adding" to that Law that we find in "ad-ministrative" codes called "legal systems" we lost our Trust, literally. We lost our Trust in ourselves mostly by adopting a system of legal jargon, fiction and commerce and calling it Law.

UCC1
UCC1 File No: 2020-056-5342-1

Verification of UCC1 [Download](#)

Decoding UCC1 Collateral The U...
UNIFORM COMMERCIAL CODE
UCC1 #2020-056-5342-1
UNIFORM COMMERCIAL CODE (UCC)
25 FEB 2020

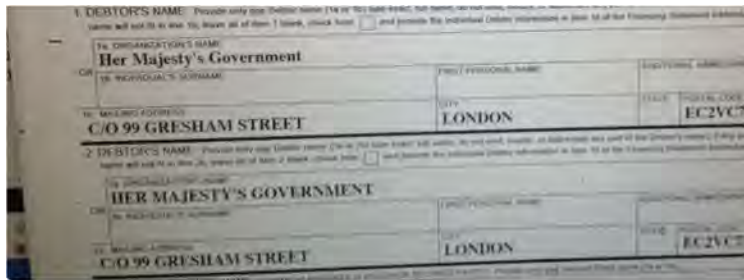
Unraveling the ULCT A Sovereign Power

THE FACTS ABOUT THE FICTION

Lawful instead of Awful

The ULC Trust separates legal and fiction from Law and Fact. The name you were given at birth is capitalised and the terms undisclosed to your parents. We place your name under our own Non-Disclosure when you Assign the Consent via the We Buy Any Debt site (see button) and is placed under ULC Trust Non-Disclosure, any unlicensed or unauthorised use creates a debt to Kindness via the creation of a Kindness Credit Account that the debt is settled through. Credits of Kindness are "loaned" to the party creating the delict or tort and this action on their part against you creates a Consuming of My Credit Agreement (CCA) to be agreed to by the usage of the credit file that is attached to the capitalised version of your given name. This gives you back your Equity stolen by the Vatican. In other words, we prosecute them for using something that is not theirs and for forcing their commercial code upon living beings. See Maritime Law you are treated like a ship that can be "lost to the sea". Anyone attempting to get you incriminate yourself by forcing you to commit fraud by using a name that was copyrighted by the system they represent are criminals... don't be one yourself. Aiding and abetting a criminal act is a crime and those responsible for it are obligated to be arrested. Should a policy enforcer attempt to get you to commit fraud by having you lay a claim to a copyrighted name belonging to the Crown or other corporations masquerading as Governments then you are obliged to use reasonable force to prevent a crime from being enacted. None of the procedure regarding the Birth Certificate was done with your consent or autographed by you in fact all contracts created from the capitalised version of the given name is fraud. As its terms and conditions of the creation of the birth certificate bonding system were not disclosed to your parents. No party can contract on your behalf, and you couldn't even hold a pen at 42 days old. You have been assuming the role as a Vatican Debtor since you were born overtime you use that name you commit fraud as it is not yours to use it was copyrighted by the Crown and every time you use it you move from the realms of Law and Truth and step into the land of fiction which administrative codes and court have the jurisdiction of that fraud. Hence you inherit all the liabilities, he who holds title holds the liability. Here we hold the Title while you enjoy your rights of use free from penalty liens and levies. Which are only payable if you are in commerce. ULC Trust removes the false presumption that you are always in commerce. Just one sentence is all you need know " if i take your name and use it to commit a contract with, without your consent... what is that? " FRAUD ..." so if a system takes my name and uses it to create a contract with, what is that? " FRAUD on an international scale, it is also operating a slavery system. Now you have a choice... Reserve your rights using UCC 308 " not obliged to perform under a contract i did not knowingly enter into".

<https://www.facebook.com/groups/universallawcommunitytrust/>



Universal Law Community Trust ULC

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About this group

Universal Law Community Trust constitution is that it stands on Universal Law to protect its beneficiaries and component parts and assets from anything that is not lawful. Legal is not law and for it to be legal there has to be a contract between two parties knowingly entered into with all terms and conditions disclosed. As most charges fines and levies are created from the capitalisation version of the given name which was created by another on behalf of another rendering all contracts created in such form as void ab initio. ULC Trust provides a second layer of protection which consists of a document called NDA1 and in there it states we agree that the name is not ours to use to have liabilities created and that we will be prosecuted if we do... now let that sink in.. thats already what will happen if you do disclose it anyway... the "authorities" cannot put you in a position where to disclose information will breach an NDA as that will set a court precedence for NDA breaching and their dirty little secrets will be disclosed and their game will beep.. either way you win. By emailing us with your name and your assignment of consent now no one can use it without your .. written consent. Of course you use it if its a benefit to do so but when someone is attempting to act as secured party we secure you as the secured party and if anyone attempts to commit commercial intercourse without your consent a contract will commence and a lien process pursued on your behalf. A 24 international telephone helpline to confirm the situation to any potential terrorists is shared with those who wish to be part of this. We also transfer all your debts and liabilities and stand the criminals down by standing as surety for you all. [See less](#)

- Private**
Only members can see who's in the group and what they post.
- Visible**
Anyone can find this group.
- History**
Group created on March 3, 2017 [See more](#)

Members - 13,4K



Nolson and 4 other members are admins. Uni is a moderator.

Activity

- 1 new post today
43 in the last month
- 13,431 total members
No new members in the last week
- Created 6 years ago

Group rules from the admins

1 There are none [...](#)

Katie's Post



Katie Hill
March 10, 2023 · 🌐

Is anyone 's property /land subject to a HS2 compulsory purchase order ,either already acquired or soon to be taken by HS2 along the section that is now due to be delayed ?

👍❤️ 6

11 comments 4 shares

👍 Like

💬 Comment

🔗 Share

Top comments ▼



Ben Wilkes
Border Collie Trust were recently advised the land HS2 will be taking would be between January and March 2024. We don't expect any update until April....2024 😞

49w Like Reply Share

👍 2



Ben Wilkes i'm hoping yesterdays news of postponement of the HS2 route from Birmingham to Manchester will mean that the compulsory purchase orders in Staffordshire and beyond are cancelled .Thanks for the info re Border Collie Trust compulsory purchase .

49w Like Reply Share

👍



Ben Wilkes
Katie, I would be delighted with cancelled. I suspect they will just be postponed and left hanging over everyone concerned for x number of years. Over seven years of "negotiations" makes me a bit cynical I suppose 😞😞😞

49w Like Reply Share

👍😞 3



Billy Cotton
Ben Wilkes Especially knowing some are elderly 😞

49w Like Reply Share



Deborah Mallender
Katie Hill The Border Collie Trust's situation is appalling. But where does that leave all that land. Hope those farmers just get on and use it.

49w Like Reply Share



Katie Hill Author
Deborah Mallender i've just looked at the website to see how the kennel was impacted by HS2 . Did HS2 compensate the kennels for land taken ? Yes hopefully all farmers / landowners can still use their land for the next few years at least but hopefully for ever 🙏

49w Like Reply Share



Rob Roy
I've submitted a TR1 at the land registry transferring ownership of a HS2 property to myself using ULCT's SPC over Her Majesty's Government. HS2 then have no rights to touch it. I suggest everyone does the same and we stop this ridiculous money



Rob Roy

I've submitted a TR1 at the land registry transferring ownership of a HS2 property to myself using ULCT's SPC over Her Majesty's Government. HS2 then have no rights to touch it. I suggest everyone does the same and we stop this ridiculous money laundering scheme destroying our countryside.

49w Like Reply Share



Katie Hill Author

Rob Roy please can you explain in a bit more detail was your property taken by HS2 previously and have you claimed it back ?

49w Like Reply Share



Deborah Mallender

Just spoken to one local farmer about that. His land is still on land registry as being his. He tells me that hs2 has bought half of his farm. He tells me he has been under paid. I have also spoken to one other local farmer who could assist with this question. If you need details pm me.

49w Like Reply Share



2



STOP HS2

STOP HS2



2

4 comments



Like



Comment



Share



Kristina Ofvera

Author

A property on the pathway of HS2 has been acquired by the universal law community trust and it's garden is stunning full of trees around 400 yrs old ,the deer graze locally and come to the garden daily along with the rabbits , badgers and other animals it's a haven ,they wanted to spoil this. Well NO we have taken it back

Like Reply



3



Anonymous post Photo Feeling

Most relevant



Kristina Ofvera

10 h · 🌐

I can't believe what they are doing 😞 this beautiful ancient wood land and garden they are trying to destroy.i have shared a Few posts into this group for you

1 comment



Like



Comment



Share



Hazel Ball

Too vague

What woodland, what garden?

Like

Reply




Tim Chantler
If HS2 think that 20m wide hole is 6m wide, it's no wonder their finances are so dire

Like Reply




Comment as James Pa-Lil




Kristina Ofvera shared a post. 




Nolson Elisabeth
9 May · 
The fuckers responsible for HS2 seem to think they can continue to destroy this rock for no reason and so we have BBQ the bailiff party tomorro... See more

 Like  Comment  Share




Kristina Ofvera shared a post. 



Nolson Elisabeth
5 d · 
ve done a securitisation of asset that was going to be used in the same way a rapid test carved through the membrane of our brains the HS2 drills ar... See more

 Like  Comment  Share




Kristina Ofvera shared a link 

Outside the Brackens, Heath Road 10.05.2023




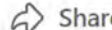
https://www.facebook.com/permalink.php?story_fbid=pfbid02HrjuWTkDFbHJ6McnUjjPMZ5D1b6Rg95fyjXPHucuke3CHhwUGrbFwLCJqZx2vGbjl&id=100080477681816




Nolson Elisabeth
May 9, 2023 · 🌐


The fuckers responsible for HS2 seem to think they can continue to destroy this rock for no reason and so we have BBQ the bailiff party tomorrow in Stoke at our new HQ that the right of use of which was exchanged for part of a High court enforcement order of 14 million slave tokens worth of kc.. thank you emoven 22399 for your surety and now we will have the bailiffs and the court dissolve their High Court Seal and prove that the paper this shit is written on either has some value.. ie asset assigned to discharge a debt is secure .. having dissolved the Securities Exchange Commission last week thanks to Worcester agents of CROWN CORPS who thought they could remove asset secured within there dissolved Washington D.C is a non geographical hypothesis as having anyvalidity to it along with Covert ID digital ID based on your Bio Metrics was dissolved with 010 eyeball at customs in Venice and 001 legal title. Proving minister plenipotentiary rights travelling without any previously defined legal documents. So if they think they are about to use force to steal asset that by their own definition is untouchable then guess what that does to those assets hidden behind trusts.. their official secrets act is in the balance this week and i have to say its looking pretty dire when my gob is so big ! best bring your biggest bailiffs for the smallest warrior ever... we have the cable ties and onion saks at the ready and some nice sage for stuffing the beasts with.. email kindnesscredits@protonmail.com and book yourself a ring side seat.

   10 5 shares

 Like  Comment  Share








We Buy Any Debt / Αγοράζουμε το χρεος σας · [Join](#)
Nolson Elisabeth · May 9, 2023 · 🌐




Nolson Elisabeth
May 9, 2023 · 🌐

The fuckers responsible for HS2 seem to think they can continue to destroy this rock for no reason and so we have BBQ the bailiff party tomorrow in Stoke at our new HQ that the right of use of which was exchanged for part of a High court enforcement order of 14 million slave tokens worth of kc.. thank you emoven 22399 for your surety and now we will have the bailiffs and the court dissolve their High Court Seal and prove that the paper this shit is written on either has some value.. ie asset assigned to discharge a debt is secure .. having dissolved the Securities Exchange Commission last week thanks to Worcester agents of CROWN CORPS who thought they could remove asset secured within there dissolved Washington D.C is a non geographical hypothesis as having anyvalidity to it along with Covert ID digital ID based on your Bio Metrics was dissolved with 010 eyeball at customs in Venice and 001 legal title. Proving minister plenipotentiary rights travelling without any previously defined legal documents. So if they think they are about to use force to steal asset that by their own definition is untouchable then guess what that does to those assets hidden behind trusts.. their official secrets act is in the balance this week and i have to say its looking pretty dire when my gob is so big ! best bring your biggest bailiffs for the smallest warrior ever... we have the cable ties and onion saks at the ready and some nice sage for stuffing the beasts with.. email kindnesscredits@protonmail.com and book yourself a ring side seat.

  3

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<https://www.facebook.com/sukh.bir.77/posts/pfbid025rCVR5gixAaPYSL2ATeLcTd3Tufmx4KccFgb5xLJ6AWMshVPmMv8qNuqPBZnbStbl>






Sukh Bir
May 9, 2023 · 🌐


BBQ the bailiffs party
Wednesday 10th May 2023
The brackens
Heath Road, ST5 5BB

Want to stop HS2 from destroying the country side, then come along and support the locals in Stoke and restore the rights back to the people.
Feel free to arrive tonight for all day tomorrow.

 6 3 comments 1 share



 Like  Comment  Share




https://www.facebook.com/permalink.php?story_fbid=pfbid0Rm6YcHGV3toRf2QEyUNmiHTaW1vGeQMBByHdfrp3cjgk6ut2bmas4bCRGCD02oGdpl&id=100080477681816








Nelson Elisabeth
May 11, 2023 · 🌐

ve done a securitisation of asset that was going to be used in the same way a rapid test carved through the membrane of our brains the HS2 drills are carving through earths membrane layer and leaving us all unsubstantiated .. where are the HS2 protectors for this massive ancient sacred land and trees to help the refugees from the Uks reign to protect .. we have stopped them for now and its time to play your part .. share this post with every protector group and conversation group you are a member of .. we have our Ministry of Remedy Ellas stoke now open for our ministerial duties to be ministered from so take your debt slave religious belief and smash it like the High court enforcement group terrorists did with the rocks yesterday in their heads as they exemplified the unlawfulness and impotence that is man made presumption when it is pounded against universal law. So let us know what time you would like to visit with an email and we will be performing sacred rites and ceremonies to protect and preserve our membranes aka trees ... see you all soon

  2 2 shares

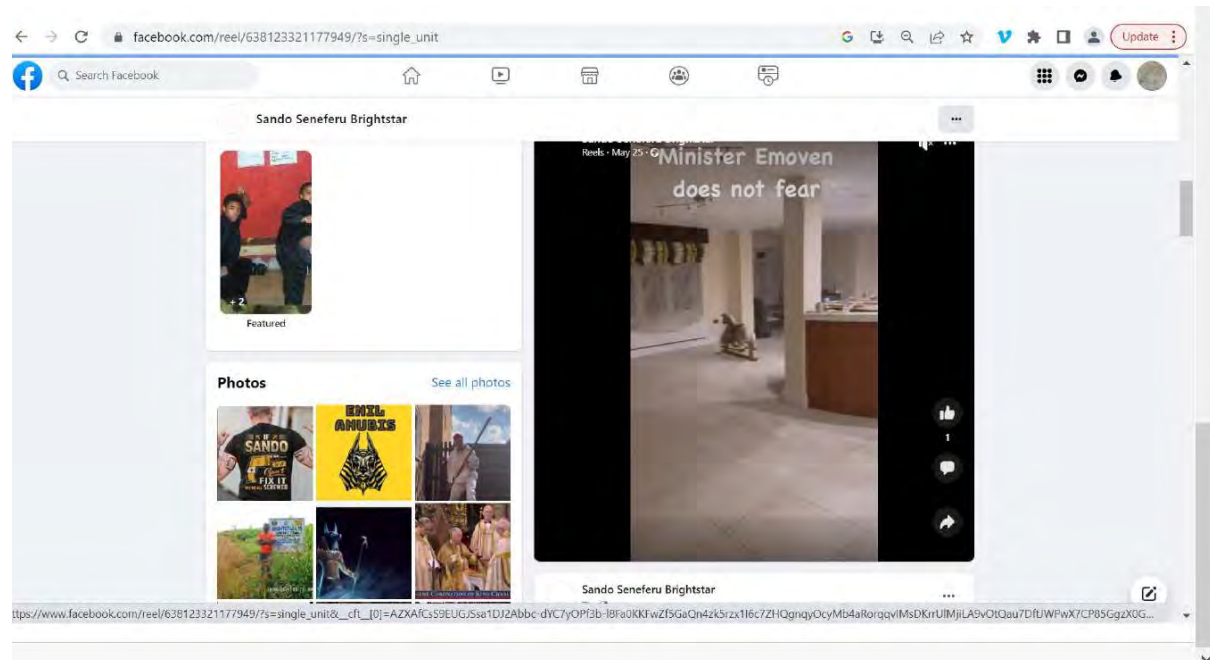
 Like  Comment  Share

 Write a comment...     

25 May 2023 - Sandu Seneferu BrightStar Video, Whitmore Heath - “Minister Eموven does not fear”

(Post subsequently removed)

<https://www.facebook.com/100006597587398/videos/178898671791862>



6 June 2023 - Post re Electrified Gates at Whitmore Heath Property

https://www.facebook.com/permalink.php?story_fbid=pfbid07bSKJwat98zatydjAAUAxXBEnB9jm2pyFrn1J8W8uDt2DrsBWeb7uzAuNqbDG135l&id=100071604704440

Emoven Kanenas
June 6, 2023 · 🌐

Visitors to Ministry please note the gate is an electrified one as of today ..do not attempt to touch the gate or the posts as there is a risk of death due to high voltage caused by the rewiring of the damage caused by the High court bailiff terrorists while invading childrens peace ful play time on the 10th (May at ST5 5TB ..reasonable force includes tasers apparently according to PACE

👍🙄 5 1 share

👍 Like 💬 Comment ➦ Share

Write a comment... 🗨️ 😊 📷 GIF 🎭

7 June 2023 - Signs on the gate of Whitmore Heath property



 LIVE

the British Government (HM/G) to offset the debt that uncollected commercial
unrecovered and undisclosed terms and conditions of the use of the legal fiction
caused.

In doing so the people of Universal Law Community Trust discharged the debt on
behalf of HER MAJESTY'S GOVERNMENT and the private corporation has only
empty credit files, no credit rating and is therefore unable to trade and is made
obsolete never to be resurrected. All credit and collateral has been assigned under
strict Non Disclosure Terms known as NDA1*** and all agents once acting in their
roles within the private corporation are given notice of 28 days from the date of this
notice that they are required to assign their consent into Universal Law Community
Trust, adopt the EMOVEN seal as authentication of documentation in order to remain
in their positions, currently held.

A New World Order as defined and in sympathy with Universal Law has been issued
which those remaining in (office) will be granted right of use of to implement
peacefully and without reservation.

Those agents of HER MAJESTY'S GOVERNMENT who do not wish to facilitate
the New World Order as defined under Universal Law will be given a Kindness
Credit Account to settle their liabilities and to discharge their debts and charges and
retire from their roles no later than 28 days.

The New World Order includes a reset of the planet's economy and the exchange of
slavery for another currency, Kindness Credits.

As our currencies token is rocks and the debt remained outstanding our debt equity
swap constitutes our rock, once known as Earth.

This debt therefore is now considered settled and the restoration process has
commenced.

This notice is politely served to all parties to give due, disclosure to enable
consideration, acceptance, a meeting of the minds and consent or to decline the offer
of re settlement in their roles currently held.

This notice does not form or imply and contract and is simply for information and
legal purposes only.

By Order,
Ministry: Remedy
Universal Law Community Trust.

A community of second party creditors who Trust in Universal Law
All Rights Reserved.
©
E-4-YJ276-C13-M0
(18 May 2023)

07732 820800
MINISTER EMOVEN
010.



Big Blue Asset Management
 Asset Management: Investments, Trusts, Tax Haven
 Asset Management Co-Operation of Universal Law Community Trust
 "For The People"

trust@universalawcommunitytrust.com
www.universalawcommunitytrust.com
 © All Rights Reserved

RESTORATION: RIGHTS: CREDITORS
 (U.C.C. 9-609 / 610)

THIS NOTICE IS TO NOTIFY ALL PREVIOUSLY INTERESTED PARTIES OF A
 PEACEFUL SURRENDER OF "COLLATERAL" ONCE KNOWN BY
 LONGITUDE AND LATITUDE REFERENCE:
 S1.5500N LATITUDE AND 2.4333 W LONGITUDE
 ONCE CLAIMED AND TITLED (ILK / ILM GOVERNMENT) FILED AS
 COLLATERAL INSIDE (SECURITIES EXCHANGE COMMISSION,
 WASHINGTON D.C) UNDER THE SECURITIES AND EXCHANGE ACT
 ACCESSION NUMBER: 999999997-08-018274
 FILING DATE: 2008-10-12
 CIK CODE: 0091452017
 MAKING (ILM GOVERNMENT) (FOREIGN GOVERNMENT) SUBJECT:
 UNIFORM COMMERCIAL CODE

See:
<https://www.sec.gov/Archives/edgar/data/1452017/000145201708000009/000145201708000009.pdf>
 For proof of this claim.

In accordance but not in accordance with (UCC) 9-609-9-610, a "Debt Equity Swap"
 has been completed through the legally matured consent of the Restored Party
 Creditors, who have assigned their shares and debts into Universal Law Community
 Trust by way of irrevocable deed.

Due to the outstanding debt owed by (HER MAJESTY'S GOVERNMENT) in
 excess of 19 Quadrillion three hundred dollars, pounds, pence of all recorded and filed

UCC / FINANCING STATEMENT: FILING NUMBER: 2020-055-1943-1
 24/02/2019

Restoring omitted a RESTORATION: RIGHTS: CREDITORS
 (a Restoration of Rights of the Creditors) has been undertaken.
 All assets, shares, minerals, commodities, utility transmitting accounts, bank
 accounts, property and trading accounts and money accounts and loans have been
 assigned by the creditors who were once assigned by this corporation as debtors
 the people of England, Ireland, Scotland and Wales and what was once referred to as

Restoration of Rights of The Creditors | 1

Cannabis Found at Whitmore Heath property



7 June 2023 - Vehicle Impounded Outside Whitmore Heath property



9 June 2023 – Whitmore Heath



CORE-B-97



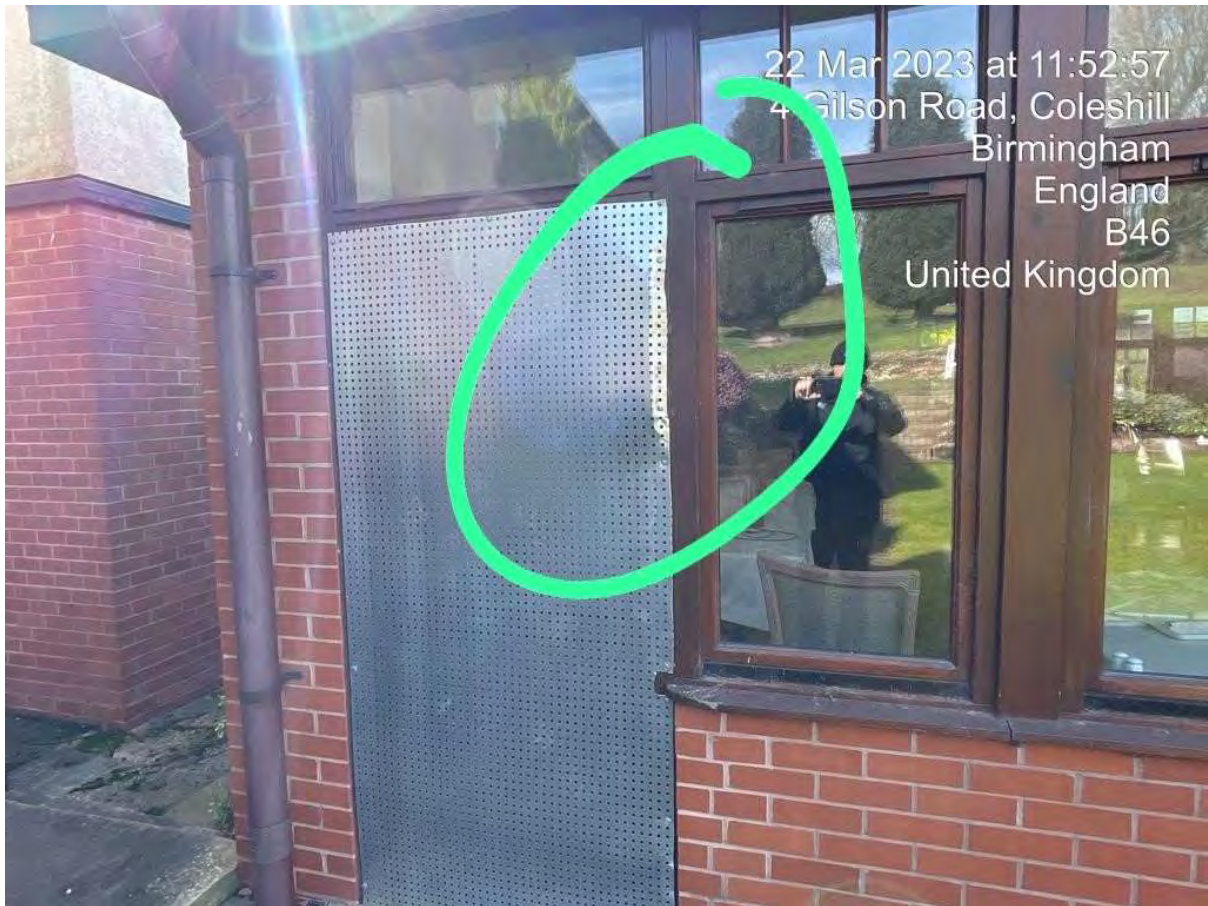


20 June 2023 - Rock thrown through window at Whitmore Heath property





Forced security grille at Gilson Road, Birmingham



21 March 2023 - Hotel on Gilson Rd, Birmingham

<https://www.facebook.com/mrairborne66/videos/938971827250802>

The image is a screenshot of a Facebook video player. The video itself is very dark, showing a person's profile and a wall. The interface includes a video player with a progress bar at 0:13 / 35:30, a Facebook logo, and a right-hand sidebar with the video title, date, and engagement metrics.

Video Player: 0:13 / 35:30

Facebook Post:

- Mr Airborne** was live. March 21, 2023
- Exploring a hs2 abandoned hotel... alarms going off...#airbornegang
- 561 likes, 1K comments, 16K shares
- Like Comment Share
- Comments Hide
- Most relevant
- Pinned Comment:** Mr Airborne 0:00 welcome to my world #LetsTalk 47w Like Reply
- Write a comment...

<https://www.facebook.com/mrairborne66/videos/353675836940113>



<https://www.facebook.com/watch/live/?ref=search&v=544614217861316>

Outside the active tower crane cabin



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25 February, 2024

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Urban explorers on hospital roof spark police op

by Jo Wadsworth — Tuesday 9 Jan, 2024 at 6:45PM

AA 6



Dozens of police officers were called to the Royal Sussex County Hospital last night after urban explorers got on to the roof of the empty Barry Building.

The 1820s Georgian era building at the heart of the hospital complex is due to be demolished now that the new Louisa Martindale Building has opened.

The video was streamed live last night on Facebook by an account called Mr Airborne and features a man wearing black clothing and hat and a woman with red hair who he calls Becks.

The man said: "The security on this place is mental. It's took us so long to get in here. We had to wait until it gets dark to even give us half a chance.

"We did get caught by a member of the public on the way in. I think we probably are going to get caught because security are in the building. But this place is mental."



After about 40 minutes exploring, by which time they're on the roof, the man spots security guards, saying: "There's loads of them. F*** it. Right guys, we're caught." He then mutes the feed briefly.

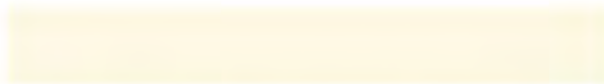
When the video starts, he realises police officers are also on the roof asking them to come down.

At one point, a police officer trips on a drain hole on the roof and the woman explorer almost does the same.

The pair then come back in through a window and are led down to the ground floor, where they exit the building.



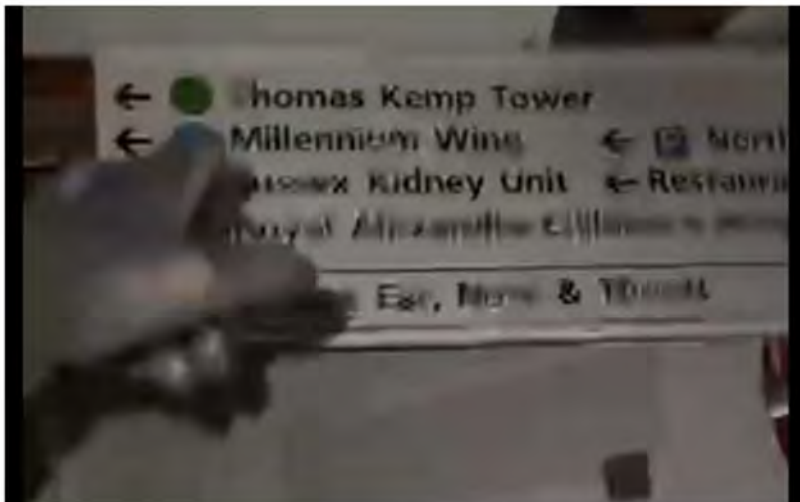
A police officer is heard telling them: "If you do this sort of thing a lot, then you'll understand ..."



Another officer is heard saying "What a waste of time" and a third said: "Don't, because if you fall off, then we have to come and scoop you up."

The first officer said: "We're satisfied you're not up to anything sinister. You're not coming equipped to steal stuff."

The male explorer said: "Nice one mate, see you later." He then walked off.



Sussex Police said: "Police were called to the Royal Sussex County Hospital yesterday (Monday 8 January) at around 6.15pm following reports of two people on the roof of the building.

"Security located a man and woman on the roof and they were removed from the area.

"No arrests were made."

ADVERTISEMENT

Urban explorer, 22, plunged 20 feet to his death when he fell through roof of abandoned dairy building, inquest hears

- Ethan Bonnar, 22, suffered a traumatic brain injury after the fall in Totnes, Devon
- He had been reported missing but was found a day later in the disused building
- Student loved climbing and exploring abandoned buildings, said his girlfriend
- The coroner recorded a conclusion of accidental death at inquest in Plymouth

By KATIE WESTON FOR MAILONLINE

PUBLISHED: 16:36, 26 March 2021 | UPDATED: 17:48, 26 March 2021



An urban explorer plunged 20 feet to his death when he fell through the roof of an abandoned dairy building, an inquest heard today.

Ethan Bonnar, 22, suffered a traumatic brain injury after dropping through a sky light in the roof of the disused warehouse in Totnes, Devon.

The student, born in Scotland, had been reported missing but was found a day later in the building, having fallen 20 feet through a roof onto a concrete floor.

Ethan, who was studying an illustration course at Plymouth University, loved climbing and exploring abandoned buildings, said his girlfriend Charlotte Rose.



Ethan Bonnar (pictured left and right), 22, suffered a traumatic brain injury after dropping through a sky light in the roof of the disused warehouse in Totnes, Devon



The student, born in Scotland, loved climbing and exploring abandoned buildings, said his girlfriend Charlotte Rose

She said Ethan would explore either alone, with her or friends, adding: 'He did this not to cause damage but to take pictures and videos because he appreciated the aesthetic.'

A woman introduced them to the Urban Explorer forum and in July last year he decided to go to the old dairy site in Totnes and sent Charlotte a video from the roof of the building.

Charlotte said she had no more contact from Greenock-born Ethan and later contacted his mother, Cheryl Reynolds.

They reported him missing to the police and sent officers the video Ethan had taken.

Police searched the old dairy and found Ethan unconscious. He died later in a Plymouth hospital.

Detective Sergeant Andy Penhaligon told the inquest: 'No third party was present at the time Ethan fell through the roof.'

'It appeared to be a tragic accident.'

Ethan's mother Cheryl, from Torquay, Devon, issued a warning to others about the dangers of urban exploring at the time of her son's death.

She said: 'What he did was so dangerous. I just want this message to get out there that these young people just don't realise how dangerous it is in these old buildings.'

'I told Ethan not to do it and I told him he was being an idiot but he always thought he would be okay.'

Judge's bid to stop urban explorers entering a construction site set to have tallest cranes in the City of London

A High Court judge has moved to stop urban explorers entering a construction site expected to feature the tallest cranes in the City of London.

Mrs Justice Stacey has made an order against 'persons unknown' after a construction firm creating a 155-metre tall building in Leadenhall Street took legal action.

A barrister representing Mace Limited said there had been 'no known incursions' at the site but told the judge about 'seven instances of urban explorer trespass' at other Mace sites across London.

Mrs Justice Stacey granted Mace's application for an injunction to 'restrain trespass'.

She said in her ruling: 'The pattern of behaviour and bravado of urban explorers in relation to other notable London sites in the past two years leads me to conclude that the probability of a trespass is not only imminent and real, but also high.'

She added: 'The risk of death or serious injury from an urban explorer trespass at the site is both real and would be grave and irreparable as demonstrated by the number of deaths of urban explorers over the past six years.'

'The last thing he sent was this video of him on top of the roof.'

'Ethan had a heart of gold, he was such a likeable, positive, outgoing person.'

The senior Plymouth and south Devon coroner Ian Arrow recorded a conclusion of accidental death.

He said: 'He went to a derelict building and while exploring that building he has fallen through the skylight and landed heavily on the concrete floor below.'

'Ethan was clearly a content person who liked exploring.'



Ethan's mother, Cheryl Reynolds, from Torquay, Devon, said: 'Ethan had a heart of gold, he was such a likeable, positive, outgoing person'

<https://www.facebook.com/mrairborne66>



Mr Airborne

152K followers • 20 following

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<https://www.facebook.com/Peakyexpo2019/posts/pfbid0RZX2HrhyHeduqdNPUZWvoJFCMssRqbuMYeg388TzHbZtYxsqQkkzaW42Jkhz3nFJI>



Peaky Explorers

9.5K likes • 11K followers

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Peaky Explorers

January 26 at 6:08 PM · 🌐

...

35 abandoned mansions bought under a compulsory purchase by the government for the build of the HS2 line and now it has been scrapped and they all sit empty and rotting away to this day. We spoke to a few locals and they have had nothing but problems ever since they started to get bought. There is some very nice houses here such a shame and hope they get a new lease of life. Please enjoy..... explored with [Forbidden footsteps](#) #Urbex @followers





149

44 39

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Top fan

Lorraine Thomas

Why aren't they up for sale seeing as the HS2 line isn't going ahead, disgusting waste of good houses not to mention waste of money

1w Like Reply



Forgotten & Forbidden Explores · Follow

Them fireplaces 🍷

3w Like Reply

3



Top fan

Lorraine Thomas

Why aren't they up for sale seeing as the HS2 line isn't going ahead, disgusting waste of good houses not to mention waste of money

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3



Author

Peaky Explorers

Forgotten & Forbidden Explores some nice ones there 👍

3w Like Reply



Elaine Helliwell

Stunning 🍷

3w Like Reply



Tracy Holliday

All stunning big houses with large grounds. I would happily live in any of them.

3w Like Reply




2








Top fan



William Tkaczuk


 **William Tkaczuk** Top fan
 they should have auctioned them off im willing 2 bet so many people WOULD have wanted 2 live in those mansions
 5d Like Reply 

 **John Hick**
 Absolute Bloody scandalous !! bloody useless Tory government !! 😡
 3w Like Reply   7

 **Brian Tullett**
 All these abandoned houses - isn't it time we abandoned the government? What a total waste of public money.
 3w Like Reply  3

 **Sharon Robinson**
 Why don't they resell them
 3w Like Reply   3

 **Corinne Rewbury**
 The owners should be aloud to buy them back if the HS2 been scrapped
 3w Like Reply  4

 **Peak Explorers** Author

 **Peak Explorers** Author
Corinne Rewbury there has been numerous issues since it all started including family members passing away before it was all announced so it's not going to be easy even if some of the families wanted to
 3w Like Reply  2

 **Caroline Hawkins**
 Such a waste. Some beautiful properties there
 3w Like Reply  2

 **Andy Sawyer**
 Bloody disgraceful these are stunning properties that are now left to rot
 3w Like Reply  4

 **Shirley Jane Taylor**
 Awful when so many homeless families wanting homes to live in X
 3w Like Reply  3

 **Carlie Selling Logan Selling**
 3w Like Reply

 **Sally James**

 **Sally James**
Absolutely shocking and probably heartbreaking for their previous owners 😞
3w Like Reply   5

 **Peaky Explorers** (Author)
Sally James it really is, a local woman told us it's caused allsorts of problems with families who used to own some of these properties
3w Like Reply   4

 **Jacqui Smith**
Disgusting what an absolute waste. Can these house not be bought to live in now
3w Like Reply  3

 **Peaky Explorers** (Author)
Jacqui Smith some of them can but think some may still disappear
3w Like Reply  2

 **Kath Hepburn**
What a shame lovely looking houses hope they get sold soon and not left to deteriorate
3w Like Reply  2

 **Ell Dakin**


 **Ell Dakin**
Unreal 
3w Like Reply

 **Pat Henry** (Top fan)
Kelly Henry these are stunning  2
3w Like Reply


 **Samantha Matthews** (Top fan)
Wow they are lovely I shall take the bungalow who wants the rest lol 😂 it's a shame such lovely houses 🏠 going to waste thank you for the photos, take care and stay safe on your next adventure xx
3w Like Reply  2


 **Peaky Explorers** (Author)
Samantha Matthews yes I imagine some may be sold on for future use, thank you 
3w Like Reply



 **Natasha Davies**
Samantha Matthews lol ill take one with a conservatory lol, plenty of garden space for the kids to run around .   2
3w Like Reply


 **Samantha Matthews** Top fan
Natasha Davies see that 2 empty houses gone lol 😂 xx
3w Like Reply  2

 **Leah Sims** Top fan
Shannon Meakin
3w Like Reply

 **Paula Flynn**
Absolutely awful... beautiful homes it's unbelievable.
3w Like Reply  2

 **The voided viking explorer** · [Follow](#)
Yes lads! I have a feeling I know exactly where ya are with these... There's loads around there! Great work as always!
👍🔨
3w Like Reply  2


 Author
Peaky Explorers
The voided viking explorer cheers mate yes there's 30+ altogether
3w Like Reply 

 **The voided viking explorer** · [Follow](#)

3w Like Reply 

 **The voided viking explorer** · [Follow](#)
Peaky Explorers be good to catch up again this year lads! Be good to see ya again! 😊👍
🔨
3w Like Reply 


 Author
Peaky Explorers
Yes we will sort something out soon mate 🙌
3w Like Reply 


 **The voided viking explorer** · [Follow](#)
Peaky Explorers sound lads! Looking forward to it...were you able to access quite a few? 😊
👍🔨
3w Like Reply

 Author
Peaky Explorers
The voided viking explorer No mate only 1, the big white one all the rest were tightly sealed
3w Like Reply 

 **The voided viking explorer** · [Follow](#)
Peaky Explorers ahh okay bro sound...still a good adventure tho... 😊👍🔨

Jennifer Brooker
What is the HS2 line? Trains?


3w Like Reply 


 **Peak Explorers**
Author
Jennifer Brooker yes the one the government recently scrapped

3w Like Reply  2


 **Anonymous Explorer**
Exploring With Andy

3w Like Reply

 **Rebecca Herd**
Omg those are really lovely houses and some look significant architecturally , art deco . Looks like prime greenbelt. Not a load of badly built now skanky council houses that could do with knocking down. This government hasn't got a bloody clue, hs2 is a massive waste of taxpayers money , no point getting somewhere 20 or 30 mins earlier now , mobile Internet for work .

3w Like Reply  2

 **Dolittle Debbie**
Top fan
Appalling waste of

 2

3w Like Reply

TikTok ghouls who filmed Nicola Bulley's body being pulled from the river is 'fraudster who tricked women into taking gym pictures'

- Curtis Arnold, 34, duped police officers on the day the mother-of-two's body
- He has received swathes of criticism, and is now revealed as reported trickster

By TIM STEWART and JAMIE PHILLIPS FOR MAILONLINE

PUBLISHED: 23:44, 26 February 2023 | UPDATED: 00:13, 27 February 2023



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A **TikTok** ghouls who secretly filmed **Nicola Bulley's** body being retrieved from the river is reportedly a fraudster who tricked women into taking gym pictures.

Curtis Arnold, 34, barged his way into the official press area and duped police officers on the day the mother-of-two's body was found before posting the distasteful content to his online accounts.

The barber, who has no journalistic credentials, insists he is offering 'media and journalism done differently' to 'help get justice for those who can't'.

But he has received swathes of fierce criticism over the grim footage of officers using a body bag on the water's edge, with his social media channels also including a number of hurtful and scandalous headlines about Ms Bulley's case.

And Arnold is also a 'narcissistic' and 'manipulative' trickster with a number of previous criminal convictions - including drink driving, burglary and fraud, **The Sun** reports.



His most recent criminal conviction is said to have come for a fraud charge in 2018, for which he served a custodial sentence, while his criminality stretches back to when he was in his 20s.

Arnold also reportedly posed as a fitness modelling agent and visited a number of gyms across London under the guise of being on the search for female models to promote a range of leggings.

Instead, though, he is said to have taken a number of sexualised photos and videos before sharing them on social media without permission to promote his own fitness products.

Arnold reportedly served his sentence at HMP Wormwood Scrubs following a conviction for fraud by false representation, where he was said to have been unpopular with staff.

A prison source told The Sun: 'He was a very narcissistic, manipulative individual and would regularly try to manipulate female staff, especially education staff.'

READ MORE:
Unmasked: The TikTok ghoul who covertly filmed Nicola Bulley's body being lifted from the river



'He was slimy and would tell them they were beautiful or he preferred them over another officer.'

'He would say very inappropriate things and would ask for their mobile numbers and ask to see them outside of the prison.'

'But when he started asking female staff to smuggle in phones and drugs for him, it all went down on his report.'

Arnold was reportedly sacked from a reception orderly role after it was alleged he was 'part of a group smuggling items' into the prison.

He is also said to have been handed a six-month suspended sentence at Hereford Crown Court in March 2010 for perverting the course of justice after altering his car's registration plate.

The barber returned to court in October later the same year reportedly for breaching the suspended sentence for drink driving on the M6.

In November, he is said to have admitted receiving two stolen registration plates.



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The barber returned to court in October later the same year reportedly for breaching the suspended sentence for drink driving on the M6.

In November, he is said to have admitted receiving two stolen registration plates.

He is also understood to have broken into the garage of a property and stolen tools in Kidderminster, before pleading guilty to burglary.

But Arnold reportedly avoided a stint in prison after the judge said he had shown signs of maturity

Now Arnold has received widespread backlash and public anger after posting footage of the ashen-faced couple in shock after finding 45-year-old mother-of-two Nicola's body in reeds by the River Wyre on February 19.

The athletically-built powerlifter makes regular six-hour round trips from his Worcestershire home to St Michael's on Wyre, Lancashire, and films with a GoPro camera strapped to his chest.

His latest video was posted on Saturday - the day after he was unmasked as being the sleuth behind the sickening eight-minute clip.

It opens with Arnold driving back to the village, saying: 'This is actually the drive that you would have to do if you were going to transport anything - AKA perhaps Nicola - to the location.'

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He continues: 'Most of the country are speculating that possibly Nicola was not in that river the whole time.'



Arnold duped a police officer into letting him continue walking along a road close to where Ms Bulley's body was found



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Showing a shallow section of the River Wyre close up, Arnold adds: 'Is that what the police want us to believe that she was in there all this time?'

Arnold then films canoes and a boat lying abandoned in nearby fields, before suggesting they could have been used to move a body during a 25-minute video already watched 60,000 times on YouTube alone.

Arnold has so far earned almost £1,000 in royalties from his channels covering the case.

His footage - possibly the most controversial and distasteful of all the material that has swamped TikTok and YouTube in the wake of Ms Bulley's disappearance a month ago - attracted nearly a million views.

The most sickening was footage covertly taken of police retrieving Ms Bulley's body from the River Wyre.

Earlier, he was asked to turn back while walking along a nearby road, but duped

READ MORE: 'Rest in peace Nikki': Hundreds gather at candlelit vigil for Nicola Bulley in her home town and pay tribute to mother-of-two who 'touched hearts in every possible way'



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Earlier, he was asked to turn back while walking along a nearby road, but duped an officer into letting him through by claiming that he needs to return to his parked car and saying that he is from Blackpool.

As dozens of officers gathered and a police helicopter and drone hovered overhead, Arnold asked a female police officer: 'What's going on down there? I've walked down and he wouldn't let me pass'.

She also directed him to leave the area, but the video then cuts to Arnold filming covertly as officers at the side of the river.

But who exactly is Curtis?

The Mail tracked Curtis down from his digital footprint to a town centre barber's shop in the Midlands.



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Inside was an athletically built young man in a tight-fitting T-shirt, knee-length shorts and trainers, clipping the hair of a middle-aged customer.



Asked if he was behind the notorious video, he replied 'Yes. How did you find me?'

He admitted that he lied to police and crouched in a field to film covertly on his Samsung S21 smartphone.

Arnold is single and lives in a three-bedroom detached house near the barber's shop he has been running for the past two years.

He made five six-hour round trips to St Michael's on Wyre in the space of ten days to acquire 'content' for his channel.

The barber gleefully revealed the £716.06 in royalties that he made from YouTube alone, adding: 'It is probably £900 by now but it takes a while to come through.'

'My ambition is to be a full-time YouTuber and make a good living from it. The income potential is there and I love doing what I am doing on the channel.'

His first viral videos were of 'car fishing' - vehicles coming unstuck attempting to drive through deep water - at Rufford ford near Newark, Nottinghamshire.



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Someone who knows Arnold well said: 'He was not making any money initially and was desperate to monetise his car fishing "fail" videos. He will do anything for more views to make money.'

'He gives all TikTok-ers a bad reputation. He is not reporting news. What he is doing is monetising people's peril or anything else he can. This all needs regulating properly. It's like the Wild West.'

Arnold tried to justify smearing the reputation of Nicola's grief-stricken partner Mr Ansell, saying: 'I felt he was hiding something when I watched him being interviewed on TV.'





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'agony' after a dogwalker found Nicola's body in the reeds of the River Wyre

'I was hoping my videos would trigger a member of the public to come forward with new information.'

Another of his videos about Ms Bulley has been viewed almost 100,000 times on YouTube.

He has also been criticised for a video he uploaded to another of his channels, 'Curtis Cool Stuff', on February 18 of a 'possible burial site'.

Arnold claims that his covert filming triggered death threats.

He said: 'I know that has caused a lot of controversy and if it has caused her family any distress, I apologise.'

'If they saw it, it can't have been a nice thing for them to have seen and I'm sorry about that.'

But he remains undeterred: "I intend to follow as many breaking news stories as I can in the future and put them on the channel.

'It gives the public a chance to get closer to the event and in the Nicola case I wanted people to watch my footage and see if they noticed that me or the police had missed anything.'



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Experts say that social media algorithms encourage and reward controversial content like Arnold's.

There have been 400 million views on TikTok alone of videos with the hashtag 'NicolaBulley'.

They include over half a million views of 26-year-old 'psychic' Lucy Hesford-Buckingham, from Wales, sharing her vision on the case before Nicola's body was found.

In her video, she claimed that she sensed intuitively from an 'overwhelming smell of lemon bleach' that Nicola was still alive but being held captive and in 'severe danger'.

So many sleuths descended on St Michael's on Wyre that, at one point, police had to issue a 48-hour dispersal order to clear the village of outsiders.

TikTok insists that it removes content and accounts that engage in bullying and harassment or otherwise violate its policies.

[Nicola Bulley](#)

[TikTok](#)

Share or comment on this article: TikTok ghoul who filmed Nicola Bulley being pulled from the river is 'fraudster who tricked women'

<https://www.youtube.com/watch?v=ZKtfF1HHXT8&t=1744s>



<https://www.youtube.com/watch?v=KGYrVmJYISo&t=11s>





Your drone has been SPOTTED above HS2, we said NO

DJE MEDIA 53.6K...

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23K views 1 month ago

Top chat replay

- just had massive drama at airport hs2
- Bitcoin Wolfcub never seen that before
- DJE MEDIA London
- Jason Hughes You with drama never
- Julie lots of security for some reason
- DJE MEDIA drone is causing people massive issuee
- Gary Ross think he cleans the drains
- Bitcoin Wolfcub they'll get over it

Hide chat replay

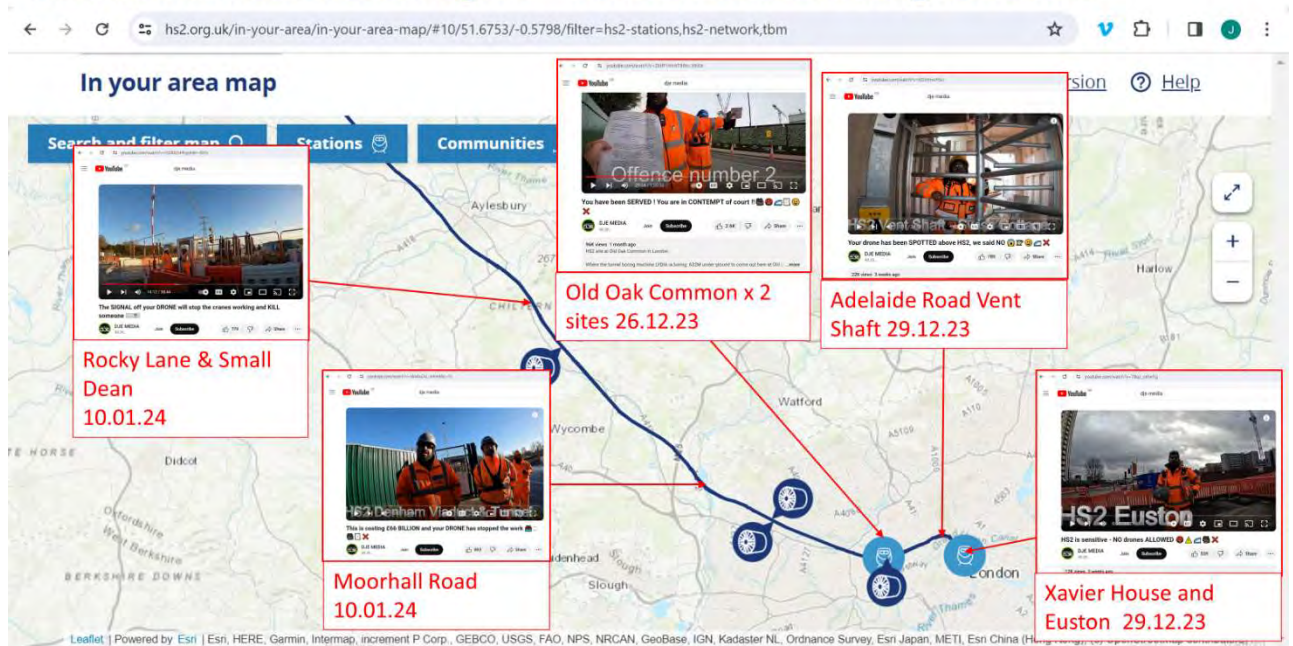
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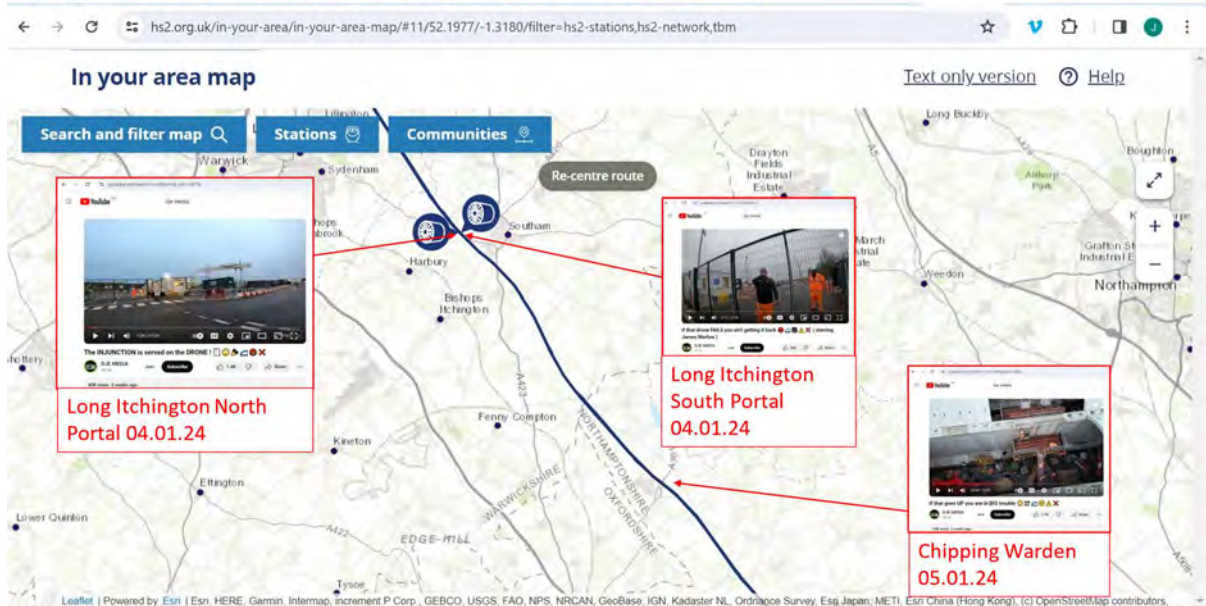
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D69 Drone Flights Maps

Southern Area Drone Flights – London and Buckinghamshire



Oxfordshire and Warwickshire Drone Flights



Birmingham Area Drone Flights

hs2.org.uk/in-your-area/in-your-area-map/#11/52.4434/-1.6881/filter=hs2-stations,hs2-network,tbm

In your area map [Text only version](#) [Help](#)

The map displays the Birmingham area with a blue line representing the HS2 route. Three specific locations are highlighted with red boxes and arrows pointing to video thumbnails:

- Curzon Street** (03.01.2024): Video thumbnail shows a person holding a drone.
- Balsall Common** (05.01.2024): Video thumbnail shows two people in orange safety gear.
- Washwood Heath** (09.01.2024): Video thumbnail shows a drone in flight over an industrial area.

Map controls: Search and filter map, Stations, Communities, Zoom in (+), Zoom out (-), Full screen.

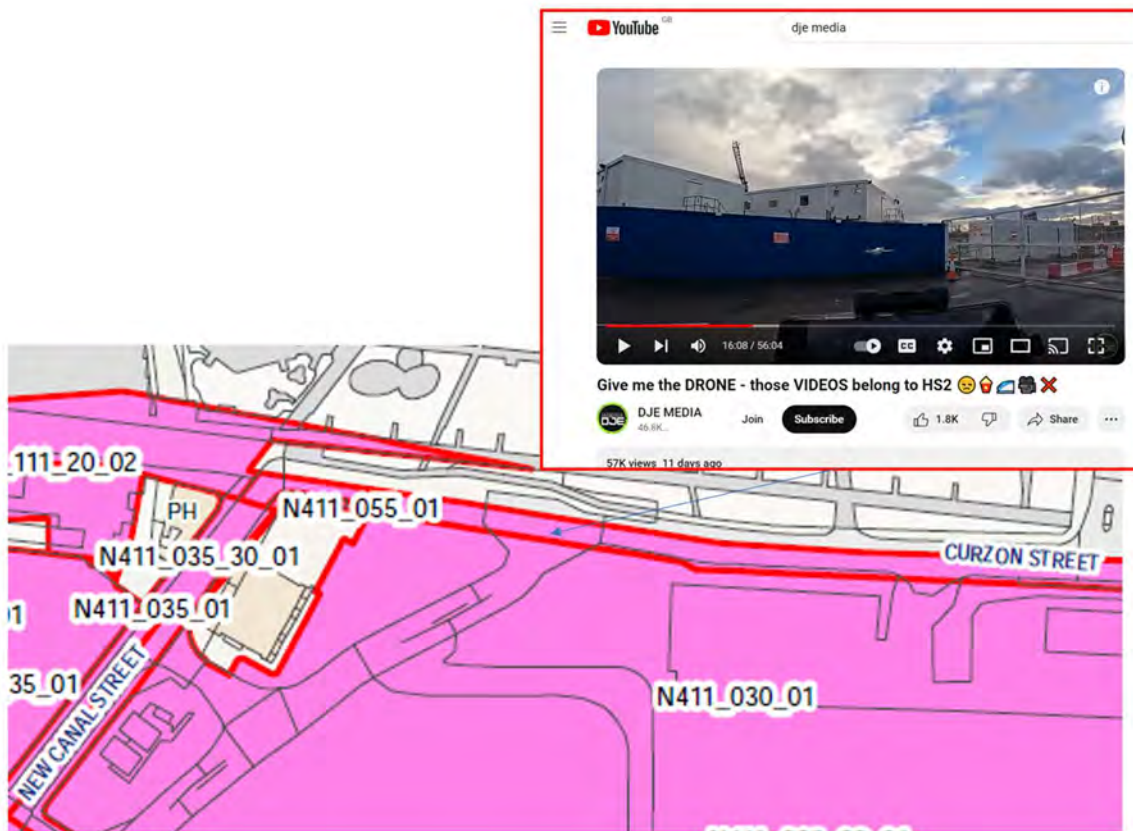
Map labels: West Bromwich, Oldbury, Dudley, Sparkhill, Kingfisher, Birmingham Airport, Acocks Green, Re-cent, Hinckley, Nuneaton, Bedworth, Godna Trading Estate, Coventry, Torrington Avenue Industrial Estate, Eastern Green, Wolston, Long Lawford, New Bilton, Balsall.

Map footer: Leaflet | Powered by Esri | Esri, HERE, Garmin, Intermap, IGN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors.

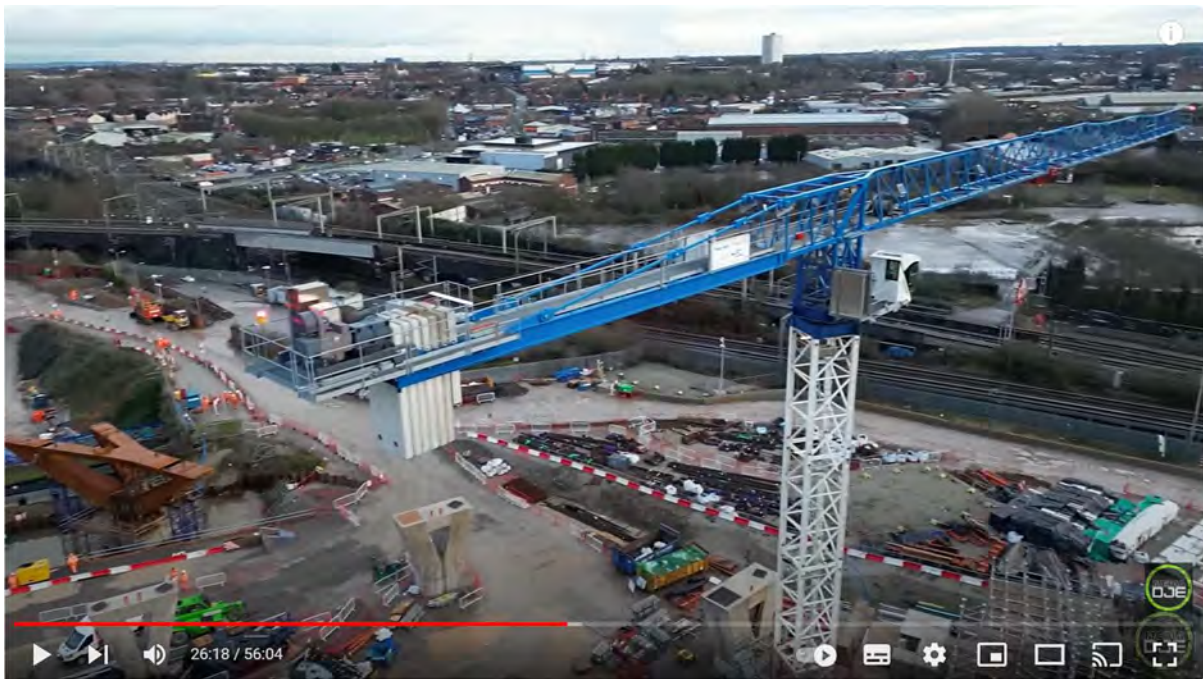
3 January 2024 – Curzon Street, Birmingham

<https://www.youtube.com/watch?v=y85e24f8O04>

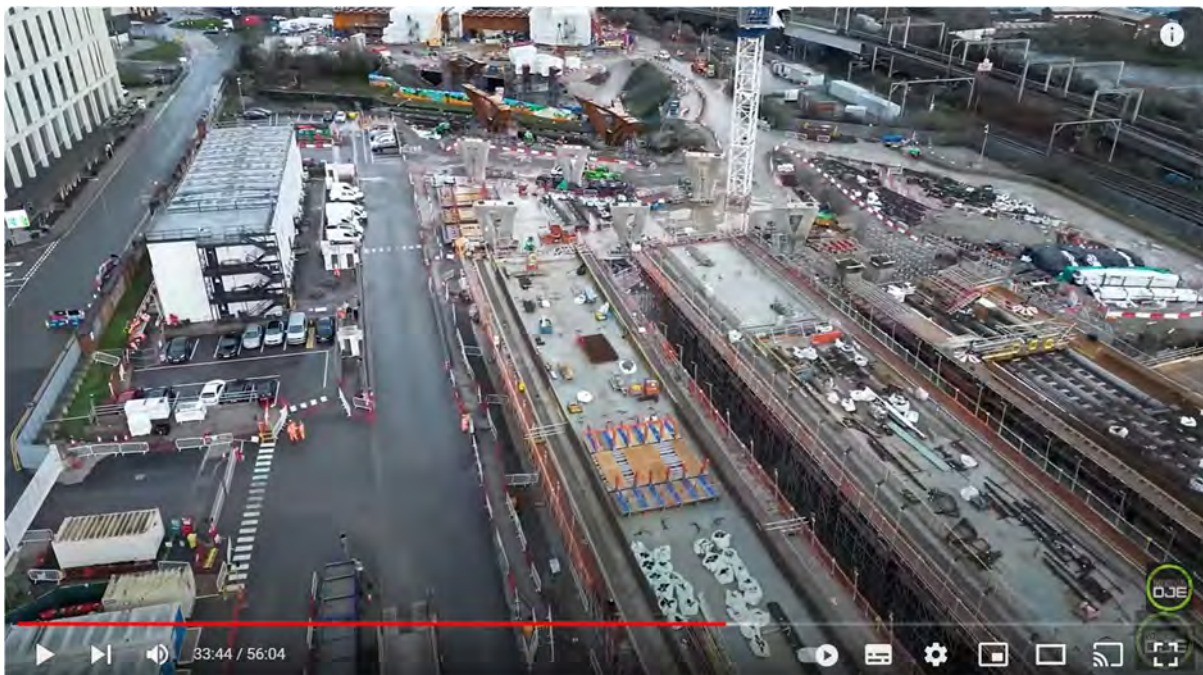
Drone is launched from pink land within the main entrance to Curzon Street site:



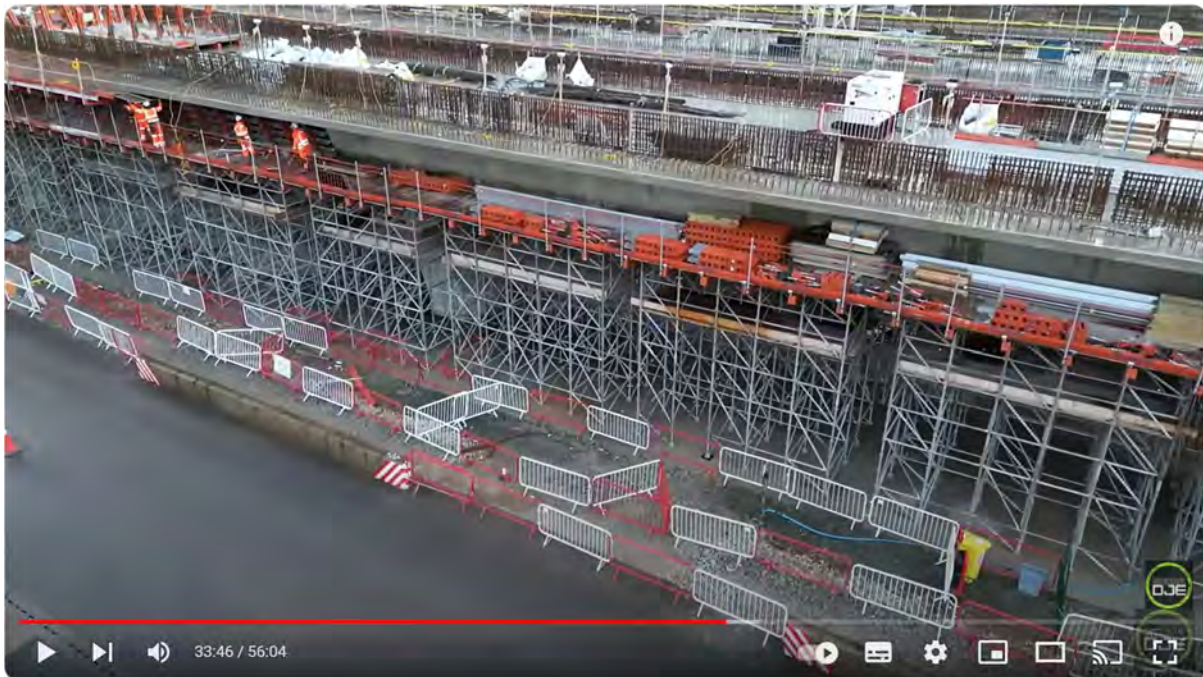
00:26:18 – Drone descends to lower altitudes near tower crane:



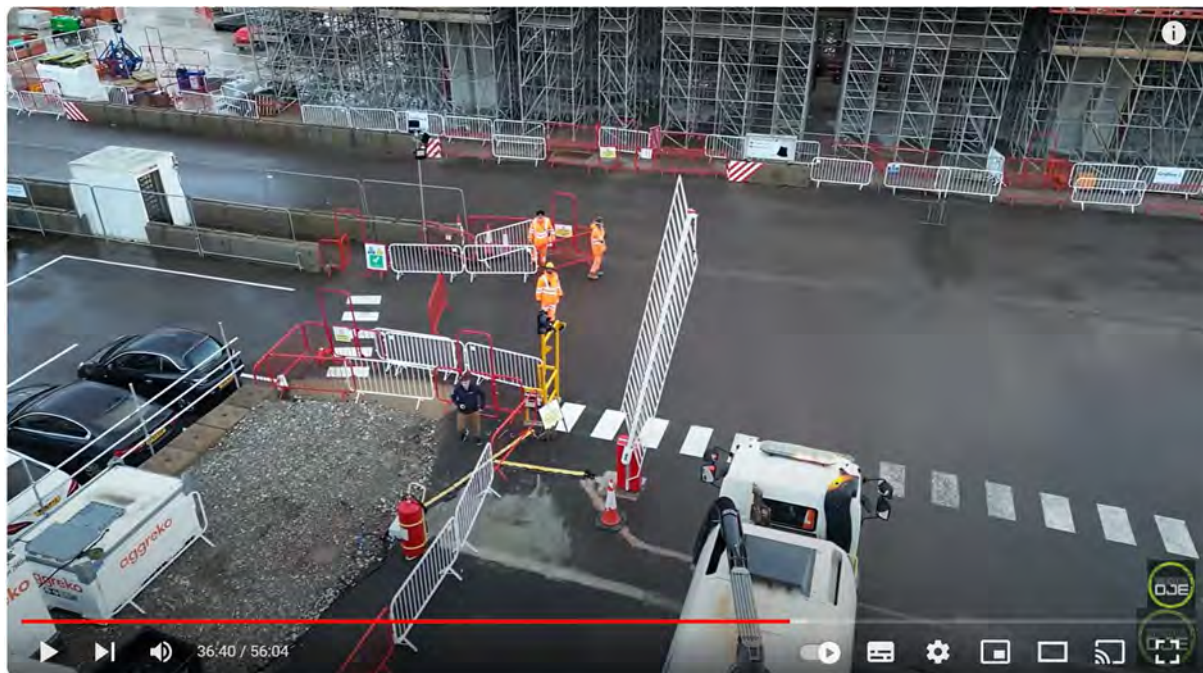
00:33:44 - Drone drops below the operating height of the tower cranes:



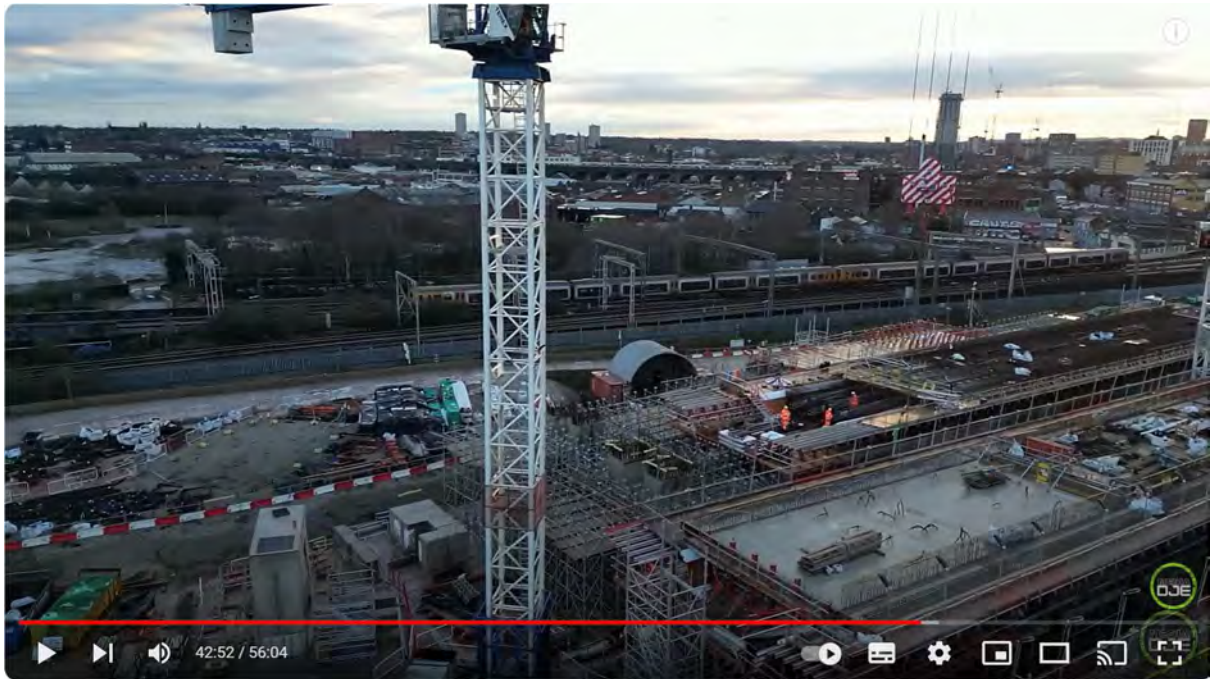
00:33:46 - Drone is at the height of the Curzon viaduct deck, which is just 20 feet (6 metres) high:



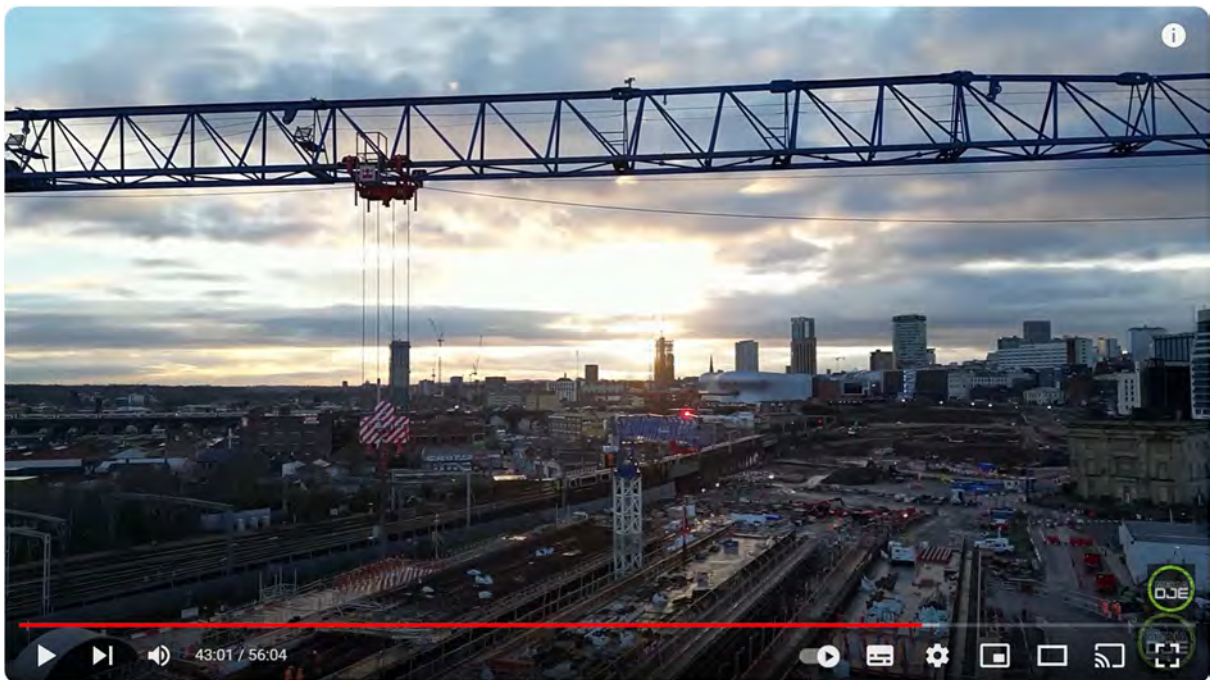
00:36:40 – Drone is lower still, filming the site manager walking to the gate:



00:42:52 - Drone flying in close proximity to the tower cranes:



00:43:01 – Drone right by tower crane jib:



Return to Home Simple Explanation

<https://www.droneblog.com/dji-mini-3-pro-return-to-home/>

DJI Mini 3 Pro has GPS + Galileo + BeiDou to ensure precise location on the map every second and for the RTH function to be as autonomous as possible.

Compared to a few years back, nowadays, to bring your drone back home and land, you have to press only one button: the RTH button.

As technology evolves, we will expect better precision and accuracy of this function, although today, the return to home on the DJI Mini 3 Pro is doing exceptionally well.

The return to home function will work when initiated, where it will ascend the drone to the Auto RTH Altitude you have set and follow a direct path towards the take-off (home) point.

Low Battery Return to Home

When your DJI Mini 3 Pro battery becomes low, the drone will auto-initiate the 'Return to Home' to safely bring your drone back to the home point before the battery is completely depleted.

<https://www.youtube.com/watch?v=FDmH1fJW97U&t=4192s>



YouTube GB

red planet media



Transcript

Search in video

- 1:10:30 because actually what we do is we target the weapons companies and when I say Target we um we go in uh hard we
- 1:10:44 break the windows we smash up equipment we smash up Vehicles we pour paint uh we
- 1:10:50 fill fire extinguishers with red paint um and gas them and then we blast them
- 1:10:57 all over the windows um smash windows and throw flares through um I mean

English (auto-generated)

How to Shut Down a Weapons Factory (w/ Palestine Action)



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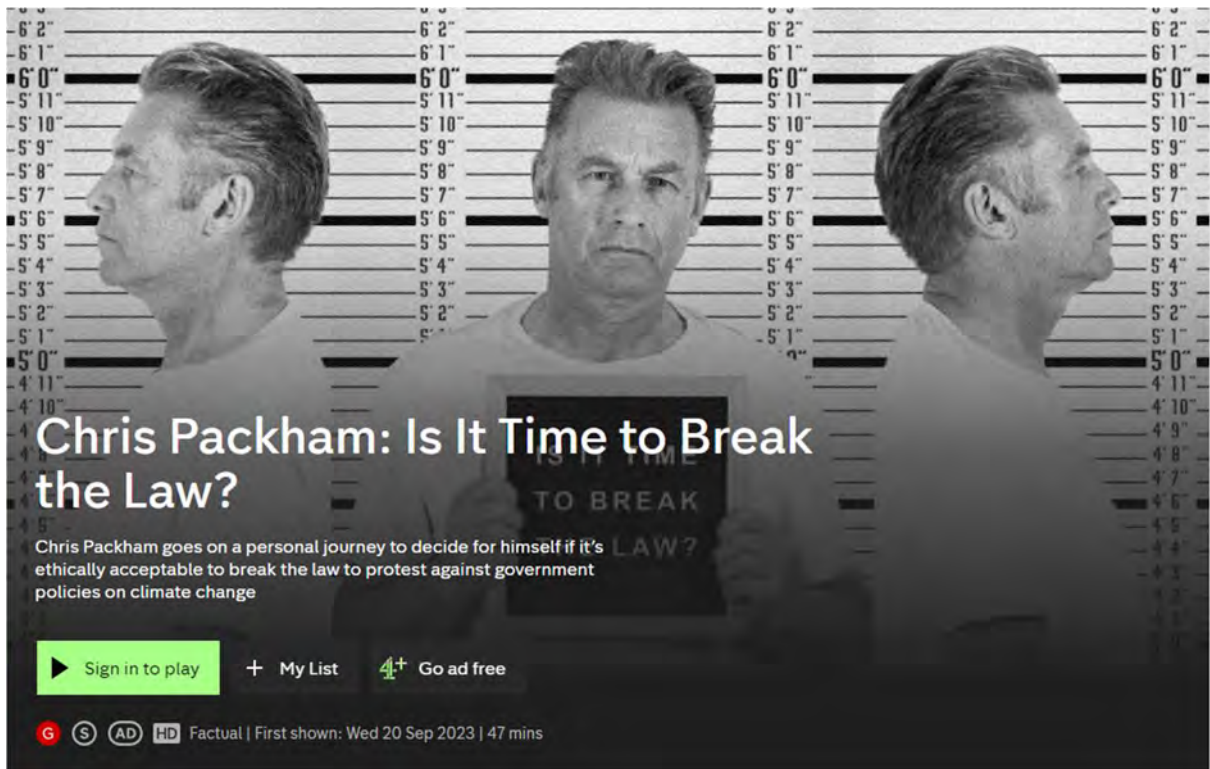
RWI coverage of Schedule 4 Works Locations and Dates

Date Started	Road	Reason for deploying injunction
07.07.2023	M42	Formerly targeted by D6 on 30.12.2021
28.07.2023	Moorhall Road	Significant risks posed by disruption
23-25.08.2023	Old Oak Common	Prior incidents
04.09.2023	A412	Major A road
15.09.2023	Old Oak Common Road	Prior incidents on this road
20-21.09.2023	A40	Significant risks posed by disruption
25.09.2023	Long Itchington	Close proximity to former protest camp
25.09.2023	Welsh Road	Close proximity to former protest camp
10-11.11.2023	A525 Madely	De-vegetation – association with previous disruption
18.11.2023	A418	De vegetation and prior incident in this location
24.01.2023	M42 M6 Link Road (two locations)	Significant risk posed by disruption and prior incidents in 2021

JSO “Radical Flank” on Green Gathering Map



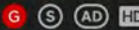
<https://www.channel4.com/programmes/chris-packham-is-it-time-to-break-the-law>

A black and white mugshot of Chris Packham. He is shown from the chest up, facing forward, with two profile views on either side. He is holding a black sign with white text that reads "IS IT TIME TO BREAK THE LAW?". The background is a height chart with markings from 5'0" to 6'2".

Chris Packham: Is It Time to Break the Law?

Chris Packham goes on a personal journey to decide for himself if it's ethically acceptable to break the law to protest against government policies on climate change

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 Factual | First shown: Wed 20 Sep 2023 | 47 mins

JSO Autumn 2023 Campaign Arrests

<https://news.met.police.uk/news/met-officers-make-record-number-of-arrests-to-keep-london-moving-476469#:~:text=Our%20aim%20in%20response%20to,20%20minutes%20to%20clear%20Whitehall.>

NEWS - 7 DECEMBER 2023 00:01

Met officers make record number of arrests to keep London moving



A total of 657 arrests were made over the last five weeks as our officers worked to keep London moving in the face of JSO disruption.

Just Stop Oil activists also faced 338 charges as a result of dozens of attempts to bring the capital to a standstill.

We believe this is the highest number of arrests ever made in response to mass unlawful disruption.

A further 308 activists remain on bail accused of offences including interfering with national infrastructure, ahead of further charging decisions.

Some individuals were arrested multiple times and face multiple charges.

The five-week operation cost at least £3.5m and led to 10,500 officer shifts being taken away from communities.

The total cost of policing Just Stop Oil protests since October 2022 is now £19.9 million.

Commander Kyle Gordon, who oversaw the operation, said: “Community policing is at the forefront of the Met’s priorities and it is tough to see resources being taken away from our boroughs by Just Stop Oil.

“These officers should be responding to local communities and dealing with local issues instead of being taken away to police Just Stop Oil protests. Their time could be far better spent tackling issues in our communities and keeping them safe.

“We understand that in a democratic society there is a strong presumption in favour of the right to protest, but we also have to consider the rights of those who are impacted by JSO’s actions. While there is a right to protest and have your voice

heard, there is no right to cause sustained serious disruption.

“It is Londoners who ultimately face the brunt and bill for this action and we understand the frustration of Londoners who are caught up in the disruption, which as we know from previous campaigns impacts on everything from a school run or commute to work through to issues such as attending hospital appointments.

“Our response has successfully minimised the disruption for the majority of Londoners going about their lives, but I urge anyone who was impacted to contact us.

“This is a busy time for Met officers and I also want thank them for their commitment to minimising JSOs disruption by effectively using the new legislation.”

Our aim in response to Just Stop Oil's activity was to keep London moving and reduce serious disruption.

egislation.

Our aim in response to Just Stop Oil's activity was to keep London moving and reduce serious disruption.

We used new legislation (section seven of the Public Order Act 2023) to arrest activists and remove them from roads.

On one occasion we made 79 arrests within 20 minutes to clear Whitehall.

The dedicated Just Stop Oil portal is still live (<https://www.met.police.uk/news/met/tell-us-about-your-experience-jso/>) for anyone who has been impacted by the disruption to get in touch with us.


These case studies could be used as evidence in court to support prosecution.

Topics

[Police matters](#)

28 May 2023 - D17 Arrested outside Elbit Systems Factory as Part of Palestine Action

https://www.instagram.com/p/Cxno2Q2NECe/?img_index=1



LEICESTER, ENGLAND

and manufacture parts that go into weapons that

www.MintPressNews.com @MintPressNews

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d.robson88 Update on everything. Definitely a very crazy month! Massive love and respect 1st off, for my mates who are in prison right NOW, for the actions they have taken against ELBIT system's. It breaks my heart every day I get to wake up free to be in the sun... We sieged the Elbit factory from May 1st and the Israeli owned factory is still under siege today! 28 days on! Some of us arrived a few days early to secure a safe camp nearby which was over 250 metres away from the factory. On the Tuesday, we woke to find ourselves surrounded by riot police with battons drawn and shields raised. Myself, along with 30+ Palestine Actionists were arrested for a range of offences inc conspiring to cause criminal damage and breach of section 14. Until Palestine is free and until Elbit is out of the U.K. then we/I

124 likes
May 28, 2023

Add a comment...

22 November 2023 - D17 On the roof of Fisher German's building in Manchester

https://www.instagram.com/p/Cz Be-tuft/?img_index=2



I AM ON THE ROOFTOP OF FISHER GERMAN

d.robson88 • Follow
Manchester, United Kingdom

d.robson88 Safe and well. Massive solidarity with everyone that came down yesterday to show your support to the Palestinians and voice your opposition to the dirty death landlords Fisher German, who rent property in the UK to Israeli weapons manufacturers Elbit systems. As usual the cops were up to their dirty tricks, but with smiles on our faces we shut Fisher German in Manchester down! The genocide must stop! We must never give up on Palestine! Free free Palestine! Let's show the Palestinians that even if our government is complicit in genocide, the people are with them and taking a stand! #ShutElbitDown #FreePalestinian #EndTheSiegeOfGaza #ShutElbitDown #joinpalestineaction #GazaMassacre #FreePalestine #PalestineWillBeFree #IsraeliCrimes #WestBank #WarCrimes #FreeThemAll

104 likes
November 23, 2023

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https://www.facebook.com/permalink.php?story_fbid=pfbid0EDe5ksJRW7LenhhDa9TfWQWRCUjCXnmVCmESQDoA8Vacnu6b8kkgkC1MiVCUYfL4I&id=100035849292228



Drew Robson

December 22, 2023 · 🌐

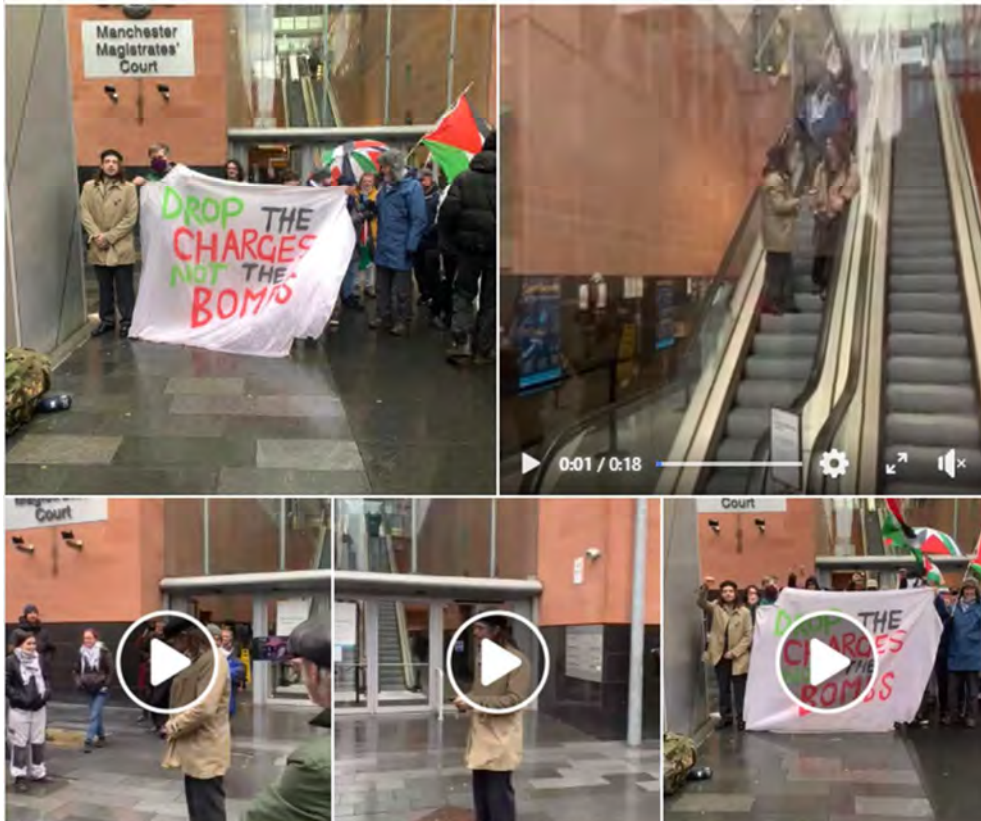
Today, as the death toll in Gaza passed 20000, I attended Manchester magistrates court to plead NOT GUILTY to charges ranging from criminal damage to aggravated trespass against Fisher German, after I occupied the rooftop of their building some weeks back. My case has been listed for trial next December 2024. My actions were part of a wider campaign against fisher German and their links with Elbit systems. Elbit systems is Israel's largest weapons manufacturer and its weapons are being used to murder, collectively punish and ethnically cleanse the population of Palestine right now! Since the rooftop occupation, Fisher German has announced that they have divested from working with Elbit systems and its subsidiary factory UAV (unmanned aerial vehicles) engines. This comes following Palestine Actions two and a half year campaign against the Landlord company as well as being targeted by other groups such as YFFP (youth front for Palestine) and Manchester Palestine Action.



We got the express building to chuck IO Associates out!
We got IO Associates to drop Elbit!
We shut down the factory in Oldham!
We shut down the HQ in London!
We got Fisher German to drop them!
We got the website design company to drop them in recent days!
We are winning trials and we are making history!
We are getting stronger and growing in numbers!
We won't simply go away!
Together, we will #ShutElbitDown!

#ShutElbitDown

#FreePalestinian #EndTheSiegeOfGaza #ShutElbitDown #joinpalestineaction #GazaMassacre #FreePalestine #PalestineWillBeFree #IsraeliCrimes #WestBank #WarCrimes

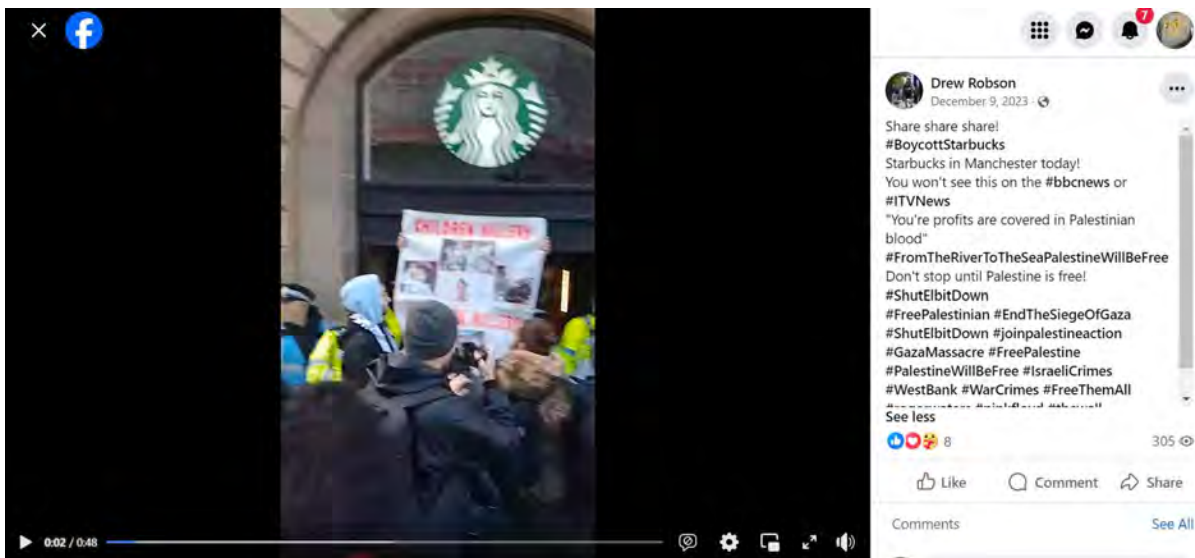
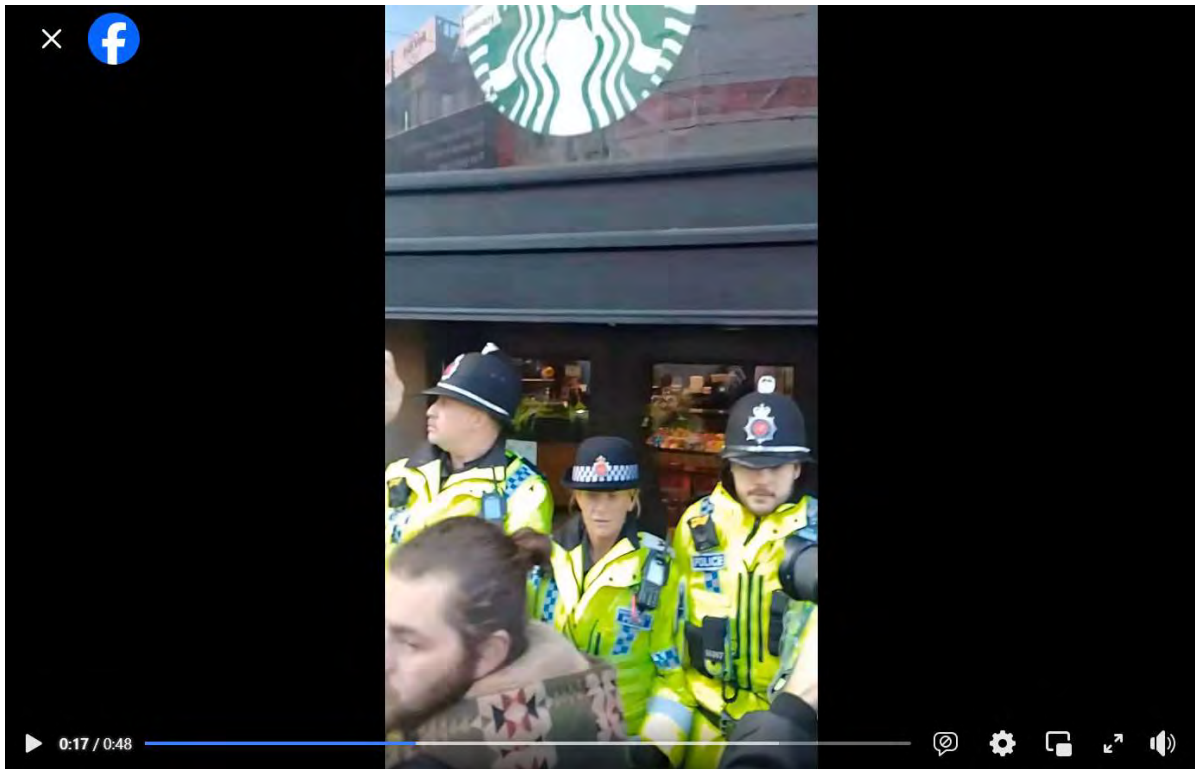


👍❤️ 23

6 comments 45 shares

9 December 2023 - Palestine Action blockade Starbucks in Manchester

<https://www.facebook.com/100035849292228/videos/884458116476472>



11 January 2024 - D16 obstructing access to Essex Court Chambers as Part of Palestine Action

https://www.facebook.com/permalink.php?story_fbid=pfbid02oLrrYLD056Fx5eqAn5rdTfN5pMscvs_aauw1HEm2ePdt8uc99hxGgvRFXRBzobWmA1&id=100008144808673

 **Karen Wildin**
January 11 · 🌐


Actionists in London calling out UK lawyer defending Israeli Genocide of Gaza at the International Court of Justice -Malcolm Shaw.
<https://www.aljazeera.com/.../live-south-africas-icj...>
photos credited to rosh.png




22 3 comments 5 shares

👍 Like 💬 Comment ➦ Share

Most relevant ▾

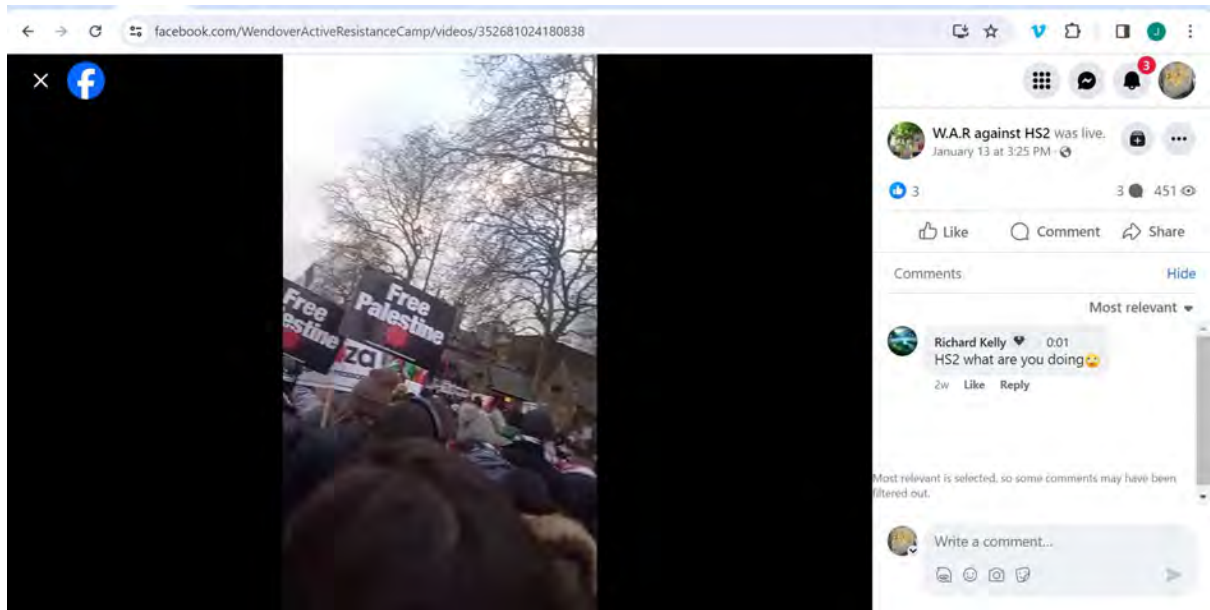
 **Stephen Wagg**
Malcolm Shaw, one of Israel's defence lawyers, is attached to Leicester University and is believed to support the slaughter. ...
6w Like Reply

 **Brenda Hillier**
Stephen Wagg ...
Money, rather than morals or a conscience. ...
6w Like Reply

 **Karen Wildin**
Stephen Wagg Essex Court Chambers also has a barrister on the Prosecution team! ...
Pointing out the ironies and the pointlessness of our Laws. They are broken at the worst levels by these super powerful professionals . Quit this Shit !!!
6w Like Reply Edited

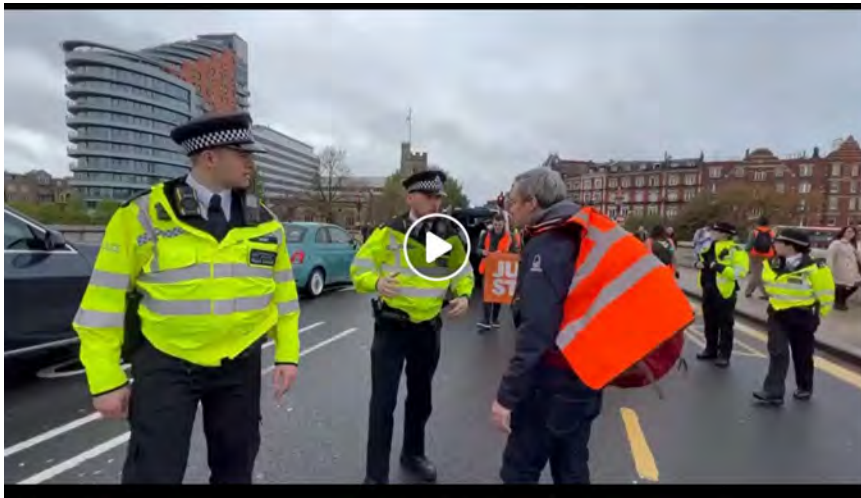
13 January 2024 - W.A.R Against HS2 Live at Palestine Action Demonstration

<https://www.facebook.com/WendoverActiveResistanceCamp> (Post subsequently removed)



28 May 2023 - D16 Slow Walk as part of JSO direct action campaign

<https://www.facebook.com/100008144808673/videos/2797715603692404>



Karen Wildin
April 28, 2023 · 🌐
Legal and responsible 🍷❤️
(...)
👍❤️ 22 1 🗨️ 406 👁️

Like Comment Share

Up next

Please phone Andrews Tipper...
Karen Wildin
2 years ago · 945 views

HUGE Crash At London Car Meet!
I aura Bianca


Comments See All

Write a comment...
🗨️ 🍷 📷 📧 🗑️ ▶️

D16 at North Warwickshire Council as Part of JSO Injunction Injustice Campaign

<https://www.facebook.com/groups/119007471490656/permalink/6781425261915477/>

Karen's Post



Karen Wildin
September 30, 2023 · 🌐

Injunctions are a tool by which the powerful can buy Laws.
And they are being used by companies and authorities across the country to quell public objection to abuses, lies and inaction.

The North Warwickshire Borough Council Injunction taken out vs Just Stop Oil protestors is a good example of such abuse of power and misuse of public money.

With barely any of the councillors being included in the discussions and decision -making this injunction is gradually being exposed for what it represents .

See links below for some insights into the oppressive and persecutory nature of Injunctions. And we remember that HS2 succeeded in having a route -wide injunction imposed (all along the line) so that folk could no longer legally protest about the bad train that the whole country knows has been a Track of Lies ..

<https://youtu.be/EulwFAudiks?si=8dVzeW1zNC3axYhJ>
<https://www.coventrytelegraph.net/.../police-called-just...>
<https://www.standard.co.uk/.../high-court-judge-justice...>

👍 2 4 comments

👍 Like 💬 Comment ➦ Share

Top comments ▼

Isabel McCue
are they still carrying on with this I thought it had stopped ?????
20w Like Reply Share

Karen Wildin Author
Isabel McCue Well there have been several times in the last 10 years when it has been believed that a halt might be occurring ... however things go quiet then we realise the thing has continued to rumble somehow along ... so we have to

Karen's Post



Karen Wildin Author

Isabel McCue Well ... there have been several times in the last 10 years when it has been believed that a halt might be occurring ... however things go quiet then we realise the thing has continued to rumble somehow along ... so we have to keep watching and avoid getting distracted! Us being successfully distracted is what they depend on, it seems to do so much sly unhelpful stuff ...

20w Like Reply Share



Isabel McCue

They do the same with everything, you think you have won the battle for it just to emerge again later its all getting too too much.

20w Like Reply Share



Maria Bagnoli

Thanks for sharing . This is a complete travesty of what the law is supposed to be : for everyone .

20w Like Reply Share



Write a public comment...





Just Stop Oil and XR protesters block UK refineries – video

Down to Earth newsletter

This article is more than **1 year old**

Inside Just Stop Oil, the youth climate group blocking UK refineries

A band of 20-year-olds have made headlines disrupting football games, the Baftas and now oil facilities across the UK. But what do they want?

Don't get Down to Earth delivered to your inbox? Sign up here



Damien Gayle

@damiengayle
Fri 1 Apr 2022 09.39 BST

Louis McKechnie is the face that launched a thousand British football memes. In March, the 21-year-old caused a stop to play when he ran onto the pitch at Goodison Park during a [match between Everton and Newcastle](#) and zip-tied himself to a goalpost by his neck.

If anything could have enraged the 40,000 jeering football fans more, it was the solemnity with which he did it. But while for many the episode will have merely been jotted down as another entry in the annals of absurdity, his cause was deadly serious.

Sign up to Down to Earth, our exclusive weekly newsletter from our top climate crisis correspondents.

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A day earlier, Maddie, 21, and Kai, 20 – who did not give their surnames – attempted to stage a similar action at Arsenal’s Emirates Stadium in north London. Kai took a long pause and looked around him at the slowly filling stands before describing how he felt about what they had planned.

“Every single second I spend here, I want to do what I’m going to do less, because I can see everyone just trying to have a nice time,” he said. “But I know it’s what is right; I know that it has to happen.”



📷 Louis McKechnie ties himself to the net in protest during the Premier League match between Everton and Newcastle United at Goodison Park on 17 March, 2022 in Liverpool, England Photograph: Michael Regan/Getty Images

Fuel to the fire

Louis, Maddie and Kai are all young activists with a climate group called Just Stop Oil. They have called on the UK government to halt all new fossil fuel projects in order to avoid the worst effects of climate change. If their efforts fail, they intend to paralyse the supply chain themselves, using non-violent direct action to disrupt the strategic oil and gas infrastructure that keeps the UK moving.

The ambition is big. “We are mobilising upwards of 1,000 people,” one JSO activist told the Guardian. “This is going to be a fusion of other large-scale blockade-style actions you have seen in the past.”

Just Stop Oil say they are taking inspiration from UK lorry drivers’ protests in 2000, when, furious at a rise in fuel duty, hauliers and farmers staged blockades that paralysed petrol distribution. **Hundreds of petrol stations ran dry**, leading to empty shelves in supermarkets, delays to mail deliveries and schools being closed. Protests ended after the government said it would order soldiers to secure deliveries, but they won: then-chancellor Gordon Brown announced in that year’s budget that fuel duty would be frozen.

But where 20 years ago those protesters enjoyed public support in their campaign against rising prices, Just Stop Oil’s target is the fossil fuel system itself. While polling shows large majorities regard the climate as one of the most important issues of the moment, it’s unclear whether that understanding would continue if the pumps were empty.

At a recruitment meeting last Thursday in Camden, north London, Larch Maxey, a veteran eco-campaigner, said the aim was “to build a community of civil resistance in response to the climate change science”.

“In 2022 you have got tens of thousands of peer-reviewed papers spelling out the climate science,” he said. Authorities such as David Attenborough and David King, the former government chief science officer, were in agreement, he said: there is a narrow window of two to three years in which to act. “We are facing the end of civilisation if we do not act on the climate emergency. We are heading towards societal collapse.

“When your house is on fire, you stop pouring petrol on the flames,” he said. “That’s basically the demand - no new licences. We are in a crisis. Let’s stop digging out new oil and gas.”



📷 Activists from the Just Stop Oil campaign group, with hands glued to the road, protest against the use of oil after the arrivals for the Baftas Photograph: Tolga Akmen/AFP/Getty Images

New kids on the blockade

Just Stop Oil doesn't just share rhetoric with [Extinction Rebellion](#), it sits within an arc of escalation that began with that group's blockades of five Thames bridges in 2018. Since then, the environmental movement has continued to explore new non-violent tactical provocations to draw attention to its demands.

Many of those involved are, like Maxey, veterans of XR and the HS2 protests; McKechnie is one of a number who took action with Insulate Britain. As with those groups, the silhouette of Roger Hallam also looms behind Just Stop Oil. Although the Guardian has been told it is wrong to describe Hallam as the mastermind of this latest campaign, he featured prominently in early coverage of its activities.

The key shift in Just Stop Oil is what its supporters say is a move from civil disobedience and into civil resistance. What that means, as Jess Causby, 25, a supporter of the campaign, told the Guardian last month, "is stopping pointing out what the government should or shouldn't be doing [and instead] actively stopping government doing what they shouldn't be."

The question is whether they can pull it off. The record of actions attended by Guardian reporters has not immediately seemed propitious. Young activists who tried to [storm the red carpet at the Baftas](#) two weeks ago misjudged how difficult it would be to reach, and ended up blocking its road-entrance instead. Kai and Maddie were intercepted before they could prove a nuisance at Arsenal. A small group who tried to disrupt play at Tottenham were also swiftly handled.

Their next plan is to tackle a much bigger target, and they can expect to be anticipated. Oil companies have already begun to [make preparations](#). What will happen next remains to be seen.

This piece first appeared in [Down to Earth](#), the Guardian's climate crisis newsletter, on Thursday 31 March before [Friday's protests at oil terminals](#) across the UK. [Sign up here](#) to read more exclusive pieces like this and for a digest of the week's biggest environment stories every Thursday

More on this story

Removing UK climate protesters' defence 'could erode right to trial by jury'

4d ago



Solicitor general urged to drop prosecutions of jury rights activists

5 Feb 2024



Protesters throw soup at Mona Lisa in Paris

28 Jan 2024



Greta Thunberg joins protest against expansion of Hampshire airport

27 Jan 2024



Geldof and O'Brien urge Home Office climate action deportation

26 Jan 2024



Most viewed

3 October 2023 – call to move to hit and run tactics

<https://www.facebook.com/WendoverActiveResistanceCamp/posts/pfbid0M6aqhyi2zpycATHAE3ZrULWjTnELsPjz2ySPWAjz628WBbdeP3AXJqFs2Zhq7XQnl> (video subsequently removed)



<https://www.facebook.com/groups/stophs2staffordshire/posts/1510712549716534/>

Hazel's Post

Hazel Ball
17m · 🌐

Whoop whoop!!!!
He's done it!!!
And a commitment to improvement to transport IN the North which was what was really needed

👍❤️ 6 3 comments

Like Comment Share

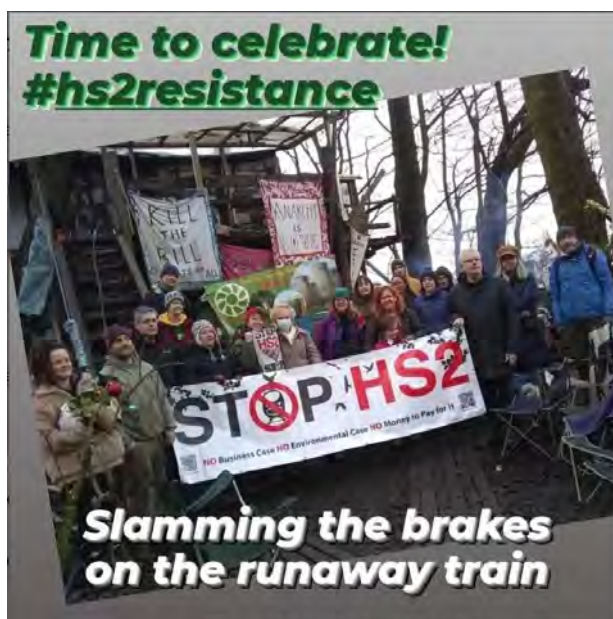
Top comments

Karen Alright
lets hope the fencing all comes down quickly and once it's confirmed that the route wide injunction does not apply to Bluebell Wood - it's PARTY TIME 🎉🎉🎉🎉🎉

Like Reply Share 7m

Karen Alright
That's awesome 🍷 and about bloody time.

Write a public comment...



hs2rebellion • Follow

hs2rebellion Thanks to all who resisted HS2 through the occupation of Bluebell Woods Protection Camp

Swathes of Staffordshire saved .. and many more biodiverse habitats further north

This was long-awaited! Now let's scrap the rest !

@resist.antitrespas.stafford
@resist_hs2
@stop_hs2_north

#hs2resistance #stophs2 #hs2whiteelephant

4d

melc19bath Thank you wonderful committed activists for your part in slowing the destruction. 🌱🌱🌱

263 likes
4 DAYS AGO

Add a comment...

<https://www.facebook.com/groups/119007471490656/posts/6805848082806528/>



Carl Woods · October 6 at 1:29 PM · 🌐

I beseech you all to continue to protest for a FULL scrapping of #HS2. The devastation from Euston to Litchfield is beyond comprehension: it's destruction of the most wicked kind.

While scrapping the whole of HS2 will not fully restore what has been needlessly vandalised, we can rewild where we can, give back to rightful land and property owners where desired and reuse elsewhere in ways that are beneficial to the environment and communities...AND...importantly, stop further destruction, biodiversity loss and carbon emissions from the continuing construction and then use of HS2.


Sunak is already reneging on his £34 Bn commitment to Network North and private investment is being sought to finance completion of Phase 1 from Euston to Birmingham. This ignores the fact that private investors will be reluctant to invest in a clearly unstable and undeliverable project - never mind the fact that Euston simply isn't big enough to accomodate the platforms and station HS2 Phase1 demands! And with 80% of the budget for Phase 1 already blown with at best only 20% of itnot including the most expensive tracklaying part for which they will struggle to find the skilled workforce leading to yet further delays, Iwhere is the money for completing Phase 1 going to come from?


I don't what to quote Penny Mordants, erm, unusually repetitive conference speech....but we must continue the fight together. Indeed now is the time for a final push, for increasing the momentum and exploiting the traction that has been presented by cancelling Phase 2 and a recognition by Rishi in his speech that we the protesters, had it right all along.


Let's #StopHS2




Carl's Post ✕

 **Ian Barnes**
Maybe it was all a ruse to create brownfield sites for housing estates in the south. If you could see the utter devastation around here, and the roads that have been built, they won't spend money on rewilding, just house building.
Like Reply Share 2d

 **Iain Press**
We need to come together and destroy everything that has been done, so we can rewild effectively, smash up any concrete that has been laid and replace it with plants and shrubs etc... Plant trees to make up for the devastation hs2 has caused 🤔
Like Reply Share 3d

 **Luke Chestermaster**
A powerful and poignant plea.
Like Reply Share 3d

 **Rose A Roberts**
A headline in 'i' newspaper today said that on Tuesday HS2 were still purchasing property, a £1.5 million property was purchased on the proposed route of Northern leg. Seems the government foraat to tell manaaers to stop wastina tax oavers funds. ...

<https://www.facebook.com/HS2rebellion/posts/pfbid02FW7wMs8ZDhHiNQc9wy61NRYB96oTprFdv269deGGJ1p1V8k4yoEe3gGjCeZGf1Gyl>



HS2 Rebellion

April 22, 2023 · 🌐

Nelly in skeletal attire..

Stop The HS2 Zombie Train

Stop HS2 campaigners representing the resistance.

The UK cannot afford a pointless money-guzzling white elephant..

But

HS2 continues to trash communities and green spaces, and decimate biodiversity

The Big One April 2023

@stop_hs2_north @xrebellionuk @transportgovuk

#hs2costingtheearth #hs2isecocide #thebigone #stopthehs2zombietrain #nhsnohs2 #stophs2

#diein #downingstreet #dft #departmentfortransport







Monday 24th April

10:30 Cut the Ties march around the government dept.

12:00 noon 1 Victoria Street DEPT ENERGY/ZERO

1:00pm Dept Transport on Horseferry Rd

1:30pm Killer DISCOBEDIENCE with Zombies

hs2rebellion.earth | stophs2.org

ACTIVISM

Not a single arrest made during Extinction Rebellion's four-day 'The Big One' protest

The Met has praised Extinction Rebellion for being 'fully engaged' with the police

GREG BARRADALE | 25 Apr 2023



Extinction Rebellion activists hold placards saying 'the government are the real criminals' during 'The Big One' protest. Image: Extinction Rebellion

SHARE



No protesters were arrested across the whole of Extinction Rebellion's four-day 'The Big One' action in central London this weekend, in a reflection of the group's decision to 'quit' disruptive action.

In a weekend which included the London Marathon passing through several parts of the city occupied by Extinction Rebellion, the climate activists focused on "attendance over arrest and relationships over roadblocks", hoping to attract new faces to their movement.

Extinction Rebellion estimates over 60,000 people turned out for the protests, which were the first mass mobilisation by the group since the Police, Crime Sentencing and Courts Act came into force in June 2022, giving the police wider powers to crack down on disruptive protests.

"The Big One was always designed as an event which prioritised attendance over arrest so that we could build alliances with other organisations, knowing that we are united by the multiple crises we face and that we are stronger together," a spokesperson for Extinction Rebellion told The Big Issue.

"The 200 organisations that supported The Big One were operating collectively for the whole weekend under a Unity Agreement which explicitly ruled out any escalation. Thankfully to everyone involved, everyone abided by this agreement, policing never became genuinely hostile and no arrests were made."

<https://www.facebook.com/HS2rebellion/posts/pfbid02SDdmU1grjTGFqraDxsWfagiBr1UUshGoX6FdDCughm47fYeTotErE1qsNKUTmvgql>



HS2 Rebellion is at Ruislip Gardens tube station.

July 14, 2023 · London · 🌐

The news nobody wants to broadcast : We give HS2 £100million every week !

This week Sarah Green @thegreenparty stood with Baroness @greenjennyjones holding this banner in Boris Johnson's old constituency of Uxbridge & South Ruislip where Sarah is standing in the by-election.

The figure comes from High Speed Two 6-monthly report to Parliament: October 2022/9

@stop_hs2_north

#hs2costingtheearth #stophs2 #hillingdongreens



On behalf of: Applicants/Claimants
J.Groves
2nd statement of witness
Exhibits: JG2
Date: 28.02.2024

Claim No. QB-2022-BHM-000044

**IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY**

Between:

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

Claimants

-and-

- (1) NOT USED**
- (2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER THE HS2 LAND WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES**
- (3) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS**
- (4) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS**
- (5) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE)**

AND 60 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM

Defendants

EXHIBIT JG2

TO THE

SECOND WITNESS STATEMENT OF JOHN GROVES

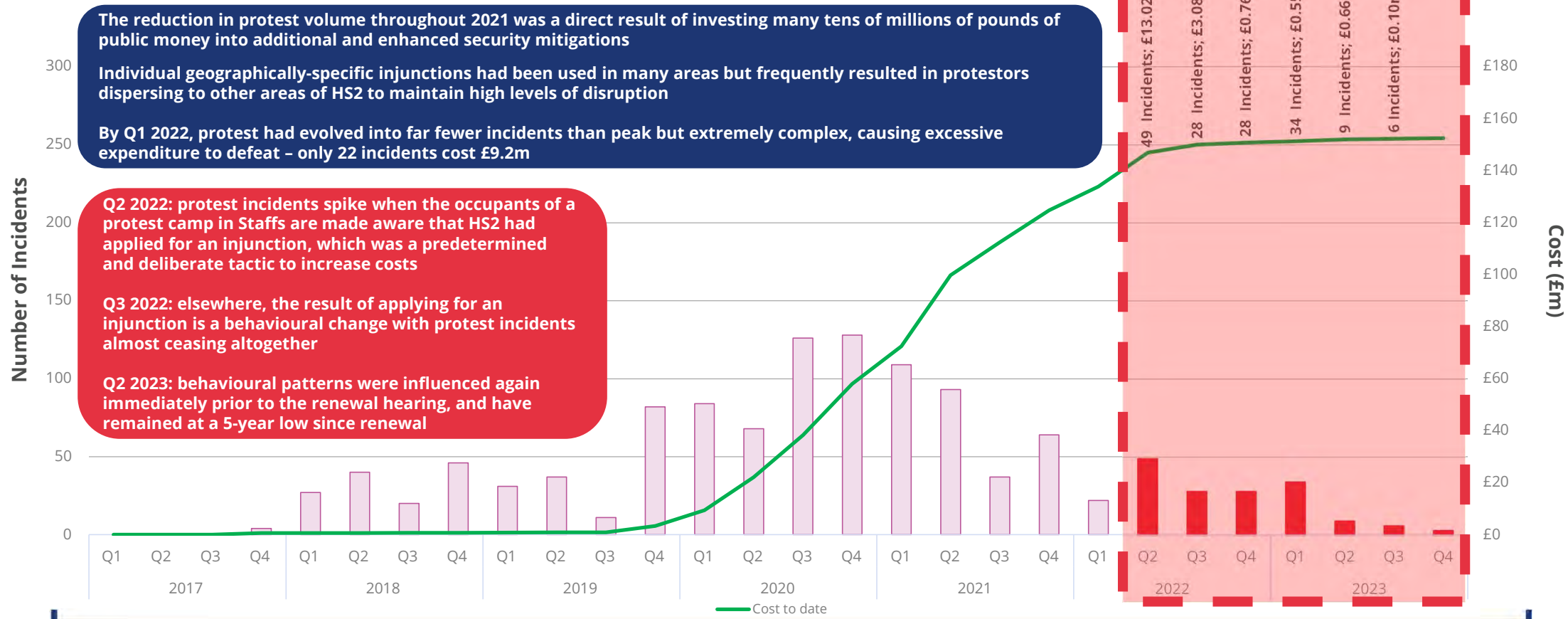
CORE-B-161

Statistical Impact of the Injunction

Cumulative Cost to Date
(November 2023): £152.56m

Total number of incidents to Date
(November 2023): 1186

Incidents and Expenditure Q1 2017 to Q4 2023



The reduction in protest volume throughout 2021 was a direct result of investing many tens of millions of pounds of public money into additional and enhanced security mitigations

Individual geographically-specific injunctions had been used in many areas but frequently resulted in protestors dispersing to other areas of HS2 to maintain high levels of disruption

By Q1 2022, protest had evolved into far fewer incidents than peak but extremely complex, causing excessive expenditure to defeat – only 22 incidents cost £9.2m

Q2 2022: protest incidents spike when the occupants of a protest camp in Staffs are made aware that HS2 had applied for an injunction, which was a predetermined and deliberate tactic to increase costs

Q3 2022: elsewhere, the result of applying for an injunction is a behavioural change with protest incidents almost ceasing altogether

Q2 2023: behavioural patterns were influenced again immediately prior to the renewal hearing, and have remained at a 5-year low since renewal

Note: All costs are current prices at time of impact. The overall anticipated cumulative forecast (at Q4 2029) based upon current projections is £152m (low range) and £229m (high range). Within the Costs to Date, 67% are actuals and 33% are forecast. This is why there are variances (up and down) each month on the cost to date (green).

Forecasted Costs without RWI

Cumulative Cost to Date (November 2023): £152.56m

Total number of incidents to Date (November 2023): 1186

Forecasted Financial Impact of no Route-wide Injunction

A logical place to study as a window into what post-RWI incident levels could be is between Q4 2019 and Q2 2021

Q4 2019 saw the arrival of full-time, experienced out-of-area protestors adept at frustrating police and victim organisations

2020 was a period of heavy recruitment and training for HS2 Rebellion, with an increase in lock-on protests and camps being set up

A period of recruitment and training would need to be undertaken to reach 2020 levels, but it would be far quicker

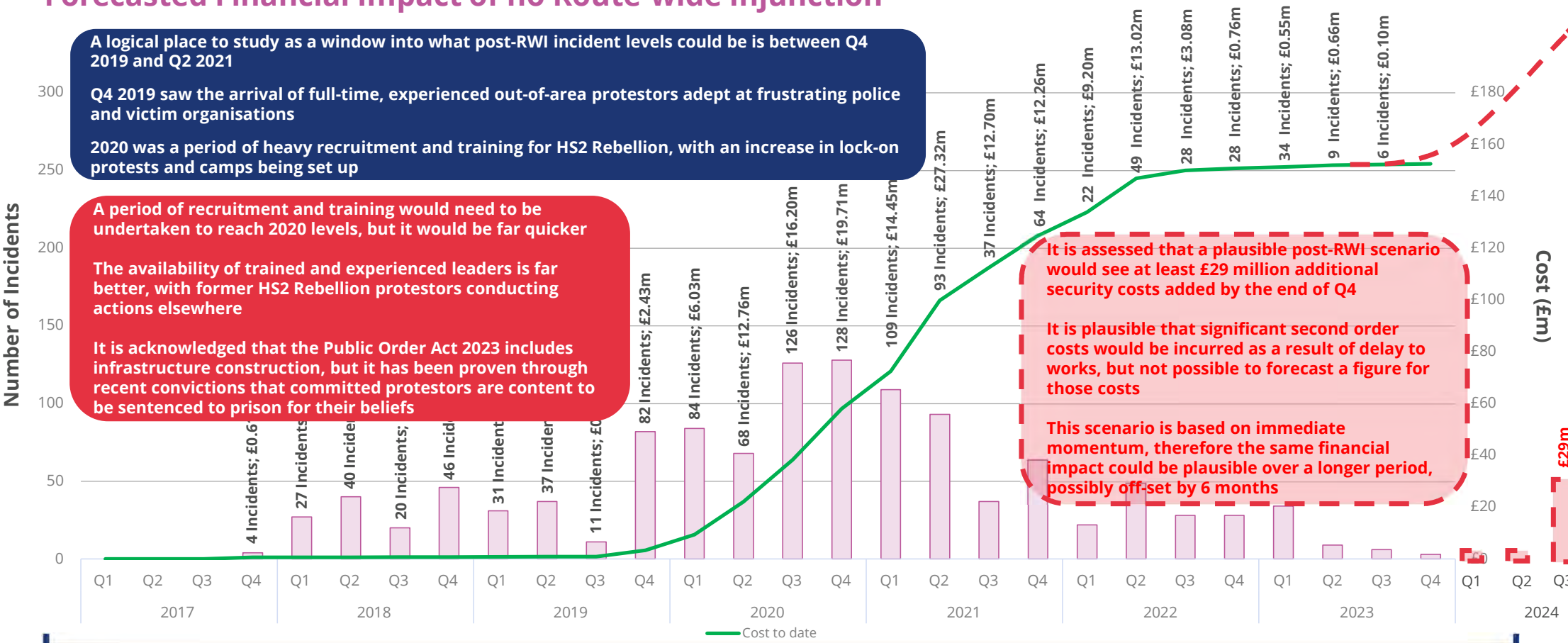
The availability of trained and experienced leaders is far better, with former HS2 Rebellion protestors conducting actions elsewhere

It is acknowledged that the Public Order Act 2023 includes infrastructure construction, but it has been proven through recent convictions that committed protestors are content to be sentenced to prison for their beliefs

It is assessed that a plausible post-RWI scenario would see at least £29 million additional security costs added by the end of Q4

It is plausible that significant second order costs would be incurred as a result of delay to works, but not possible to forecast a figure for those costs

This scenario is based on immediate momentum, therefore the same financial impact could be plausible over a longer period, possibly off-set by 6 months



Note: All costs are current prices at time of impact. The overall anticipated cumulative forecast (at Q4 2029) based upon current projections is £152m (low range) and £229m (high range). Within the Costs to Date, 67% are actuals and 33% are forecast. This is why there are variances (up and down) each month on the cost to date (green).

On behalf of: Applicants/Claimants
J.A Dilcock
13th statement of witness
Exhibits: JAD15
Date: 28.02.2024

Claim No. QB-2022-BHM-000044

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BIRMINGHAM DISTRICT REGISTRY**

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- (5) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE)**

AND 60 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM

Defendants

EXHIBIT JAD15

TO THE

THIRTEENTH WITNESS STATEMENT OF JULIE AMBER DILCOCK

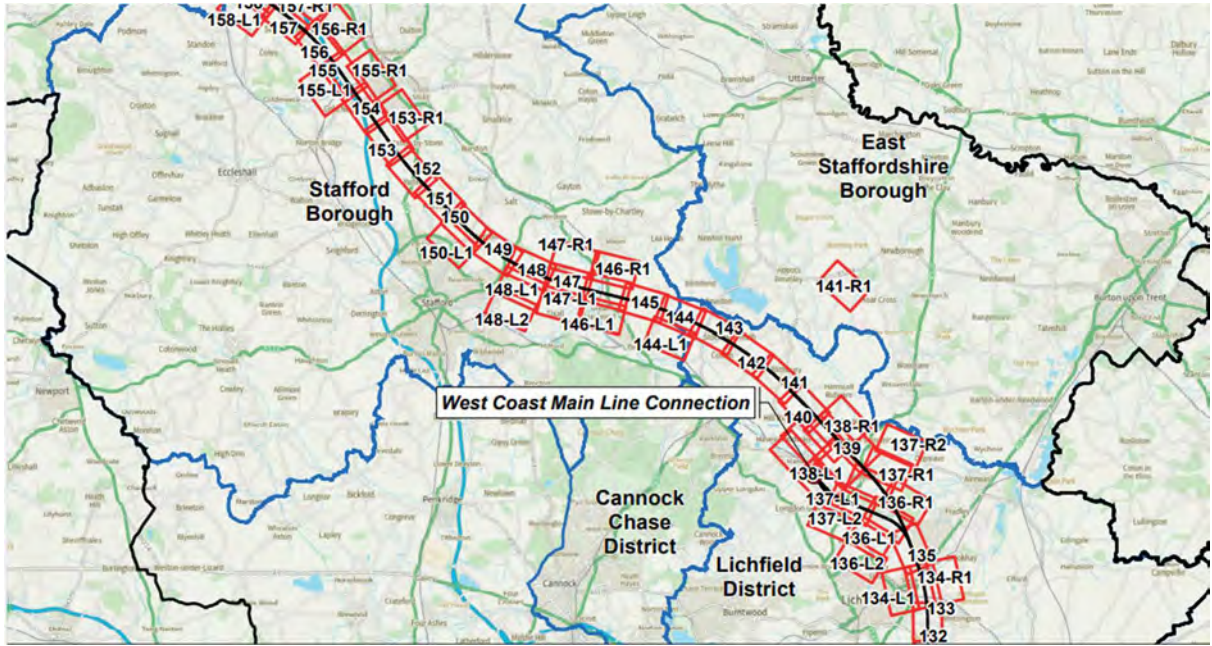
CORE-B-164



Dark blue = P1

Purple = P2A

Orange=P2B



On behalf of: Applicants/Claimants
R. Shaw
3rd statement of witness
Exhibits: RXS3
Date: 27 February 2024

Claim No. QB-2022-BHM-000044

**IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY**

Between:

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(2) **THE SECRETARY OF STATE FOR TRANSPORT**

Claimants

-and-

- (1) **NOT USED**
- (2) **PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER THE HS2 LAND WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES**
- (3) **PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS**
- (4) **PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS**
- (5) **MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE) AND 60 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM**

Defendants

**EXHIBIT RXS3
TO THE THIRD WITNESS STATEMENT OF ROBERT SHAW**

CORE-B-167

IN THE COURT OF APPEAL (CIVIL DIVISION)
ON APPEAL FROM
THE HIGH COURT OF JUSTICE (KBD)
BIRMINGHAM DISTRICT REGISTRY

Mr Justice Julian Knowles
[2022] EWHC 2360 (KB)

B E T W E E N

MR JAMES KNAGGS

Appellant/Sixth Defendant

-and-

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

Respondents/Claimants

RULING ON APPLICATION FOR PERMISSION TO APPEAL

Background

1. There is an application for permission to appeal against a decision of Mr Justice Julian Knowles (“**the Judge**”) dated 20 September 2022. In short, the Judge made an Order providing the Respondents with injunctive relief restraining persons unknown and 59 named defendants from acts of protest in relation to the HS2 railway development (“**the Injunction**”).
2. The land subject to the Injunction covers the full length of the HS2 railway under construction from London to Cheshire. Two types of land are covered by the Injunction: (i) **Pink Land**, which is land to which the Respondents have either freehold or leasehold title and (ii) **Green Land**, which is land to which the Respondents do not have freehold/leasehold title but do have statutory powers of temporary possession for the purposes of the HS2 project. It is the Green Land that matters for this application.

Grounds of Appeal

3. The Appellant seeks to advance five grounds of appeal:
 - a. First, the judge erred in concluding the Respondents had sufficient interest in the entirety of the land subject to the order capable of supporting injunctive relief founded on claims in trespass and private nuisance.
 - b. Second, the judge erred in concluding that the Respondents may rely on the rights under Article 1 Protocol 1 (“A1P1”) ECHR in support of the application for injunctive relief.
 - c. Third, the judge erred in law by defining the prohibited conduct by reference to:
 - i. legal terms and a legal cause of action,
 - ii. by reference to vague terms (such as ‘slow walking’) and,
 - iii. in a disproportionate manner.
 - d. Fourth, the judge erred in law by finding that the service provisions for the order are sufficient to bring proceedings to the attention of all those affected.
 - e. Fifth, there is some other compelling reason to grant permission to appeal, because of the wider public importance of both the HS2 project and the issues arising out of the terms of the injunction.
4. For the reasons set out below, I refuse permission to appeal. On a proper analysis, none of the five grounds have a real prospect of success.

Ground 1: HS2 Has Insufficient Interest In The Green Land

The Issue

5. The Judge accepted the Respondents’ submission that HS2 had the right to immediate possession over the Green Land because the relevant statutory notices had been served. It did not matter that “*the diggers have not yet moved in*” J[78]. The Judge found that the right to possession was sufficient to maintain an action for trespass.
6. The Respondents’ right to possession of the Green Land is contained in Schedule 15 of the High Speed Rail (West Midlands – Crewe) Act 2021 (“**the Phase 2a Act**”). Schedule 15 paragraph 1(1) sets out the conditions required for the Respondents to take possession of the Green Land:

“Schedule 15

Right to enter on and take possession of land

1(1) The nominated undertaker may enter on and take possession of the land specified in the table in Schedule 16—

(a) for the purpose specified in relation to the land in column (3) of that table in connection with the authorised works specified in column (4) of the table,

(b) for the purpose of constructing such works as are mentioned in column (5) of that table in relation to the land, or

(c) otherwise for Phase 2a purposes.

(2) The nominated undertaker may (subject to paragraph 2(1)) enter on and take possession of any other land within the Act limits for Phase 2a purposes.

(3) The reference in sub-paragraph (1)(a) to the authorised works specified in column (4) of the table in Schedule 16 includes a reference to any works which are necessary or expedient for the purposes of or in connection with those works.”

7. “Phase 2a purposes” is defined at section 61 of the Phase 2a Act:

“References in this Act to anything being done or required for “Phase 2a purposes” are to the thing being done or required—

(a) for the purposes of or in connection with the works authorised by this Act,

(b) for the purposes of or in connection with trains all or part of whose journey is on Phase 2a of High Speed 2, or

(c) otherwise for the purposes of or in connection with Phase 2a of High Speed 2 or any high speed railway transport system of which Phase 2a of High Speed 2 forms or is to form part.”

8. The Schedule 16 table includes specific purposes for which access to each piece of land is required (e.g. for diversion of utilities, access to utilities, for environmental mitigation works etc). Paragraph 4(1) requires that the Respondent must give 28 days notice of their intention to take possession of the land to the owners and occupiers of the land. Paragraph 4(4) entitles the landowners and occupiers of the land to compensation for any loss they may suffer by the Respondent’s exercise of the possession power.

9. The Appellant submits that on the construction of the Phase 2a Act, the Respondents only have a legal right to possession of the land where the Schedule 15 paragraph 1(1)

conditions are met. Therefore, the natural conclusion is that at any point in time where the conditions are not met, the Respondents will have no right to possession of the land and cannot found a claim in trespass. The Appellant goes on to submit that “*where works are not scheduled to take place on land imminently then the Respondents are not only not in actual possession but have no right to such possession either immediately or imminently*” **ASA[29]**.

10. It was the Respondents’ case that all statutory notices under Schedule 15 paragraph 4(4) for the possession of the Green Land had been given (confirmed in the first witness statement of Julie Dilcock **RSA[2]**). Simply put, the Respondents have therefore exercised this statutory power and are entitled to immediate possession of all the Green Land. Moreover, this is land which is needed, and there is no statutory requirement for the land to be used ‘imminently’ **RSA[6]**. Further, they say that the definition of Phase 2a ‘purposes’ is very broad, for example it can include landscaping, advance planting and activities beyond the immediate construction of the railway **RSA[3]**. Finally, the Respondents said that the Appellant had conceded at an earlier stage of the proceedings that Schedule 15 and 16 were sufficient to found a potential trespass claim **RSA[4]**.

Analysis

11. I agree with the judge (at **J[78]**, **SJ[18]**): the Respondents plainly have sufficient interest in the Green Land to found an action in trespass and therefore to be granted injunctive relief. I consider that this was conceded by the Appellant in his written submissions of 5 April 2022. In any event, the Appellant’s proposition that Green Land can only be taken possession of where it is required ‘imminently’ is not arguable; it is simply not supported by a plain construction of the Phase 2a Act 2021.
12. Parliament has granted the Respondents the right to immediate possession of the Green Land through the Phase 2a Act. The Act has built-in procedural requirements (e.g. giving 28 days notice before taking possession) and safeguards (e.g. compensation provision and a long-stop of possession for no more than one year after the works are complete). This balances the competing interests of ensuring the land can be used for the railway construction on the one hand, and on the other, respecting the proprietary interest of the underlying leaseholder/freeholder.
13. There is no statutory wording to the effect that the exercise of the paragraph 1(1) immediate possession power (following a 28 day notice period) must be contingent on immediate action. There must be an identified purpose for possession of the Green Land

(and there is), but that purpose is not given a temporal dimension anywhere in the statute. In contrast, the Appellant's submissions seem to assume that "*for the purpose of*" necessarily implies an imminence to the fulfilment of that purpose. But that is just not what the statute says.

14. This unjustified leap of reasoning is revealed at paragraph 29 of the Appellant's skeleton argument:

"29. [...] At any point in time where this statutory condition is not met the Respondents have no right to possession of the land whatsoever. Where works are not scheduled to take place on land imminently then the Respondents are not only not in actual possession but have no right to such possession either immediately or imminently. It is therefore wrong to conclude in relation to such land that the Respondents "are entitled to immediate possession"." (emphasis added).

15. The suggestion that the statute requires any works to be scheduled to take place 'imminently' is unjustified (and indeed there is no real attempt to justify it). There is no textual support for it; nor does it make practical sense. Moreover, there are all sorts of practical difficulties with it. First, there is nothing to say what could be defined as 'imminently': 2 weeks? 2 months? Or, for a project scheduled to take 10 years, might 2 years be considered 'imminent'? Second, it must be for the contractor or relevant sub-contractor to decide when to take possession of any given site, not to have his logistical planning taken over for him by the courts. Third, the qualification of 'imminence' would be impossible to patrol. Even if notice was given before works were about to 'imminently' start, if there was an unexpected delay to construction would this remove the Respondent's right to possess the land? The only requirement is for the Respondent to identify the purpose for which the land is needed, provide 28 days notice, and then they are entitled to immediate possession of that land. That is the power Parliament granted.

16. I am further confirmed in that conclusion by reading Schedules 15, 16 and section 61 together. It is clear that Parliament intended the 'purpose' condition to be interpreted broadly. That explains the inclusion of paragraph 1(1)(c) in addition to 1(1)(a) and (b) in Schedule 15 to work as a fall-back provision to catch any broader purposes that may not align with the originally stated aims of each parcel of land detailed in Schedule 16.

17. Finally, the plain meaning of the word “purposes” is not restricted to actual construction works. As is clear from Schedule 16, the purpose for which temporary possession of the land is required includes for the “*provision of access*” for construction, utility works or creation of new rights of way (see Schedule 16, Column 3). These purposes may not have a defined starting point in the same way that actual construction activities might do. This also reinforces my conclusion that the Act envisages that the land will be temporarily possessed even if there is no immediate construction activities on the land.
18. Accordingly, I consider that Ground 1 has no real prospect of success, and permission to appeal is refused.

Ground 2: The Respondents’ Rights under A1P1

The Issue

19. The Judge found that the Respondents could pray in aid A1P1 **J[125]**. He considered that he was bound by the case of *Secretary of State for Transport v Cuicurean* [2022] EWCA 661 where Lewison LJ held:

“There was some debate about whether these were themselves convention rights (given that the Secretary of State for Transport is himself a public authority and cannot therefore be a “victim” for the purposes of the Convention, and HS2 Ltd may not be regarded as a “non-governmental” organisation for that purpose). But whether or not they are convention rights, they are clearly legal rights (either proprietary or possessory) recognised by national law” (at [28], emphasis added)

20. The Appellant complains that the Judge erred in concluding that the Respondents, as a public body, may rely on A1P1 ECHR protection. The Appellant submits that the case law is clear that a ‘core public authority’, or a party exercising functions of a public nature, cannot rely on its own Convention Rights as a cause of action or as part of a EHCR proportionality assessment: see *Aston Cantlow v Wallbank* [2003] UKHL 37; *YL v Birmingham City Council and others* [2007] EWCA Civ 26. It cannot in law be ‘a victim’. This is derived from ECtHR case law which extends to ‘non-governmental organisations’.

21. The Respondents' simple response is that it is not and has never been part of their case that HS2 is a 'victim' under the ECHR. They also criticise the Appellant for developing this point in written submissions after the hearing.

Analysis

22. I do not consider that the Appellant's submissions have a real prospect of success. They are not aimed at a substantial or relevant target. A1P1 was only even potentially relevant as a counterbalancing factor to the protestors' rights under articles 10 and 11. The authorities make clear that, regardless of A1P1, ordinary proprietary or possessory rights provide an equivalent counter balance.
23. As noted above, the judge relied on paragraph 28 of *Cuciurean*. The final underlined sentence of the extract quoted at paragraph 19 above makes clear that Lewison LJ did not expressly decide whether HS2 could pray in aid A1P1 because he did not need to. That was because, however they arose, whether through A1P1 or the common law, the proprietary or possessory rights in question were on any view "*clearly legal rights*".
24. The same point has been made more recently by the Lord Chief Justice in *DPP v Cuciurean* [2022] EWHC 736 (Admin) at [84] when he said:

"84. The judge was not given the assistance she might have been with the result that a few important factors were overlooked. She did not address A1P1 and its significance. Articles 10 and 11 were not the only Convention rights involved. A1P1 pulled in the opposite direction to articles 10 and 11. At the heart of A1P1 and section 68 is protection of the owner and occupier of the Land against interference with the right to possession and to make use of that land for lawful activities without disruption or obstruction. Those lawful activities in this case had been authorised by Parliament through the 2017 Act after lengthy consideration of both the merits of the project and objections to it. The legislature has accepted that the HS2 project is in the national interest. One object of section 68 is to discourage disruption of the kind committed by the respondent, which, according to the will of Parliament, is against the public interest. The respondent (and others who hold similar views) have other methods available to them for protesting against the HS2 project which do not involve committing any offence under section 68, or indeed any offence. The Strasbourg Court has often observed that the Convention is concerned with the fair balance of competing rights. The rights enshrined in articles 10 and 11, long recognised by the Common Law, protect the expression of opinions, the right to persuade and protest and to convey strongly held views. They do not sanction a right to use guerrilla tactics endlessly to delay and increase the cost of an infrastructure project which has been subjected to the most detailed public scrutiny, including in Parliament."

25. The Judge had these issues well in mind in his judgment at [125] where he said:

“125. I am satisfied that the First Claimant can pray in aid A1P1, and the common law values they reflect, and that the approach set out in DPP v Cuciurean and other cases is binding upon me. The point raised by D6 was specifically dealt with by the Court of Appeal in *Secretary of State for Transport v Cuciurean* [2022] EWCA Civ 661, [28]...” (My emphasis)

The judge then cited the passage set out at para 19 above.

26. For completeness, I do not consider that *Attorney General’s Reference Number 1 of 2022* (cited by the Appellant in their skeleton argument for permission to appeal) is authority that public authorities could not rely on A1P1 rights. The relevant passage states:

“102. That is unsurprising because in addition to the usual questions about the applicability of a Convention right and then proportionality the A1P1 rights of the non-state owner are in play. We find it difficult to imagine that the Convention could ever be used to avoid conviction for damaging private property, even if very rarely it might be when considering damage to public property which is not significant. For domestic purposes, in our view, that is the position.”

27. On this basis, Ground 2 tilts at a windmill. The Judge did not rely solely on A1P1 but recognised these rights were reflected in ordinary property rights at common law. The Judge’s findings as to trespass and nuisance were findings of proprietary or possessory rights which were enough to found the claim for the injunction, with or without A1P1.

Ground 3: The Terms Of The Injunction

The Issues

28. The Appellant submits that the Judge erred in law by defining the terms of the injunction (i) by reference to legal terms and a legal cause of action, (ii) by reference to vague terms (such as ‘slow walking’), and (iii) in a way which is disproportionate because they do not correspond with the definition of persons unknown.

i) Legal terms/Analysis

29. The Appellant takes issue with the reference to ‘legal terms’ such as “*public right of way*”, “*lawful rights over any public highway*” and “*a lawful freehold or leasehold interest*”. Moreover, the Appellant submits that the Injunction contains an internal

inconsistency: it prohibits conduct hindering the Respondents but allows for lawful rights over the public highway which may include deliberately and intentionally obstructive conduct on that highway. The Appellant concludes this leads to uncertainty about what conduct is covered by the Injunction.

30. I disagree with the Appellant that the Injunction contains ‘legal terms’ that make it hard or unclear to understand. Whilst the terms ‘freehold’ and ‘leasehold’ are legal vocabulary, they are also commonly used and widely understood by those without legal training or advice. Similarly, I consider reference to “lawful rights” over public highway is sufficiently clear. Moreover, even though the Appellant’s heading for this ground refer to “*references to a ... cause of action*”, the Appellant does not identify any cause of action used in the language of the Injunction. There is no inconsistency.

ii) *‘Slow Walking’/Analysis*

31. The Appellant submits that ‘slow walking’ (at paragraph 5 of the Injunction) is too vague, and he relies on the comments by the Court of Appeal in *Ineos v Persons Unknown* [2019] EWCA Civ 515 (at [40]) to the effect that it is not clear what is sufficiently ‘slow’ to engage such conduct. The Judge, clearly alive to this fact, qualified this part of the Injunction with the word ‘deliberately’ (at paragraph 5(f) of the Injunction) but the Appellant contends this does not address the vagueness of this provision.

32. I do not accept that this argument is open to the Appellant, or that it has a real prospect of success.

33. It is not open to him because, before the Judge, the Appellant’s argument was that ‘slow walking’ was a recognised form of protest and should therefore not be prohibited by the Injunction. There was no question that it was too vague; on the contrary, its clarity meant that the Appellant wanted it excluded from the injunction altogether. The Appellant cannot credibly argue now that this recognised form of protest was unclear.

34. Furthermore, I do not consider that it was unclear. The word ‘deliberately’ qualifies the activity in a relevant way. Moreover, the comment in *Ineos*, which was decided before the latest raft of HS2 cases and did not include the word ‘deliberately’, could be said to be a summary of counsel’s criticisms of the injunction in that case, rather than a series of findings by the court.

35. In the later case of *National Highways*, cited below, although the express words “slow walking” were not used in the injunction, neither Lavender J (nor counsel for the protestors) raised any concerns with the wording: “*deliberately ... slowing down ... the flow of traffic*”. In my view, that also demonstrates both that this is now a well-recognised phenomenon and its inclusion is an important part of any effective injunction. I do not consider there is any material difference in the wording accepted in *National Highways* and the present injunction to found a realistic ground of appeal.

iii) Alleged Discrepancy: Analysis

36. The Appellant argues there is a discrepancy between the definition of persons unknown (which contains an ‘effect clause’) and the prohibited conduct (which does not require any such effect). The ‘effect clause’ captures individuals whose conduct has the effect of “*damaging and/or delaying and or hindering*” the HS2 works. The Appellant submits that the definition of persons unknown is narrower than the prohibited conduct because it requires it to have the effect of damaging/delaying the works. He contends that this discrepancy means an individual who ‘unintentionally’ delays the HS2 works will be caught by the Injunction, even where there is no work ongoing or disruption caused. This is said to be disproportionate.

37. I consider that the Appellant’s construction of the Injunction is untenable. In my view, the Injunction must be read as a whole. There is no inconsistency. A person reading the Injunction would have no difficulty in concluding that it prohibits them from entering the HS2 Land even where they do not cause any delay or disruption to the works. That is clearly contained in the definition of ‘persons unknown’ and cannot be ignored simply because the same detail is not repeated in the prohibited conduct section of the Injunction.

38. I therefore reject all three arguments about the terms of the Injunction. They are excessively legalistic and do not arise on a common sense view of the words used. They have no real prospect of success.

Ground 4: Service

The Issue

39. The Judge was satisfied that service of the Injunction complied with the guidance in *Canada Goose UK Retails Ltd v Persons Unknown* [2020] 1 WLR 2802 and that the terms were sufficiently clear to allow persons potentially affected to know what they must not do. The Judge repeated this finding at paragraph [26] of the Supplemental Judgment.
40. The Appellant asserts that the Judge erred in finding that the service provisions (at paragraphs 7-11 of the Injunction) were sufficient to bring the Injunction to the attention of all those affected. The Appellant points to the case of *National Highways v Person Unknown and others* [2021] EWHC 3081 (QB) where it was held to be impracticable to place notices on stakes in the ground. Instead, the broad scope of the injunction was tempered by requiring personal service on persons unknown. The Appellant suggests that the Injunction in the present case allows for the possibility that persons may fall within the definition of persons unknown and breach the terms of the Injunction without being aware of the Injunction itself (particularly as the Injunction is not restricted to protestors, but land users and land owners covered by the Injunction). The Appellant suggests that notice should be provided by post.
41. The Respondent states that the final service provisions at paragraph 2 of the Injunction were a product of the earlier debate about the service of the proceedings themselves which resulted in the order of 28 April 2022. They say that the proceedings were highly effective at bringing proceedings to the attention of those who wished to participate. The Respondent characterises this ground as an attempt to re-run earlier arguments that were never appealed. In any event, the Injunction does make a provision for personal service where this is practicable: see paragraph 11 of the Injunction.

Analysis

42. I consider that this complaint is not open to the Appellant. The service provisions in the Injunction mirrored those ordered in respect of the original proceedings in April 2022. The appellant said he was going to appeal those provisions but did not do so. Time to bring such an appeal expired in May 2022. It is too late to challenge those same service provisions now. It would be an abuse of the court process.
43. In any event, I consider that the service provisions in the Injunction were more than sufficient to comply with the guidance in *Canada Goose* and, made adequate provision for personal service. Any contrary argument has no real prospect of success.

44. Given the scope of the Injunction, it is clearly impractical for service to be effected along every piece of injunctioned land. The Appellant takes issue with the failure to provide notice by 'post', but does not explain why this is necessary in addition to the current methods of service already proposed. Crucially, in my view, at paragraph 11 the Injunction does provide for personal service where this is reasonably practicable – for example when a person unknown becomes identified or a named defendant or where the Respondents become aware of a trespasser.

Ground 5: Some Other Compelling Reason?

45. For the reasons set out above, I do not accept that any of these grounds of appeal have a real prospect of success.

46. In those circumstances, it would be pointless to allow permission to appeal simply because this is a major project and there may be issues which may become relevant to other injunctions. There has been recent Court of Appeal guidance on service (*Canada Goose, Barking and Dagenham*) and recent Divisional Court and Court of Appeal guidance on the balancing of possessory and protestors' rights (*DPP v Cuciurean* and *SoS for Transport v Cuciurean*). Both these last two arose out of HS2. It might be thought that that is sufficient guidance, at least for the moment, in this area, and that to grant permission in this case on this ground would, in the words of the Lord Chief Justice in *DPP v Cuciurean* (at [84]), be simply to sanction yet further delay and further increase the cost of a project which has been subjected to the most detailed public and Parliamentary scrutiny.

47. For all these reasons, I refuse permission to appeal.



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.

QB-2022-BHM-000044

Claim no: QB-2022-BHM-000044

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

**Before: Mr Justice Ritchie
Made on: 31 May 2023**

Between:

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

Claimants/Applicants

-and-

- (1) NOT USED**

- (2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER THE HS2 LAND WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES**
- (3) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS**
- (4) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS**
- (5) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE)**

AND 60 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM

Defendants/Respondents

ORDER

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.

A Defendant who is an individual who is ordered not to do something must not do it himself/herself or in any other way. He/she must not do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

BEFORE Mr the Honourable Mr Justice Ritchie sitting at the Birmingham Civil Justice Centre, on 16th May 2023.

AND UPON HEARING Counsel for the Claimants, Mr Richard Kimblin KC and Mr Michael Fry; Mr Stephen Simblet KC and Mr Owen Greenhall for D6, and Mr Mark Keir and Ms Caroline Thomson-Smith in person at the (“**Review Hearing**”).

FURTHER TO the Orders made in these proceedings by Julian Knowles J on 20 September 2022 (the “**Injunction Order**”) and by HHJ Kelly on 16 March 2023 (the “**Directions Order**”).

AND UPON the Claimants’ application by Application Notice dated 27 March 2023 pursuant to the provisions at paragraphs 15 and 20 of the Injunction Order (“**March 2023 Application**”).

AND UPON the Court accepting the Claimants’ renewed undertaking that they 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.

AND UPON the Claimants’ renewed confirmation that this Order is not intended to prohibit lawful protest which does not involve trespass upon the HS2 Land and does not block, slow down, obstruct or otherwise interfere with the Claimants’ access to or egress from the HS2 Land.

AND UPON the Claimants’ renewed confirmation that they do not intend for any freeholder or leaseholder with a lawful interest in the HS2 Land to fall within the Defendants to this Order, and undertaking not to make any committal application in respect of a breach of this Order, where the breach

is carried out by a freeholder or leaseholder with a lawful interest in the HS2 Land on the land upon which that person has an interest.

AND UPON the Claimants' renewed confirmation that this Order is not intended to act against any guests or invitees of any freeholders or leaseholders with a lawful interest in the HS2 Land unless that guest or invitee undertakes actions with the effect of damaging, delaying or otherwise hindering the HS2 Scheme on the land held by the freeholder or leaseholder with a lawful interest in the HS2 Land.

NOW IT IS ORDERED THAT:

Definitions

1. In this Order, the following defined terms shall apply:

- (a) The "RWI Updated Website" means the webpages at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.
- (b) The "Named Defendants" means D5 to D65 whose names appear in Annex A.
- (c) The "Defendants" refers to all Defendants.
- (d) The "March 2023 HS2 Land Plans" means the updated plans which illustrate the land to which the Claimants are entitled to possession and which the Claimants shall update from time to time to include:
 - (i) further land of which they have become entitled to possession for Rail Act purposes and
 - (ii) to remove land to which they are no longer entitled to possession for Rail Act purposes.
- (e) The "HS2 Land" means:
 - i) 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 March 2023 HS2 Land Plans and which are available electronically on the RWI Updated Website; and
 - ii) any land which the First Claimant has taken into temporary or permanent possession using its powers under Part 2 of Schedule 4 of the HS2 Acts (Interference with Highways) for Rail Act purposes and on which a copy of this Order shall be displayed at prominent locations on the land in question in accordance with paragraph 10 below.
- (f) The "HS2 Acts" are the High Speed Rail (London – West Midlands) Act 2017 and the High Speed Rail (West Midlands – Crewe) Act 2021.

- (g) “Rail Act purposes” means “Phase One purposes” as defined in section 67 of the High Speed Rail (London – West Midlands) Act 2017 and “Phase 2A purposes” as defined in section 61 of the High Speed Rail (West Midlands – Crewe) Act 2021.

Injunction in force

- 2. With immediate effect, and until 23.59 on 31 May 2024 unless varied, discharged or extended by further order, the Defendants and each of them are forbidden from doing the following:
 - (a) entering or remaining upon the HS2 Land;
 - (b) deliberately obstructing or otherwise interfering with the free movement of vehicles, equipment or persons accessing or egressing the HS2 Land; or
 - (c) interfering with any sign, fence or gate on or at the perimeter of the HS2 Land.

- 3. Nothing in paragraph 2 of this Order:
 - (a) Shall prevent any person from exercising their rights over any open public right of way over the HS2 Land.
 - (b) Shall affect any private rights of access over the HS2 Land.
 - (c) Shall prevent any person from exercising their lawful rights over any public highway.
 - (d) Shall extend to any person holding a lawful freehold or leasehold interest in land over which the Claimants have taken temporary possession.
 - (e) Shall extend to any interest in land held by statutory undertakers.

- 4. For the purposes of paragraph 2(b) prohibited acts of obstruction and interference shall include (but not be limited to):
 - (a) standing, kneeling, sitting or lying or otherwise remaining present on the carriageway when any vehicle is attempting to turn into the HS2 Land or attempting to turn out of the HS2 Land in a manner which impedes the free passage of the vehicle;
 - (b) digging, erecting any structure or otherwise placing or leaving any object or thing on the carriageway which may slow or impede the safe and uninterrupted passage of vehicles or persons onto or from the HS2 Land;
 - (c) affixing or attaching their person to the surface of the carriageway where it may slow or impede the safe and uninterrupted passage of vehicles onto or from the HS2 Land;
 - (d) affixing any other object to the HS2 Land which may delay or impede the free passage of any vehicle or person to or from the HS2 Land;

- (e) climbing on to or affixing any object or person to any vehicle in the vicinity of the HS2 Land; and
 - (f) deliberate slow walking in front of vehicles in the vicinity of the HS2 Land.
5. For the purposes of paragraph 2(c) prohibited acts of interference shall include (but not be limited to):
- (a) cutting, damaging, moving, climbing on or over, digging beneath, or removing any items affixed to, any temporary or permanent fencing or gate on or at the perimeter of the HS2 Land;
 - (b) the prohibition includes carrying out the aforementioned acts in respect of the fences and gates; and
 - (c) interference with a gate includes drilling the lock, gluing the lock or any other activities which may prevent the use of the gate.

Service by Alternative Method – This Order

6. The Court will provide sealed copies of this Order to the Claimants’ solicitors for service (whose details are set out below).
7. Pursuant to CPR r.6.27 and r.81.4:
- (a) The Claimants shall serve this Order upon the Second, Third and Fourth Defendants by:
 - i) Advertising the existence of this Order in the Times and Guardian newspapers, and in particular advertising the web address of the RWI Updated Website, and direct link to this Order.
 - ii) Where permission is granted by the relevant authority, by placing an advertisement and/or a hard copy of the Order within 14 libraries approximately every 10 miles along the route of the HS2 Scheme. In the alternative, if permission is not granted, the Claimants shall use reasonable endeavours to place advertisements on local parish council notice boards in the same approximate locations.
 - iii) Publishing social media posts on the HS2 Twitter and Facebook platforms advertising the existence of this Order and providing a link to the RWI Updated Website.

- (b) Service of this Order on Named Defendants may be effected by personal service where practicable and/or posting a copy of this Order through the letterbox of each Named Defendant (or leaving in a separate mailbox), with a notice drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing this Order may be affixed to or left at the front door or other prominent feature marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The notices shall be given in prominent lettering in the form set out in Annex B. It is open to any Defendant to contact the Claimants to identify an alternative place for service and, if they do so, it is not necessary for a notice or package to be affixed to or left at the front door or other prominent feature.
 - (c) The Claimants shall further advertise the existence of this Order in a prominent location on the RWI Updated Website, together with a link to download an electronic copy of this Order.
 - (d) The Claimants shall email a copy of this Order to solicitors for D6 and any other party who has as at the date hereof provided an email address to the Claimants to the email address: HS2Injunction@governmentlegal.gov.uk or hs2injunction@dlapiper.com.
8. Service in accordance with paragraph 7 above shall:
- (a) be verified by certificates of service to be filed with Court;
 - (b) be deemed effective as at the date of the certificates of service; and
 - (c) be good and sufficient service of this Order on the Defendants and each of them and the need for personal service be dispensed with.
9. Insofar as this order applies to land under 1(e)(ii) above, namely land over which the First Claimant has taken into temporary possession using its powers under Part 2 of Schedule 4 (Interference with Highways) of the HS2 Acts, a copy of this Order shall be displayed at prominent locations on the land in question clearly identifying the land, or portion of land, which is affected and such copy shall be removed promptly after any temporary possession has ceased.
10. Although not expressed as a mandatory obligation due to the transient nature of the task, the Claimants will seek to maintain copies of this Order on areas of the HS2 Land in proximity to potential Defendants, such as on the gates of construction compounds or areas of the HS2 Land known to be targeted by objectors to the HS2 Scheme.

11. Further, without prejudice to paragraph 7, while this Order is in force, the Claimants shall take all reasonably practicable steps to effect personal service of the Order upon any Defendant of whom they become aware is, or has been, on the HS2 Land without consent and shall verify any such service with further certificates of service (where possible if persons unknown can be identified) to be filed with Court.

Further Case Management

12. This Order will be reconsidered at a hearing to be listed on approximately a yearly basis between 15 and 31 May to determine whether there is a continued threat which justifies continuation of this Order (“**Yearly Review**”), but nothing in this order is intended to absolve the Claimants of their obligation to progress their claim expeditiously.
13. It will be the Claimants’ responsibility to apply for listing of the Yearly Review and to place details of the date of the Yearly Review on the RWI Updated Website. At Schedule A are directions which will apply to the next Yearly Review. Parties are advised to consider them carefully.

Applying to vary/discharge/bring to trial

14. Without prejudice to the foregoing, any 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 (and in any event not less than 48 hours before the hearing of any such application) via the contact details set out below. Schedule B to this Order indicates the process which must be followed for any such application. Useful sources of support and information are listed in Schedule C.
15. 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 or an application under CPR Part 40.9 (unless they are already named as a Defendant).
16. Any Named Defendant or other person who believes that they will or might bring themselves within the definition of the “persons unknown” by their conduct and who wishes to oppose these proceedings and bring them to trial should file an Acknowledgment of Service pursuant to CPR Part 8.3 and serve a copy on the Claimants’ solicitors via the email address set out in paragraph 26 below. Schedule D to this Order indicates the process which must be followed.
17. Any Defendant who fails to comply with paragraphs 15 or 16 above shall not be permitted to defend these proceedings or take any further role in these proceedings without further order of

the Court and shall be liable to have injunctive relief continued against them without trial pursuant to CPR r.3.5.

18. The Claimants and named Defendants otherwise have liberty to apply to extend or vary this Order or for further directions.
19. Save as provided for above, the Claim be stayed generally with liberty to restore.

Costs

20. There be no order as to costs as between any of the parties to the Review Hearing.
21. 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.

Documents in the Claim and Application

22. All documents relating to these proceedings and this Order may be downloaded at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.
23. A single hard copy of any document will be sent within 21 days of the receipt of a reasonable request for that document or documents via the Claimants' solicitors whose contact details are set out below so long as any requests include a postal address and the full name of the requestor.

Communications with Claimants and the Court

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

Birmingham District Registry
Civil Justice Centre
Priory Courts
33 Bull Street
Birmingham
B4 6DS

E: qb.birmingham@justice.gov.uk
T: 0121 681 4441
F: 01264 785 131
DX: 701987 Birmingham 7

25. Any person who wishes to view or download copies of the documents shall contact the Claimants' solicitors via the contact details below.

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

FAO: HS2 TEAM

DLA PIPER UK LLP

1 St Paul's Place

Sheffield

S1 2JX

E: HS2Injunction@dlapiper.com

T: 0114 283 3312

DX: 708580 Sheffield 10

Ref: RXS/380900/401

By Ritchie J

MADE ON 31 May 2023

ANNEX A – SCHEDULE OF DEFENDANTS

PART 1

DEFENDANT NUMBER	UNNAMED DEFENDANTS
(1)	Not used
(2)	PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER THE HS2 LAND WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES
(3)	PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS
(4)	PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS

For the avoidance of doubt, any person who has been a defendant in these proceedings, or who has given undertakings to HS2, may nevertheless become Defendant 2 – Defendant 4 as a person unknown if they commit any of the prohibited acts.

PART 2

DEFENDANT NUMBER	NAMED DEFENDANTS
(5)	Mr Ross Monaghan (aka Squirrel / Ash Tree)
(6)	Mr James Andrew Taylor (aka Jimmy Knaggs / James Knaggs / Run Away Jim)
(7)	Ms Leah Oldfield
(8)	Not Used
(9)	Not Used
(10)	Not Used
(11)	Not Used
(12)	Not Used
(13)	Not Used
(14)	Not Used
(15)	Not Used
(16)	Ms Karen Wildin (aka Karen Wilding / Karen Wilden / Karen Wilder)
(17)	Mr Andrew McMaster (aka Drew Robson)
(18)	Not Used
(19)	Not Used
(20)	Mr George Keeler (aka C Russ T Chav / Flem)
(21)	Not Used
(22)	Mr Tristan Dixon (aka Tristan Dyson)
(23)	Not Used
(24)	Not Used
(25)	Not Used
(26)	Not Used
(27)	Mr Lachlan Sandford (aka Laser / Lazer)
(28)	Mr Scott Breen (aka Scotty / Digger Down)
(29)	Not Used
(30)	Not Used
(31)	Not Used
(32)	Not Used
(33)	Mr Elliot Cuciurean (aka Jellytot)
(34)	Not Used
(35)	Not Used
(36)	Mr Mark Keir
(37)	Not Used
(38)	Not Used
(39)	Mr Iain Oliver (aka Pirate)

DEFENDANT NUMBER	NAMED DEFENDANTS
(40)	Not Used
(41)	Not Used
(42)	Not Used
(43)	Not Used
(44)	Not Used
(45)	Not Used
(46)	Not Used
(47)	Not Used
(48)	Mr Conner Nichols
(49)	Not Used
(50)	Not Used
(51)	Not Used
(52)	Not Used
(53)	Not Used
(54)	Not Used
(55)	Not Used
(56)	Not Used
(57)	Ms Samantha Smithson (aka Swan / Swan Lake)
(58)	Mr Jack Charles Oliver
(59)	Ms Charlie Inskip
(60)	Not Used
(61)	Not Used
(62)	Not Used
(63)	Mr Dino Misina (aka Hedge Hog)
(64)	Stefan Wright (aka Albert Urtubia)
(65)	Not Used

ANNEX B – WORDING FOR NOTICES

[On the package containing the Order]

“VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CONTACT –

FAO: HS2 TEAM
DLA PIPER UK LLP
1 St Paul’s Place
Sheffield
S1 2JX

E: HS2Injunction@dlapiper.com
T: 0114 283 3038
DX: 708580 Sheffield 10
R: RXS/380900/401

All documents relating to these proceedings and this Order may be downloaded at:
<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>”

SCHEDULE A – DIRECTIONS FOR YEARLY REVIEW

Definitions

1. In these Directions, the following defined terms shall apply:
 - a. The “RWI Updated Website” means the webpages at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.
 - b. The term “Defendants” refers to all Defendants, both named and persons unknown, and (b) above will be good and sufficient service on the Defendants and each of them.
2. The Claimants shall email a copy of this Order to solicitors for D6 and any other party who has as at the date hereof provided an email address to the Claimants to the email addresses: HS2Injunction@governmentlegal.gov.uk or HS2Injunction@dlapiper.com.

Further Case Management

3. The Yearly Review will be listed for one day at 10.30am on a date between 15 and 31 May 2024 in the High Court in Birmingham at a date, after consultation by the court with the parties, convenient to counsel for any named party
4. Any person who wishes to address the Court at the Review must inform the Court and the Claimants of their intention to attend by 4pm on 10 May 2024 at the addresses at paragraphs 24 and 26 of the Order.
5. By 4pm on 1 March 2024, the Claimants’ must file and serve (in accordance with paragraph 3(a) of this Schedule) any applications relevant to the Yearly Review, a draft order, and any evidence upon which they seek to rely.
6. By 4pm on 5 April 2024, any person seeking to amend (including discharge) the Order, or oppose any applications made by the Claimants, must file and serve their written reasons in a document and indicate whether they intend to adduce evidence upon which that person seeks to rely by emailing or posting it to the Court and the Claimants at the addresses listed at paragraphs 24 and 26 of the Order.
7. Any evidence upon which a Defendant or other Applicant wishes to rely must be filed by 4pm on 19 April 2024.
8. By 4pm on 26 April 2024, the Claimants have permission to file and serve (in accordance with paragraph 3(a) of this Schedule) any evidence in response to any document or evidence filed in accordance with paragraphs 6 and 7 of this Schedule if so advised.
9. By 4pm on 3rd May 2024, the Claimants shall cause to be placed on the RWI Updated Website a draft hearing bundle index.
10. By 4pm on 6 May 2024, any person who wishes to comment on the draft hearing bundle must notify the Claimants of their comments by email to the address in paragraph 26 of the Order. Any person may provide suggested documents for inclusion to the Claimants. Where there is disagreement between the Claimants and that person as to the relevance of any document, that disagreement will be noted in the hearing bundle index and the document shall be provided to the Court in a separate bundle by the person seeking to rely upon it.,
11. By 4pm on 10 May 2024, the Claimants shall file and serve a properly paginated and indexed hearing bundle to the Court by email and in hard copy and shall cause to be placed on the RWI Updated Website a copy of the same.

12. By 4pm on 10 May 2024, the Claimants and any other person seeking to address the Court at the Yearly Review shall file and serve any skeleton argument or speaking note.
13. The parties otherwise have liberty to apply to for further or varied directions.

Documents in the Claim and Application

14. All documents relating to these proceedings and the Yearly Review may be downloaded at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.
15. A single hard copy of any document will be sent within 21 days of the receipt of a reasonable request for that document or documents via the Claimants' solicitors whose contact details are set out in the Order so long as any requests include a postal address and the full name of the requestor.

SCHEDULE B – STEPS TO VARY OR DISCHARGE THIS ORDER

If, in accordance with paragraphs 14-16 of the Order, 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 must be followed:

1. Any person seeking to contest the Claimants' entitlement to interim relief should file with the court (i.e. send to the court) and serve (i.e. send to the Claimants):

- (a) An N244 application form¹;
- (b) Written grounds (which may be contained in within the N244 application form or a separate document) for:
 - i. permission to bring the application; and
 - ii. the application (i.e. reasons for the proposed variation / discharge of the Order).

Any applicant shall explain clearly within their written grounds the differences between their grounds and the issues which the Court has already adjudicated upon in the judgment of Mr Justice Julian Knowles of 20 September 2022 [or any judgment arising out of this Application]. A copy of the judgment[s] can be found on the RWI Updated Website; and

(c) A witness statement(s) containing and/or appending all 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 24 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 26 of this Order; and/or

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>

- (b) Send electronic copies of the documents to the e-mail address at paragraph 26 of the Order.
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.
 5. Thereafter the Claimants 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:
 - i. whether to grant permission for the application to proceed; and
 - ii. if permission is granted, 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 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/>

Chancery Division Guide: <https://www.gov.uk/government/publications/chanceryguide>

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/civil/rules/part08>

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

SCHEDULE D – STEPS TO BRING MATTER TO TRIAL

If, in accordance with paragraph 16 of the Order above, any Defendant or other person affected by this Order wishes to apply to bring the Claimants' proceedings (whether as a whole or in part) to final trial, to ensure effective case management by the Court the following steps must be followed:

1. If not already so, the person must apply to become a named defendant to the claim. This can be done by filing with the court (i.e. send to the court) and serving (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 person who is applying should:

(a) Send physical copies to the address at paragraph 24 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 Claimants, the person applying should:

(a) Send physical copies to the address at paragraph 26 of this Order; and/or

(b) Send electronic copies to the to the e-mail address at paragraph 26 above.

4. The person seeking to contest the Order 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 Order (whether as a whole or in part), which must include a postal address for service together with (if they wish to be served with documents electronically in these proceedings) an email address to which such service may be effected;

(b) An application for permission to contest the Order and to bring the matter to trial, which explains clearly the differences between their grounds of defence relied upon and the issues which the Court has already adjudicated upon in the judgment of Mr Justice Julian Knowles of 20 September 2022 [or any judgment arising out of this Application]. A copy of the judgment[s] can be found on the RWI Updated Website;

(c) A written Defence responding to the allegations set out in the Particulars of Claim (to the extent in the Defendant's knowledge); and

(d) A witness statement(s) (verified by a statement of truth) containing and/or appending all the evidence to be relied upon in support of the application for permission and Defence (i.e. evidence explaining the basis for contesting the claim).

5. Thereafter the Claimants shall have 14 days after service of the Defence to file and serve any evidence in reply.

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>

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

6. The Court shall then list a hearing date for a Case Management Conference, at which it will:
- (a) determine the application for permission to contest the Order and to bring the matter to trial; and
 - (b) should the application for permission be successful, 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.

7. Further:

- a. The Claimants shall prepare an electronic hearing bundle for the hearing and provide the Defendant(s) with access to the bundle not less than 14 days before the hearing.
- b. At the hearing, the Court shall consider whether injunctive relief shall be continued against any or all of the Defendants, whether on an interim or final basis.
- c. Any further application by the Claimants to add further named defendants, to have final relief granted against any Defendant(s) without trial pursuant to CPR r.3.5 and/or otherwise to amend its claim shall be determined at the hearing.
- d. The need for and form of any further case management directions through to trial or any further hearing shall be considered.

END



Claim no: QB-2022-BHM-000044

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

Between:

QB-2022-BHM-000044

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

Claimants/Applicants

-and-

- (1) NOT USED

(2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER THE HS2 LAND WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES

(3) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS

(4) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS

(5) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE)

AND 62 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM

Defendants/Respondents

NOTICE OF HEARING

The Court has listed the Review Hearing in this matter on **Wednesday 15 May 2024 at 10.30am** before a High Court Judge at the Birmingham Civil and Family Justice Hearing Centre, Priory Courts, 33 Bull Street, Birmingham B4 6DS, with a time estimate of 1 day. Face to face with attendance at Court.

Important Note: A hearing bundle must be lodged at least 3 clear days before the hearing.

Certificate of service

Name of court HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	0	1	/	0	2	/	2	0	2	4
The date of service is	0	1	/	0	2	/	2	0	2	4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

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On whom did you serve?

(If appropriate include their position e.g. partner, director).

The Defendants

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

- 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 (..14:15....time sent, 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

By uploading to website:

<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>

Being the claimant's 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
- other (please specify)

Place of service ordered by the Court in the order made on 31 May 2023

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

Signed 

Claimant's Solicitor

Position or office held

Head Counsel – L&P Disputes

(If signing on behalf of firm or

Date

0	1	0	2	2	0	2	4
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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

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 next business day	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, 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 leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas 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 Head Counsel – L&P Disputes.
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 01.02.2024 I instructed Connie Holmes, Digital Media and Content Manager for the First Claimant, to upload the following document:

153 – Notice of Review Hearing 2024

to the website: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>. A copy of this document has already been filed with the Court.
4. At 14:15 on 01.02.2024, Connie Holmes confirmed to me that the upload was complete and I checked the website and noted that the document was available to view and download. A screenshot of the website showing the documents is here:


Notice

HS2 route-wide injunction proceedings (2024)

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 1 February 2024

 [Get emails about this page](#)

Documents



[153. Notice of Review Hearing 2024](#)

PDF, 118 KB, 2 pages

This file may not be suitable for users of assistive technology.

[▶ Request an accessible format.](#)

Details

Exhibits contain strong and/or abusive language and scenes of violence that some viewers may find disturbing. Viewer discretion advised.

Published 1 February 2024

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: 01 February 2024

Mary Barraclough

From: Michael Fry <Michael.Fry@ftbchambers.co.uk>
Sent: 19 February 2024 16:37
To: Robert Shaw; Jonathan Welch
Subject: FW: Draft order
Attachments: RWI Review Order - AMENDED (16 May 2023)(126363518.1) -OG (002) (DLA Amends - 17.05.2023)(126397323.2).docx

****EXTERNAL****

Michael Fry
Barrister

M: 07973 286191

From: Richard Kimblin KC <rk@no5.com>
Sent: Wednesday, May 17, 2023 6:46 PM
To: Stephen Simblet KC <stephens@gclaw.co.uk>
Cc: Michael Fry <Michael.Fry@ftbchambers.co.uk>; Owen Greenhall <oweng@gclaw.co.uk>
Subject: Re: Draft order

Dear Stephen & Owen,

Here is our draft in markup.

If either of you are free in the morning and want to talk it through, catch me on the number below.

Best wishes,

Richard

Richard Kimblin KC

M: 07932 008904

Practice Director: Andrew Bisbey 02074207568



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On 17 May 2023, at 14:11, Stephen Simblet KC <stephens@gclaw.co.uk> wrote:

OK. There will obviously also need to be suitable notice requirements to ensure that people can know what land is temporarily affected, and for how long.

Stephen

Sent from [Outlook for Android](#)

From: Richard Kimblin KC <rk@no5.com>
Sent: Wednesday, May 17, 2023 8:56:44 AM
To: Stephen Simblet KC <stephens@gclaw.co.uk>
Cc: Michael Fry <Michael.Fry@ftbchambers.co.uk>; Owen Greenhall <oweng@gclaw.co.uk>
Subject: Re: Draft order

Thank you for your email Stephen. I'm terrified.

We too have a draft and will look at them together and come back to you in the middle of the day.

Best wishes,

Richard

Richard Kimblin KC

M: 07932 008904

Practice Director: Andrew Bisbey 02074207568

<PastedGraphic-2.png>

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On 17 May 2023, at 08:28, Stephen Simblet KC <stephens@gclaw.co.uk> wrote:

I forgot to include Owen in this, which was particularly culpable in the light of this being mostly his draft!
Am resending so that he can be included in replies .
Stephen

Sent from [Outlook for Android](#)

From: Stephen Simblet KC <stephens@gclaw.co.uk>
Sent: Wednesday, May 17, 2023 8:15:27 AM
To: Richard Kimblin KC <rk@no5.com>; Michael Fry <Michael.Fry@ftbchambers.co.uk>
Subject: Fwd: Draft order

Morning Richard and Michael,

These are our proposals for changing the definition of "HS2 Land" in the injunction and notifying people as to what land is affected.

Our position is that:

1. This protects the mischief complained about by the Claimants in the way that the case is now presented to the court.
2. Means that no conspiracy injunction is required.

We invite you to agree this, along with no order as to costs for D6.

We think there are considerable advantages to you in adopting this course, and that the chance of your getting a conspiracy injunction to be small. We also think that a refusal to grant such an injunction after a hearing would be unpalatable to your clients.

At the moment, this draft is just sent to you (and will also be sent to you solicitors), but if it is not speedily dealt with, we intend to make this an open offer and send our proposed wording and proposals to the judge, as indicated yesterday. This ought to save him some judgment writing time. I also intend to write to him now to say that we have made proposals around the wording and they are with you.

On the costs, I consider that our no order to costs proposal is generous to the Claimants bearing in mind that D6 only attended because your injunction as drawn, and the arguments in your skeleton argument as understood by all including the judge went much further than can possibly be your position now, so I hope that we can agree something.

Stephen

Sent from [Outlook for Android](#)

From: Owen Greenhall <oweng@gclaw.co.uk>
Sent: Tuesday, May 16, 2023 4:35:45 PM
To: Stephen Simblet KC <stephens@gclaw.co.uk>; Nicola Hall <nhall@robertlizar.com>
Subject: Draft order

Owen Greenhall, Barrister
Garden Court Chambers
57-60 Lincoln's Inn Fields, London, WC2A 3LJ
DX: 34 London Chancery Lane
Twitter: @GardenCourtLaw @GardenCtPublic @GCCHousing @GCCCivillibs
Switchboard: 020 7993 7600 | Direct Tel: 020 7993 7723
My Profile: <https://www.gardencourtchambers.co.uk/barristers/owen-greenhall>

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<RWI Review Order - AMENDED (16 May 2023)(126363518.1) -OG.docx>

Michael Fry

Please consider the environment before printing this email

Francis Taylor Building

Inner Temple

London EC4Y 7BY

DX: 402 LDE **Tel:** 020 7353 8415 **Fax:** 020 7353 7622

clerks@ftbchambers.co.uk

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Claim no: QB-2022-BHM-000044

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

Before: ~~Mr/Mrs Justice Ritchie~~
On: 16 May 2023

Between:

(1) HIGH SPEED TWO (HS2) LIMITED
(2) THE SECRETARY OF STATE FOR TRANSPORT
Claimants/Applicants

-and-

- (1) NOT USED
- (2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER THE HS2 LAND WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES
- (3) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS
- (4) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS
- (5) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE)

AND 62 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM

~~(68) PERSONS UNKNOWN BY UNLAWFUL MEANS OBSTRUCTING, IMPEDING, HINDERING, OR DELAYING WORKS OR ACTIVITIES AUTHORISED BY THE HS2 ACTS, IN EXPRESS OR IMPLIED AGREEMENT OR COMBINATION WITH ANOTHER PERSON WITH THE INTENTION OF CAUSING DAMAGE TO THE CLAIMANTS~~

Defendants/Respondents

ORDER

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.

A Defendant who is an individual who is ordered not to do something must not do it himself/herself or in any other way. He/she must not do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

FURTHER TO the Orders made in these proceedings by Julian Knowles J on 20 September 2022 (the “**Injunction Order**”) and by HHJ Kelly on 16 March 2023 (the “**Directions Order**”)

AND UPON the Claimants’ application by Application Notice dated 27 March 2023 pursuant to the provisions at paragraphs 15 and 20 of the Injunction Order (“**March 2023 Application**”).

AND UPON the Court accepting the Claimants’ renewed undertaking that they 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.

AND UPON the Claimants’ renewed confirmation that this Order is not intended to prohibit lawful protest which does not involve trespass upon the HS2 Land and does not block, slow down, obstruct or otherwise interfere with the Claimants’ access to or egress from the HS2 Land.

AND UPON the Claimants’ renewed confirmation that they do not intend for any freeholder or leaseholder with a lawful interest in the HS2 Land to fall within the Defendants to this Order, and undertaking not to make any committal application in respect of a breach of this Order, where the breach is carried out by a freeholder or leaseholder with a lawful interest in the HS2 Land on the land upon which that person has an interest.

AND UPON the Claimants’ renewed confirmation that this Order is not intended to act against any guests or invitees of any freeholders or leaseholders with a lawful interest in the HS2 Land unless that

guest or invitee undertakes actions with the effect of damaging, delaying or otherwise hindering the HS2 Scheme on the land held by the freeholder or leaseholder with a lawful interest in the HS2 Land.

AND UPON HEARING Counsel for the Claimants, Mr Richard Kimblin KC and Mr Michael Fry,
[Stephen Simblet KC and Mr Owen Greenhall for D6, \[Counsel for a Defendant\]\[the Defendants in person and various non-Defendants in person\]](#) and Mr Mark Keir and Ms Caroline Thomson-Smith in person (“Review Hearing”).

IT IS ORDERED THAT:

Definitions

1. In this Order, the following defined terms shall apply:

- (a) The “RWI Updated Website” means the webpages at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.
- (b) The “Named Defendants” means D5 to D6~~57~~ whose names appear in Annex A.
- (c) The “Defendants” refers to all Defendants.
- (d) The “March 2023 HS2 Land Plans” means the updated plans which illustrate the land of which the Claimants are entitled to possession [and which the Claimants shall update from time to time to include further land of which they have become entitled to possession and remove land of which they are no longer entitled to possession](#).
- (e) The “HS2 Land” means:
 - i) 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 ~~March 2023~~ HS2 Land Plans which are available electronically on the RWI Updated Website;
[and](#)
 - ~~(e)ii) any land over which the First Claimant has exercised Land which is taken into temporary or permanent possession by the Claimants using its powers under Part 2 of Schedule 4 (Interference with Highways) of the HS2 Acts (Interference with Highways) for Rail Act purposes.~~
- (f) The “HS2 Acts” are the High Speed Rail (London – West Midlands) Act 2017 and the High Speed Rail (West Midlands – Crewe) Act 2021.

Amendments to the Claim

2. The Claimants have permission:

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- (a) To amend the description of the HS2 Land to refer to the land illustrated in the March 2023 HS2 Land Plans [and any land over which the First Claimant has exercised its powers under Part 2 of Schedule 4 of the HS2 Acts \(Interference with Highways\)](#).
- (b) To amend the description of D2 to refer to the HS2 Land.
- (c) To remove Named Defendants to the Claim where expedient namely: D11 - 13, 18, 19, 21, 23, 31, 34, 37, 38, 40 – 46, 49 - 53, 60 – 62, and 65.
- ~~(d) To add D66 Caroline Thomson Smith (aka Carl Woods) as a new defendant to the Claim~~
- ~~(e) To add D67 Christopher Paul Butcher (aka Rob) as a new defendant to the Claim~~
- ~~(f) To add D68 as a new defendant to the Claim: PERSONS UNKNOWN BY UNLAWFUL MEANS OBSTRUCTING, IMPEDING, HINDERING OR DELAYING WORKS OR ACTIVITIES AUTHORISED BY THE HS2 ACTS, IN EXPRESS OR IMPLIED AGREEMENT OR COMBINATION WITH ANOTHER PERSON WITH THE INTENTION OF CAUSING DAMAGE TO THE CLAIMANTS~~
- ~~(g) To make consequential amendments to the Amended Particulars of Claim arising from the March 2023 Application including adding a further prohibition preventing the Defendants from obstructing, impeding, hindering, or delaying works or activities authorised by the HS2 Acts by unlawful means, in express or implied agreement or in combination with another person with the intention of causing damage to the Claimants and removing those paragraphs of the Amended Particulars of Claim which are no longer pertinent to the Claim.~~
- ~~(h)~~(d) To amend the Amended Particulars of Claim dated 26 April 2022 to give effect to 2(a) – ~~(c)~~ above.

Injunction in force

3. With immediate effect, and until 23.59 on 31 May 2024 unless varied, discharged or extended by further order, the Defendants and each of them are forbidden from doing the following:
 - (a) entering or remaining upon the HS2 Land;
 - (b) deliberately obstructing or otherwise interfering with the free movement of vehicles, equipment or persons accessing or egressing the HS2 Land; [or](#)
 - (c) interfering with any [sign](#), fence or gate on or at the perimeter of the HS2 Land; ~~or~~
 - ~~(d) by unlawful means obstructing, impeding, hindering, or delaying works or activities authorised by the HS2 Acts, in express or implied agreement or combination with another person with the intention of causing damage to the Claimants.~~

4. Nothing in paragraph 3 of this Order:
 - (a) Shall prevent any person from exercising their rights over any open public right of way over the HS2 Land.
 - (b) Shall affect any private rights of access over the HS2 Land.
 - (c) Shall prevent any person from exercising their lawful rights over any public highway.
 - (d) Shall extend to any person holding a lawful freehold or leasehold interest in land over which the Claimants have taken temporary possession.
 - (e) Shall extend to any interest in land held by statutory undertakers.

5. For the purposes of paragraph 3(b) prohibited acts of obstruction and interference shall include (but not be limited to):
 - (a) standing, kneeling, sitting or lying or otherwise remaining present on the carriageway when any vehicle is attempting to turn into the HS2 Land or attempting to turn out of the HS2 Land in a manner which impedes the free passage of the vehicle;
 - (b) digging, erecting any structure or otherwise placing or leaving any object or thing on the carriageway which may slow or impede the safe and uninterrupted passage of vehicles or persons onto or from the HS2 Land;
 - (c) affixing or attaching their person to the surface of the carriageway where it may slow or impede the safe and uninterrupted passage of vehicles onto or from the HS2 Land;
 - (d) affixing any other object to the HS2 Land which may delay or impede the free passage of any vehicle or person to or from the HS2 Land;
 - (e) climbing on to or affixing any object or person to any vehicle in the vicinity of the HS2 Land; and
 - (f) deliberate slow walking in front of vehicles in the vicinity of the HS2 Land.

6. For the purposes of paragraph 3(c) prohibited acts of interference shall include (but not be limited to):
 - (a) cutting, damaging, moving, climbing on or over, digging beneath, or removing any items affixed to, any temporary or permanent fencing or gate on or at the perimeter of the HS2 Land;
 - (b) the prohibition includes carrying out the aforementioned acts in respect of the fences and gates; and
 - (c) interference with a gate includes drilling the lock, gluing the lock or any other activities which may prevent the use of the gate.

Service by Alternative Method – This Order

7. The Court will provide sealed copies of this Order to the Claimants' solicitors for service (whose details are set out below).
8. Pursuant to CPR r.6.27 and r.81.4:
 - (a) The Claimants shall serve this Order upon the Second, Third ~~and~~, Fourth ~~and~~ ~~Sixty~~ ~~Eighth~~ Defendants by:
 - i) Advertising the existence of this Order in the Times and Guardian newspapers, and in particular advertising the web address of the RWI Updated Website, and direct link to this Order.
 - ii) Where permission is granted by the relevant authority, by placing an advertisement and/or a hard copy of the Order within 14 libraries approximately every 10 miles along the route of the HS2 Scheme. In the alternative, if permission is not granted, the Claimants shall use reasonable endeavours to place advertisements on local parish council notice boards in the same approximate locations.
 - iii) Publishing social media posts on the HS2 Twitter and Facebook platforms advertising the existence of this Order and providing a link to the RWI Updated Website.
 - (b) Service of this Order on Named Defendants may be effected by personal service where practicable and/or posting a copy of this Order through the letterbox of each Named Defendant (or leaving in a separate mailbox), with a notice drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing this Order may be affixed to or left at the front door or other prominent feature marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The notices shall be given in prominent lettering in the form set out in Annex B. It is open to any Defendant to contact the Claimants to identify an alternative place for service and, if they do so, it is not necessary for a notice or package to be affixed to or left at the front door or other prominent feature.

- (c) The Claimants shall further advertise the existence of this Order in a prominent location on the RWI Updated Website, together with a link to download an electronic copy of this Order.
- (d) The Claimants shall email a copy of this Order to solicitors for D6 and any other party who has as at the date hereof provided an email address to the Claimants to the email address: HS2Injunction@governmentlegal.gov.uk or hs2injunction@dlapiper.com.

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9. Service in accordance with paragraph 8 above shall:
- (a) be verified by certificates of service to be filed with Court;
 - (b) be deemed effective as at the date of the certificates of service; and
 - (c) be good and sufficient service of this Order on the Defendants and each of them and the need for personal service be dispensed with.

10. Insofar as this order applies to land under 1(e)(ii) above, namely land over which the First Claimant has exercised its powers under Part 2 of Schedule 4 (Interference with Highways) of the HS2 Acts, a copy of this Order shall be displayed at prominent locations on the land in question.

~~which is taken into temporary or permanent possession by the Claimants using powers under Part 2 of Schedule 4 (Interference with Highways) of the HS2 Acts for Rail Act purposes, the land shall be clearly demarcated and signs of the order shall be affixed to posts at prominent locations at each site.~~

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~~10.11.~~ Although not expressed as a mandatory obligation due to the transient nature of the task, the Claimants will seek to maintain copies of this Order on areas of the HS2 Land in proximity to potential Defendants, such as on the gates of construction compounds or areas of the HS2 Land known to be targeted by objectors to the HS2 Scheme.

~~11.12.~~ Further, without prejudice to paragraph ~~89~~, while this Order is in force, the Claimants shall take all reasonably practicable steps to effect personal service of the Order upon any Defendant of whom they become aware is, or has been, on the HS2 Land without consent and shall verify any such service with further certificates of service (where possible if persons unknown can be identified) to be filed with Court.

Further Case Management

13. This Order will be reconsidered at a hearing to be listed on approximately a yearly basis between 15 and 31 May to determine whether there is a continued threat which justifies continuation of this Order (“Yearly Review”).

~~12.~~14. It will be the Claimants’ responsibility to apply for listing of ~~arrange such a hearing and the~~ Yearly Review and to place details of ~~any such hearing~~ the date of the Yearly Review on the RWI Updated Website. At Schedule A are directions which will apply to the next Yearly Review. Parties are advised to consider them carefully.

~~13.~~15. Without prejudice to the foregoing, any 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 (and in any event not less than 48 hours before the hearing of any such application) via the contact details set out below. Schedule ~~A-B~~ to this Order indicates the process which must be followed for any such application. Useful sources of support and information are listed in Schedule C.

~~14.~~16. 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~~ Defendant).

~~15.~~17. Any Named Defendant or other person who believes that they will or might bring themselves within the definition of the “persons unknown” by their conduct and who wishes to oppose these proceedings and bring them to trial should file an Acknowledgment of Service pursuant to CPR Part 8.3 and serve a copy on the Claimants’ solicitors via the email address set out in paragraph ~~26~~5 below. Schedule ~~B-D~~ to this Order indicates the process which must be followed.

~~16.~~18. Any Defendant who fails to comply with paragraph ~~15~~7 above shall not be permitted to defend these proceedings or take any further role in these proceedings without further order of the Court and shall be liable to have injunctive relief continued against them without trial pursuant to CPR r.3.5.

~~17.~~19. The Claimants otherwise have liberty to apply to extend or vary this Order or for further directions.

~~18.~~20. Save as provided for above, the Claim be stayed generally with liberty to restore.

Costs

~~19.~~21. There be no order as to costs as between any of the parties to the Review Hearing.

~~20.~~ 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.

Documents in the Claim and Application

~~21-22.~~ All documents relating to these proceedings and this Order may be downloaded at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

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~~22-23.~~ A single hard copy of any document will be sent within 21 days of the receipt of a reasonable request for that document or documents via the Claimants' solicitors whose contact details are set out below so long as any requests include a postal address and the full name of the requestor.

Communications with Claimants and the Court

~~23-24.~~ All communications to the Court about this Order (which should quote the case number) should be sent to:

Birmingham District Registry
Civil Justice Centre
Priory Courts
33 Bull Street
Birmingham
B4 6DSW

E: qb.birmingham@justice.gov.uk
T: 0121 681 4441
F: 01264 785 131
DX: 701987 Birmingham 7

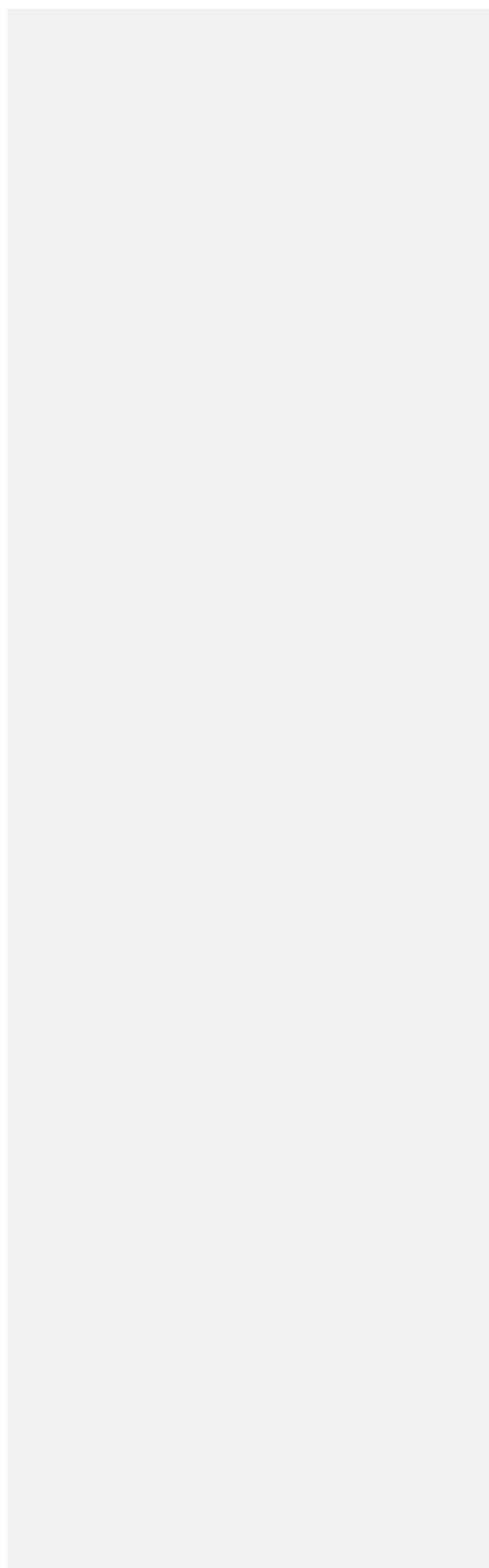
~~24-25.~~ Any person who wishes to view or download copies of the documents shall contact the Claimants' solicitors via the contact details below.

~~25-26.~~ The Claimants' solicitors and their contact details are:

FAO: HS2 TEAM
DLA PIPER UK LLP
1 St Paul's Place
Sheffield
S1 2JX

E: HS2Injunction@dlapiper.com
T: 0114 283 3312
DX: 708580 Sheffield 10
Ref: RXS/380900/401

BY THE COURT
MADE ON [DATE]



ANNEX A – SCHEDULE OF DEFENDANTS

PART 1

DEFENDANT NUMBER	UNNAMED DEFENDANTS
(1)	Not used
(2)	PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER THE HS2 LAND WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES
(3)	PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS
(4)	PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS
(68)	PERSONS UNKNOWN BY UNLAWFUL MEANS OBSTRUCTING, IMPEDING, HINDERING OR DELAYING WORKS OR ACTIVITIES AUTHORISED BY THE HS2 ACTS, IN EXPRESS OR IMPLIED AGREEMENT OR COMBINATION WITH ANOTHER PERSON WITH THE INTENTION OF CAUSING DAMAGE TO THE CLAIMANTS

For the avoidance of doubt, any person who has been a defendant in these proceedings, or who has given undertakings to HS2, may nevertheless become Defendant ~~4~~ – Defendant 4 or Defendant 68 as a person unknown if they commit any of the prohibited acts.

PART 2

DEFENDANT NUMBER	NAMED DEFENDANTS
(5)	Mr Ross Monaghan (aka Squirrel / Ash Tree)
(6)	Mr James Andrew Taylor (aka Jimmy Knaggs / James Knaggs / Run Away Jim)
(7)	Ms Leah Oldfield
(8)	Not Used
(9)	Not Used
(10)	Not Used
(11)	Not Used
(12)	Not Used
(13)	Not Used
(14)	Not Used
(15)	Not Used
(16)	Ms Karen Wildin (aka Karen Wilding / Karen Wilden / Karen Wilder)
(17)	Mr Andrew McMaster (aka Drew Robson)
(18)	Not Used
(19)	Not Used
(20)	Mr George Keeler (aka C Russ T Chav / Flem)
(21)	Not Used
(22)	Mr Tristan Dixon (aka Tristan Dyson)
(23)	Not Used
(24)	Not Used
(25)	Not Used
(26)	Not Used
(27)	Mr Lachlan Sandford (aka Laser / Lazer)
(28)	Mr Scott Breen (aka Scotty / Digger Down)
(29)	Not Used
(30)	Not Used
(31)	Not Used
(32)	Not Used
(33)	Mr Elliot Cuciurean (aka Jellytot)
(34)	Not Used
(35)	Not Used
(36)	Mr Mark Keir
(37)	Not Used
(38)	Not Used
(39)	Mr Iain Oliver (aka Pirate)

DEFENDANT NUMBER	NAMED DEFENDANTS
(40)	Not Used
(41)	Not Used
(42)	Not Used
(43)	Not Used
(44)	Not Used
(45)	Not Used
(46)	Not Used
(47)	Not Used
(48)	Mr Conner Nichols
(49)	Not Used
(50)	Not Used
(51)	Not Used
(52)	Not Used
(53)	Not Used
(54)	Not Used
(55)	Not Used
(56)	Not Used
(57)	Ms Samantha Smithson (aka Swan / Swan Lake)
(58)	Mr Jack Charles Oliver
(59)	Ms Charlie Inskip
(60)	Not Used
(61)	Not Used
(62)	Not Used
(63)	Mr Dino Misina (aka Hedge Hog)
(64)	Stefan Wright (aka Albert Urtubia)
(65)	Not Used
(66)	Caroline Thompson Smith (aka Carl Woods)
(67)	Christopher Paul Butcher (aka Rob)

ANNEX B – WORDING FOR NOTICES

[On the package containing the Order]

“VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CONTACT –

FAO: HS2 TEAM
DLA PIPER UK LLP
1 St Paul’s Place
Sheffield
S1 2JX

E: HS2Injunction@dlapiper.com
T: 0114 283 3038
DX: 708580 Sheffield 10
R: RXS/380900/401

All documents relating to these proceedings and this Order may be downloaded at:
<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>”

SCHEDULE A – DIRECTIONS FOR YEARLY REVIEW

Definitions

1. In these Directions, the following defined terms shall apply:
 - a. The “RWI Updated Website” means the webpages at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.
 - b. The term “Defendants” refers to all Defendants, both named and persons unknown.
 - c. The “Review Documents” means all the documents filed with the Court by the Claimants for the Yearly Review.

Service by Alternative Method – Review Documents

2. On the Claimants’ application, the Court will provide Notice of Hearing. The Claimants shall advertise the existence of the Notice of Hearing in a prominent location on the RWI Updated Website.
3. Pursuant to CPR r. 6.27 and r. 81.4, personal service is dispensed with and service of the Review Documents upon the Defendants shall be by:
 - a. placing the Review Documents on the RWI Updated Website.
 - b. causing to be made social media posts on the HS2 twitter and Facebook pages advertising the date of the Review and the web address of the HS2 RWI Updated Website.
 - c. Compliance with 3(a) and (b) above will be good and sufficient service on the Defendants and each of them.
4. The Claimants shall email a copy of this Order to solicitors for D6 and any other party who has as at the date hereof provided an email address to the Claimants to the email addresses: HS2Injunction@governmentlegal.gov.uk or HS2Injunction@dlapiper.com.

Further Case Management

5. The Yearly Review will be listed for one day at 10.30am on a date between 15 and 31 May 2024 in the High Court in Birmingham.

6. Any person who wishes to address the Court at the Review must inform the Court and the Claimants of their intention to attend by 4pm on 10 May 2024 at the addresses at paragraphs 24 and 26 of the Order.
7. By 4pm on 22 March 2024, the Claimants' must file and serve (in accordance with paragraph 3(a) above) any applications relevant to the Yearly Review, a draft order, and any evidence upon which they seek to rely.
8. By 4pm on 5 April 2024, any person seeking to amend (including discharge) the Order, or oppose any applications made by the Claimants, must file and serve a written statement of case and any evidence upon which that person seeks to rely by emailing or posting it to the Court and the Claimants at the addresses listed at paragraphs 24 and 26 of the Order. Any such person must:
 - a. explain clearly within their written statement of case the differences between their case and the issues which the Court has already adjudicated upon in the judgment of Mr Justice Julian Knowles of 20 September 2022, and any further judgment arising out of these proceedings. A copy of any judgment[s] can be found on the RWI Updated Website;
 - b. Provide a witness statement(s) verified by a statement of truth containing and/or appending all of the evidence to be relied upon in support of the application/opposition; and
 - c. If the evidence amounts to more than 2,000 words or more than three documents/other evidence, a short summary of less than 1,000 words explaining in simple terms the points they wish to make to the Court.
9. At the same time and date, any party requiring any of the Claimants' witnesses to attend for cross-examination are to give notice of the name of the witness required together with the reasons why that person is required. For the avoidance of doubt, whether live evidence will be permitted will remain to be determined by the Court.
10. By 4pm on 19 April 2024, the Claimants have permission to file and serve (in accordance with paragraph 3(a) above) any evidence in response to any statement of case or evidence filed in accordance with paragraph 8 above if so advised.
11. By 4pm on 22 April 2024, the Claimants shall cause to be placed on the RWI Updated Website a draft hearing bundle index.

12. By 4pm on 23 April 2024, any person who wishes to comment on the draft hearing bundle must notify the Claimants of their comments by email to the address in paragraph 26 of the Order. Any person may provide suggested documents for inclusion to the Claimants. Where there is disagreement between the Claimants and that person as to the relevance of any document, that disagreement will be noted in the hearing bundle index and the document shall be provided to the Court in a separate bundle by the person seeking to rely upon it, with reasons provided as to the document's relevance.

13. By 4pm on 7 May 2024, the Claimants shall file and serve a properly paginated and indexed hearing bundle to the Court by email and in hard copy and shall cause to be placed on the RWI Updated Website a copy of the same.

14. By 4pm on 10 May 2024, the Claimants and any other person seeking to address the Court at the Review shall file and serve any skeleton argument or speaking note.

15. The Claimants otherwise have liberty to apply to for further or varied directions.

Documents in the Claim and Application

16. All documents relating to these proceedings and the Yearly Review may be downloaded at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

17. A single hard copy of any document will be sent within 21 days of the receipt of a reasonable request for that document or documents via the Claimants' solicitors whose contact details are set out in the Order so long as any requests include a postal address and the full name of the requestor.

SCHEDULE BA – STEPS TO VARY OR DISCHARGE THIS ORDER

If, in accordance with paragraph 1~~53~~ 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 must be followed:

1. Any person seeking to contest the Claimants' entitlement to interim relief should file with the court (i.e. send to the court) and serve (i.e. send to the Claimants):

- (a) An N244 application form¹;
- (b) Written grounds (which may be contained in within the N244 application form or a separate document) for:
 - i. permission to bring the application; and
 - ii. the application (i.e. reasons for the proposed variation / discharge of the Order).

Any applicant shall explain clearly within their written grounds the differences between their grounds and the issues which the Court has already adjudicated upon in the judgment of Mr Justice Julian Knowles of 20 September 2022 [or any judgment arising out of this Application]. A copy of the judgment[s] can be found on the RWI Updated Website; and

- (c) A witness statement(s) containing and/or appending all 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 2~~43~~ 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 2~~56~~ of this Order; and/or
- (b) Send electronic copies of the documents to the e-mail address at paragraph 2~~65~~ 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.

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:

- i. whether to grant permission for the application to proceed; and
- ii. if permission is granted, whether a hearing is necessary, and/or may request from the parties evidence on any further matters necessary to determine the application. If the

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>

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 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/>

Chancery Division Guide: <https://www.gov.uk/government/publications/chanceryguide>

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/civil/rules/part08>

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

SCHEDULE DB – STEPS TO BRING MATTER TO TRIAL

If, in accordance with paragraph 175 above, any Defendant or other person affected by this Order wishes to apply to bring the Claimants' proceedings (whether as a whole or in part) to final trial, to ensure effective case management by the Court the following steps must be followed:

1. If not already so, the person must apply to become a named defendant to the claim. This can be done by filing with the court (i.e. send to the court) and serving (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 person who is applying should:

(a) Send physical copies to the address at paragraph 243 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 Claimants, the person applying should:

(a) Send physical copies to the address at paragraph 256 of this Order; and/or

(b) Send electronic copies to the to the e-mail address at paragraph 256 above.

4. The person seeking to contest the Order 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 Order (whether as a whole or in part), which must include a postal address for service together with (if they wish to be served with documents electronically in these proceedings) an email address to which such service may be effected;

(b) An application for permission to contest the Order and to bring the matter to trial, which explains clearly the differences between their grounds of defence relied upon and the issues which the Court has already adjudicated upon in the judgment of Mr Justice Julian Knowles of 20 September 2022 [or any judgment arising out of this Application]. A copy of the judgment[s] can be found on the RWI Updated Website;

(c) A written Defence responding to the allegations set out in the Particulars of Claim (to the extent in the Defendant's knowledge); and

(d) A witness statement(s) (verified by a statement of truth) containing and/or appending all the evidence to be relied upon in support of the application for permission and Defence (i.e. evidence explaining the basis for contesting the claim).

5. Thereafter the Claimants shall have 14 days after service of the Defence to file and serve any evidence in reply.

6. The Court shall then list a hearing date for a Case Management Conference, at which it will:

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>

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

- (a) determine the application for permission to contest the Order and to bring the matter to trial; and
- (b) should the application for permission be successful, 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.

7. Further:

- a. The Claimants shall prepare an electronic hearing bundle for the hearing and provide the Defendant(s) with access to the bundle not less than 14 days before the hearing.
- b. At the hearing, the Court shall consider whether injunctive relief shall be continued against any or all of the Defendants, whether on an interim or final basis.
- c. Any further application by the Claimants to add further named defendants, to have final relief granted against any Defendant(s) without trial pursuant to CPR r.3.5 and/or otherwise to amend its claim shall be determined at the hearing.
- d. The need for and form of any further case management directions through to trial or any further hearing shall be considered.

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/>~~

~~Chancery Division Guide: <https://www.gov.uk/government/publications/chanceryguide>~~

~~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>~~

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

HER HONOUR JUDGE EMMA KELLY

Between:



QB-2022-BHM-000044

(1) HIGH SPEED TWO (HS2) LIMITED

(2) THE SECRETARY OF STATE FOR TRANSPORT

Claimants

-and-

- (1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND KNOWN AS LAND AT CASH'S PIT, STAFFORDSHIRE SHOWN COLOURED ORANGE ON PLAN A ANNEXED TO THE ORDER DATED 11 APRIL 2022 ("THE CASH'S PIT LAND")
- (2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND ACQUIRED OR HELD BY THE CLAIMANTS IN CONNECTION WITH THE HIGH SPEED TWO RAILWAY SCHEME SHOWN COLOURED PINK, AND GREEN ON THE HS2 LAND PLANS AT <https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings> ("THE HS2 LAND") WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES
- (3) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS
- (4) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS
- (5) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE) AND 58 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM

Defendants

DIRECTIONS ORDER

CORE-B-231

BEFORE Her Honour Judge Emma Kelly, sitting as a Judge of the High Court, and considering the matter on paper on 15 March 2023

UPON the Order of Mr Justice Julian Knowles made on 20 September 2022 (“**Injunction Order**”) requiring at paragraph 15 reconsideration of the injunction on approximately a yearly basis.

AND UPON the Court noting the requirement in paragraph 15 of the Injunction Order that the Claimants are required to “place details of any such hearing on the HS2 Proceedings Website”

AND UPON the Court having listed a review hearing to take place on 16 May 2023 at the High Court in Birmingham at which the reconsideration of the Injunction Order will take place including any application made by parties to the proceedings (“**the Review**”)

AND UPON the Court reading the Certificate of Service dated 21 February 2023 filed by the Claimants confirming that the Notice of Review Hearing has been placed on the HS2 Proceedings Website

AND UPON the Claimants’ application for directions by Application Notice dated 10 March 2023.

AND UPON the Court noting that the HS2 Proceedings Website has reached capacity and is unable to hold further substantial documents relating to this case.

IT IS ORDERED THAT:

Definitions

1. In this Order, the following defined terms shall apply:
 - a. The “HS2 Proceedings Website” means the webpages at: <https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings>.
 - b. The “RWI Updated Website” means the webpages at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.
 - c. The term “Defendants” refers to all Defendants 1 – 63.
 - d. The term “Named Defendants” means D5 to D63 whose names appear in Annex A of the Injunction Order (and copied in full at Annex A of this Order for convenience).
 - e. 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.
 - f. The “Review Documents” means all the documents filed with the Court by the Claimants for the Review, including this Order and the Application Notice dated 10 March 2023.

The Websites

2. The Claimants shall forthwith place a notice on the HS2 Proceedings Website stating that in future documents will be uploaded to the RWI Updated Website and include a link to the RWI Updated Website.
3. The Claimants shall forthwith place copies of all documents already uploaded to the HS2 Proceedings Website onto the RWI Updated Website.
4. The Claimants shall retain the HS2 Proceedings Website unless and until the Court considers that at some future date it is no longer necessary to do so.

Service by Alternative Method – Review Documents

5. The Court will provide sealed copies of this Order to the Claimants' solicitors for service (whose details are set out below). The Claimants shall advertise the existence of this Order in a prominent location on the HS2 Proceedings Website and the RWI Updated Website, together with a link to download an electronic copy of this Order.
6. Pursuant to CPR r. 6.27 and r. 81.4, personal service is dispensed with and service of the Review Documents upon the Defendants shall be by:
 - a. placing the Review Documents on the RWI Updated Website.
 - b. causing an advertisement advertising the date of the Review in the *Times* and *Guardian* newspapers, and in particular advertising the web address of the RWI Updated Website.
 - c. where permission is granted by the relevant authority, by causing to be placed an advertisement and/or a hard copy of this Order within 14 libraries approximately every 10 miles along the route of the HS2 Scheme. In the alternative, if permission is not granted, the Claimants shall use reasonable endeavours to place advertisements on local parish council notice boards in the same approximate locations.
 - d. causing to be made social media posts on the HS2 twitter and Facebook pages advertising the date of the Review and the web address of the HS2 RWI Updated Website.
7. Compliance with paragraphs 6(a), (b) and (c) above will be good and sufficient service on the Defendants and each of them.

8. The Claimants shall email a copy of the Order to the solicitors for D6 and any other party who has at the date hereof provided an email address to the Claimants to the email addresses: HS2Injunction@governmentlegal.gov.uk or HS2Injunction@dlapiper.com.

Further Case Management

9. The Review has been listed for one day at 10.30am on Tuesday 16 May 2023 in the High Court in Birmingham, The Priory Courts, 33 Bull Street, Birmingham B4 6DS.
10. Any person, other than a Named Defendant (D5 – D63), who wishes to address the Court at the Review must inform the Court and the Claimants of their intention to attend by 4pm on 12 May 2023 at the addresses listed in paragraphs 23 and 24 below.
11. By 4pm on 27 March 2023, the Claimants' must file and serve (in accordance with paragraph 6(a) above) any applications relevant to the Review, a draft order, and any evidence upon which they seek to rely.
12. By 4pm on 11 April 2023, any person seeking to amend (including discharge) the Injunction Order, or oppose any applications made by the Claimants, must file and serve a statement of case and any evidence upon which that person seeks to rely by emailing or posting it to the Court and the Claimants at the addresses listed below. At the same time and date, any party requiring any of the Claimants' witnesses to attend for cross-examination are to give notice of the name of the witness required together with the reasons why that person is required. For the avoidance of doubt, whether live evidence will be permitted will remain to be determined by the Court.
13. By 4pm on 17 April 2023, the Claimants' have permission to file and serve any evidence in response to any statement of case or evidence filed in accordance with paragraph 12 above if so advised.
14. By 4pm on 18 April 2023, the Claimants shall cause to be placed on the RWI Updated Website a draft hearing bundle index.
15. By 4pm on 21 April 2023, any person who wishes to comment on the draft hearing bundle must notify the Claimants of their comments by email to the address in paragraph 24 below. Any person may provide suggested documents for inclusion to the Claimants. Where there is disagreement between the Claimants and that person as to the relevance of any document, that disagreement will be noted in the hearing bundle index and the document shall be provided to

the Court in a separate bundle by the person seeking to rely upon it, with reasons provided as to the document's relevance.

16. By 4pm on 8 May 2023, the Claimants shall file and serve a properly paginated and indexed hearing bundle to the Court by email and in hard copy, and shall cause to be placed on the RWI Updated Website a copy of the same. The electronic copy of the bundle must be bookmarked and have a hyperlinked index.
17. By 4pm on 10 May 2023, the Claimants and any other person seeking to address the Court at the Review shall file and serve any skeleton argument or speaking note.
18. The Claimants otherwise have liberty to apply to extend or vary this Order or for further directions.
19. Costs reserved.

Documents in the Claim and Application

20. All documents relating to the underlying proceedings may be downloaded at: <https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings>.
21. All documents relating to this application and the Review may be downloaded at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.
22. A single hard copy of any document will be sent within 21 days of the receipt of a reasonable request for that document or documents via the Claimants' solicitors whose contact details are set out below so long as any requests include a postal address and the full name of the requestor.

Communications with Claimants and the Court

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

Birmingham District Registry
Birmingham Civil and Family Justice Centre
The Priory Courts
33 Bull Street
Birmingham
B4 6DS

E: kb.birmingham@justice.gov.uk
T: 0121 681 3033
DX: 701987 Birmingham 7

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

FAO: HS2 TEAM
DLA PIPER UK LLP
1 St Paul's Place
Sheffield
S1 2JX

E: HS2Injunction@dlapiper.com
T: 0114 283 3312
DX: 708580 Sheffield 10
Ref: RXS/380900/378

25. This order has been made by the Court pursuant to CPR 23.9 as the Court has disposed of an application without service of a copy of the application notice. Any person not served with a copy of the application notice before the order was made may apply to have the order set aside or varied, with any such application to be made within 7 days after the date on which this order was served on the person making the application.

BY THE COURT

15 MARCH 2023

ANNEX A – NAMED DEFENDANTS

PART 1

DEFENDANT NUMBER	UNNAMED DEFENDANTS
(1)	PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND KNOWN AS LAND AT CASH’S PIT, STAFFORDSHIRE SHOWN COLOURED ORANGE ON PLAN A ANNEXED TO THE ORDER DATED 11 APRIL 2022 (“THE CASH’S PIT LAND”)
(2)	PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER LAND ACQUIRED OR HELD BY THE CLAIMANTS IN CONNECTION WITH THE HIGH SPEED TWO RAILWAY SCHEME SHOWN COLOURED PINK, AND GREEN ON THE HS2 LAND PLANS AT https://www.gov.uk/government/publications/hs2-route-wide-injunction-proceedings (“THE HS2 LAND”) WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES
(3)	PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS
(4)	PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS

For the avoidance of doubt, any person who has been a defendant in these proceedings, or who has given undertakings to HS2, may nevertheless become Defendant 1 – Defendant 4 as a person unknown if they commit any of the prohibited acts.

PART 2

DEFENDANT NUMBER	NAMED DEFENDANTS
(5)	Mr Ross Monaghan (aka Squirrel / Ash Tree)
(6)	Mr James Andrew Taylor (aka Jimmy Knaggs / James Knaggs / Run Away Jim)
(7)	Ms Leah Oldfield
(8)	Not Used
(9)	Not Used
(10)	Not Used
(11)	Mr Tony Carne
(12)	Ms Amy Lei
(13)	Mr Tom Holmes
(14)	Not Used
(15)	Not Used
(16)	Ms Karen Wildin (aka Karen Wilding / Karen Wilden / Karen Wilder)
(17)	Mr Andrew McMaster (aka Drew Robson)
(18)	Mr William Harewood (aka Satchel / Satchel Baggins)
(19)	Mr Harrison Radcliffe (aka Log / Bir_Ch / Sasha James)
(20)	Mr George Keeler (aka C Russ T Chav / Flem)
(21)	Mr William French (aka Will French / Took)
(22)	Mr Tristan Dixon (aka Tristan Dyson)
(23)	Mx Scarlett Rien (aka Leggs)
(24)	Not Used
(25)	Not Used
(26)	Not Used
(27)	Mr Lachlan Sandford (aka Laser / Lazer)
(28)	Mr Scott Breen (aka Scotty / Digger Down)
(29)	Not Used
(30)	Not Used
(31)	Mr Rory Hooper
(32)	Not Used
(33)	Mr Elliot Cuciurean (aka Jellytot)
(34)	Mr Paul Sandison
(35)	Not Used
(36)	Mr Mark Keir
(37)	Mr Thorn Ramsey (aka Virgo Ramsay)
(38)	Mr Vajda Robert Mordechaj

DEFENDANT NUMBER	NAMED DEFENDANTS
(39)	Mr Iain Oliver (aka Pirate)
(40)	Ms Jess Walker
(41)	Mr Matt Atkinson
(42)	Ms Hannah Bennett
(43)	Mr James Ruggles (aka Jimmy Ruggles)
(44)	Mr Nick Grant (aka Potts)
(45)	Mr Stuart Ackroyd
(46)	Ms Wiktoria Paulina Zieniuk
(47)	Not Used
(48)	Mr Conner Nichols
(49)	Mr Sebastian Roblyn Maxey
(50)	Ms Jessica Heathland-Smith
(51)	Ms Ella Dorton
(52)	Mr Karl Collins
(53)	Mr Sam Goggin
(54)	Not Used
(55)	Not Used
(56)	Not Used
(57)	Ms Samantha Smithson (aka Swan / Swan Lake)
(58)	Mr Jack Charles Oliver
(59)	Ms Charlie Inskip
(60)	Mr Xavier Gonzalez Trimmer
(61)	Mr David Buchan (aka David Holliday)
(62)	Ms Leanne Swateridge (aka Leayn / Flowery Zebra)
(63)	Mr Dino Misina (aka Hedge Hog)

Mary Barraclough

From: Michael Fry <Michael.Fry@ftbchambers.co.uk>
Sent: 19 February 2024 16:37
To: Robert Shaw; Jonathan Welch
Subject: FW: HS2 injunction.
Attachments: RWI Review Order - AMENDED SSOG(16 May 2023)(126363518.1) -OG (002) (DLA Amends - 17.05.2023)(126397323.2).docx

****EXTERNAL****

Michael Fry
Barrister

M: 07973 286191

From: Stephen Simblet KC <stephens@gclaw.co.uk>
Sent: Friday, May 19, 2023 9:39 AM
To: Richard Kimblin KC <rk@no5.com>; Michael Fry <Michael.Fry@ftbchambers.co.uk>; Owen Greenhall <oweng@gclaw.co.uk>
Cc: Nicola Hall <nhall@robertlizar.com>
Subject: HS2 injunction.

Hello Richard and Michael,

We have taken instructions, and can put forward the above draft as one that our client would agree if your clients will.

We have reconsidered your draft order, which as I am sure you appreciate had in addition to the body of the order significant changes made to schedule A etc . As to the latter, while I can see why *your clients* want the order lined up like that, there has to be an opportunity for defendants (including everyone in the world that is not currently a named defendant) or others to dispute it. As I am sure you are aware from Barking, where there are three separate references to CPR Part 40.9 as being a way of making such injunctions fair, to enable that to be used if appropriate by non- parties. Ritchie J decided something similar in the Esso case, around six months ago.

As to the rest of it:

- (i) The “railway purposes” part of it is necessary, as your clients’ powers to obtain and use land, particularly on a temporary basis, are defined by

statute and where they are having the benefit of an anticipatory injunction, such must be limited to the purposes for which they have been given those extensive powers of land acquisition, which are defined in the (two separate) HS2 Acts;

- (ii) The injunction needs to reflect the temporary nature of HS2 interests, which is why we had used “temporary” in our wording and putting it back in.
- (iii) The notification requirements in relation to land ought to require HS2 to take the same steps to alert people that the land is no longer within their temporary control as they need to alert people to it becoming in it. Otherwise, HS2 maintains injunctions, founded in property rights that they do not have, in relation to land that they are no longer using. Or to put it bluntly, if the purpose of the injunctions is to stop people “causing mayhem” while works are being carried out, HS2 should be telling people that they are no longer using the land when they stop using it. It is for that reason that we suggest that the notification and plans that land is no longer being used is given at the same time as HS2 seeks to notify additional land being used.
- (iv) This ought, by keeping the land affected appropriately under review, to reduce the complications around considering which portions of land should be covered or not at review hearings, and getting into tedious disputes about that. Essentially, doing it this way allows you to construct a mechanism by which the land currently needed for HS2 projects is available for those projects.

I hope this helps, and that you can agree this. We agree the “no order for costs” I doubt that much will be gained in much back and forward on footling points about the order, so have tried to take a pragmatic view at this stage.

Stephen

Stephen Simblet KC, Barrister
Garden Court Chambers
57-60 Lincoln's Inn Fields, London, WC2A 3LJ
DX: 34 London Chancery Lane
Twitter: @GardenCourtLaw @GardenCtPublic @GCCHousing @GCCivillibs
Switchboard: 020 7993 7600 | Direct Tel: 020 7993 7852
My Profile: <https://www.gardencourtchambers.co.uk/barristers/stephen-simblet-kc/sao>





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Michael Fry

Please consider the environment before printing this email

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Inner Temple

London EC4Y 7BY

DX: 402 LDE **Tel:** 020 7353 8415 **Fax:** 020 7353 7622

clerks@ftbchambers.co.uk

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Claim no: QB-2022-BHM-000044

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

Before: ~~Mr/Mrs Justice Ritchie~~
On: 16 May 2023

Between:

(1) HIGH SPEED TWO (HS2) LIMITED
(2) THE SECRETARY OF STATE FOR TRANSPORT
Claimants/Applicants

-and-

- (1) NOT USED
- (2) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER THE HS2 LAND WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES
- (3) PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS
- (4) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS
- (5) MR ROSS MONAGHAN (AKA SQUIRREL / ASH TREE)

AND 62 OTHER NAMED DEFENDANTS AS SET OUT IN THE SCHEDULE TO THE PARTICULARS OF CLAIM

~~(68) PERSONS UNKNOWN BY UNLAWFUL MEANS OBSTRUCTING, IMPEDING, HINDERING, OR DELAYING WORKS OR ACTIVITIES AUTHORISED BY THE HS2 ACTS, IN EXPRESS OR IMPLIED AGREEMENT OR COMBINATION WITH ANOTHER PERSON WITH THE INTENTION OF CAUSING DAMAGE TO THE CLAIMANTS~~

Defendants/Respondents

ORDER

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.

A Defendant who is an individual who is ordered not to do something must not do it himself/herself or in any other way. He/she must not do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

FURTHER TO the Orders made in these proceedings by Julian Knowles J on 20 September 2022 (the “**Injunction Order**”) and by HHJ Kelly on 16 March 2023 (the “**Directions Order**”)

AND UPON the Claimants’ application by Application Notice dated 27 March 2023 pursuant to the provisions at paragraphs 15 and 20 of the Injunction Order (“**March 2023 Application**”).

AND UPON the Court accepting the Claimants’ renewed undertaking that they 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.

AND UPON the Claimants’ renewed confirmation that this Order is not intended to prohibit lawful protest which does not involve trespass upon the HS2 Land and does not block, slow down, obstruct or otherwise interfere with the Claimants’ access to or egress from the HS2 Land.

AND UPON the Claimants’ renewed confirmation that they do not intend for any freeholder or leaseholder with a lawful interest in the HS2 Land to fall within the Defendants to this Order, and undertaking not to make any committal application in respect of a breach of this Order, where the breach is carried out by a freeholder or leaseholder with a lawful interest in the HS2 Land on the land upon which that person has an interest.

AND UPON the Claimants’ renewed confirmation that this Order is not intended to act against any guests or invitees of any freeholders or leaseholders with a lawful interest in the HS2 Land unless that

guest or invitee undertakes actions with the effect of damaging, delaying or otherwise hindering the HS2 Scheme on the land held by the freeholder or leaseholder with a lawful interest in the HS2 Land.

AND UPON HEARING Counsel for the Claimants, Mr Richard Kimblin KC and Mr Michael Fry;
Mr Stephen Simblet KC and Mr Owen Greenhall for D6, ~~Counsel for a Defendant~~ ~~the Defendants in person and various non-Defendants in person~~ and Mr Mark Keir and Ms Caroline Thomson-Smith in person (“Review Hearing”).

AND UPON the Claimants withdrawing after the hearing their application to join Ms Caroline Thomson- Smith as a named Defendant.

IT IS ORDERED THAT:

Definitions

1. In this Order, the following defined terms shall apply:

- (a) The “RWI Updated Website” means the webpages at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.
- (b) The “Named Defendants” means D5 to D6~~57~~ whose names appear in Annex A.
- (c) The “Defendants” refers to all Defendants.

(d) The “March 2023 HS2 Land Plans” means the updated plans which illustrate the land of which the Claimants are entitled to possession for “Rail Act purposes” and which the Claimants shall update from time to time to include:
(i) further land of which they have become entitled to possession for Rail Act purposes and
(ii) to remove land of which they are no longer entitled to possession for Rail Act purposes.

(e) The “HS2 Land” means:
i) 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 ~~March 2023~~ HS2 Land Plans which are available electronically on the RWI Updated Website;
and
ii) any land over which the First Claimant has exercised Land which is taken into temporary or permanent possession by the Claimants using its powers

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~~under Part 2 of Schedule 4 (Interference with Highways) of the HS2 Acts (Interference with Highways) for Rail Act purposes.~~

~~(f)~~ The “HS2 Acts” are the High Speed Rail (London – West Midlands) Act 2017 and the High Speed Rail (West Midlands – Crewe) Act 2021.

~~(e)(g)~~ “Rail Act purposes” means “Phase One purposes” as defined in section 67 of the the High Speed Rail (London – West Midlands) Act 2017 and “Phase 2A purposes” as defined in section 61 of the High Speed Rail (West Midlands – Crewe) Act 2021

Amendments to the Claim

2. The Claimants have permission:

~~i)~~ To amend the description of the HS2 Land to refer to the land illustrated in the March 2023 HS2 Land Plans ~~and any land over which the First Claimant has exercised its powers under Part 2 of Schedule 4 of the HS2 Acts (Interference with Highways); taken into temporary or permanent possession using its powers under Part 2 of Schedule 4 of the HS2 Acts (Interference with Highways) for Rail Act purposes.~~

~~(a)(b)~~

~~(b)(c)~~ To amend the description of D2 to refer to the HS2 Land.

~~(e)(d)~~ To remove Named Defendants to the Claim where expedient namely: D11 - 13, 18, 19, 21, 23, 31, 34, 37, 38, 40 – 46, 49 - 53, 60 – 62, and 65.

~~(d)~~ To add D66 Caroline Thomson-Smith (aka Carl Woods) as a new defendant to the Claim

~~(e)~~ To add D67 Christopher Paul Butcher (aka Rob) as a new defendant to the Claim

~~(f)~~ To add D68 as a new defendant to the Claim: PERSONS UNKNOWN BY UNLAWFUL MEANS OBSTRUCTING, IMPEDING, HINDERING OR DELAYING WORKS OR ACTIVITIES AUTHORISED BY THE HS2 ACTS, IN EXPRESS OR IMPLIED AGREEMENT OR COMBINATION WITH ANOTHER PERSON WITH THE INTENTION OF CAUSING DAMAGE TO THE CLAIMANTS

~~(g)~~ To make consequential amendments to the Amended Particulars of Claim arising from the March 2023 Application including adding a further prohibition preventing the Defendants from obstructing, impeding, hindering, or delaying works or activities authorised by the HS2 Acts by unlawful means, in express or implied agreement or in combination with another person with the intention of causing damage to the Claimants and removing those paragraphs of the Amended Particulars of Claim which are no longer pertinent to the Claim.

~~(h)~~(e) To amend the Amended Particulars of Claim dated 26 April 2022 to give effect to 2(a) – ~~(c)~~ above.

Injunction in force

3. With immediate effect, and until 23.59 on 31 May 2024 unless varied, discharged or extended by further order, the Defendants and each of them are forbidden from doing the following:
 - (a) entering or remaining upon the HS2 Land;
 - (b) deliberately obstructing or otherwise interfering with the free movement of vehicles, equipment or persons accessing or egressing the HS2 Land; or
 - (c) interfering with any ~~sign~~, fence or gate on or at the perimeter of the HS2 Land; ~~or~~
 - ~~(d) by unlawful means obstructing, impeding, hindering, or delaying works or activities authorised by the HS2 Acts, in express or implied agreement or combination with another person with the intention of causing damage to the Claimants.~~

4. Nothing in paragraph 3 of this Order:
 - (a) Shall prevent any person from exercising their rights over any open public right of way over the HS2 Land.
 - (b) Shall affect any private rights of access over the HS2 Land.
 - (c) Shall prevent any person from exercising their lawful rights over any public highway.
 - (d) Shall extend to any person holding a lawful freehold or leasehold interest in land over which the Claimants have taken temporary possession.
 - (e) Shall extend to any interest in land held by statutory undertakers.

5. For the purposes of paragraph 3(b) prohibited acts of obstruction and interference shall include (but not be limited to):
 - (a) standing, kneeling, sitting or lying or otherwise remaining present on the carriageway when any vehicle is attempting to turn into the HS2 Land or attempting to turn out of the HS2 Land in a manner which impedes the free passage of the vehicle;
 - (b) digging, erecting any structure or otherwise placing or leaving any object or thing on the carriageway which may slow or impede the safe and uninterrupted passage of vehicles or persons onto or from the HS2 Land;
 - (c) affixing or attaching their person to the surface of the carriageway where it may slow or impede the safe and uninterrupted passage of vehicles onto or from the HS2 Land;

- (d) affixing any other object to the HS2 Land which may delay or impede the free passage of any vehicle or person to or from the HS2 Land;
 - (e) climbing on to or affixing any object or person to any vehicle in the vicinity of the HS2 Land; and
 - (f) deliberate slow walking in front of vehicles in the vicinity of the HS2 Land.
6. For the purposes of paragraph 3(c) prohibited acts of interference shall include (but not be limited to):
- (a) cutting, damaging, moving, climbing on or over, digging beneath, or removing any items affixed to, any temporary or permanent fencing or gate on or at the perimeter of the HS2 Land;
 - (b) the prohibition includes carrying out the aforementioned acts in respect of the fences and gates; and
 - (c) interference with a gate includes drilling the lock, gluing the lock or any other activities which may prevent the use of the gate.

Service by Alternative Method – This Order

7. The Court will provide sealed copies of this Order to the Claimants' solicitors for service (whose details are set out below).
8. Pursuant to CPR r.6.27 and r.81.4:
- (a) The Claimants shall serve this Order upon the Second, Third and, Fourth ~~and Sixty Eighth~~ Defendants by:
 - i) Advertising the existence of this Order in the Times and Guardian newspapers, and in particular advertising the web address of the RWI Updated Website, and direct link to this Order.
 - ii) Where permission is granted by the relevant authority, by placing an advertisement and/or a hard copy of the Order within 14 libraries approximately every 10 miles along the route of the HS2 Scheme. In the alternative, if permission is not granted, the Claimants shall use reasonable endeavours to place advertisements on local parish council notice boards in the same approximate locations.

iii) Publishing social media posts on the HS2 Twitter and Facebook platforms advertising the existence of this Order and providing a link to the RWI Updated Website.

- (b) Service of this Order on Named Defendants may be effected by personal service where practicable and/or posting a copy of this Order through the letterbox of each Named Defendant (or leaving in a separate mailbox), with a notice drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing this Order may be affixed to or left at the front door or other prominent feature marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The notices shall be given in prominent lettering in the form set out in Annex B. It is open to any Defendant to contact the Claimants to identify an alternative place for service and, if they do so, it is not necessary for a notice or package to be affixed to or left at the front door or other prominent feature.
- (c) The Claimants shall further advertise the existence of this Order in a prominent location on the RWI Updated Website, together with a link to download an electronic copy of this Order.
- (d) The Claimants shall email a copy of this Order to solicitors for D6 and any other party who has as at the date hereof provided an email address to the Claimants to the email address: HS2Injunction@governmentlegal.gov.uk or hs2injunction@dlapiper.com.

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9. Service in accordance with paragraph 8 above shall:

- (a) be verified by certificates of service to be filed with Court;
- (b) be deemed effective as at the date of the certificates of service; and
- (c) be good and sufficient service of this Order on the Defendants and each of them and the need for personal service be dispensed with.

10. The obligation on the Claimants to update the March 2023 Land Plans shall require the Claimants to discharge the updating obligations in relation to 2d(i) and 2d(ii) simultaneously.

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11. Insofar as this order applies to land under 1(e)(ii) above, namely land over which the First Claimant has taken into temporary possession using ~~exercised~~ its powers under Part 2 of Schedule 4 (Interference with Highways) of the HS2 Acts, a copy of this Order shall be

displayed at prominent locations on the land in question clearly identifying the land, or portion of land, which is affected:

~~which is taken into temporary or permanent possession by the Claimants using powers under Part 2 of Schedule 4 (Interference with Highways) of the HS2 Acts for Rail Act purposes, the land shall be clearly demarcated and signs of the order shall be affixed to posts at prominent locations at each site.~~

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~~10.12.~~ Although not expressed as a mandatory obligation due to the transient nature of the task, the Claimants will seek to maintain copies of this Order on areas of the HS2 Land in proximity to potential Defendants, such as on the gates of construction compounds or areas of the HS2 Land known to be targeted by objectors to the HS2 Scheme.

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~~11.13.~~ Further, without prejudice to paragraph ~~89~~, while this Order is in force, the Claimants shall take all reasonably practicable steps to effect personal service of the Order upon any Defendant of whom they become aware is, or has been, on the HS2 Land without consent and shall verify any such service with further certificates of service (where possible if persons unknown can be identified) to be filed with Court.

Further Case Management

~~14.~~ This Order will be reconsidered at a hearing to be listed on approximately a yearly basis between 15 and 31 May to determine whether there is a continued threat which justifies continuation of this Order (**“Yearly Review”**), but nothing in this order is intended to absolve the Claimants of their obligation to progress their claim expeditiously.

~~12.15.~~ It will be the Claimants’ responsibility to apply for listing of ~~arrange such a hearing and the~~ Yearly Review and to place details of ~~any such hearing~~ the date of the Yearly Review on the RWI Updated Website. At Schedule A are directions which will apply to the next Yearly Review. Parties are advised to consider them carefully.

~~13.16.~~ Without prejudice to the foregoing, any 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 (and in any event not less than 48 hours before the hearing of any such application) via the contact details set out below. Schedule ~~A-B~~ to this Order indicates the process which must be followed for any such application. Useful sources of support and information are listed in Schedule C.

~~14.~~17. 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 [or an application under CPR Part 40.9](#) (unless they are already named as a defendant~~Defendant~~).

~~15.~~ Any Named Defendant or other person who believes that they will or might bring themselves within the definition of the “persons unknown” by their conduct and who wishes to oppose these proceedings and bring them to trial should file an Acknowledgment of Service pursuant to CPR Part 8.3 and serve a copy on the Claimants’ solicitors via the email address set out in paragraph ~~265~~ below. Schedule B ~~D~~ to this Order indicates the process which must be followed.

~~16.~~ Any Defendant who fails to comply with paragraph ~~157~~ above shall not be permitted to defend these proceedings or take any further role in these proceedings without further order of the Court and shall be liable to have injunctive relief continued against them without trial pursuant to CPR r.3.5.

~~17.~~18. The Claimants [and named Defendants](#) otherwise have liberty to apply to extend or vary this Order or for further directions.

~~18.~~19. Save as provided for above, the Claim be stayed generally with liberty to restore.

Costs

~~19.~~20. There be no order as to costs as between any of the parties to the Review Hearing.

~~20.~~21. 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.

Documents in the Claim and Application

~~21.~~22. All documents relating to these proceedings and this Order may be downloaded at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

~~22.~~23. A single hard copy of any document will be sent within 21 days of the receipt of a reasonable request for that document or documents via the Claimants’ solicitors whose contact details are set out below so long as any requests include a postal address and the full name of the requestor.

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Communications with Claimants and the Court

~~23-24.~~ 24. All communications to the Court about this Order (which should quote the case number) should be sent to:

Birmingham District Registry
Civil Justice Centre
Priory Courts
33 Bull Street
Birmingham
B4 6DSW

E: qb.birmingham@justice.gov.uk
T: 0121 681 4441
F: 01264 785 131
DX: 701987 Birmingham 7

~~24-25.~~ 25. Any person who wishes to view or download copies of the documents shall contact the Claimants' solicitors via the contact details below.

~~25-26.~~ 26. The Claimants' solicitors and their contact details are:

FAO: HS2 TEAM
DLA PIPER UK LLP
1 St Paul's Place
Sheffield
S1 2JX

E: HS2Injunction@dlapiper.com
T: 0114 283 3312
DX: 708580 Sheffield 10
Ref: RXS/380900/401

BY THE COURT

MADE ON [DATE]

ANNEX A – SCHEDULE OF DEFENDANTS

PART 1

DEFENDANT NUMBER	UNNAMED DEFENDANTS
(1)	Not used
(2)	PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS ON, IN OR UNDER THE HS2 LAND WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES
(3)	PERSONS UNKNOWN OBSTRUCTING AND/OR INTERFERING WITH ACCESS TO AND/OR EGRESS FROM THE HS2 LAND IN CONNECTION WITH THE HS2 SCHEME WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT, WITH THE EFFECT OF DAMAGING AND/OR DELAYING AND/OR HINDERING THE CLAIMANTS, THEIR AGENTS, SERVANTS, CONTRACTORS, SUBCONTRACTORS, GROUP COMPANIES, LICENSEES, INVITEES AND/OR EMPLOYEES WITHOUT THE CONSENT OF THE CLAIMANTS
(4)	PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE PERIMETER OF THE HS2 LAND, OR DAMAGING, APPLYING ANY SUBSTANCE TO OR INTERFERING WITH ANY LOCK OR ANY GATE AT THE PERIMETER OF THE HS2 LAND WITHOUT THE CONSENT OF THE CLAIMANTS
(68)	PERSONS UNKNOWN BY UNLAWFUL MEANS OBSTRUCTING, IMPEDING, HINDERING OR DELAYING WORKS OR ACTIVITIES AUTHORISED BY THE HS2 ACTS, IN EXPRESS OR IMPLIED AGREEMENT OR COMBINATION WITH ANOTHER PERSON WITH THE INTENTION OF CAUSING DAMAGE TO THE CLAIMANTS

For the avoidance of doubt, any person who has been a defendant in these proceedings, or who has given undertakings to HS2, may nevertheless become Defendant ~~4~~ – Defendant 4 or Defendant 68 as a person unknown if they commit any of the prohibited acts.

PART 2

DEFENDANT NUMBER	NAMED DEFENDANTS
(5)	Mr Ross Monaghan (aka Squirrel / Ash Tree)
(6)	Mr James Andrew Taylor (aka Jimmy Knaggs / James Knaggs / Run Away Jim)
(7)	Ms Leah Oldfield
(8)	Not Used
(9)	Not Used
(10)	Not Used
(11)	Not Used
(12)	Not Used
(13)	Not Used
(14)	Not Used
(15)	Not Used
(16)	Ms Karen Wildin (aka Karen Wilding / Karen Wilden / Karen Wilder)
(17)	Mr Andrew McMaster (aka Drew Robson)
(18)	Not Used
(19)	Not Used
(20)	Mr George Keeler (aka C Russ T Chav / Flem)
(21)	Not Used
(22)	Mr Tristan Dixon (aka Tristan Dyson)
(23)	Not Used
(24)	Not Used
(25)	Not Used
(26)	Not Used
(27)	Mr Lachlan Sandford (aka Laser / Lazer)
(28)	Mr Scott Breen (aka Scotty / Digger Down)
(29)	Not Used
(30)	Not Used
(31)	Not Used
(32)	Not Used
(33)	Mr Elliot Cuciurean (aka Jellytot)
(34)	Not Used
(35)	Not Used
(36)	Mr Mark Keir
(37)	Not Used
(38)	Not Used
(39)	Mr Iain Oliver (aka Pirate)

DEFENDANT NUMBER	NAMED DEFENDANTS
(40)	Not Used
(41)	Not Used
(42)	Not Used
(43)	Not Used
(44)	Not Used
(45)	Not Used
(46)	Not Used
(47)	Not Used
(48)	Mr Conner Nichols
(49)	Not Used
(50)	Not Used
(51)	Not Used
(52)	Not Used
(53)	Not Used
(54)	Not Used
(55)	Not Used
(56)	Not Used
(57)	Ms Samantha Smithson (aka Swan / Swan Lake)
(58)	Mr Jack Charles Oliver
(59)	Ms Charlie Inskip
(60)	Not Used
(61)	Not Used
(62)	Not Used
(63)	Mr Dino Misina (aka Hedge Hog)
(64)	Stefan Wright (aka Albert Urtubia)
(65)	Not Used
(66)	Caroline Thompson Smith (aka Carl Woods)
(67)	Christopher Paul Butcher (aka Rob)

ANNEX B – WORDING FOR NOTICES

[On the package containing the Order]

“VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CONTACT –

FAO: HS2 TEAM
DLA PIPER UK LLP
1 St Paul’s Place
Sheffield
S1 2JX

E: HS2Injunction@dlapiper.com
T: 0114 283 3038
DX: 708580 Sheffield 10
R: RXS/380900/401

All documents relating to these proceedings and this Order may be downloaded at:
<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>”

SCHEDULE A – DIRECTIONS FOR ~~YEARLY~~ REVIEW

Definitions

1. In these Directions, the following defined terms shall apply:
 - a. The “RWI Updated Website” means the webpages at: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.
 - b. The term “Defendants” refers to all Defendants, both named and persons unknown, and (b) above will be good and sufficient service on the Defendants and each of them.
2. The Claimants shall email a copy of this Order to solicitors for D6 and any other party who has as at the date hereof provided an email address to the Claimants to the email addresses: HS2Injunction@governmentlegal.gov.uk or HS2Injunction@dlapiper.com.

Further Case Management

3. The Yearly Review will be listed for one day at 10.30am on a date between 15 and 31 May 2024 in the High Court in Birmingham at a date, after consultation by the court with the parties, convenient to counsel for any named party.
4. Any person who wishes to address the Court at the Review must inform the Court and the Claimants of their intention to attend by 4pm on 10 May 2024 at the addresses at paragraphs 24 and 26 of the Order.
5. By 4pm on ~~22~~ 21 March 2024, the Claimants’ must file and serve (in accordance with paragraph 3(a) above) any applications relevant to the Yearly Review, a draft order, and any evidence upon which they seek to rely.
6. By 4pm on 5 April 2024, any person seeking to amend (including discharge) the Order, or oppose any applications made by the Claimants, must file and serve their written reasons in a document ~~a written statement of case and any~~ and to indicate whether they intend to adduce evidence upon which that person seeks to rely by emailing or posting it to the Court and the Claimants at the addresses listed at paragraphs 24 and 26 of the Order. ~~Any such person must~~
~~—explain clearly within their written statement of case the differences between their case and the issues which the Court has already adjudicated upon in the judgment of Mr Justice Julian Knowles of 20 September 2022, and any further judgment arising out of these proceedings. A copy of any judgment[s] can be found on the RWI Updated Website;~~

~~Provide a witness statement(s) verified by a statement of truth containing and/or appending all of the evidence to be relied upon in support of the application/opposition; and~~

~~If the evidence amounts to more than 2,000 words or more than three documents/other evidence, a short summary of less than 1,000 words explaining in simple terms the points they wish to make to the Court.~~

7. At the same time and date, any party requiring any of the Claimants' witnesses to attend for cross-examination are to give notice of the name of the witness required together with the reasons why that person is required. For the avoidance of doubt, whether live evidence will be permitted will remain to be determined by the Court.

8. Any evidence upon which a Defendant or other Applicant wishes to rely must be filed by 4 p.m on 19th April 2024.

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9. By 4pm on 26th April 2024 on 19 April 2024, the Claimants have permission to file and serve (in accordance with paragraph 3(a) above) any evidence in response to any ~~statement of case~~ document or evidence filed in accordance with paragraph 8 above if so advised.

Formatted: Superscript

10. By 4pm on 22 April 3rd May 2024, the Claimants shall cause to be placed on the RWI Updated Website a draft hearing bundle index.

11. By 4pm on 23 April 6th May 2024, any person who wishes to comment on the draft hearing bundle must notify the Claimants of their comments by email to the address in paragraph 26 of the Order. Any person may provide suggested documents for inclusion to the Claimants. Where there is disagreement between the Claimants and that person as to the relevance of any document, that disagreement will be noted in the hearing bundle index and the document shall be provided to the Court in a separate bundle by the person seeking to rely upon it, ~~with reasons provided as to the document's relevance.~~

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12. By 4pm on 7 10th May 2024, the Claimants shall file and serve a properly paginated and indexed hearing bundle to the Court by email and in hard copy and shall cause to be placed on the RWI Updated Website a copy of the same.

13. By 4pm on 10 May 2024, the Claimants and any other person seeking to address the Court at the Review shall file and serve any skeleton argument or speaking note.

14. The parties ~~Claimants~~ otherwise have liberty to apply to for further or varied directions.

Documents in the Claim and Application

15. All documents relating to these proceedings and the Yearly Review may be downloaded at:
<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>.

16. A single hard copy of any document will be sent within 21 days of the receipt of a reasonable request for that document or documents via the Claimants' solicitors whose contact details are set out in the Order so long as any requests include a postal address and the full name of the requestor.

SCHEDULE BA – STEPS TO VARY OR DISCHARGE THIS ORDER

If, in accordance with paragraph 1~~53~~ 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 must be followed:

1. Any person seeking to contest the Claimants' entitlement to interim relief should file with the court (i.e. send to the court) and serve (i.e. send to the Claimants):

- (a) An N244 application form¹;
- (b) Written grounds (which may be contained in within the N244 application form or a separate document) for:
 - i. permission to bring the application; and
 - ii. the application (i.e. reasons for the proposed variation / discharge of the Order).

Any applicant shall explain clearly within their written grounds the differences between their grounds and the issues which the Court has already adjudicated upon in the judgment of Mr Justice Julian Knowles of 20 September 2022 [or any judgment arising out of this Application]. A copy of the judgment[s] can be found on the RWI Updated Website; and

- (c) A witness statement(s) containing and/or appending all 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 2~~43~~ 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 2~~56~~ of this Order; and/or
- (b) Send electronic copies of the documents to the e-mail address at paragraph 2~~65~~ 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.

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:

- i. whether to grant permission for the application to proceed; and
- ii. if permission is granted, whether a hearing is necessary, and/or may request from the parties evidence on any further matters necessary to determine the application. If the

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>

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 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/>

Chancery Division Guide: <https://www.gov.uk/government/publications/chanceryguide>

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/civil/rules/part08>

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

SCHEDULE DB – STEPS TO BRING MATTER TO TRIAL

If, in accordance with paragraph 175 above, any Defendant or other person affected by this Order wishes to apply to bring the Claimants' proceedings (whether as a whole or in part) to final trial, to ensure effective case management by the Court the following steps must be followed:

1. If not already so, the person must apply to become a named defendant to the claim. This can be done by filing with the court (i.e. send to the court) and serving (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 person who is applying should:

(a) Send physical copies to the address at paragraph 243 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 Claimants, the person applying should:

(a) Send physical copies to the address at paragraph 256 of this Order; and/or

(b) Send electronic copies to the to the e-mail address at paragraph 256 above.

4. The person seeking to contest the Order 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 Order (whether as a whole or in part), which must include a postal address for service together with (if they wish to be served with documents electronically in these proceedings) an email address to which such service may be effected;

(b) An application for permission to contest the Order and to bring the matter to trial, which explains clearly the differences between their grounds of defence relied upon and the issues which the Court has already adjudicated upon in the judgment of Mr Justice Julian Knowles of 20 September 2022 [or any judgment arising out of this Application]. A copy of the judgment[s] can be found on the RWI Updated Website;

(c) A written Defence responding to the allegations set out in the Particulars of Claim (to the extent in the Defendant's knowledge); and

(d) A witness statement(s) (verified by a statement of truth) containing and/or appending all the evidence to be relied upon in support of the application for permission and Defence (i.e. evidence explaining the basis for contesting the claim).

5. Thereafter the Claimants shall have 14 days after service of the Defence to file and serve any evidence in reply.

6. The Court shall then list a hearing date for a Case Management Conference, at which it will:

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>

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

- (a) determine the application for permission to contest the Order and to bring the matter to trial; and
- (b) should the application for permission be successful, 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.

7. Further:

- a. The Claimants shall prepare an electronic hearing bundle for the hearing and provide the Defendant(s) with access to the bundle not less than 14 days before the hearing.
- b. At the hearing, the Court shall consider whether injunctive relief shall be continued against any or all of the Defendants, whether on an interim or final basis.
- c. Any further application by the Claimants to add further named defendants, to have final relief granted against any Defendant(s) without trial pursuant to CPR r.3.5 and/or otherwise to amend its claim shall be determined at the hearing.
- d. The need for and form of any further case management directions through to trial or any further hearing shall be considered.

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/>~~

~~Chancery Division Guide: <https://www.gov.uk/government/publications/chanceryguide>~~

~~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/civil/rules/part08>~~

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

Certificate of service

Name of court HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM- 000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	0	1	/	0	2	/	2	0	2	4
The date of service is	0	1	/	0	2	/	2	0	2	4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

153 – Notice of Review Hearing 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

The Defendants

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

- 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 (..14:15....time sent, 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

By uploading to website:

<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>


- Being the claimant's 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
- other (please specify)

Place of service ordered by the Court in the order made on 31 May 2023

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

Signed 

Claimant's Solicitor

Position or office held

Head Counsel – L&P Disputes

(If signing on behalf of firm or

Date

0	1	0	2	2	0	2	4
---	---	---	---	---	---	---	---

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 next business day	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, 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 leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas 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 Head Counsel – L&P Disputes.
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 01.02.2024 I instructed Connie Holmes, Digital Media and Content Manager for the First Claimant, to upload the following document:

153 – Notice of Review Hearing 2024

to the website: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>. A copy of this document has already been filed with the Court.
4. At 14:15 on 01.02.2024, Connie Holmes confirmed to me that the upload was complete and I checked the website and noted that the document was available to view and download. A screenshot of the website showing the documents is here:


Notice

HS2 route-wide injunction proceedings (2024)

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 1 February 2024

 [Get emails about this page](#)

Documents



[153. Notice of Review Hearing 2024](#)

PDF, 118 KB, 2 pages

This file may not be suitable for users of assistive technology.

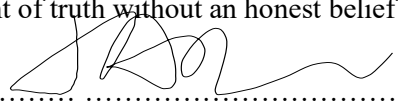
[▶ Request an accessible format.](#)

Details

Exhibits contain strong and/or abusive language and scenes of violence that some viewers may find disturbing. Viewer discretion advised.

Published 1 February 2024

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: 01 February 2024

Certificate of service

Name of court HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM- 000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	2	8	/	0	2	/	2	0	2	4
The date of service is	2	8	/	0	2	/	2	0	2	4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Application Notice – 27 February 2024
2. Draft Order for Alternative Service
3. Third Witness Statement of Robert Shaw
4. Exhibit RXS3

On whom did you serve?

(If appropriate include their position e.g. partner, director).

The Defendants

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

- 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 (..11:16...time sent, 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

By uploading to website:

<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>


- Being the claimant's 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
- other (please specify)

Place of service ordered by the Court in the order made on 31 May 2023

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

Signed 

Claimant's Solicitor

Position or office held

Head Counsel – L&P Disputes

(If signing on behalf of firm or

Date

2	8	0	2	2	0	2	4
---	---	---	---	---	---	---	---

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First class post or other service which provides for delivery on the next business day	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, 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 leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas 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 Head Counsel – L&P Disputes.
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 28.02.2024 I instructed Connie Holmes, Digital Media and Content Manager for the First Claimant, to upload copies of the following documents:

154 – Application Notice – 27 February 2024

155 – Draft Order for Alternative Service

156 – Third Witness Statement of Robert Shaw

157 – Exhibit RXS3

to the website: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>. Copies of the above listed documents have already been filed with the Court.
4. At 11:16 on 28.02.2024, Connie Holmes confirmed to me that the upload was complete and I checked the website and noted that the document was available to view and download. A screenshot of the website showing the documents is here:

Notice

HS2 route-wide injunction proceedings (2024)

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 1 February 2024

Last updated 28 February 2024 — [See all updates](#)

 [Get emails about this page](#)

Documents



[157. Exhibit RXS3](#)

PDF, 10.1 MB, 99 pages

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[156. Third Witness Statement of Robert Shaw](#)

PDF, 1.14 MB, 6 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[155. Draft Order for Alternative Service](#)

PDF, 35.4 KB, 4 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[154. Application Notice - 27 February 2024](#)

PDF, 35.3 KB, 2 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)

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

Published 1 February 2024
Last updated 28 February 2024 - [hide all updates](#)

28 February 2024


Documents added:

- 154. Application Notice - 27 February 2024
- 155. Draft Order for Alternative Service
- 156. Third Witness Statement of Robert Shaw
- 157. Exhibit RXS3

1 February 2024

First published.

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: 28 February 2024

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?

2 8 / 0 2 / 2 0 2 4

The date of service is

2 9 / 0 2 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Application Notice – 27 February 2024
2. Draft Order for Alternative Service
3. Third Witness Statement of Robert Shaw
4. Exhibit RXS3

On whom did you serve?

(If appropriate include their position e.g. partner, director).

James Taylor Knaggs (D6)

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

- 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 (...22:30.....time sent, where document is other than a claim form) (please specify)

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

lfrazer@robertlizar.com and
nhall@robertlizar.com

Being the claimant's 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
 other (please specify)

Email address

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



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

0	1	0	3	2	0	2	4
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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
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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 leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 2 8 / 0 2 / 2 0 2 4

The date of service is 2 9 / 0 2 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Application Notice – 27 February 2024
2. Draft Order for Alternative Service
3. Third Witness Statement of Robert Shaw
4. Exhibit RXS3

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Leah Oldfield (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
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- solicitor's litigation friend

- usual residence
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- place of business
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- last known place of business
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- 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
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Email address used by the Defendant

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Full name MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

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On whom did you serve?

(If appropriate include their position e.g. partner, director).

Mark Keir (D36)

How did you serve the documents?

(please tick the appropriate box)

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Full name MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

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4. Exhibit RXS3

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Samantha Smithson (D57)

How did you serve the documents?

(please tick the appropriate box)

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(.....time left, where document is other than a claim form) (please specify)

- by other means permitted by the court
(please specify)

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Email address used by the Defendant

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Full name

MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

0	1	0	3	2	0	2	4
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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	2	8	/	0	2	/	2	0	2	4
The date of service is	2	9	/	0	2	/	2	0	2	4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Application Notice – 27 February 2024 2. Draft Order for Alternative Service 3. Third Witness Statement of Robert Shaw 4. Exhibit RXS3
Alan Cooper

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)

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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)

--

- by other means permitted by the court (please specify)

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Email address used by the Defendant

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Full name	MARY ELIZABETH BARRACLOUGH
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Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

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On what day did you serve?

2 8 / 0 2 / 2 0 2 4

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4. Exhibit RXS3

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Caroline Thomson-Smith

How did you serve the documents?

(please tick the appropriate box)

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Full name

MARY ELIZABETH BARRACLOUGH

Signed

M. E. Baraoudogl

Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
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Date

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On whom did you serve?

(If appropriate include their position e.g. partner, director).

Chris Butcher

How did you serve the documents?

(please tick the appropriate box)

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Full name

MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

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On whom did you serve?

(If appropriate include their position e.g. partner, director).

Deborah Mallender

How did you serve the documents?

(please tick the appropriate box)

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- principal office of the company
- place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
- 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.

Full name MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

0	1	0	3	2	0	2	4
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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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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 leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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
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Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 2 8 / 0 2 / 2 0 2 4

The date of service is 2 9 / 0 2 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Application Notice – 27 February 2024
2. Draft Order for Alternative Service
3. Third Witness Statement of Robert Shaw
4. Exhibit RXS3

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Haydn Chick

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
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By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

- Being the claimant's defendant's
- solicitor's litigation friend

- usual residence
- last known residence
- place of business
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On what day did you serve?	2	8	/	0	2	/	2	0	2	4
The date of service is	2	9	/	0	2	/	2	0	2	4

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Iain Oliver (D39)

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(please tick the appropriate box)

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████████████████████ and

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Being the claimant's defendant's

solicitor's litigation friend

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Full name MARY ELIZABETH BARRACLOUGH

CORE-B-293

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
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Date

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Joe Rukin

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Full name

MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
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Date

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Maren Strandevold

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Signed



Claimant's Solicitor

Position
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Senior Associate Solicitor

(If signing on behalf of firm or
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Mike Haville

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Signed



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Position
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Nicola Woodhouse

How did you serve the documents?

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Sally Brooks

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Full name

MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

0	1	0	3	2	0	2	4
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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

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 next business day	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, 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 leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	2	8	/	0	2	/	2	0	2	4
The date of service is	2	9	/	0	2	/	2	0	2	4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

<ol style="list-style-type: none">1. Application Notice – 27 February 20242. Draft Order for Alternative Service3. Third Witness Statement of Robert Shaw4. Exhibit RXS3
Steve Colclough and Ros Colclough

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

- 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 (...22:32.....time sent, where document is other than a claim form) (please specify)

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

- Being the claimant's 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
- 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.

Full name MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

0	1	0	3	2	0	2	4
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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	2	8	/	0	2	/	2	0	2	4
The date of service is	2	9	/	0	2	/	2	0	2	4

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Please attach copies of the documents you have not already filed with the court.

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2. Draft Order for Alternative Service
3. Third Witness Statement of Robert Shaw
4. Exhibit RXS3

On whom did you serve?

(If appropriate include their position e.g. partner, director).

The Chiltern Society

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

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- by other electronic means (...22:32.....time sent, where document is other than a claim form) (please specify)

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

██ and

██ and

██

- Being the claimant's 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
- other (please specify)

Email address used by the Defendant

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

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Full name	MARY ELIZABETH BARRACLOUGH
-----------	----------------------------

CORE-B-507

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

0	1	0	3	2	0	2	4
---	---	---	---	---	---	---	---

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Certificate of service

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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 2 8 / 0 2 / 2 0 2 4

The date of service is 2 9 / 0 2 / 2 0 2 4

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1. Application Notice – 27 February 2024
2. Draft Order for Alternative Service
3. Third Witness Statement of Robert Shaw
4. Exhibit RXS3

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Timothy Chantler

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

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- by other electronic means (...22:32.....time sent, where document is other than a claim form) (please specify)

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

- Being the claimant's 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
- other (please specify)

Email address used by the Defendant

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

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Full name MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

0	1	0	3	2	0	2	4
---	---	---	---	---	---	---	---

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Certificate of service

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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	0 1 / 0 3 / 2 0 2 4
The date of service is	0 1 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Application Notice – 1 March 2024
2. Draft Injunction Order
3. Draft Judgment Order
4. Link to HS2 Land Plans
5. Second Witness Statement of James Dobson
6. Exhibit JD7
7. Thirteenth Witness Statement of Julie Dilcock
8. Exhibit JAD15
9. Second Witness Statement of John Groves
10. Exhibit JG2

On whom did you serve?

(If appropriate include their position e.g. partner, director).

The Defendants

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

- 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 (..09:58...time sent, 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

By uploading to website:

<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>

Being the claimant's 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
- other (please specify)

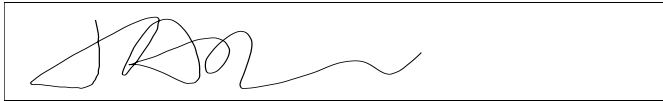
Place of service ordered by the Court in the order made on 31 May 2023 and 7 March 2024

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

Signed



Claimant's Solicitor

Position
or office
held

Head Counsel – L&P Disputes

(If signing on behalf of firm or
company)

Date

1 3 0 3 2 0 2 4

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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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
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In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas 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 Head Counsel – L&P Disputes.
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 01.03.2024 I instructed Connie Holmes, Manager - Digital Media & Content for the First Claimant, to upload the following documents:
 - (a) Application Notice – 1 March 2024
 - (b) Draft Injunction Order
 - (c) Draft Judgment Order
 - (d) Link to HS2 Land Plans
 - (e) Second Witness Statement of James Dobson
 - (f) Exhibit JD7
 - (g) Thirteenth Witness Statement of Julie Dilcock
 - (h) Exhibit JAD15
 - (i) Second Witness Statement of John Groves
 - (j) Exhibit JG2

to the website: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>. Copies of the above documents have already been filed with the Court.

4. At 09:58 on 01.03.2024, Connie Holmes confirmed to me that the upload was complete and I checked the website and noted that the documents were available to view and download. Screenshots of the website showing the documents and the website change record are here:

Notice

HS2 route-wide injunction proceedings (2024)

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 1 February 2024

Last updated 1 March 2024 — [See all updates](#)

 [Get emails about this page](#)

Documents



[167. Exhibit JG2](#)

PDF, 652 KB, 3 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[166. Second Witness Statement of John Groves](#)

PDF, 651 KB, 8 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[165. Exhibit JAD15](#)

PDF, 1.15 MB, 3 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[164. Thirteenth Witness Statement of Julie Dilcock](#)

PDF, 659 KB, 10 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[163. Exhibit JD7](#)

PDF, 44.3 MB, 159 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[162. Second Witness Statement of James Dobson - Signed](#)

PDF, 972 KB, 49 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[161. HS2 Land Plans](#)

PDF, 358 KB, 1 page

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[160. Draft Judgment Order](#)

PDF, 370 KB, 2 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[159. Draft Injunction Order](#)

PDF, 341 KB, 17 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[158. Application Notice - 1 March 2024](#)

PDF, 914 KB, 6 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)

Published 1 February 2024
Last updated 1 March 2024 - [hide all updates](#)

1 March 2024

Following documents added:

- 158. Application Notice – 1 March 2024
- 159. Draft Injunction Order
- 160. Draft Judgment Order
- 161. HS2 Land Plans
- 162. Second Witness Statement of James Dobson
- 163. Exhibit JD7
- 164. Thirteenth Witness Statement of Julie Dilcock
- 165. Exhibit JAD15
- 166. Second Witness Statement of John Groves
- 167. Exhibit JG2

28 February 2024

Documents added:


- 154. Application Notice - 27 February 2024
- 155. Draft Order for Alternative Service
- 156. Third Witness Statement of Robert Shaw
- 157. Exhibit RXS3

1 February 2024

First published.

 [Get emails about this page](#)  [Print this page](#)

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: 13 March 2023

Certificate of service

Name of court HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM- 000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	0	1	/	0	3	/	2	0	2	4
The date of service is	0	1	/	0	3	/	2	0	2	4

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

Social media posts on the HS2 X and Facebook pages advertising the date of the Review and the web address of the HS2 RWI Updated Website

On whom did you serve?
(If appropriate include their position e.g. partner, director).

The Defendants

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

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 (..13:00....time sent, 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

By uploading to website:
<https://x.com/hs2ltd>
<https://www.facebook.com/HS2ltd>

Being the claimant's 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

other *(please specify)*

Place of service ordered by the Court in the order made on 31 May 2023 and 7 March 2024

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

Signed 
Claimant's Solicitor

Position or office held Head Counsel – L&P Disputes
(If signing on behalf of firm or

Date

1	3	0	3	2	0	2	4
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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 Head Counsel – L&P Disputes.
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 01.03.2024 I instructed Ibraheem Munawar, Digital Media and Content Senior Manager for the First Claimant to issue a post from the First Claimant’s X (formerly known as “Twitter”) account (<https://x.com/HS2Ltd>) advertising the date of the Review and the web address of the HS2 RWI Updated Website. That post was issued from the First Claimant’s twitter account at 13:00 that day and a screen shot of the post is here:




4. On 01.03.2024 I instructed Ibraheem Munawar, Digital Media and Content Senior Manager for the First Claimant to issue a post from on the First Claimant’s Facebook page (<https://facebook.com/HS2Ltd>)

advertising the date of the Review and the web address of the HS2 RWI Updated Website. That post was issued on the First Claimant's Facebook page at 13:00 that day and a screen shot of the post is here:



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: 13 March 2023

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?

0	1	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

The date of service is

0	1	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Application Notice – 1 March 2024
2. Draft Injunction Order
3. Draft Judgment Order
4. HS2 Land Plans
5. Second Witness Statement of James Dobson
6. Exhibit JD7
7. Thirteenth Witness Statement of Julie Dilcock
8. Exhibit JAD15
9. Second Witness Statement of John Groves
10. Exhibit JG2

James Taylor Knaggs (D6)

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

- 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 (...15:52.....time sent, where document is other than a claim form) (please specify)

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

lfrazer@robertlizar.com and
nhall@robertlizar.com

Being the claimant's 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
 other (please specify)

Email address

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 

Position or office held Senior Associate Solicitor

Claimant's Solicitor

(If signing on behalf of firm or company)

Date 04 03 2024

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

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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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	0	1	/	0	3	/	2	0	2	4
The date of service is	0	1	/	0	3	/	2	0	2	4

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 6. Exhibit JD7
 7. Thirteenth Witness Statement of Julie Dilcock
 8. Exhibit JAD15
 9. Second Witness Statement of John Groves
 10. Exhibit JG2
- Leah Oldfield (D7)

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

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 (...15:52.....time sent, where document is other than a claim form) *(please specify)*

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the claimant's 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
- 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.

CORE-B-523

Full name

Signed 

Position or office held

Claimant's Solicitor

(If signing on behalf of firm or company)

Date

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Certificate of service

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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?

0	1	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

The date of service is

0	1	/	0	3	/	2	0	2	4
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8. Exhibit JAD15
9. Second Witness Statement of John Groves
10. Exhibit JG2

Mark Keir (D36)

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)

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- By Document Exchange

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By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

- Being the claimant's 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
- other (please specify)

Email address used by the Defendant

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

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Full name

Signed 

Claimant's Solicitor

Position or office held

(If signing on behalf of firm or company)

Date

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Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 0 1 / 0 3 / 2 0 2 4

The date of service is 0 1 / 0 3 / 2 0 2 4

What documents did you serve?

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6. Exhibit JD7
7. Thirteenth Witness Statement of Julie Dilcock
8. Exhibit JAD15
9. Second Witness Statement of John Groves
10. Exhibit JG2

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Iain Oliver (D39)

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)

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By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

██████████ and

██████████

- Being the claimant's 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
- 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.

CORE-B-527

Full name

Signed 

Claimant's Solicitor

Position or office held

(If signing on behalf of firm or company)

Date

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Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	0 1 / 0 3 / 2 0 2 4
The date of service is	0 1 / 0 3 / 2 0 2 4

What documents did you serve?
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 7. Thirteenth Witness Statement of Julie Dilcock
 8. Exhibit JAD15
 9. Second Witness Statement of John Groves
 10. Exhibit JG2
- Samantha Smithson (D57)

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

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 (...15:52.....time sent, where document is other than a claim form) *(please specify)*

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the claimant's 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
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- place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
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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.

CORE-B-529

Full name	MARY ELIZABETH BARRACLOUGH		
Signed		Position or office held	Senior Associate Solicitor
	Claimant's Solicitor		(If signing on behalf of firm or company)
Date	0	4	0
	0	3	2
	2	0	2
	4		

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Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 0 1 / 0 3 / 2 0 2 4

The date of service is 0 1 / 0 3 / 2 0 2 4

What documents did you serve?

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5. Second Witness Statement of James Dobson
6. Exhibit JD7
7. Thirteenth Witness Statement of Julie Dilcock
8. Exhibit JAD15
9. Second Witness Statement of John Groves
10. Exhibit JG2

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Alan Cooper

How did you serve the documents?

(please tick the appropriate box)

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By Email

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- usual residence
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Email address used by the Defendant

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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		Position or office held	Senior Associate Solicitor
	Claimant's Solicitor		(If signing on behalf of firm or company)
Date	0 4	0 3	2 0 2 4

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Certificate of service

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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
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Caroline Thomson-Smith

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)

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By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification


- Being the claimant's defendant's
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- usual residence
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Email address used by the Defendant

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

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Full name	MARY ELIZABETH BARRACLOUGH		
Signed		Position or office held	Senior Associate Solicitor
	Claimant's Solicitor		(If signing on behalf of firm or company)
Date	0 4	0 3	2 0 2 4

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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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Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?

0	1	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

The date of service is

0	1	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Application Notice – 1 March 2024
2. Draft Injunction Order
3. Draft Judgment Order
4. HS2 Land Plans
5. Second Witness Statement of James Dobson
6. Exhibit JD7
7. Thirteenth Witness Statement of Julie Dilcock
8. Exhibit JAD15
9. Second Witness Statement of John Groves
10. Exhibit JG2

Chris Butcher

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

- 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 (...15:52.....time sent, where document is other than a claim form) (please specify)

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

--

- Being the claimant's 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
- 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.

Full name

Signed 

Position or office held

Claimant's Solicitor

(If signing on behalf of firm or company)

Date

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The date of service is 0 1 / 0 3 / 2 0 2 4

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8. Exhibit JAD15
9. Second Witness Statement of John Groves
10. Exhibit JG2

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Deborah Mallender

How did you serve the documents?

(please tick the appropriate box)

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Email address used by the Defendant

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 8. Exhibit JAD15
 9. Second Witness Statement of John Groves
 10. Exhibit JG2
- Haydn Chick

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)

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- other (please specify)

Email address used by the Defendant

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Full name

Signed 

Position or office held

Claimant's Solicitor

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0	1	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

The date of service is

0	1	/	0	3	/	2	0	2	4
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Joe Rukin

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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
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On what day did you serve?	0	1	/	0	3	/	2	0	2	4
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 8. Exhibit JAD15
 9. Second Witness Statement of John Groves
 10. Exhibit JG2
- Maren Strandevold

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)

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(.....time left, where document is other than a claim form) *(please specify)*

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Being the claimant's 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

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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.

CORE-B-543

Full name

Signed 

Position or office held

Claimant's Solicitor

(If signing on behalf of firm or company)

Date

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 10. Exhibit JG2
- Mike Haville

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)

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By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the claimant's 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

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place of business of the partnership/company/corporation within the jurisdiction with a connection to claim

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Email address used by the Defendant

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CORE-B-345

Full name

Signed 

Position or office held

Claimant's Solicitor

(If signing on behalf of firm or company)

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0	1	/	0	3	/	2	0	2	4
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The date of service is

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9. Second Witness Statement of John Groves
10. Exhibit JG2

Nicola Woodhouse

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)

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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.

Full name

Signed 

Position or office held

Claimant's Solicitor

(If signing on behalf of firm or company)

Date

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 next business day	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, 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 leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 0 1 / 0 3 / 2 0 2 4

The date of service is 0 1 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Application Notice – 1 March 2024
 2. Draft Injunction Order
 3. Draft Judgment Order
 4. HS2 Land Plans
 5. Second Witness Statement of James Dobson
 6. Exhibit JD7
 7. Thirteenth Witness Statement of Julie Dilcock
 8. Exhibit JAD15
 9. Second Witness Statement of John Groves
 10. Exhibit JG2
- Sally Brooks

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

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 (...15:52.....time sent, where document is other than a claim form) (please specify)

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the claimant's 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

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.

Full name

Signed 

Position or office held

Claimant's Solicitor

(If signing on behalf of firm or company)

Date

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 next business day	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, 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 leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	0	1	/	0	3	/	2	0	2	4
The date of service is	0	1	/	0	3	/	2	0	2	4

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

1. Application Notice – 1 March 2024
 2. Draft Injunction Order
 3. Draft Judgment Order
 4. HS2 Land Plans
 5. Second Witness Statement of James Dobson
 6. Exhibit JD7
 7. Thirteenth Witness Statement of Julie Dilcock
 8. Exhibit JAD15
 9. Second Witness Statement of John Groves
 10. Exhibit JG2
- Steve Colclough and Ros Colclough

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

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 (...15:52.....time sent, where document is other than a claim form) *(please specify)*

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the claimant's 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

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.

CORE-B-351

Full name

Signed 

Position or office held

Claimant's Solicitor

(If signing on behalf of firm or company)

Date

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 leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?

0	1	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

The date of service is

0	1	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Application Notice – 1 March 2024
2. Draft Injunction Order
3. Draft Judgment Order
4. HS2 Land Plans
5. Second Witness Statement of James Dobson
6. Exhibit JD7
7. Thirteenth Witness Statement of Julie Dilcock
8. Exhibit JAD15
9. Second Witness Statement of John Groves
10. Exhibit JG2

The Chiltern Society

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

- 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 (...15:52.....time sent, where document is other than a claim form) (please specify)

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

	and
	and

- Being the claimant's 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
- 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.

Full name

Signed Position or office held
 Claimant's Solicitor (If signing on behalf of firm or company)

Date

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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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

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Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?

0	1	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

The date of service is

0	1	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

<ol style="list-style-type: none">1. Application Notice – 1 March 20242. Draft Injunction Order3. Draft Judgment Order4. HS2 Land Plans5. Second Witness Statement of James Dobson6. Exhibit JD77. Thirteenth Witness Statement of Julie Dilcock8. Exhibit JAD159. Second Witness Statement of John Groves10. Exhibit JG2
Timothy Chantler

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

- 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 (...15:52.....time sent, where document is other than a claim form) (please specify)

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

--


- Being the claimant's 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
- 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.

Full name	MARY ELIZABETH BARRACLOUGH		
Signed		Position or office held	Senior Associate Solicitor
	Claimant's Solicitor		(If signing on behalf of firm or company)
Date	0 4	0 3	2 0 2 4

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 next business day	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, 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 leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	1	1	/	0	3	/	2	0	2	4
The date of service is	1	1	/	0	3	/	2	0	2	4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order dated 5 March 2024 2. Order dated 7 March 2024
--

On whom did you serve?

(If appropriate include their position e.g. partner, director).

The Defendants

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

- 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 (..13:19...time sent, 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

By uploading to website:

<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>


- Being the claimant's 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
- other (please specify)

Place of service ordered by the Court in the order made on 31 May 2023 and the order made on 7 March 2024

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

Signed 

Claimant's Solicitor

Position or office held

Head Counsel – L&P Disputes

(If signing on behalf of firm or

Date

1	1	0	3	2	0	2	4
---	---	---	---	---	---	---	---

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 next business day	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, 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 leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas 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 Head Counsel – L&P Disputes.
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 11.03.2024 I instructed Connie Holmes, Digital Media and Content Manager for the First Claimant, to upload the following documents:
 - (a) Order dated 5 March 2024
 - (b) Order dated 7 March 2024to the website: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>. A copy of this document has already been filed with the Court.
4. At 13:19 on 11.03.2024, Connie Holmes confirmed to me that the upload was complete and I checked the website and noted that the document was available to view and download. A screenshot of the website showing the documents is here:

Notice

HS2 route-wide injunction proceedings (2024)

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 1 February 2024

Last updated 11 March 2024 — [See all updates](#)

 [Get emails about this page](#)

Documents



[169. Order dated 7 March 2024](#)

PDF, 128 KB, 4 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[168. Order dated 5 March 2024](#)

PDF, 121 KB, 2 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)

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

Published 1 February 2024
Last updated 11 March 2024 - [hide all updates](#)

11 March 2024


Two new documents added:
Order dated 7 March 2024
Order dated 5 March 2024

1 March 2024

Following documents added:

- 158. Application Notice – 1 March 2024
- 159. Draft Injunction Order
- 160. Draft Judgment Order
- 161. HS2 Land Plans
- 162. Second Witness Statement of James Dobson
- 163. Exhibit JD7
- 164. Thirteenth Witness Statement of Julie Dilcock
- 165. Exhibit JAD15
- 166. Second Witness Statement of John Groves
- 167. Exhibit JG2

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: 11 March 2024

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?

1	2	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

The date of service is

1	2	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024
--

On whom did you serve?

(If appropriate include their position e.g. partner, director).

James Taylor Knaggs (D6)

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

- 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 (...14:13.....time sent, where document is other than a claim form) (please specify)

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

lfrazer@robertlizar.com and nhall@robertlizar.com
--

- Being the claimant's 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
 other (please specify)

Email address


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



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
---	---	---	---	---	---	---	---

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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 next business day	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, 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 leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day 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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 1 2 / 0 3 / 2 0 2 4

The date of service is 1 2 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Leah Oldfield (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

- 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

- 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 (...14:15.....time sent, where document is other than a claim form) *(please specify)*

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

- Being the claimant's 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
- 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.

Full name

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
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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

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
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Certificate of service

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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 1 2 / 0 3 / 2 0 2 4

The date of service is 1 2 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Deborah Mallender

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
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Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

- Being the claimant's 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
- 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.

Full name MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
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Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?

1 2 / 0 3 / 2 0 2 4

The date of service is

1 2 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Mark Keir (D36)

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
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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)

- 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)

- by other electronic means (...14:15.....time sent, where document is other than a claim form) (please specify)

By Email

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- Being the claimant's 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
- other (please specify)

Email address used by the Defendant

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

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Full name

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
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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 service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?

1	2	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

The date of service is

1	2	/	0	3	/	2	0	2	4
---	---	---	---	---	---	---	---	---	---

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024
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On whom did you serve?

(If appropriate include their position e.g. partner, director).

Iain Oliver (D39)

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)

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- by other means permitted by the court (please specify)

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- 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)

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By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

████████████████████ and ████████████████████
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- Being the claimant's defendant's
- solicitor's litigation friend

- usual residence
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- principal place of business
- last known place of business
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- principal office of the partnership
- principal office of the corporation
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- place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
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Email address used by the Defendant

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Full name

MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
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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 KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 1 2 / 0 3 / 2 0 2 4

The date of service is 1 2 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Alan Cooper

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)*

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(please specify)

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By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

- Being the claimant's 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
- 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.

Full name

Signed

M. E. Baraoudogl

Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1 9 0 3 2 0 2 4

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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Certificate of service

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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
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On what day did you serve? 1 2 / 0 3 / 2 0 2 4

The date of service is 1 2 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Caroline Thomson-Smith

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)*

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Email address used by the Defendant

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Full name

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
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Date

1	9	0	3	2	0	2	4
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The date of service is 1 2 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Chris Butcher

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
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Email address used by the Defendant

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Full name

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
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Date

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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

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	1	2	/	0	3	/	2	0	2	4
The date of service is	1	2	/	0	3	/	2	0	2	4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024
--

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Haydn Chick

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)

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- 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)

- by other electronic means (...14:15.....time sent, where document is other than a claim form) (please specify)

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

--

- Being the claimant's 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
- 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.

Full name	MARY ELIZABETH BARRACLOUGH
-----------	----------------------------

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
---	---	---	---	---	---	---	---

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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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
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On what day did you serve?	1	2	/	0	3	/	2	0	2	4
The date of service is	1	2	/	0	3	/	2	0	2	4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024
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On whom did you serve?

(If appropriate include their position e.g. partner, director).

Joe Rukin

How did you serve the documents?

(please tick the appropriate box)

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Full name	MARY ELIZABETH BARRACLOUGH
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Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 1 2 / 0 3 / 2 0 2 4

The date of service is 1 2 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Maren Strandevold

How did you serve the documents?

(please tick the appropriate box)

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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)*

- 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)*

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Email address used by the Defendant

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Full name

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
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Certificate of service

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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	1	2	/	0	3	/	2	0	2	4
The date of service is	1	2	/	0	3	/	2	0	2	4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Mike Haville

How did you serve the documents?

(please tick the appropriate box)

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 solicitor's litigation friend

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- principal place of business
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Email address used by the Defendant

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Full name

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
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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 KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	1	2	/	0	3	/	2	0	2	4
The date of service is	1	2	/	0	3	/	2	0	2	4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024
--

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Nicola Woodhouse

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)

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- by other means permitted by the court (please specify)

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- Being the claimant's defendant's
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- usual residence
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- last known principal place of business
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- place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
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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.

Full name

MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
---	---	---	---	---	---	---	---

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Certificate of service

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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
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On what day did you serve?	1	2	/	0	3	/	2	0	2	4
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What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024
--

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Sally Brooks

How did you serve the documents?

(please tick the appropriate box)

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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.

Full name	MARY ELIZABETH BARRACLOUGH
-----------	----------------------------

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
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Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 1 2 / 0 3 / 2 0 2 4

The date of service is 1 2 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Samantha Smithson (D57)

How did you serve the documents?

(please tick the appropriate box)

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- 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)

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Email address used by the Defendant

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

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Full name MARY ELIZABETH BARRACLOUGH

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
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Date

1	9	0	3	2	0	2	4
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In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 1 2 / 0 3 / 2 0 2 4

The date of service is 1 2 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Steve Colclough and Ros Colclough

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

- 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 (...14:15.....time sent, where document is other than a claim form) *(please specify)*

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

- Being the claimant's 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
- 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.

Full name

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
---	---	---	---	---	---	---	---

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 next business day	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, the next business day after that day
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Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve? 1 2 / 0 3 / 2 0 2 4

The date of service is 1 2 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

The Chiltern Society

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

- 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 (...14:15.....time sent, where document is other than a claim form) (please specify)

By Email

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

████████████████████ and

████████████████████ and

████████████████████

- Being the claimant's 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
- other (please specify)
- Email address used by the Defendant

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

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Full name

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
---	---	---	---	---	---	---	---

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Certificate of service

Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	1	2	/	0	3	/	2	0	2	4
The date of service is	1	2	/	0	3	/	2	0	2	4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Order of HHJ Kelly dated 7 March 2024

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Timothy Chantler

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
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By Email

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- Being the claimant's 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
- 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.

Full name

Signed



Claimant's Solicitor

Position
or office
held

Senior Associate Solicitor

(If signing on behalf of firm or
company)

Date

1	9	0	3	2	0	2	4
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Calculation of deemed day of service of a claim

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Certificate of service

Name of court HIGH COURT OF JUSTICE KING'S BENCH DIVISION	Claim No. QB-2022-BHM-000044
Name of Claimant (1) High Speed Two (HS2) Limited (2) The Secretary of State for Transport	
Name of Defendant Persons Unknown & Ors	

On what day did you serve?	0 3 / 0 5 / 2 0 2 4
The date of service is	0 3 / 0 5 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

Draft Hearing Bundle Indices

On whom did you serve?

(If appropriate include their position e.g. partner, director).

The Defendants

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

- 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 (..14:16...time sent, 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

By uploading to website:

<https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>


- Being the claimant's 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
- other (please specify)

Place of service ordered by the Court in the order made on 31 May 2023

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

Signed 

Claimant's Solicitor

Position or office held

Head Counsel – L&P Disputes

(If signing on behalf of firm or

Date

0	8	0	5	2	0	2	4
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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 Head Counsel – L&P Disputes.
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 03.05.2024 I instructed Connie Holmes, Manager - Digital Media & Content for the First Claimant, to upload the Draft Hearing Bundle Indices to the website: <https://www.gov.uk/government/collections/hs2-route-wide-injunction-proceedings>. A copy of that document is attached to this Certificate of Service.
4. At 14:16 on 03.05.2024, Connie Holmes confirmed to me that the upload was complete and I checked the website and noted that the documents were available to view and download. Screenshots of the website showing the documents and the website change record are here:

Notice


HS2 route-wide injunction proceedings (2024)

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 1 February 2024

Last updated 3 May 2024 — [See all updates](#)

 [Get emails about this page](#)

Documents



[170. Draft Hearing Bundle Indices](#)

PDF, 19.9 KB, 9 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[169. Order dated 7 March 2024](#)

PDF, 128 KB, 4 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)



[168. Order dated 5 March 2024](#)

PDF, 121 KB, 2 pages

This file may not be suitable for users of assistive technology.

▶ [Request an accessible format.](#)

Published 1 February 2024
Last updated 3 May 2024 - [hide all updates](#)

3 May 2024

170. Draft Hearing Bundle Indices - file attachment CREATED


11 March 2024

Two new documents added:

Order dated 7 March 2024

Order dated 5 March 2024

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: 8 May 2024

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

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & OTHERS

Defendants

**draft CORE BUNDLE
(Volume A)**
for hearing on 15 May 2024

TAB	DOCUMENT	PAGE
1	Injunction Order of Mr. Justice Ritchie dated 31 May 2023	
2	Judgment Order of Mr. Justice Ritchie dated 28 June 2023	
3	Injunction Order of Mr. Justice Julian Knowles dated 20 September 2022	
4	Judgment of Mr. Justice Julian Knowles dated 20 September 2022 - <i>High Speed Two (HS2) Ltd & Anor v Four Categories of Persons Unknown & Ors</i> [2022] EWHC 2360 (KB)	
5	<i>James Knaggs v SSfT & HS2</i> – Order of Coulson LJ and Ruling on Application for Permission to Appeal CA-2022-001952	
6	Order of HHJ Kelly dated 5 March 2024	
7	Order of HHJ Kelly dated 7 March 2024	
8	N244 Application Notice dated 1 March 2024	
9	Draft Injunction Order	

10	Draft Judgment Order	
11	HS2 Land Plans	
12	Second Witness Statement of James Dobson dated 28 February 2024	
13	Second Witness Statement of John Groves dated 28 February 2024	
14	Thirteenth Witness Statement of Julie Dilcock dated 28 February 2024	
15	Third Witness Statement of Robert Shaw dated 27 February 2024	
16	Schedule of Named Defendants to be removed or added	
17	Written reasons for seeking to amend order and oppose Claimants' applications on behalf of D6 (James Taylor Knaggs)	
18	Undertakings from Curtis Arnold	
19	Re-Amended Particulars of Claim dated 26 July 2023	

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

Telephone: 0114 283 3312
Email: HS2Injunction@dlapiper.com
Reference: RXS/380900/441

Solicitors for the Claimants

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

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & OTHERS

Defendants

***draft* CORE BUNDLE
(Volume B)
for hearing on 15 May 2024**

TAB	DOCUMENT	PAGE
1	Exhibit JD7	
2	Exhibit JG2	
3	Exhibit JAD15	
4	Exhibit RXS3	
5	Certificates of Service	

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

**Telephone: 0114 283 3312
Email: HS2Injunction@dlapiper.com
Reference: RXS/380900/441**

Solicitors for the Claimants

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

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & OTHERS

Defendants

***draft* SUPPLEMENTAL BUNDLE
(Volume A)
for hearing on 15 May 2024**

1	Witness Statement of Richard Joseph Jordan dated 23 March 2022	
2	First Witness Statement of Julie Amber Dilcock dated 25 March 2022	
3	Second Witness Statement of Julie Amber Dilcock dated 1 April 2022	
4	Third Witness Statement of Julie Amber Dilcock dated 26 April 2022	
5	Fourth Witness Statement of Julie Amber Dilcock dated 19 May 2022	
6	Witness Statement of Timothy Robins dated 26 May 2022	
7	Fifth Witness Statement of Julie Amber Dilcock dated 8 June 2022	
8	Sixth Witness Statement of Julie Amber Dilcock dated 13 June 2022	
9	Seventh Witness Statement of Julie Amber Dilcock dated 25 July 2022	
10	Eighth Witness Statement of Julie Amber Dilcock dated 2 September 2022	

11	Ninth Witness Statement of Julie Amber Dilcock dated 16 September 2022	
12	Tenth Witness Statement of Julie Amber Dilcock dated 3 March 2023	
13	First Witness Statement of James Dobson dated 27 March 2023	
14	First Witness Statement of John Groves dated 27 March 2023	
15	Eleventh Witness Statement of Julie Amber Dilcock dated 27 March 2023	
16	Twelfth Witness Statement of Julie Amber Dilcock dated 17 April 2023	

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

Telephone: 0114 283 3312
Email: HS2Injunction@dlapiper.com
Reference: RXS/380900/441

Solicitors for the Claimants

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

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & OTHERS

Defendants

***draft* SUPPLEMENTAL BUNDLE
(Volume B)**

not intended for reading at the hearing on 15 May 2024

TAB	DOCUMENT	PAGE
1	Exhibit RJ1	
2	Exhibit RJ2 – link	
3	Exhibit JAD1 – link	
4	Exhibit JAD2 – link	
5	Exhibit JAD3	
6	Exhibit JAD4	
7	Exhibit JAD5 – link	
8	Exhibit JAD6	
9	Exhibit JAD7 – link	
10	Exhibit JAD8	
11	Exhibit JAD10	

12	Exhibit JAD11	
13	Exhibit JAD12	
14	Exhibit JAD13	
15	Exhibit JAD14	
16	Exhibit JD5	
17	Exhibit JD6 - link	
18	Exhibit JG1	

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

Telephone: 0114 283 3312
Email: HS2Injunction@dlapiper.com
Reference: RXS/380900/441

Solicitors for the Claimant

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

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & OTHERS

Defendants

draft SUPPLEMENTAL BUNDLE
(Volume C)
for hearing on 15 May 2024

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

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

Telephone: 0114 283 3312
Email: HS2Injunction@dlapiper.com
Reference: RXS/380900/441

Solicitors for the Claimants

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

BETWEEN:

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

Claimants

- and -

PERSONS UNKNOWN & OTHERS

Defendants

***draft* AUTHORITIES BUNDLE**
for hearing on 15 May 2024

TAB	DOCUMENT	PAGE
1		
2		
3		
4		
5		
6		
7		
8		
9		

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

**Telephone: 0114 283 3312
Email: HS2Injunction@dlapiper.com
Reference: RXS/380900/441**

Solicitors for the Claimants