

Application notice

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Name of court High Court of Justice King's Bench Division		Claim no. QB-2021-003576							
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)								
PBA:0087960	<table border="1"> <tr> <td>H</td> <td>W</td> <td>F</td> <td>-</td> <td></td> <td>-</td> <td></td> </tr> </table>		H	W	F	-		-	
H	W	F	-		-				
Warrant no. (if applicable)									
Claimant's name (including ref.) National Highways Limited (Ref: PYB/RXS/ 439241/16)									
Defendant's name (including ref.) PERSONS UNKNOWN CAUSING THE BLOCKING OF, ENDANGERING, OR PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25 MOTORWAY, A2 A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY, A1(M), A3, A12, A13, A21, A23 A30, A120 A414, A1081 AND A3113 TRUNK ROADS AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40 MOTORWAYS FOR THE PURPOSE OF PROTESTING									
Date	24 July 2024								

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

DLA Piper UK LLP

2. Are you a Claimant Defendant Legal Representative

Other (please specify) _____

If you are a legal representative whom do you represent?

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

An order in the form of the draft order attached seeking:

- 1) a variation of the final injunction imposed by the Order of Mrs Justice Collins Rice dated 26 April 2024 ("**the Rice Order**") to cover certain additional parts of the Strategic Road Network as defined in paragraph 1. b. of the draft Order sought ("**the Additional Parts**"); and
- 2) given the exceptional urgency of this application the permission of the Court pursuant to CPR PD23A paragraphs 3(1) and (4), to have this application heard without prior service of this application notice on the Defendants.

4. Have you attached a draft of the order you are applying for? Yes No
5. How do you want to have this application dealt with? at a hearing without a hearing
6. How long do you think the hearing will last? hours
Is this time estimate agreed by all parties? Yes No
7. Give details of any fixed trial date or period
8. What level of Judge does your hearing need?
9. Who should be served with this application?
- 9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.
10. What information will you be relying on, in support of your application?
- the attached witness statement and 5 exhibits
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

Please see the attached witness statement of Sean Martell with 5 exhibits.

Statement of Truth

The applicant believes that the facts stated in this section (and any continuation sheets) are true. The applicant understands that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.


Signed  Dated **24 July 2024**
Applicant's legal representative

Full name: Petra Billing

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

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

11. Signature and address details

Signed 
 Applicant's legal representative

Dated **24 July 2024**

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

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

DLA Piper UK LLP Elshaw House 51 Carver St Sheffield		If applicable		
		Phone no.	0207 349 0296	
		Fax no.	N/A	
		DX no.	DX: 708580 Sheffield 10	
		Ref no.	PXB/RXS/ 439241/16	
Postcode	<input type="text"/>	<input type="text"/>	S 1	4 F T <input type="text"/>
E-mail address	petra.billing@dlapiper.com / rob.shaw@dlapiper.com / laura.higson@dlapiper.com			