



# Claim Form

In the	High Court of Justice Queen's Bench Division
Fee Account no.	
Help with Fees - Ref no. (if applicable)	<b>H W F</b> - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/>
<i>For court use only</i>	
Claim no.	
Issue date	

You may be able to issue your claim online which may save time and money. Go to [www.moneyclaim.gov.uk](http://www.moneyclaim.gov.uk) to find out more.

## Claimant(s) name(s) and address(es) including postcode

NATIONAL HIGHWAYS LIMITED (Co. Reg. No. 09346363)  
Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ



## Defendant(s) name and address(es) including postcode

(1) PERSONS UNKNOWN causing the blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or off or along the roads described in the draft order and witness statement (being the roads owned by National Highways and crossing the M25 into London or feeding into the M25) **A1(M), A3, A12, A13, A21, A23, A30, A414 and A3113 Trunk Roads and the M1, M3, M4, M4 Spur, M11, M26, M23 and M40 Motorways** for the purpose of protesting

**(2) Mr Alexander Rodger and the Named Defendants listed in Schedule 1 to this Claim Form.**

## Brief details of claim

1. Possession of the Land, to which the Claimants have an immediate right and being the roads described in the draft order and witness statement (being the roads owned by National Highways and crossing the M25 into London or feeding into the M25) **A1(M), A3, A12, A13, A21, A23, A30, A414 and A3113 Trunk Roads and the M1, M3, M4, M4 Spur, M11, M26, M23 and M40 Motorways (shown marked red and described in more detail on Plan 1 to this Claim Form)**, including all on and off slip roads on the grounds of trespass.
2. In nuisance by obstruction and interference with the free passage of the public and the Claimant onto or off or along the roads described in the draft order and witness statement (being the roads owned by National Highways and crossing the M25 into London or feeding into the M25) **A1(M), A3, A12, A13, A21, A23, A30, A414 and A3113 Trunk Roads and the M1, M3, M4, M4 Spur, M11, M26, M23 and M40 Motorways (shown marked red and described in more detail on Plan 1 to this Claim Form)**.

This claim does not involve possession of a house, demotion of tenancy or the suspension of the right to buy.

## Value

You must indicate your preferred County Court Hearing Centre for hearings here (see notes for guidance)

Defendant's name and address for service including postcode

	£
Amount claimed	
Court fee	
Legal representative's costs	
<b>Total amount</b>	



Claim No.

Does, or will, your claim include any issues under the Human Rights Act 1998?  Yes  No

Particulars of Claim (attached) (to follow)


To follow

## Statement of Truth

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.

- I believe that the facts stated in these particulars of claim are true.
- The Claimant believes that the facts stated these particulars of claim are true. I am authorised by the claimant to sign this statement.

### Signature



- Claimant
- Litigation friend (where judgment creditor is a child or a patient)
- Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day

Month

Year

04 03

10

2021

Full name

Antony Chidi Nwanodi

Name of claimant's legal representative's firm

Government Legal Department

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

Senior Lawyer

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

102 Petty France

Second line of address

Town or city

Westminster

County (optional)

London

Postcode

S W 1 H 9 G L

If applicable

Phone number

02072103424

Fax phone number

DX number

123243 Westminster 12

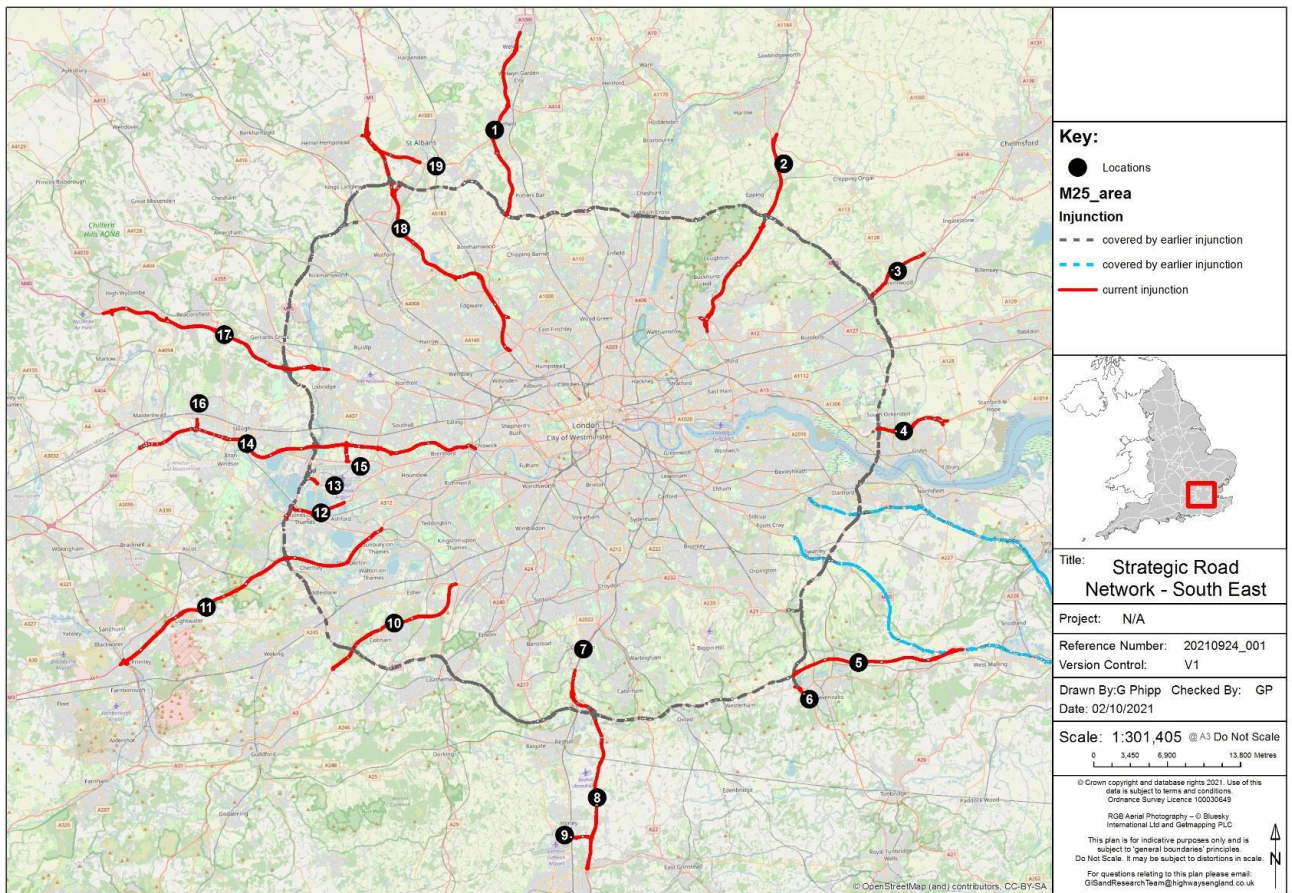
Your Ref.

Z2111665/CAN/DS3

Email

[tony.nwanodi@governmentlegal.gov.uk](mailto:tony.nwanodi@governmentlegal.gov.uk)

## PLAN 1 – The Land



- 1.A1(M) from Junction 1 to Junction 6
- 2.M11 from Junction 4 to Junction 7
- 3.A12 from M25 Junction 28 to A12 Junction 12
- 4.A13 from M25 Junction 30 to A1089
- 5.M26 (the whole motorway) from M25 to M20
- 6.A21 from the M25 to B2042
- 7.A23 from M23 to Star Shaw
- 8.M23 from Junction 7 to Junction 10 (including M23 Gatwick Spur)
- 9.A23 between North and South Terminal Roundabouts
- 10.A3 from A309 to B2039 Ripley Junction
- 11.M3 from Junction 1 to Junction 4
- 12.A30 from M25 Junction 13 to Harrow Road, Stanwell, Feltham
- 13.A3113 from M25 Junction 14 to A3044
- 14.M4 from Junction 4B to Junction 7
- 15.M4 Spur (whole spur) from M4 Junction 4 to M4 Junction 4a
- 16.M4 from Junction 1 to Junction 4B
- 17.M40 from M40 Junction 7 to A40 (Fray's River Bridge)
- 18.M1 from Junction 1 to Junction 8
- 19.A414 from M1 Junction 8 to A405

**SCHEDULE 1 – NAMED DEFENDANTS**

	<b>Name</b>	<b>Address</b>
1	Alexander RODGER	[REDACTED]
2	Alyson LEE	[REDACTED]
3	Amy Pritchard	[REDACTED]
4	Ana Heyatawin	[REDACTED]
5	Andrew Worsley	[REDACTED]
6	Anne Taylor	[REDACTED]
7	Anthony WHITEHOUSE	[REDACTED]
8	Arne Springorum	[REDACTED]
9	Barry Mitchell	[REDACTED]
10	Ben TAYLOR	[REDACTED]
11	Benjamin Buse	[REDACTED]
12	Biff William Courtenay Whipster	[REDACTED]
13	Cameron FORD	[REDACTED]
14	Catherine RENNIE-NASH	[REDACTED]
15	Cathy Eastburn	[REDACTED]
16	Christian Murray-Leslie	[REDACTED]
17	Christian Rowe	[REDACTED]
18	Cordelia Rowlatt	[REDACTED]

19	Daniel Sargison	[REDACTED]
20	Daniel Shaw	[REDACTED] [REDACTED]
21	David CRAWFORD	[REDACTED]
22	David JONES	[REDACTED] [REDACTED]
23	David Nixon	[REDACTED] [REDACTED]
24	David Squire	[REDACTED] [REDACTED]
25	Diana Bligh	[REDACTED] [REDACTED]
26	Diana Hekt	[REDACTED] [REDACTED]
27	Diana Lewen Warner	[REDACTED] [REDACTED]
28	Donald BELL	[REDACTED]
29	Edward HERBERT	[REDACTED] [REDACTED]
30	Elizabeth Rosser	[REDACTED] [REDACTED]
31	Emily Brocklebank	[REDACTED] [REDACTED]
32	Emma Joanne Smart	[REDACTED]
33	Gabriella Ditton	[REDACTED] [REDACTED]
34	Gregory FREY	[REDACTED]
35	Gwen HARRISON	[REDACTED]
36	Harry Barlow	[REDACTED] [REDACTED]
37	Ian Bates	[REDACTED] [REDACTED]
38	Ian Duncan Webb	[REDACTED] [REDACTED]



39	James Bradbury	[REDACTED]
40	James Sargison	[REDACTED]
41	James Thomas	[REDACTED]
42	Janet Brown	[REDACTED]
43	Janine EAGLING	[REDACTED]
44	Jerrard Mark Latimer	[REDACTED]
45	Jessica Causby	[REDACTED]
46	Jonathan Coleman	[REDACTED]
47	Joseph SHEPHERD	[REDACTED]
48	Joshua Smith	[REDACTED]
49	Judith Bruce	[REDACTED]
50	Julia Mercer	[REDACTED]
51	Julia Schofield	[REDACTED]
52	Karen Matthews	[REDACTED]
53	Karen Wildin	[REDACTED]
54	Liam Norton	[REDACTED]
55	Louis McKechnie	[REDACTED]
56	Louise Charlotte Lancaster	[REDACTED]
57	Lucy Crawford	[REDACTED]
58	Mair Bain	[REDACTED]

59	Margaret MALOWSKA	[REDACTED]
60	Marguerite Dowbleday	[REDACTED]
61	Maria Lee	[REDACTED]
62	Martin NEWELL	[REDACTED]
63	Mary Adams	[REDACTED]
64	Martin Lunnon	[REDACTED]
65	Matthew Tulley	[REDACTED]
66	Meredith Williams	[REDACTED]
67	Michael Brown	[REDACTED]
68	Michael WILEY	[REDACTED]
69	Michelle Charlesworth	[REDACTED]
70	Natalie MORLEY	[REDACTED]
71	Nathaniel Squire	[REDACTED]
72	Nicholas Cooper	[REDACTED]
73	Nicholas ONLEY	[REDACTED]
74	Nicholas TILL	[REDACTED]
75	Oliver Rock	[REDACTED]
76	Paul Cooper	[REDACTED]
77	Paul Sheeky	[REDACTED]

78	Peter BLENCOWE	██ ████████████████████
79	Peter Morgan	██ ████████████████████
80	Phillipa CLARKE	██ ████████████████████
81	Priyadaka CONWAY	██ ████████████████████
82	Richard RAMSDEN	██ ████████████████████
83	Rob STUART	██ ████████████████████
84	Robin COLLETT	██ ████████
85	Roman Andrzej Paluch- Machnik	██ ████████████████████
86	Rosemary Webster	██ ████████
87	Rowan Tilly	██ ████████
88	Ruth Ann Cook	██ ████████████████████
89	Ruth Jarman	██ ████████████████████
90	Sarah Hirons	██ ████████████████████
91	Serena Schellenberg	██ ████████████████████
92	Simon REDING	██ ████████
93	Stefania MOROSI	██ ████████
94	Stephanie AYLETT	██ ████████████████████

95	Stephen Gower	[REDACTED]
96	Stephen Pritchard	[REDACTED]
97	Sue Chambers	[REDACTED]
98	Sue Parfitt	[REDACTED]
99	Sue Spencer-Longhurst	[REDACTED]
100	Susan HAGLEY	[REDACTED]
101	Suzie WEBB	[REDACTED]
102	Tam Millar	[REDACTED]
103	Tessa-Marie Burns	[REDACTED]
104	Teresa NORTON	[REDACTED]
105	Tim Speers	[REDACTED]
106	Tim William Hewes	[REDACTED]
107	Tracey Mallaghan	[REDACTED]
108	Tryrone Hodge	[REDACTED]
109	Valeria SAUNDERS	[REDACTED]
110	Venitia CARTER	[REDACTED]
111	Victoria Anne Lindsell	[REDACTED]
112	Xabier GONZALEZ TRIMMER	[REDACTED]