

Application notice

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

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Name of court HIGH COURT OF JUSTICE, KING'S BENCH DIVISION		Claim no.
Fee account no. (if applicable)	Help with Fees - Ref. no. (if applicable)	
PBA0087115	H W F - - -	
Warrant no. (if applicable)		
Claimant's name (including ref.) TELEDYNE UK LIMITED (TEL14/40)		
Defendant's name (including ref.) See Schedule 1		
Date	13 Dec 2024 13 December 2024	

KB-2024-004175

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

Keystone Law

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent?

Claimant

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

The Claimant seeks interim injunctive relief pursuant to the Senior Courts Act 1981, s37(1) and CPR 25.1(1)(a) to restrain acts of trespass, interference with its common law right to access the highway from its land and public nuisance (obstruction of the highway).

The Claimant also seeks, pursuant to CPR 6.15 and CPR 6.27, an order permitting service by an alternative method of the Claim Form, Application for interim relief, all documents in support of the Claim and Application and any injunction order made.

The Claimant intends to make this Application on short notice to 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

☐ at a remote hearing

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

Hours

Minutes

☐ Yes

☒ No

7. Give details of any fixed trial date or period

N/A

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

Defendants

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

☐ the statement of case

☐ the evidence set out in the box below

If necessary, please continue on a separate sheet.

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

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

☒ No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

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

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

Signature

M Singh

☐ Applicant

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

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

Date

Day

13

Month

12

Year

2024

Full name

MANAN SINGH

Name of applicant's legal representative's firm

KEYSTONE LAW

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

PARTNER

Applicant's address to which documents should be sent.

Building and street

48

Second line of address

CHANCERY LANE

Town or city

HOLBORN

County (optional)

Postcode

W C 2 A 1 U F

If applicable

Phone number

020 3319 3700

Fax phone number

DX number

193 Chancery Lane

Your Ref.

TEL14/40

Email

Manan.Singh@keystonelaw.co.uk
info.teledyne@keystonelaw.co.uk

SCHEDULE 1 - DEFENDANTS

(1) JULIAN ALLEN GAO

(2) RUBY HAMILL

(3) DANIEL JONES

(4) NAJAM SHAH

(5) RICKY SOUTHALL

(6) AMAREEN AFZAL

(7) SERENA FENTON

(8) Persons Unknown who are without the consent of the Claimant entering or remaining on land and in or on buildings on any of the sites listed in Schedule 2 to the Claim Form, those being:

- a. The 'ShIPLEY Site' (Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW);
- b. The 'Lincoln Site' (Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS);
- c. The 'Wirral Site' (Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA);
- d. The 'Chelmsford Site' (Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU);
- e. The 'Presteigne Site' (Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH);
and
- f. The 'Newbury Site' (Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR).

(9) Persons Unknown who for the purpose of protesting are obstructing any vehicle accessing the 'ShIPLEY Site' (Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW) from the highway

(10) Persons Unknown who for the purpose of protesting are obstructing any vehicle accessing the highway from the 'ShIPLEY Site' (Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW)

(11) Persons Unknown who for the purpose of protesting are causing the blocking, slowing down, obstructing or otherwise interfering with the free flow of traffic on to, off or along the roads listed at Schedule 3 to the Claim Form