

Application notice

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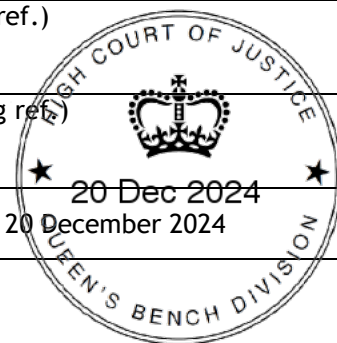
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Name of court HIGH COURT OF JUSTICE, KING'S BENCH DIVISION		Claim no. KB-2024-004175	
Fee account no. (if applicable) PBA0087115		Help with Fees - Ref. no. (if applicable) H W F - [] [] [] - [] [] []	
Warrant no. (if applicable)			
Claimant's name (including ref.) TELEDYNE UK LIMITED (TEL14/40)			
Defendant's name (including ref.) See Schedule 1			
Date		20 Dec 2024 20 December 2024	



KB-2024-004175

Sub Event ID: 9

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 applies for an order under the Senior Courts Act 1981, s34 and CPR 31.17 (a draft of which is attached) that the Chief Constable of Merseyside Police (the **Respondent**):

- Discloses and permits the Claimant to inspect the documents in its control that are within the classes identified in the attached draft order; and
- Specifies any of those documents that are no longer in its control and what has happened to them and those for which it claims a right or duty to withhold inspection.

The Claimant believes that:

- The Respondent holds the documents of which disclosure is sought;
- Those documents are likely to support the case of the Claimant or adversely affect the case of one of the parties to the proceedings; and
- Disclosure of the documents is necessary in order to dispose fairly of the claim or to save costs.

The Respondent has confirmed (as per the attached witness statement and evidence) that she adopts a neutral position on this Application.

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

Hours

Minutes

this time estimate agreed by all parties?

☐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?

Respondent

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

Solicitor service

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.

1. On 13 December 2024 the Claimant issued a claim against the Defendants in Schedule 1 and Persons Unknown (as defined fully in the Claim Form) and an application seeking interim precautionary injunctive relief.
2. The injunction order sought includes prohibitions in relation to “**Wirral Site**”, which means Teledyne UK Limited’s site at Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA. Specifically, prohibitions on trespass are sought.

5 July 2024 Incident

3. On 5 July 2024, three individuals unlawfully entered the Wirral Site and spray-painted the premises in red paint. These individuals also attempted to access the roof of the premises with a ladder but failed to do so. They were arrested by police officers acting for and on behalf of the Respondent and were subsequently released on bail.
4. The Claimant suffered loss, by way of repair bills and loss of production revenue, in the amount of approximately £7,500.00.

2 October 2024 Incident

5. On 2 October 2024, three individuals gained access to the Wirral Site and climbed onto the roof of the premises. They caused damage to the roof, as well as to the production floor in the building underneath, including by the use of red paint. They were arrested by police officers acting for and on behalf of the Respondent and were subsequently released on bail.
6. The Claimant suffered loss, by way of repair bills and loss of production revenue, in the amount of approximately £162,000.00 (with a further £335,000 expected to be incurred in further repair costs).

Persons Known

7. The Claimant does not know the identities or contact details of those persons arrested in the above two incidents. It is the Claimant’s position that the identities of those persons arrested are known to the Respondent.
8. The Claimant’s position is that the persons arrested ought to be named and served in these injunction proceedings in order to be subject to the jurisdiction of the Court and any injunction order made. The Claimant therefore requests disclosure of relevant documents in order to identify (and assist with effecting service on) the individuals who have previously trespassed onto its property and been arrested by the Respondent.
9. Disclosure of the classes of documents requested will enable the Claimant to:
 - a. add those individuals that it alleges to have committed trespass in the past to the Claim as named individuals;
 - b. effect service of documents on those individuals in the proceedings; and
 - c. commence any further necessary proceedings against those individuals should they breach any injunction order in the future.
10. In conclusion, I believe that the Respondent holds the classes of documents requested in the Draft Order, that those documents will support the Claimant’s case or adversely affect the case of the Defendants and will assist the court to dispose fairly of the action or save costs.
11. I believe that it is appropriate for the court to exercise its power under CPR 31.17 to make the Order requested for those reasons.
12. The Respondent has confirmed that she adopts a neutral position on the Application.

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

20

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 | J | 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

(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

Defendants