

Application notice

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

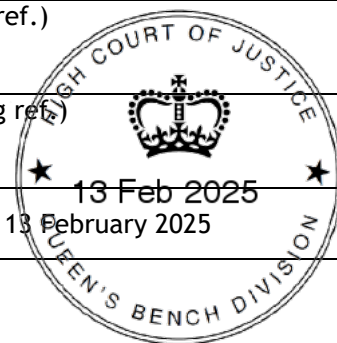
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Name of court HIGH COURT OF JUSTICE, KING'S BENCH DIVISION		Claim no. KB-2024-004175	
Fee account no. (if applicable) PBA0087115		Help with Fees - Ref. no. (if applicable) H W F - [] [] - [] []	
Warrant no. (if applicable)			
Claimant's name (including ref.) TELEDYNE UK LIMITED (TEL14/40)			
Defendant's name (including ref.) See Schedule 1			
Date		13 Feb 2025 13 February 2025	



KB-2024-004175

Sub Event ID: 64

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 an Order (i) adding Mary Ensell and Harry Wade as the Nineteenth and Twentieth Defendants to the Claim respectively (pursuant to CPR 19.4), (ii) extending the scope of the interim injunctive relief granted by Tipples J on 24 January 2025 to Mary Ensell and Harry Wade, and (iii) directions to bring the Claim against Mary Ensell and Harry Wade to final hearing (those directions being the same as those made on 24 January 2025 by Tipples J in relation to all other Named Defendants in the Claim).

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?

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

02

Year

2025

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 – DEFENDANTS

1. JULIAN ALLEN GAO of 11 Ellesmere Place, Walton-on-Thames, Surrey KT12 5AE
2. RUBY HAMILL of 14A Emu Road, Wandsworth, London SW8 3PR
3. DANIEL JONES of 2 Rossett Road, Crosby, Sefton L23 3AW
4. NAJAM SHAH of 24 Cliffe Gardens, Shipley, Bradford BD18 3DB
5. RICKY SOUTHALL of 3 Clarendon Street, Wakefield, West Yorkshire WF1 3RQ
6. AMAREEN AFZAL of 11 North Hill Road, Flat F, Headingley, Leeds, West Yorkshire LS6 2EN
7. SERENA FENTON of 19 Foxcroft Green, Headingley, Leeds, West Yorkshire LS6 3NR
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
12. CHERYL LEANAGHAN of 33 Faulkner Square, Flat 2, Liverpool, Merseyside L8 7NZ
13. MAIS ROBINSON of The Trees, 83-89 Amhurst Park, Flat 24, Hackney, London N16 5DP
14. AUTUMN TAYLOR-WARD of 88 Allington Street, Liverpool, Merseyside L17 7AF
15. ANABELLA BARRINGER of 8 Furance Hill, Flat 4, Sheffield S3 7AF
16. LARA DOWNES of 49 Gipsy Hill, Flat 3, London SE19 1QH
17. GABRIELLE MIDDLETON of 21 Athelstan Road, Margate, Kent CT9 2BD
18. LUKE CARTER of 34 Broad Road, Lower Willingdon, East Sussex BN20 9QU
19. MARY ENSELL of 24 Aylton Road, Huyton, Merseyside L36 2LU
20. HARRY WADE of Beaumont, 178 Leverington Road, Wisbech, Cambridgeshire PE13 1RU