

Application notice

In the High Court of Justice
King's Bench Division

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

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|---------------------------------------|--|
| Claim no. | QB-2022-001317 |
| Fee Account no. | PBA0087028 |
| Warrant no. (if applicable) | |
| Claimant (including ref.) | (1) Thurrock Council (2) Essex County Council |
| Defendants (including ref.) | (1) Mafelise Adams & Ors |
| Date | 26 Jan 2023 26 January 2023 |

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

Sharpe Pritchard LLP

QB-2022-001317

Sub Event ID: 27

2. Are you a Claimant Defendant Legal Representative
 Other (please specify)

If you are a solicitor whom do you represent

Claimant

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

The Claimants seek (i) the adjournment of the final hearing of the Claimants' Claim for final injunctive relief against the Defendants, pending the outcome of the expedited appeal to the Supreme Court in Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors (UKSC 2022/0046), which appeal may dispose of part of these proceedings, (ii) the continuation of the Injunction Order dated 27 May 2022 granted by HHJ Simon (sitting as a Judge of the High Court) (the 'Injunction Order'), pending the outcome of the aforementioned appeal and the final hearing of the Claimants' Claim and (iii) a 12 month extension to the power of arrest contained within the Injunction Order.

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 telephone hearing
6. How long do you think the hearing will last? Hours Minutes
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?
High Court
9. Who should be served with this application?
The 48th, 51st, 63rd, 86th, 102nd and 150th 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

1. The Claimants ask that this Application is considered on the papers, unless the Court considers it appropriate to do otherwise.
2. As per paragraph 11 of the Interim Injunction, this Application should be made on notice to those Defendants who have acknowledged service and provided an address for service. No Defendant has acknowledged service.
3. However, this Application will be served on the solicitors that represented the Sixty-Third Defendant at an earlier hearing in these proceedings, and by way of email on the Forty-Eighth, Fifty-First, Eighty-Sixth, One-Hundred and Second and the One-Hundred and Fiftieth Defendants (for whom the Claimants have an email address).
4. The Claimants rely on the witness statement of Adam Rulewski dated 25 January 2023 and its exhibit.

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.

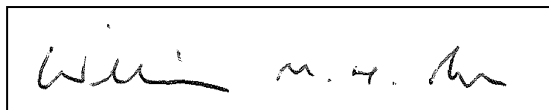
No

Statement of Truth

I understand that proceedings for contempt of court may be brought against 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 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



- 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

26

Month

January

Year

2023

Full name

William Maxwell Hunt Rose

Name of applicant's legal representative's firm

Sharpe Pritchard LLP

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

Elm Yard, 10-16 Elm Street

Second line of address

Town or city

London

County (optional)

Postcode

WC1X 0BJ

If applicable

Phone number

020 7405 4600 / 07799 900961

Fax number

020 7204 2244

DX number

Your Ref.

WMHR/1329.48

Email

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