



Amended pursuant to Richard Kimblin KC

Order dated 16 June 2025

Amended Pursuant to HH Mr Justice Turner

Claim Form (CPR Part 8)

in the HIGH COURT AT THE ROYAL COURTS OF JUSTICE

Order dated 22 July 2025

Claim no.

Fee Account no.

PBA Account: 0079006

Help with Fees -
Ref no. (if applicable)

H W F - - - - -

Amended Pursuant to HH Mrs Justice McGowan Order dated 30 July 2025

Amended Pursuant to HH Mrs Justice McGowan Order dated 14 October 2025

Amended 03.09.2026 pursuant to HH Mrs Justice Brunner Order dated 25.08.2026

Amended 13.10.2026 pursuant to HH Mr Justice Sweeting Order dated 08.10.2026

Claimant

LONDON BOROUGH OF ENFIELD
CIVIC CENTRE
SILVER STREET
ENFIELD
MIDDLESEX
EN1 3XA



Defendant(s)

- Persons Unknown who participates between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the London Borough of Enfield, Map Exhibit MR1/1 (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.
- Persons unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the London Borough of Enfield, Map Exhibit MR1/1 with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving.
- Persons Unknown promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00pm and 7:00am of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within London Borough of Enfield, Map Exhibit MR1/1.
- ALIN HUSSEIN
- MUHAMMAD AKSAHIN
- SAM HOUGH
- SERGIU BOGDAN
- ALEXANDRU PIRTOACA
- KLODJAN GURI
- NOJUS SARTAUSKAS
- KADAM KAYA
- ILKER VURUCU

KB-2024-003851

Does your claim include any issues under the Human Rights Act 1998?

☐ Yes

☒ No

Details of claim(see also overleaf)

The Claimants seek the following relief:

- An Injunction order;
- A power of arrest;
- Declaratory relief; and
- Further or other relief as the Court thinks fit

Defendant's
name and
address

PERSONS UNKNOWN AS DEFINED ABOVE (D1-D3)

ADDRESSES NOT APPLICABLE AND

ALIN HUSSEIN (D4) AND MUHAMMAD AKSAHIN
(D5) TO BE SERVED BY EMAIL

SAM HOUGH (D6) TO BE SERVED BY EMAIL

SERGIU BOGDAN (D7) AND ALEXANDRU
PIRTOACA (D8) TO BE SERVED BY EMAIL

KLODJAN GURI(D0) TO BE SERVED BY EMAIL

SEE ATTACHED SHEET

£

Court fee

626

Legal representative's
costs

TBC

Issue date

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Details of claim (continued)**To restrain:**

1. Persons Unknown who participates between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the within the London Borough of Enfield, Map EXHIBIT MR/1, at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving
2. Persons unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the London Borough of Enfield, Map EXHIBIT MR/1 with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving
3. Persons Unknown promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00pm and 7:00am of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the London Borough of Enfield, Map EXHIBIT MR/1 Area as attached)

The Claim is brought pursuant to the following statutory provisions:

- (i) Sections 111 and 222 Local Government Act 1972
- (ii) Section 130 Highways Act 1980
- (iii) Section 37 Senior Courts Act 1981
- (iv) Section 1 Localism Act 2011
- (v) Sections 6 and 17 Crime and Disorder Act 1998
- (vi) Section 27 Police and Justice Act 2006

Full details of the legal and factual basis for the claim are set out in the attached Particulars of Claim and witness statements filed herewith.

Part 8 of the Civil Procedure Rules applies to this claim.

The Claimants seek orders for service of the Claim Form and supporting documentation by alternative means pursuant to CPR 6.15 & 6.27. The proposed steps to effect service are set out in the draft Order.

The Claimants will also seek an order dispensing with personal service of the Injunction. The proposed steps to bring the order to the attention of persons likely to be affected by any Injunction are set out in the draft Order,

PERSONS UNKNOWN AS DEFINED ABOVE (D1-D3)
ADDRESSES NOT APPLICABLE AND
ALIN HUSSEIN (D4) AND MUHAMMAD AKSAHIN (D5)
TO BE SERVED BY EMAIL
SAM HOUGH - TO BE SERVED BY EMAIL
SERGIU BOGDAN (D7) AND ALEXANDRU
PIRTOACA (D8) TO BE SERVED BY EMAIL
KLODJAN GURI(D0) TO BE SERVED BY EMAIL

SEE ATTACHED SHEET

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

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 in these particulars of claim are true. I **am authorised** by the claimant to sign this statement.

Signature



- ☒ Claimant
- ☐ Litigation friend (where claimant is a child or a Protected Party)
- ☒ Litigation Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day Month Year

 15 NOVEMBER 2024

Amended 24 June 2025 pursuant to Richard Kimblin KC Order dated 16 June 2025

Full name Amended 31 July 2025 pursuant to HH Mr Justice Turner Order dated 22 July 2025

BALBINDER KAUR

Amended 7 August 2025 Pursuant to HH Mrs Justice McGowan Order dated 30 July 2025

Amended on 29 October 2025 pursuant to HH Mrs Justice McGowan Order dated 14 October 2025

Name of claimant's legal representative's firm

LONDON BOROUGH OF ENFIELD

Amended 03.09.2026 pursuant to HH Mrs Justice Brunner Order dated 25.08.2026
Amended 13.10.2026 pursuant to HH Mr Justice Sweeting Order dated 08.10.2026

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

ASSISTANT PRINCIPAL LAWYER

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Additional Defendants added to the Claim Form and Particulars of Claim

**IN THE HIGH COURT AT THE ROYAL COURTS OF JUSTICE
KINGS BENCH**

CASE NO: KB-2024-003851

IN THE MATTER OF AN APPLICATION FOR AN INJUNCTION UNDER

S.222 LOCAL GOVERNMENT ACT 1972 AND

S.130 OF THE HIGHWAYS ACT 1980

BETWEEN:

LONDON BOROUGH OF ENFIELD

CLAIMANT

- and -

1. Persons Unknown who participates between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the London Borough of Enfield, Map **Exhibit MR1/1** at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.
2. Persons unknown who participate between the hours of 3:00pm and 7:00am in a gathering of 2 or more persons within the London Borough of Enfield, **Map Exhibit MR1/1** with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving.
3. Persons Unknown promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00pm and 7:00am of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within London Borough of Enfield, **Map Exhibit MR1/1**.
4. ALIN HUSSEIN (D4)
5. MUHAMMAD AKSAHIN (D5)
6. SAM HOUGH (D6)
7. SERGIU BOGDAN (D7)
8. ALEXANDRU PIRTOACA (D8)
9. KLODJAN GURI (D9)
10. NOJUS SARTAUŠKAS (D10)
11. KADIM KAYA (D11)
12. ILKER VURUCU (D12)

DEFENDANTS

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KINGS BENCH

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8. **ALEXANDRU PIRTOACA (D8)**
9. **KLODJAN GURI (D9)**
10. **NOJUS SARTAUSSKAS (D10)**
11. **KADIM KAYA (D11)**
12. **ILKER VURUCU (D12)**

DEFENDANTS

NAMED DEFENDANTS ADDRESSES

1. **First Defendant** – Persons Unknown
2. **Second Defendant** – Persons Unknown
3. **Third Defendant** – Persons Unknown

NAMED DEFENDANTS

4. **Fourth Defendant:** Muhammad Aksahin, 321 Greenhill Street, Stratford upon Avon, Warwickshire, CV37 6LE.
5. **Fifth Defendant:** Alin Hussein, 94 Holcombe Road, Tottenham, London, N17 9AB & 64 Beech Road, Witley, OX33 1UD, Oxfordshire.
6. **Sixth Defendant:** Sam Hough, 30 Beverley Road, Ruislip, Middlesex, HA4 9AW.
7. **Seventh Defendant:** Sergiu Bogan, 103 Addiscombe Court Road, Croydon, CR0 6TX.
8. **Eighth Defendant:** Alexandru Pirtoaca, 5 Rendle Close, Croydon, CR0 6YJ.
9. **Ninth Defendant:** Klodjan Guri, 59 King Edward's Road, Enfield, EN3 7DA.
10. **Tenth Defendant:** Nojus Sartajuskas, 1 Alveston Avenue HA38TG.
11. **Eleventh Defendant:** Kadim Kaya, 29 Richmond Street, Sheerness, ME12 2QA
12. **Twelfth Defendant:** Ilker Vurucu, 108 Whitehead Close, Edmonton, London, N1 1VZ