

Application notice

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Name of Court IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION		Claim no.
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)	
PBA0079006	H W F - - - - -	
Warrant no. (if applicable)		
Claimant's name (including ref.) LONDON BOROUGH OF ENFIELD		
Defendant's name (including ref.) (1) CHARLES SNELL (2) DAVID SNELL (3) STEPHEN MAY (4) ABDELLAH TAYEB (AKA CASTRO) (5) MICHAEL WUJECK (6) PERSONS UNKNOWN		
Date		

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

LEGAL SERVICES, LONDON BOROUGH OF ENFIELD

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 following order:

- 1. Abridging time for service of the Part 8 Claim Form pursuant to CPR 3.1(2)(a) in order that the Claimant may apply for an interim injunction against the Defendants forthwith;**

(The Claimant's application is made as it recognises that the hearing of a Part 8 Claim that includes an injunction to prevent unlicensed activities and/or environmental harm can, ordinarily only be heard 21 days after service of the Claim Form by virtue of CPR 8APD20.8.)

- 2. Listing a hearing for this application without notice to the Defendant (albeit on informal written notice) due to the extreme urgency of the application;**
- 3. An interim injunction against the Defendants' in the following terms; namely that the Defendants' should be forbidden (whether by themselves or by instructing or encouraging or permitting any other person) from:**
 - Occupying in any way, including by setting up an encampment on or in;**
 - a) Bringing onto and/or mooring or leaving any boats on;**
 - b) Bringing onto and/or leaving any caravans, mobile homes, pick-up trucks, vans or lorries and/or any associated vehicles on;**
 - c) Entering for the purposes of fly-tipping or discarding rubbish;**
 - d) Fly-tipping or discarding rubbish on or in;**
 - e) Engaging in any anti-social behaviour on or in; or**
 - f) Causing nuisance by reason of any unauthorised occupation, trespass, mooring of boats or in any other way on or in;**
 - g)**

any part of the of the Land identified on Plan 1 (AGL536977) in yellow, Plan 2 (AGL216617) in yellow and Plan 3 (AGL536978) edged blue and/or any part of the River Lee Navigation System adjacent to the Land;

- 4. A power of arrest be attached to Paragraphs 3a-g above.**

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?

9. Who should be served with this application?

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.

Please find attached the Witness Statement of Karen Maguire dated 18 April 2024

Statement of Truth

(I believe) (The applicant believes) that the facts stated in this section (and any continuation sheets) are true. 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.

Signed BKaur Dated: 18 April 2024
 Applicant('s legal representative)(~~'s litigation friend~~)

Full name Balbinder Kaur

Name of applicant's legal representative's firm: Legal Services, London Borough of Enfield

Position or office held Assistant Principal Lawyer
 (if signing on behalf of firm or company)

11. Signature and address details

Signed BKaur Dated 18 April 2023
 Applicant('s legal representative)(~~'s litigation friend~~)

Position or office held Assistant Principal Lawyer
 (if signing on behalf of firm or company)

Applicant's address to which documents about this application should be sent

LEGAL SERVICES, PO BOX 50, CIVIC CENTRE, SILVER STREET, ENFIELD,			If applicable					
			Phone no.	020 8132 0091				
			Fax no.					
			DX no.					
			Ref no.	LS/C/BK/169168				
Postcode	E	N	1	3	X	A		
e-mail address	balbinder.kaur@enfield.gov.uk							