

N244

Application notice

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Name of court IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION		Claim no.
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)	
PBA0079006	— —	
Warrant no. (if applicable)		
Claimant's name (including ref.) LONDON BOROUGH OF ENFIELD		
Defendant's name (including ref.) PERSONS UNKNOWN 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 (attached) 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		
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 Claimant seeks the following relief:

- (i) An Injunction order;
- (ii) A power of arrest;
- (iii) Declaratory relief; and
- (iv) Further or other relief as the Court thinks fit.

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 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 the London Borough of Enfield, Map **EXHIBIT MR1/1** Area as attached)

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.

The grounds of this application are set out in the written evidence of: Martin Rattigan dated 13 September 2024 with the Exhibits MR1/1-92 attached thereto in support of the claim; incorporating

S9 witness statements of Inspector Richard Lee dated 1 March 2024, PS Mark Wells dated 2 February 2024; PC 2067T Luke Heming dated 22 December 2023; PC Paige dated 17 April 2024 and 2 anonymous civilian witnesses.

This written evidence is served with this application.

The Claimants seek orders for service of the Claim Form and supporting documentation by alternative means pursuant to **CPR 6.15 & 6.27 & 6.28**. 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 pursuant to **CPR 6.28 and 81.4(2)(d)**. 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.

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? a hearing without a hearing
 at a remote 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 Witness Statement of Martin Rattigan dated 13.11.24 with exhibits MR1/1-92

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

B Kaur

- 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 Month Year

19 11 2024

Full name

Balbinder Kaur

Name of applicant's legal representative's firm

Legal Services, London Borough of Enfield

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

Assistant Principal Solicitor

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

LEGAL SERVICES, PO BOX 50, CIVIC CENTRE, SILVER STREET, ENFIELD, Postcode <table border="1"><tr><td>E</td><td>N</td><td>1</td><td></td><td></td></tr></table> <table border="1"><tr><td>3</td><td>X</td><td>A</td><td></td><td></td></tr></table>	E	N	1			3	X	A			If applicable	
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	3	X	A									
	Phone no.	020 8132 0091										
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