

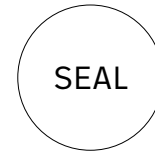


Claim Form (CPR Part 8)

In the High Court Queen's Bench Division Birmingham District Registry	
Claim no.	QB-2021-BHM-000056
Fee Account no.	PBA0085443 26 Jan 2022
Help with Fees - Ref no. (if applicable)	H W F - BIRMINGHAM

QB-2021-BHM-000056

Claimant
 Birmingham City Council
 The Council House
 Victoria Square
 Birmingham B1 1BB



Defendant(s)
 (1) Thomas Cash
 (2) Patrick Connors
 (3) Patrick Connors
 (4) Persons Unknown being the Defendants identified by description at Schedule 1 hereof.

Does your claim include any issues under the Human Rights Act 1998? Yes No

Details of claim (see also overleaf)

The Claimant claims an injunction pursuant to s222 Local Government Act 1972, s1 of the Localism Act 2011, s130 Highways Act 1980 and s187B Town and Country Planning Act 1990 to promote and protect the interests of the inhabitants of the Claimant's local authority area as delineated on the map annexed to the Particulars of Claim by restraining the Defendants by way of injunction from committing tortious and criminal acts and including acts amounting to public nuisance and to deliberate and flagrant breaches of the criminal law and which use of the criminal law is unable to prevent or control. To restrain breaches of planning control. To protect the rights of the public to the use and enjoyment of the highways within its district. The Claimant believes that the conduct complained of includes significant risk of harm to local residents, its officers and members of the public so that it is necessary for a power of arrest pursuant to s27 Police and Justice Act 2006 to be attached to the injunction.

Defendant's name and address	Persons Unknown
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	£
Court fee	569.00
Legal representative's costs	To be assessed.
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.

Claim no.

C90BM249

Details of claim (continued)

See Particulars of Claim attached.

Birmingham City Council
Legal and Governance Department
PO Box 15992
B2 2 UQ

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

H. MacPherson

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

Date

Day Month Year

24 01 2022

Full name

Hilary MacPherson

Name of claimant's legal representative's firm

Birmingham City Council Legal and Governance Department

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

Solicitor

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>

SCHEDULE 1 – LIST OF DEFENDANTS

1. The person currently in possession of or a passenger in vehicle 07MO3760
2. The person currently in possession of or a passenger in vehicle 131-LS-566
3. The person currently in possession of or a passenger in vehicle AD06THN
4. The person currently in possession of or a passenger in vehicle AU10 TWP
5. The person currently in possession of or a passenger in vehicle AX53FEF
6. The person currently in possession of or a passenger in vehicle BIG6307
7. The person currently in possession of or a passenger in vehicle BIGS307
8. The person currently in possession of or a passenger in vehicle BJ56EPK
9. The person currently in possession of or a passenger in vehicle BJ69ZDE
10. The person currently in possession of or a passenger in vehicle BJ69ZDF
11. The person currently in possession of or a passenger in vehicle BL56EEA
12. The person currently in possession of or a passenger in vehicle BLT8EPK
13. The person currently in possession of or a passenger in vehicle BT54AHE
14. The person currently in possession of or a passenger in vehicle BU11YVJ
15. The person currently in possession of or a passenger in vehicle CF60PBV
16. The person currently in possession of or a passenger in vehicle CF60FBV
17. The person currently in possession of or a passenger in vehicle DG07NWJ
18. The person currently in possession of or a passenger in vehicle DG07NWA
19. The person currently in possession of or a passenger in vehicle DK54ZKO
20. The person currently in possession of or a passenger in vehicle DK66VED
21. The person currently in possession of or a passenger in vehicle DK66VXD
22. The person currently in possession of or a passenger in vehicle DU11YVJ
23. The person currently in possession of or a passenger in vehicle DV13GUE
24. The person currently in possession of or a passenger in vehicle DV13 GUR
25. The person currently in possession of or a passenger in vehicle DV18ZDG
26. The person currently in possession of or a passenger in vehicle DV18DZG
27. The person currently in possession of or a passenger in vehicle DV60VTT
28. The person currently in possession of or a passenger in vehicle DX54ZKO
29. The person currently in possession of or a passenger in vehicle EX15AYK
30. The person currently in possession of or a passenger in vehicle FL08AXS
31. The person currently in possession of or a passenger in vehicle FL11PLO

32. The person currently in possession of or a passenger in vehicle FL64JYK
33. The person currently in possession of or a passenger in vehicle FL54YJK
34. The person currently in possession of or a passenger in vehicle FV08XFE
35. The person currently in possession of or a passenger in vehicle GF11ONL
36. The person currently in possession of or a passenger in vehicle GF11DNL
37. The person currently in possession of or a passenger in vehicle GK130JA
38. The person currently in possession of or a passenger in vehicle KCK8903
39. The person currently in possession of or a passenger in vehicle KCK890F
40. The person currently in possession of or a passenger in vehicle KJZ9398
41. The person currently in possession of or a passenger in vehicle KM05KXY
42. The person currently in possession of or a passenger in vehicle KP57TGU
43. The person currently in possession of or a passenger in vehicle KT16KXY
44. The person currently in possession of or a passenger in vehicle LB07AKU
45. The person currently in possession of or a passenger in vehicle LB07AKO
46. The person currently in possession of or a passenger in vehicle LB60NBU
47. The person currently in possession of or a passenger in vehicle LF03FOT
48. The person currently in possession of or a passenger in vehicle LI05RYC
49. The person currently in possession of or a passenger in vehicle LM16HTD
50. The person currently in possession of or a passenger in vehicle LN15HTV
51. The person currently in possession of or a passenger in vehicle LR18EOU
52. The person currently in possession of or a passenger in vehicle MK13OZS
53. The person currently in possession of or a passenger in vehicle NX08CWA
54. The person currently in possession of or a passenger in vehicle PJ07NEU
55. The person currently in possession of or a passenger in vehicle PK58XBZ
56. The person currently in possession of or a passenger in vehicle PK58YBZ
57. The person currently in possession of or a passenger in vehicle PN19YHR
58. The person currently in possession of or a passenger in vehicle PX09XMV
59. The person currently in possession of or a passenger in vehicle SG16THN
60. The person currently in possession of or a passenger in vehicle SJ18LLD
61. The person currently in possession of or a passenger in vehicle SK21VJG
62. The person currently in possession of or a passenger in vehicle SN21VJG
63. The person currently in possession of or a passenger in vehicle SK71RGO
64. The person currently in possession of or a passenger in vehicle SK61RGO
65. The person currently in possession of or a passenger in vehicle SN67ZSD

66. The person currently in possession of or a passenger in vehicle VE19WVW
67. The person currently in possession of or a passenger in vehicle VN06JHL
68. The person currently in possession of or a passenger in vehicle WG09JUC
69. The person currently in possession of or a passenger in vehicle WJ55CPF
70. The person currently in possession of or a passenger in vehicle YY54MFO

71. Persons unknown who have, since 06 August 2021, used the vehicles identified at paragraph 1-70 of this Schedule for the purpose of entering one or more of Daisy Farm Park, Swanshurst Park, Billesley Common, Chinn Brook Recreation Ground, The Dell, Fox Hollies Park, Cofton Park, Kings Norton Playing Field, Kings Heath Park, Highbury Park , Kings Norton Park, Senneleys Park, Selly Oak Park, Walkers Heath Recreation Ground, Stechford Hall Park, Stechford Recreational Ground, or Horselea Croft / Cottsmeadow Drive within the City of Birmingham to establish, join and / or be a part of any unauthorised encampment there.

72. Persons unknown who have, since 06 August 2021, entered the land at one or more of Daisy Farm Park, Swanshurst Park, Billesley Common, Chinn Brook Recreation Ground, The Dell, Fox Hollies Park, Cofton Park, Kings Norton Playing Field, Kings Heath Park, Highbury Park , Kings Norton Park, Senneleys Park, Selly Oak Park, Walkers Heath Recreation Ground, Stechford Hall Park, Stechford Recreational Ground, or Horselea Croft / Cottsmeadow Drive within the City of Birmingham to establish, join and / or be a part of any unauthorised encampment there.