

N244

Application notice

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Name of court High Court Of Justice King's Bench Division		Claim no. QB-2022-001420
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)	
	HWF - [] [] [] - [] [] []	
Warrant no. (if applicable)		
Claimant's name (including ref.) Shell U.K. Oil Products Limited OLDFIEA/SHELL		
Defendant's name (including ref.) Persons unknown and 14 named defendants as set out in the appendix to this application		
Date	11 April 2024	

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

Eversheds Sutherland (International) LLP

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?

1. Pursuant to CPR 6.15 and 6.27,
a) in circumstances where it has been discovered that some of the Named Defendants may no longer live at the last known address supplied to the Claimant which is referred to at paragraph 7.3 of the Order of Soole J dated 15 March 2024 (the "Order of Soole J"):
(i) an order the steps already taken by the Claimant in the proceedings QB-2022-001420 to bring the 2024 Documents to the attention of the Second, Third, Fourth and Tenth Defendants in accordance with paragraph 7.3 of the Order of Soole J shall be good service; and
(ii) an order to vary the requirements for alternative service of future documents in these proceedings as set out in paragraphs 7 of the Order of Soole J dated 15 March 2024 in respect of the Second, Fourth, Third and Tenth Defendants to effect service on those Defendants;

and
b) in circumstances where it has been identified that attachments can be too large to attach to an email and where it has come to the attention of the Claimant that an interested party no longer lives at the last known address provided to the Claimant:
(i) an order that the steps already taken by the Claimant in the proceedings QB-2022-001420 to bring the 2024 Documents to the attention of an interested party known as Jessica Branch, shall be good service; and
(ii) an order to vary the requirements for alternative service of future documents in QB-2022-001420 to effect service on the Defendants and any interested parties by sending an email providing a link to the Claimants' website where copies are available and by sending copies to an interested party's solicitor.

3. For this application to be heard at the review hearing listed on 17 April 2024 in accordance with paragraph 17 of the Soole J 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 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

Review Hearing listed on 17 April 2024.
Claimant considers this application can be heard
at the same time without impacting the time
estimate

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

Claimant will arrange service on the
Defendants

9a. Please give the service address, (other than details
of the claimant or defendant) of any party named in
question 9.

Claimant will arrange service on
interested parties

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.

The attached Eighth Witness Statement of Alison Oldfield dated 11 April 2024

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



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

11

April

2024

Full name

Alison Oldfield

Name of applicant's legal representative's firm

Eversheds Sutherland (Intl) 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

Bridgewater Place, Water Lane

Second line of address

Town or city

Leeds

County (optional)

Postcode

L S 1 1 5 D R

If applicable

Phone number

020 7497 9797

Fax phone number

020 7919 4919

DX number

DX 12027 Leeds - 27

Your Ref.

Email