

N244

Application notice

For help in completing this form please read the notes for guidance form N244Notes.

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Name of court High Court Of Justice King's Bench Division Royal Courts of Justice		Claim no. QB-2022-001420
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)	
PBA0088890	H W F - [] - []	
Warrant no. (if applicable)		
Claimant's name (including ref.) Shell U.K. Oil Products Limited		
Defendant's name (including ref.) Persons Unknown damaging and/or blocking the use of or access to any Shell Petro Station in England and Wales, or to any equipment or infrastructure upon it, by express or implied agreement with others, in connection with environmental protest campaigns with the intention of disrupting the sale or supply of fuel to and from the said station		
Date	19 April 2023	



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?

An order that the Chief Constable of Metropolitan Police (who is not a party to these proceedings) shall give disclosure pursuant to CPR 31.17 of documents in the categories identified in the appended draft order, and subject to the conditions identified in that order. A copy of the draft order has been shared with the Respondent ahead of filing this application, however it has not been possible to obtain the Respondent's comments (if any) at the time of filing.

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

Renewal Hearing is listed for 1.5 days starting on 25 April 2023 (the court has been invited to consider this application without a hearing but to the extent that a hearing is necessary, the claimant invites the court to consider the application in the course of the Renewal Hearing)

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

The Chief Constable of The Metropolitan Police

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

Julia.Bartholomew@met.police.uk

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.

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

Full name

Name of applicant's legal representative's firm

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

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

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.

OLDFIEA/SHELL

Email

shell.service@eversheds-sutherland.com

