

Application notice

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Name of court IN THE HIGH COURT OF JUSTICE		Claim no. QB-2019-002737	
Fee account no. (if applicable)		Help with Fees - Ref. no. (if applicable)	
PBA0079788		H W F - <input type="text"/> <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/>	
Warrant no. (if applicable)		N/A	
Claimant's name (including ref.) THE LONDON BOROUGH OF HAVERING			
Defendant's name (including ref.) 106 PERSONS UNKNOWN			
Date		9.9.2025	

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

Ms Rachel George-Hamilton, OneSource Legal Services (on behalf of LB Newham & LB of Havering)

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent?

London Borough of Havering

3. What order are you asking the court to make and why?

Pursuant to paragraph 12 of the Order of Eyre J dated 3 October 2024, the Claimant applies for the continuation of the injunction granted by that same Order as against the 106th Defendant (Persons Unknown) only. The Claimant seeks, pursuant to CPR 6.15 and CPR 6.27, and for the purposes of CPR 81.4, an order for the alternative service of any order made in this Application.

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? Is this time estimate agreed by all parties?

3 Hours Minutes

☐ Yes ☒ No

7. Give details of any fixed trial date or period

6th October 2025

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

Persons Unknown on the relevant land

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

The Claimant will serve the relevant land by 15th September 2025. This is in accordance with paragraph 10 of the order of Eyre J dated 3rd October 2024. Certificates of service will be provided in advance of the hearing.

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.

Witness statements and Exhibits of:

1. Miss Mandeep Mehat (Fourth Witness Statement)
2. Ms Jane Eastaff (Second Witness Statement)
3. Ms Jill Warren
4. Acting Chief Inspector Charlie Routley
5. Ms Jane Eastaff (Third Witness Statement)

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

09

Month

09

Year

2025

Full name

Ms Rachel George-Hamilton

Name of applicant's legal representative's firm

OneSource Legal Services on Behalf of LB Newham & LB Havering

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

Head of Law Procurement, Contracts & Companies - Solicitor

Applicant's address to which documents should be sent.

Building and street

OneSource Legal Services, Enforcement & Litigation

Second line of address

Newham Dockside, 1000 Dockside Road

Town or city

London

County (optional)

Postcode

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If applicable

Phone number

0203 373 9287

Fax phone number

DX number

Your Ref.

LE/MM/HAV012579

Email

mandeep.mehat@onesource.co.uk