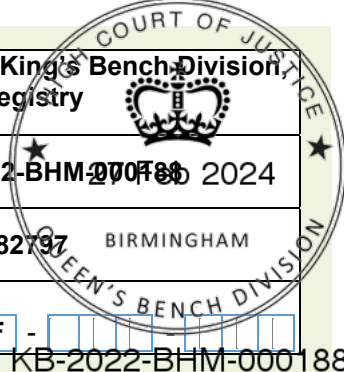




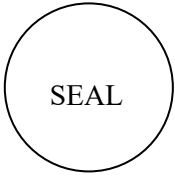
# Claim Form (CPR Part 8)

In the	High Court of Justice, King's Bench Division, Birmingham District Registry	
Claim no.	KB-2022-BHM-000188	2024
Fee Account no.	PBA0082737	BIRMINGHAM
Help with Fees – Ref no. (if applicable)	H W F -	KB-2022-BHM-000188



### Claimant

- (1) WOLVERHAMPTON CITY COUNCIL
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL



### Defendant(s)

- (1-4) PERSONS UNKNOWN AS DESCRIBED IN THE ATTACHED AMENDED PARTICULARS OF CLAIM
- (5) ANTHONY PAUL GALE
  - (6) WIKTORIA SZCZUBLINSKA
  - (7) ISA IQBAL
  - (8) MASON PHELPS
  - (9) REBECCA RICHOLD

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

### Details of claim (see also overleaf)

The Claimants respectfully invite the honourable court to grant injunctive relief (reinforced with a power of arrest) pursuant to the Court's powers under section 37(1) Senior Courts Act 1981, to restrain street racing and associated dangerous driving activities in the Black Country Area (which the Claimants define for the purposes of this injunction application, as the entirety of the combined local government areas of Dudley, Sandwell, Walsall and Wolverhampton Councils).

Should the honourable court be minded to grant the injunctive relief sought by the Claimant, the Claimants further invite the Court to exercise the discretion granted to it pursuant to rule 81.8 of the Civil Procedure Rules and dispense with the requirement to serve any injunction and power of arrest on Persons Unknown personally and instead serve any injunction and power of arrest granted by alternative means.

Full details of the Claim, together with draft orders and further details of the requisite steps the Claimants suggest would achieve effective alternative service of the order should the honourable court be minded to grant any injunction and power of arrest on persons unknown, and should the honourable court further be minded to permit the Claimants to serve any order by alternative means to personal service, are particularised in the attached documentation.

### Defendant's name and address

(1-4) PERSONS UNKNOWN (as described in the Amended Particulars of Claim)  
 (5) Mr ANTHONY GALE (care of Messrs Waldrons Solicitors)  
 (6) Miss WIKTORIA SZCZUBLINSKA (care of Messrs Charles Strachan Solicitors)  
 (7) Mr Isa Iqbal (care of Messrs Waldrons Solicitors)  
 (8) Mr MASON PHELPS  
[masonphelpsb36@hotmail.co.uk](mailto:masonphelpsb36@hotmail.co.uk)  
 (9) Ms REBECCA RICHOLD (care of Messrs Harringtons Solicitors)

	£
Court fee	569.00
Legal representative's costs	T.B.A.
Issue date	

For further details of the courts <http://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.

<b>Claim no.</b>	KB-2022-BHM-000188
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Details of claim (*continued*)

The Claimants would respectfully draw attention to the attached amended particulars of claim for full details of this claim.

**Statement of Truth**

**The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the Claimant to sign this statement.

**The Claimant understands 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.**

Full name DAVID PATTISON

Name of claimant's legal representative's firm Legal Services, Wolverhampton City Council

signed



**Claimant's Legal representative** (as defined by CPR 2.3(1))

position or office held: Chief Operating Officer  
(if signing on behalf of firm or company)

**Date**

27 FEBRUARY 2024

"BLACK COUNTRY CAR CRUISE"  
Wolverhampton City Council, Civic Centre, St Peter's  
Square, Wolverhampton WV1 1RG  
DX744350 Wolverhampton 27  
Ref: LIT/AS/LIJ017753P  
E-mail: [litigation@wolverhampton.gov.uk](mailto:litigation@wolverhampton.gov.uk)

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.