



**BETWEEN:**

1. WOLVERHAMPTON CITY COUNCIL
2. DUDLEY METROPOLITAN BOROUGH COUNCIL
3. SANDWELL METROPOLITAN BOROUGH COUNCIL
4. WALSALL METROPOLITAN BOROUGH COUNCIL

**KB-2022-BHM-000188**

**Claimants**

**-and-**

**1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING**

**2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING**

**3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)**

**4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING**

**5. Mr ANTHONY PAUL GALE**

**6. Miss WIKTORIA SZCUBLINSKA**

**7. Mr ISA IQBAL**

**8. Mr MASON PHELPS**

**Defendants**

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**CLAIMANTS' APPLICATION FOR INJUNCTIVE RELIEF  
BUNDLE OF DOCUMENTS FOR USE AT A HEARING LISTED 27 FEBRUARY AND  
28 FEBRUARY 2024**

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**VOLUME ONE**

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**B E T W E E N:**

- 1. WOLVERHAMPTON CITY COUNCIL**
- 2. DUDLEY METROPOLITAN BOROUGH COUNCIL**
- 3. SANDWELL METROPOLITAN BOROUGH COUNCIL**
- 4. WALSALL METROPOLITAN BOROUGH COUNCIL**

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**-and-**

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**5. Mr ANTHONY PAUL GALE**

**6. Miss WIKTORIA SCZCUBLINSKA**

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**8. Mr MASON PHELPS**

**Defendants**

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**CLAIMANTS' APPLICATION FOR INJUNCTIVE RELIEF  
BUNDLE OF DOCUMENTS FOR USE AT A HEARING LISTED 27 FEBRUARY AND  
28 FEBRUARY 2024**

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**VOLUME TWO**

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## I. SECTION I - Supplemental Evidence Bundle as filed 14 December 2022 and Application for Urgent Relief

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2.	David England Statement 3.11.2020	I 65 - I 66
3.	Faye Willetts Statement 12.04.2021_Redacted	I 67 - I 71
4.	Hema Hayer Statement 27.10.2020_Redacted	I 72 - I 74
5.	Jeffrey Differ Statement 27.10.2020_Redacted	I 75 - I 76
6.	Lisa Fox Statement 28.10.2020_Redacted	I 77 - I 78
7.	Rachel Fanthom Statement 13.04.2021	I 79 - I 81
8.	Rajbinder Kaur Statement 3.11.2020_Redacted	I 82 - I 83
9.	Richard Hardy Statement 16.10.2020_Redacted	I 84 - I 85

## J. SECTION J - COURT ORDERS

1.	INJUNCTION (Granted 22.12.2022)	J 1 - J 24
2.	POWER OF ARREST (Granted 22.12.2022)	J 25 - J 27
3.	PLAN A Map of the Black Country Councils Areas	J 28
4.	KB 2022 BHM 000221 - Birmingham City Council v Nagmadin Ors; KB 2022 BHM 000188 Wolverhampton City Council & Ors v Persons Unknown (21.12.22) - Approved judgment	J 29 - J 46

## K. SECTION K - Claimants' Evidence re: Compliance with Court Orders and Updating Evidence

1.	Witness Statement Pardip Nagra 23 Jan 2023	K 1 - K 3
2.	Witness Statement of PC Mark Campbell 27 January 2023	K 4 - K 7
3.	Statement of Paul Brown re Injunction Service Requirements 27 01 2023	K 8 - K 18
4.	Exhibit Cover Exhibit PB3A	K 19
5.	EXHIBIT PB3A	K 20 - K 31
6.	Exhibit Cover Exhibit PB3B	K 32
7.	EXHIBIT PB3B	K 33 - K 36
8.	Exhibit Cover Exhibit PB3C	K 37
9.	EXHIBIT PB3C	K 38 - K 39
10.	Exhibit Cover Exhibit PB3D	K 40
11.	EXHIBIT PB3D	K 41 - K 44
12.	Exhibit Cover Exhibit PB3E	K 45
13.	EXHIBIT PB3E	K 46
14.	Exhibit Cover Exhibit PB3F	K 47

15.	EXHIBIT PB3F	K 48 - K 52
16.	Exhibit Cover Exhibit PB3G	K 53
17.	EXHIBIT PB3G	K 54 - K 55
18.	Exhibit Cover Exhibit PB3H(i)	K 56
19.	Exhibit PB3H(i) - Part 1 of Statement of Anrdew Clarke (Sandwell MBC)	K 57 - K 60
20.	Exhibit PB3H(i) - Part 2 Exhibit Cover AC1	K 61
21.	Exhibit PB3H(i) - Part 3 Exhibit AC1	K 62 - K 78
22.	Exhibit PB3H(i) - Part 4 Exhibit Cover AC2	K 79
23.	Exhibit PB3H(i) - Part 5 Exhibit AC2	K 80 - K 82
24.	Exhibit Cover Exhibit PB3H(ii)	K 83
25.	Exhibit PB3H(ii) - Statement of Nick Hooper with Exhibits (Dudley MBC)	K 84 - K 102
26.	Exhibit Cover Exhibit PB3H(iii)	K 103
27.	Exhibit PB3H(iii) - Witness Statement of Tim Philpot and Exhibits (Wolverhampton City Council)	K 104 - K 114
28.	Exhibit Cover Exhibit PB3H(iv)	K 115
29.	Exhibit PB3H(iv) - Part 1 Witness Statement of Steven Gittins (Walsall MBC)	K 116 - K 120
30.	Exhibit PB3H(iv) - Part 2 Exhibit Cover SJG4	K 121
31.	Exhibit PB3H(iv) - Part 3 Exhibit SJG4 Car Cruising Replacement signs 24.1.23	K 122 - K 138
32.	Receipt Filing Paul Brown Witness Statement 27 01 23 and Exhibit Bundle (split into two parts due to file size) 27 01 23	K 139
33.	Statement of Adam Sheen 3 2 23.pdf	K 140 - K 149
34.	Statement of Paul Brown 1 Feb 2023.pdf	K 150 - K 157
35.	Exhibit Cover PB4A	K 158
36.	EXHIBIT PB4A	K 159 - K 165
37.	Exhibit Cover PB4B	K 166
38.	EXHIBIT PB4B	K 167 - K 175
39.	Exhibit Cover PB4C	K 176
40.	EXHIBIT PB4C	K 177 - K 181
41.	Exhibit Cover PB4D	K 182
42.	EXHIBIT PB4D	K 183 - K 190
43.	Exhibit Cover PB4E	K 191
44.	EXHIBIT PB4E	K 192 - K 200
45.	Exhibit Cover PB4F	K 201
46.	EXHIBIT PB4F	K 202 - K 204
47.	7th Statement of Paul Brown 27 2 23	K 205 - K 212
48.	EXHIBIT PB7A	K 213 - K 223
49.	EXHIBIT PB7B	K 224 - K 238
50.	EXHIBIT PB7C	K 239 - K 243
51.	EXHIBIT PB7D	K 244 - K 245
52.	EXHIBIT PB7E	K 246 - K 252
53.	EXHIBIT PB7F	K 253 - K 261

54.	Affidavit of Paul Brown 29 June 2023 (re witness statements PB12 and PB13)	K 262 - K 264
55.	12th Statement of Paul Brown 16 6 23	K 265 - K 272
56.	Exhibit Cover PB12A	K 273
57.	EXHIBIT PB12A	K 274 - K 301
58.	Exhibit Cover PB12B	K 302
59.	EXHIBIT PB12B	K 303 - K 304
60.	13th Statement of Paul Brown 16 6 23	K 305 - K 307
61.	Exhibit Cover PB13A	K 308
62.	EXHIBIT PB13A	K 309
63.	Filing Receipt 12th and 13th statements of Paul Brown.pdf	K 310

**B E T W E E N:**

- 1. WOLVERHAMPTON CITY COUNCIL**
- 2. DUDLEY METROPOLITAN BOROUGH COUNCIL**
- 3. SANDWELL METROPOLITAN BOROUGH COUNCIL**
- 4. WALSALL METROPOLITAN BOROUGH COUNCIL**

**Claimants**

**-and-**

**1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING**

**2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING**

**3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)**

**4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING**

**5. Mr ANTHONY PAUL GALE**

**6. Miss WIKTORIA SZCUBLINSKA**

**7. Mr ISA IQBAL**

**8. Mr MASON PHELPS**

**Defendants**

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**CLAIMANTS' APPLICATION FOR INJUNCTIVE RELIEF  
BUNDLE OF DOCUMENTS FOR USE AT A HEARING LISTED 27 FEBRUARY AND  
28 FEBRUARY 2024**

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**VOLUME THREE**

## A. SECTION A - Statements of Case

1. Wolverhampton CC & Ors v Persons Unknown - Statement of Case for Hearing 15 May 2023 A 1 - A 7

## B. SECTION B - Evidence Filed on Behalf of the Claimant

1. Witness Statement Pardip Nagra (Wolverhampton City Council) 02 May 2023 B 1 - B 3
2. Statement of Mark Wilson Dudley MBC 25 April 2023 B 4 - B 6
3. Statement of Pardip Sandhu 3 May 2023 B 7 - B 17
4. 03 05 23 Witness Statement of Steve Gittins B 18 - B 21
5. Statement of PC Mark Campbell 02 May 2023 B 22 - B 25
6. Notice of Moving - Paul Brown Statement no.7 B 26
7. 8th Statement of Paul Brown 28 April 23 B 27 - B 31
8. Exhibit PB8A B 32
9. Paul Brown Statement no 9 B 33 - B 36
10. Exhibit PB9A B 37 - B 67

## C. SECTION C - Evidence Filed on Behalf of The Defendant

1. Confirmation of No Evidence from Any Defendant C 1

## D. SECTION D - Court Orders

1. SEALED INJUNCTION ORDER (Order of Hill J) 22.12.22 Wolverhampton City Council and others v Unknown KB-2022-BHM-000188 D 1 - D 24
2. SEALED POWER OF ARREST (Order of Hill J) 22.12.22 KB-2022-BHM-000188 D 25 - D 27
3. KB 2022 BHM 000188 - Wolverhampton City Council v Nagmadin Ors (21.12.22) - Approved judgment of Hill J D 28 - D 45
4. Order 16 Februray 2023 (Black Country Car Cruising Injunction) D 46 - D 59
5. Schedule A Index (Schedule to Order Sealed 16 February 2023) D 60 - D 66
6. Plan A D 67
7. TRANSCRIPT OF JUDGMENT 13 February 2023 - Wolverhampton City Council v Persons Unknown (KB-2022-BHM-000188) D 68 - D 84
8. Transcript of Hearing 06 February 2023 Wolverhampton City Council & Ors v Persons Unknown - KB.2022.BHM-00188 D 85 - D 143
9. Hearing Notice - Hearing: 15 May 2023 at 10.30 a.m. D 144
10. Hearing Notice - Hearing: 15 May 2023 at 10.30 a.m. D 145

**B E T W E E N:**

- 1. WOLVERHAMPTON CITY COUNCIL**
- 2. DUDLEY METROPOLITAN BOROUGH COUNCIL**
- 3. SANDWELL METROPOLITAN BOROUGH COUNCIL**
- 4. WALSALL METROPOLITAN BOROUGH COUNCIL**

**Claimants**

**-and-**

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**5. Mr ANTHONY PAUL GALE**

**6. Miss WIKTORIA SZCUBLINSKA**

**7. Mr ISA IQBAL**

**8. Mr MASON PHELPS**

**Defendants**

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**CLAIMANTS' APPLICATION FOR INJUNCTIVE RELIEF  
BUNDLE OF DOCUMENTS FOR USE AT A HEARING LISTED 27 FEBRUARY AND  
28 FEBRUARY 2024**

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**VOLUME FOUR**



## A. SECTION A - Statements of Case

- |    |  |             |
|----|--|-------------|
| 1. | Wolverhampton ats ors v PU Rep for 4OCT23.pdf                        | A 1 - A 7   |
| 2. | Pt 8 Claim form amended June 2023 Page 1 to 2.pdf                    | A 8 - A 9   |
| 3. | Car Cruise 2022 Pt 8 Signed Amended Particulars of Claim 6 June 2023 | A 10 - A 25 |
| 4. | Confirmation of Filing Amended Particulars of Claim 7 June 2023.pdf  | A 26        |
| 5. | Confirmation of Filing Amended Part 8 Claim Form 7 June 2023.pdf     | A 27        |

## B. SECTION B - Evidence Filed on Behalf of the Claimant

- |     |   |               |
|-----|---|---------------|
| 1.  | Overarching Witness Statement Pardip Nagra (Wolverhampton City Council) 21.09.23            | B 1 - B 5     |
| 2.  | Exhibit PN1 Pardip Nagra Statement 21 September 2023  | B 6 - B 7     |
| 3.  | Exhibit PN2 (Statement of Pardip Nagra September 2023) (Sandwell MBC Overarching Statement) | B 8 - B 13    |
| 4.  | Exhibit PN3A (Statement of Pardip Nagra) Dudley MBC Overarching Statement 22-09-23          | B 14 - B 17   |
| 5.  | Exhibit PN3B (Statement of Pardip Nagra) (Exhibit to Dudley MBC Overarching Statement)      | B 18          |
| 6.  | Statement of PC Karam Soomal-Goode (Wolverhampton Signs) 18 September 2023                  | B 19 - B 20   |
| 7.  | Witness Statement of Steve Gittins (Walsall MBC) 22-09-23                                   | B 21 - B 24   |
| 8.  | Statement of PC Mark Campbell 21 September 2023   | B 25 - B 29   |
| 9.  | 10th Witness Statement of Paul Brown.pdf  | B 30 - B 34   |
| 10. | EXHIBIT PB10A.pdf   | B 35 - B 57   |
| 11. | 11th Witness Statement of Paul Brown 17 May 23.pdf  | B 58 - B 62   |
| 12. | EXHIBIT PB11A .pdf  | B 63 - B 82   |
| 13. | Notice of Moving 12th and 13th Witness Statements   | B 83          |
| 14. | Witness Statement - 14th Statement of Paul Brown 22 9 23                                    | B 84 - B 92   |
| 15. | EXHIBIT PB14A (14th Statement of Paul Brown 22 Sept 2023)                                   | B 93 - B 129  |
| 16. | EXHIBIT PB14B (14th Statement of Paul Brown 22 Sept 2023)                                   | B 130 - B 131 |
| 17. | EXHIBIT PB14C (14th Statement of Paul Brown 22 Sept 2023)                                   | B 132 - B 140 |
| 18. | Witness Statement -15th Statement of Paul Brown 22 9 23                                     | B 141 - B 144 |
| 19. | Exhibit Cover PB15A (15th Statement of Paul Brown Sept 2023)                                | B 145         |
| 20. | Exhibit PB15A (15th Stat Paul Brown Sept 2023) STREET RACING STATS 19 MAY TO 15 SEPTEMBER   | B 146 - B 151 |

## C. SECTION C - Evidence Filed on Behalf of The Defendant

- |    |  |     |
|----|--|-----|
| 1. | Confirmation of No Evidence from Any Defendant | C 1 |
|----|--|-----|

## D. SECTION D - Court Orders

- |    |  |             |
|----|--|-------------|
| 1. | Notice of Moving of court orders from original review hearing 04 October 2023 bundle | D 1         |
| 2. | Combined Directions Order 19 May 2023 (Sealed 23 May 2023)                           | D 2 - D 17  |
| 3. | Amended Injunction Order 19 May 2023 (Sealed 23 May 2023)                            | D 18 - D 35 |
| 4. | Amended Power of Arrest (Amended 19 May 2023; Sealed 23 May 2023)                    | D 36 - D 38 |

5.	Clearer Copy of Plan A for injunction (WCC & Ors v Persons Unknown KB-2022-BHM-000188)	D 39
6.	Letter WCC to Court 07 06 2023	D 40
7.	Letter WCC to Court 14 6 23	D 41
8.	Letter to Claimants from Court 3 July 2023	D 42
9.	Letter WCC to HHJ E. Kelly 26 July 2023	D 43 - D 44
10.	Confirmation of Filing Letter 26 July 2023	D 45
11.	Order of Her Honour Judge Kelly 26 July 2023	D 46 - D 49
12.	Letter from Claimants to Court 1 August 2023	D 50 - D 51
13.	Confirmation of Filing of Dates of Availability Aug to Sept 2023 1 August 2023 at 1202 hours	D 52
14.	Notice of Hearing 04 October 2023	D 53 - D 54
15.	Notice of Further Case Management Hearing 21 September 2023 (VACATED)	D 55 - D 56
16.	Notice of Further Case Management Hearing 10 November 2023 (VACATED)	D 57 - D 58

**B E T W E E N:**

1. WOLVERHAMPTON CITY COUNCIL
2. DUDLEY METROPOLITAN BOROUGH COUNCIL
3. SANDWELL METROPOLITAN BOROUGH COUNCIL
4. WALSALL METROPOLITAN BOROUGH COUNCIL

**Claimants**

**-and-**

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

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5. Mr ANTHONY PAUL GALE

6. Miss WIKTORIA SZCUBLINSKA

7. Mr ISA IQBAL

8. Mr MASON PHELPS

**Defendants**

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**CLAIMANTS' APPLICATION FOR INJUNCTIVE RELIEF  
BUNDLE OF DOCUMENTS FOR USE AT A HEARING LISTED 27 FEBRUARY AND  
28 FEBRUARY 2024**

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**VOLUME FIVE**

## A. SECTION A - Statements of Case For Hearing 20 December 2023

1.	Wolverhampton & ors v PU Case Summary for hearing 20 DEC 23	A 1 - A 26
2.	SIGNED N244 Relief from Sanctions Application (Car Cruising) 13 12 23	A 27 - A 31
3.	Car Cruising - Relief from sanctions - witness statement Mushtaq Ahmed-Khan 12 12 23	A 32 - A 34
4.	Draft Order for relief to accompany application for relief from sanctions 13 12 23	A 35 - A 38
5.	SIGNED Claim Form V4 13 12 2023.pdf	A 39 - A 42
6.	Amended Particulars of Claim v4 13 12 23	A 43 - A 59
7.	Black Country Car Cruising Injunction v4 13 December 2023	A 60 - A 68
8.	Schedule A to Injunction Index to injunction order 19 May 2023	A 69 - A 78
9.	Plan A	A 79
10.	Amended Power of Arrest (Version 4)	A 80 - A 83
11.	Plan A	A 84

## B. SECTION B - Supreme Court Judgment in the WCC v London Gypsies and Travellers and Others case [2023] UKSC 47

1.	WCC v London Gypsies and Travellers Judgment Summary 29 11 23	B 1 - B 3
2.	WCC v London Gypsies and Travellers Judgment 29 11 23	B 4 - B 80
3.	E-mail WCC to Court 29 November 2023 at 20 36 hours Supreme Court Judgment	B 81
4.	Confirmation of Filing Supreme Court Judgment via CE File 29 November 2023	B 82
5.	Confirmation of Filing Supreme Court Judgment via KB Birmingham Addresss 30 November 2023 at 10 33 hrs	B 83 - B 84

## C. SECTION C - Evidence Filed on Behalf of Claimants for Hearing 20 December 2023

1.	Witness Statement of Pardip Nagra 11.12.23	C 1 - C 5
2.	Exhibit PN1 Part 1 of 2 - Witness Statement of Pardip Sandhu 11.12.23	C 6 - C 12
3.	Exhibit PN1 Part 2 of 2 - Express & Star Article 5 December 2023	C 13 - C 18
4.	Exhibit PN2 -Third Witness Statement of Mark Wilson	C 19 - C 24
5.	Schedule of Committals re Black Country Car Cruising Injunction December 2022 to December 2023	C 25
6.	Exhibit PN3 Part One of Three - Witness Statement of Steve Gittins 30-11-23	C 26 - C 29
7.	Exhibit PN3 Part Two of Three -Witness Statement of Steve Gittins 8-12-23	C 30 - C 32
8.	Exhibit PN3 Part Three of Three -Exhibit SJG 5 to Statement of Steve Gittins 8 12 23 Car Cruising Sign Audit December 2023	C 33 - C 51
9.	17th Statement of Paul Brown 30 11 23	C 52 - C 55
10.	10-12-23 Statement of PC Mark Campbell	C 56 - C 59

## D. SECTION D - Orders and Sealed Documents from Hearing 4 October 2023 and Claimants' evidence purporting to show compliance with those orders

1.	Order (re Persons Unknown) Hearing of 4 October 2023	D 1 - D 14
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2.	Sealed Amended Part 8 Claim Form 6 10 23	D 15 - D 17
3.	Car Cruise 2022 Part 8 Amended Particulars of Claim v3 Oct23	D 18 - D 35
4.	Sealed Wolverhampton CC v PU Interim Injunction v3 to include D5 and D6 4 Oct 2023	D 36 - D 44
5.	Sealed Plan A 9 October 2023	D 45
6.	Schedule A to Injunction Index to injunction order 19 May 2023 amended 4 October 2023	D 46 - D 55
7.	Amended Power of Arrest amended 04 10 23	D 56 - D 58
8.	Sealed Plan A 9 October 2023	D 59
9.	E-mail WCC to Solicitors for Mr A Gale and Miss W Szczublińska 11 October 2023 at 13 59 hrs	D 60 - D 61
10.	16th Statement of Paul Brown 20 10 23	D 62 - D 67
11.	PB Exhibit Cover.pdf	D 68
12.	EXHIBIT PB16A	D 69 - D 83

## E. SECTION E - Statements of Case for Hearing on 04 October 2023

1.	Confirmation of Filing Amended Particulars of Claim 7 June 2023.pdf	E 1
2.	Car Cruise 2022 Pt 8 Signed Amended Particulars of Claim 6 June 2023	E 2 - E 17
3.	Pt 8 Claim form amended June 2023 page 3 signature page.pdf	E 18
4.	Pt 8 Claim form amended June 2023 Page 1 to 2.pdf	E 19 - E 20
5.	Wolverhampton ats ors v PU Rep for 4OCT23.pdf	E 20a - E 20g

## F. SECTION F - Evidence Filed on Behalf of the Claimants For Hearing 04 October 2023

1.	Confirmation of Filing Amended Part 8 Claim Form 7 June 2023.pdf	F 1
2.	Overarching Witness Statement Pardip Nagra (Wolverhampton City Council) 21.09.23	F 2 - F 6
3.	Exhibit PN1 Pardip Nagra Statement 21 September 2023	F 7 - F 8
4.	Exhibit PN2 (Statement of Pardip Nagra September 2023) (Sandwell MBC Overarching Statement)	F 9 - F 14
5.	Exhibit PN3A (Statement of Pardip Nagra) Dudley MBC Overarching Statement 22-09-23	F 15 - F 18
6.	Exhibit PN3B (Statement of Pardip Nagra) (Exhibit to Dudley MBC Overarching Statement)	F 19
7.	Statement of PC Karam Soomal-Goode (Wolverhampton Signs) 18 September 2023	F 20 - F 21
8.	Witness Statement of Steve Gittins (Walsall MBC) 22-09-23	F 22 - F 25
9.	Statement of PC Mark Campbell 21 September 2023	F 26 - F 30
10.	10th Witness Statement of Paul Brown.pdf	F 31 - F 35
11.	EXHIBIT PB10A.pdf	F 36 - F 58
12.	11th Witness Statement of Paul Brown 17 May 23.pdf	F 59 - F 63
13.	EXHIBIT PB11A .pdf	F 64 - F 83
14.	12th Statement of Paul Brown 16 6 23.docx	F 84 - F 91
15.	Exhibit Cover PB12A.docx	F 92
16.	EXHIBIT PB12A.docx	F 93 - F 120

17.	Exhibit Cover PB12B.docx	F 121
18.	EXHIBIT PB12B.docx	F 122 - F 123
19.	13th Statement of Paul Brown 16 6 23.docx	F 124 - F 126
20.	Exhibit Cover PB13A.docx	F 127
21.	EXHIBIT PB13A.docx	F 128
22.	Witness Statement - 14th Statement of Paul Brown 22 9 23	F 129 - F 137
23.	EXHIBIT PB14A (14th Statement of Paul Brown 22 Sept 2023)	F 138 - F 174
24.	EXHIBIT PB14B (14th Statement of Paul Brown 22 Sept 2023)	F 175 - F 176
25.	EXHIBIT PB14C (14th Statement of Paul Brown 22 Sept 2023)	F 177 - F 185
26.	Witness Statement -15th Statement of Paul Brown 22 9 23	F 186 - F 189
27.	Exhibit Cover PB15A (15th Statement of Paul Brown Sept 2023)	F 190
28.	Exhibit PB15A (15th Stat Paul Brown Sept 2023) STREET RACING STATS 19 MAY TO 15 SEPTEMBER	F 191 - F 196

## G. SECTION G - Evidence Filed on Behalf of The Defendant

1.	Confirmation of No Evidence from Any Defendant	G 1
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## H. SECTION H - Court Orders, Judgments and Transcripts of Hearings and Correspondence with the Court

1.	SEALED INJUNCTION ORDER (Order of Hill J) 22.12.22 Wolverhampton City Council and others v Unknown KB-2022-BHM-000188	H 1 - H 24
2.	SEALED POWER OF ARREST (Order of Hill J) 22.12.22 KB-2022-BHM-000188	H 25 - H 27
3.	Wolverhampton City Council v Persons Unknown and Others: KB- 2022-BHM 000188 (21.12.22) - Approved judgment of Hill J	H 28 - H 45
4.	Order 13 02 23 (sealed 16 Februray 23) Wolverhampton City Council v Persons Unknown and Others 2023 KB-2022-BHM-000188	H 46 - H 59
5.	Schedule A Index (Schedule to Order Sealed 16 February 2023)	H 60 - H 66
6.	Plan A (attached to order 16 February)	H 67
7.	TRANSCRIPT of JUDGMENT 13 February 2023 - Wolverhampton City Council v Persons Unknown (KB-2022-BHM-000188)	H 68 - H 84
8.	TRANSCRIPT of HEARING 06 February 2023 Wolverhampton City Council & Ors v Persons Unknown - KB.2022.BHM-00188	H 85 - H 143
9.	Hearing Notice - Hearing: 15 May 2023 at 10.30 a.m.	H 144
10.	Combined Directions Order 19 May 2023 (Sealed 23 May 2023).pdf	H 145 - H 160
11.	Amended Injunction Order 19 May 2023 (Sealed 23 May 2023).pdf	H 161 - H 178
12.	Amended Power of Arrest (Amended 19 May 2023; Sealed 23 May 2023).pdf	H 179 - H 181
13.	Clearer Copy of Plan A for injunction (WCC & Ors v Persons Unknown KB-2022-BHM-000188).pdf	H 182
14.	Letter From WCC to Court 07 06 2023.pdf	H 183
15.	Letter from WCC to Court 14 6 23.pdf	H 184
16.	Letter to Claimants from Court 3 July 2023.pdf	H 185
17.	Letter WCC to Her Honour Judge E. Kelly 26 July 2023.pdf	H 186 - H 187
18.	Letter From Court to WCC 26 July 2023.pdf	H 188 - H 189
19.	Order of Her Honour Judge Kelly 26 July 2023.pdf	H 190 - H 193

20.	Confirmation of Filing Letter From Claimants to Court 26 July 2023	H 194
21.	Letter From Claimants to Court 1 August 2023.pdf	H 195 - H 196
22.	Confirmation of Filing of Dates of Availability Aug to Sept 2023 1 August 2023 at 1202 hours.pdf	H 197
23.	Notice of Hearing 04 October 2023.pdf	H 198 - H 199
24.	Notice of Further Case Management Hearing 21 September 2023 (VACATED).pdf	H 200 - H 201
25.	Notice of Further Case Management Hearing 10 November 2023 (VACATED).pdf	H 202 - H 203

## I. SECTION I - Orders from Concluded Committal Proceedings Relating to this Injunction

1.	Committal Order WCC v Gale 03 10 23	I 1 - I 4
2.	Committal Order SMBC v Szczublińska 03 10 23	I 5 - I 8
3.	Committal Order WCC v Iqbal 1 11 23	I 9 - I 12
4.	Order SMBC v Gale 03 10 23	I 13 - I 15
5.	Order SMBC v Szczublińska 03 10 23	I 16 - I 17
6.	Order WCC v Iqbal 1 11 23	I 18 - I 19
7.	Certificate of Service WCC v Iqbal 1 11 23	I 20 - I 21